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Your Ref:
Email: twilliams@firstplan.co.uk
Date: 29 April 2015

Laura Hazelton
Planning Department
London Borough of Camden Council
Planning Department
5 Pancras Square
London
N1C 4AG

Dear Ms Hazelton,

PLANNING APPLICATION FOR EXTERNAL ALTERATIONS AND INSTALLATION OF REPLACEMENT EXTERNAL PLANT AT NORTHUMBERLAND HOUSE, 303-306 HIGH HOLBORN, WC1V 7JZ

We are instructed by our client, Barts and The London Charity Trust, to submit an application (via Planning Portal ref: PP-04161626 for the replacement and installation of external air conditioning equipment at first and fourth floors and external alterations at rear basement level at the above office building. The purpose of the application proposal is to replace the existing and dated plant with a more efficient and modernised air-conditioning solution to facilitate the continued use of the building as Class B1 office space. The scheme also seeks the removal of the damaged and dated roller shutters and louvre to the rear of the property at basement level.

This application should be considered in association with planning application (ref: 2015/1954/P) for installation and replacement of roof mounted plant at 303-306 High Holborn.

In support of the application and in accordance with national and local validation requirements the following documents are attached:

- Completed planning application forms and certificates;
- Site Location Plan ref: Site location plan ref: L141210-D09-001;
- Block Plan ref: ref: L141210-D09-002;
- Existing First Floor Plan ref: L141210-A09-01;
- Proposed First Floor Plan ref: L141210-A09-02;
- Existing Fourth Floor Plan ref: L141210-A09-03;
- Proposed Fourth Floor Plan ref: L141210-A09-04;
- Existing North/South Elevation Plan ref: L141210-H09-01;
- Proposed North/South Elevation Plan ref: L141210-H09-03Rev A;
- Proposed South Elevation Plan ref: L141210-H09-06;
- Existing West and East Elevation Plan ref: L141210-H09-02;
- Proposed West and East Elevation Plan ref: L141210-H09-04Rev A;

- Proposed West and East Elevation Plan ref: L141210-H09-07;
- Proposed South Elevation Plan ref: L141210-H09-08
- Planning Statement, Design and Access Statement and Heritage Impact Statement included within this letter;
- Environmental Noise Survey Report – Prepared by Sandy Brown Associates;
- Manufacturers Equipment Specification Details;
- Completed CIL forms.

The Council's requisite planning fee of £385.00 has been paid online via Planning Portal.

Site and Surrounding Area

The application site comprises an eight storey building fronting onto High Holborn, situated close to the junction with Chancery Lane, and within a highly commercial area characterised by office and retail uses. A bank and electronic retail shop is situated at ground floor with office accommodation set out over the upper floors. A storage yard is situated to the rear of the property and views are restricted by a substantial wall. At basement level the rear elevation features two roller shutter doors and an access door and louvre.

The existing plant is situated within two designated roof plant areas at first floor (east and west). Additional plant is located within an existing plant zone at fourth floor. The first floor (east) plant zone currently accommodates 3no. A/C units and is screened by an existing timber screen (2 metre). The west zone accommodates 3no. A/C units and is screened from view by the existing building. The fourth floor plant zone is situated on a terrace roof to the rear and is delineated by an existing timber screen (2 metre), which accommodates 5no. units.

Relevant Planning History

The Council's on-line planning history records for the site are limited but we believe Northumberland House was erected between 1957 and 1959. The available planning records show that a number of applications have been approved at the site in recent years. These include:

- **2003/3339/A** – Display of externally illuminated fascia and projecting sign. Approved 11 December 2003.
- **PSX0105077** – Change of use of part of the first floor from Class B1 to a dual use as offices (Class B1) or computer training. Approved 4 December 2001.
- **PSX0004039** – Retention of 6no. air conditioning units on main roof. Approved 21 March 2000.

Application Proposal

The application proposes the installation of new and replacement air-conditioning plant at first and fourth floors and the removal of the damaged roller shutters and louvre situated to the rear of the property at basement level.

