

Ref: P14-3064/JW/so



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Development Management
Regeneration and Planning
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Dear Sir/Madam

**Planning Application for Air Handling Units
Site at Whittington House, 19-30 Alfred Place, London WC1E 7EA
Planning Portal Ref: PP-04410682**

Vail Williams LLP has been instructed by Platine Holdings Limited to submit the attached planning application for plant replacement and installation at Whittington House, 19-30 Alfred Place.

This application comprises the following documents:

1. Completed application form
2. Completed CIL form – Planning Application Additional Information Requirement form
3. This letter; incorporating the Planning Statement
4. Design and Access Statement – Plant Replacement Works, prepared by Tate & Hindle, dated 6th August 2015
5. Noise Impact Statement, prepared by The Equus Patnership: August 2015
6. Plans:
 - Site Location Plan – PL-A(02)001 – Rev 00
 - First Floor Plan Existing – EX(03)011 – Rev 00
 - Seventh Floor Plan Existing – EX(03)017 – Rev 00
 - First Floor Plan Proposed – PL-A(03)011 – Rev 00
 - Seventh Floor Plan Proposed – PL-A(03)017 – Rev 00
 - First Floor Plan Detail Proposed – PL-A(03)111 – Rev 00
 - Seventh Floor Plan Detail Proposed – PL-A(03)117 – Rev 00
 - Existing Cross Section – EX(04)010 – Rev 00
 - Section A-A Existing – EX(04)011 – Rev 00
 - Section B Proposed – PL-A(04)010 – Rev 00
 - Section A-A Proposed – PL-A(04)011 – Rev 00
 - Existing West Elevation – EX(05)010 – Rev 00
 - Existing Rear (East) Elevation – EX(05)012 – Rev 00

Leading Real Estate Advisors

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- Proposed West Elevation – PL-A(05)010 – Rev 00
- Proposed Rear (East) Elevation – PL-A-(05)012 – Rev 00
- Roof Plant Area Details – PL(27)001 – Rev 01
- First Floor – Plant Area Details - PL(27)002 – Rev 00
- First Floor – Plant Area Details - PL(27)003 – Rev 00
- First Floor – Plant Area Acoustic Panels Details – PL(27)004 – Rev 00
- Roof Access Route First Floor – PL-A(31)020 – Rev 00

7. A planning application fee of £770 has been paid separately.

The Site

Whittington House is situated in Fitzrovia in close proximity to Goodge Street Station, to the South East of Regents Park. The immediate area comprises a mix of commercial uses, including retail, office and restaurants/cafes. In addition, there is a dramatic arts academy to the rear of the property (Royal Academy of Dramatic Arts – “RADA”).

The building is an “L” shape and comprises 9 storeys; a basement for parking; ground floor comprising a reception area and office showroom use; 1st floor to 6th floor comprising office accommodation; and a part 7th floor housing plant equipment for the operation of the building (this is considered ancillary office given the predominant use of the building). To the rear of the building is a small courtyard at 1st floor level which houses some plant material and also lightwells to the ground floor office area below.

The property is located to the South West of the London Borough of Camden and is located behind the primary retail street, Tottenham Court Road, and also within the Bloomsbury Conservation Area.

PROPOSAL

The enclosed application seeks to replace and install plant machinery on the first and seventh floor of the building. On the first floor the proposal is for the installation of cooling condenser units (including acoustic louvre) and the replacement of one window to facilitate cleaning and maintenance. On the seventh floor the proposal includes the replacement of an existing generator with a new air handling unit and associated ductwork and the installation of an architectural louvre to provide screening.

The Design and Access Statement provides further details, including photographs, of the proposals along with the detailed drawings identifying the rooftop locations.

PLANNING HISTORY

There have been a number of planning applications submitted for various proposals at Whittington House, comprising large scale extensions, changes of use and smaller scale proposals integral to the functioning of the offices. This proposal is for relatively minor works to replace and install plant machinery located on the roof, as detailed on the enclosed drawings and design and access statement, and is considered to have limited relevance to the majority of previous proposals and applications.

The recent application, ref 2014/4199/P: Change of use of seventh floor from plant facility to office (B1) and erection of eighth floor extension to provide additional office accommodation including terrace, has been approved subject to a legal agreement which is currently in the process of negotiation. This proposal could



be implemented and represents a viable and deliverable