Plant

The existing air conditioning system is now dated and no longer capable of efficiently managing room temperatures within the building. The proposed plant will provide a modern air conditioning

solution, which will ensure that the temperature and environment within the building can be controlled in a manner conducive to the continued use of the premises as B1 (office) use.

The proposed plant equipment will be quieter and more efficient than the existing mechanical services. The proposed 6.no items of plant will directly replace 6.no existing units and will not result in a numerical increase. All plant will be situated in the same location as the plant that it replaces and will therefore be acceptable in respect to amenity and visual impact.

In summary, the replacement plant comprises the following:

First Floor East Plant Zone

- 1no. Heat Pump (ref:PUHZ-ZRP50VKA);
- 1no. Heat Pump (ref: PUHZ-ZRP71VHA).

First Floor West Plant Zone

- 2no. Heat Pump (ref: PUHZ-ZRP71VHA).

Fourth Floor Plant Zone

- 2no. Chiller (ref: PURY-P250-YJM-A(-BS)).

Full details of the proposed plant are set out within the enclosed drawings and equipment specification details. An environmental noise survey report prepared by Sandy Brown Associates demonstrates that predicted noise levels will be in-line with Camden's standards following the construction of 1.2 metre acoustic fences. It is important to note that the noise report also considers the noise associated with the proposed roof level plant submitted pursuant to planning application reference 2015/1954/P.

External Alterations

The two existing roller shutters on the rear elevation are corroded and are no longer in use. The application seeks to remove the roller shutters and infill with brickwork to match existing. The existing access door to the storage yard will be retained. The existing louvre will be replaced with a new like-for-like replacement.

Relevant Planning Policy

The statutory development plan for the site comprises the London Plan 2011 (consolidated with REMA 2013 and FALP 2015), Camden Core Strategy 2010-2025 (adopted 2010) and the Camden Development Policies 2010-2025 (adopted 2010).

The Proposals Map shows that the site is situated within the defined Central London Frontage within the Central London Area and Holborn Growth Area. The site also falls within the Bloomsbury Conservation Area and an Archaeological Priority Area.

Camden Core Strategy 2010-2025 (2010)

Policy CS2 encourages development in the growth areas and expects site opportunities to be maximised.

Policy CS14 requires that development proposals preserve the character and appearance of heritage assets, including conservation areas and important views.

Camden Development Polices 2010-2015 (2010)

Policy DP25 requires development within conservation areas to preserve and enhance the character and appearance of the area.

Policy DP26 sets out that development should not harm amenity in respect to noise, vibration levels, odour and fumes. The need for appropriate attenuation measures will be considered where necessary.

Policy DP28 seeks to ensure that noise and vibration is controlled and managed. Plant should be designed to be operated without causing harm to amenity or exceeding Camden's noise and vibration thresholds. Supporting paragraph 28.3 states that an acoustic report will be required in support of noise generating development.

Other Relevant Guidance

Camden Planning Guidance: Amenity (2011)

The guidance states that the Council's preference for controlling noise begins with attempting to reduce noise at its source and that this is best achieved in respect to plant by using "*quiet machines*" and by specifying an acceptable noise limit. The guidance requires that applications for plant are supported by a noise assessment and manufacturers specification details. The proposed plant is of an efficient and quiet design. The noise assessment predicts that the noise levels shall be within the local authority requirements.

Camden Planning Guidance: Design (2014)

The guidance sets out that wherever possible new plant within Conservation Areas should be kept to a minimum and screened to minimise impact and avoid visual blight. Roof mounted plant and machinery should not be visible from the street or other sensitive locations. External plant should be designed to avoid harmful reduction in daylight and sunlight or cause nuisance to occupiers. Machinery must be installed and maintained to ensure that impacts are properly mitigated and the situation does not deteriorate overtime with continued operation.

The application proposals have been carefully designed to accord with the design principles set out within this document; and specifically to address the deteriorating performance of the existing plant..

Planning Assessment

Principle of the development

The application site is an existing and long established office building situated fronting onto High Holborn. The building lies within a Central London Frontage, the Central London Area and Holborn Growth Area, where office development is considered an appropriate use in the Camden Development Plan.

The application proposal seeks to replace the dated and inadequate air-conditioning system with a more modern and efficient solution. The principle of plant has been established and this application

will result in a solution of comparable scale and quantity within an existing designated plant location.

The removal of the unattractive roller shutters and the infilling of the space with brickwork to match existing is a minor alteration that will enhance the character and appearance of the conservation area.

Noise and Amenity

A full noise survey report has been prepared by Sandy Brown Associates in support of the application. The report includes an assessment of background noise levels and a forecast of propagated noise at the closest noise sensitive receptors. The report demonstrates that following the construction of the proposed 1.2 metre noise attenuation screening the expected noise level measured 1 metre external to the worst affected window of each premises is LAeq 32dB at Lincoln House and 33 LAeq at 3-4 Stone Building, which is within the Council's required noise limits.

The proposed replacement plant represents an enhanced solution in noise terms when compared to the existing arrangement. Accordingly, the proposal is in compliance with the advice contained within Camden Planning Guidance: Amenity (2011) and Policies DP26 and DP28.

Design and Heritage Statement

The site is situated within the Bloomsbury Conservation Area. The Bloomsbury Conservation Area Appraisal and Management Strategy (2011) states that Northumberland House was designed and constructed by Clyde Young and Bernard Engle between 1957 and 1959. The building is not listed or identified as a heritage asset. The site is not therefore considered to be of particular historic interest or to make a positive contribution to the character and appearance of the conservation area.

The replacement plant will not be visible from High Holborn at street level. The plant at fourth floor and first floor (west) will be visually screened by the existing 2 metre screen. The proposed noise attenuation (1.2 metres) will be hidden from view by the existing screening and will not result in harm to the character and appearance of the conservation area. The plant at first floor (east) is not prominent in views. As a direct replacement, the plant will cause no adverse material harm to the conservation area in accordance with the terms of Policy CS14 and DP25.

The basement rear elevation is screened by an existing wall and surrounding buildings. Accordingly, the proposed alterations will not be visible from the wider area and these minor alterations will preserve the character and appearance of the conservation area.

Design and Access Statement

Use

This application seeks permission for the installation of replacement plant in relation to the existing office building, the removal of roller shutters and replacement louvre.

Amount and Scale

The application proposes the installation of the same level of plant as existing, which is suitable to meet the operational needs of the site. The brick infill will not create any additional floorspace.

Layout and Appearance

The proposed plant will be located within the existing plant areas and will be screened from view by the existing visual screening. The plant will not be visible from High Holborn street level and will preserve the character and appearance of the conservation area.

Views of the proposed louvre and infill brickwork will be limited and will not cause material harm to the designated heritage asset.

Landscaping

The proposals do not include a landscaping scheme.

Access

Access to the roof plant areas will be via the existing access arrangements. Access to the rear storage yard will be provided by the existing door.

Conclusions

The application proposes the installation of new plant to replace the existing air-conditioning system, which are no longer capable of efficiently managing room temperatures at Northumberland House, 303-306 High Holborn. The new plant solution is more modern and efficient than the existing arrangement. It will be situated behind the existing visual screening and will therefore preserve the character and appearance of the heritage asset. The proposed plant equipment will represent an improved solution in terms of noise. The noise survey report demonstrates that noise levels from new plant at the nearest noise sensitive premises are well within the Council's required limits and will not cause material harm to the amenity of surrounding occupiers. Views of the minor external alterations are very limited and will also preserve the character and appearance of the Bloomsbury Conservation Area. Accordingly, the proposal is in accordance with the policies and guidance contained within the National Planning Policy Framework (2012), the Camden Core Strategy (2010) and Camden Development Policies (2010).

In the light of the above, we trust that the enclosed information is sufficient to enable a favourable determination of this application. In the meantime, we look forward to receiving confirmation that the application has been registered. Please do not hesitate to contact me should you have any queries.

Yours faithfully,



TIM WILLIAMS

Associate

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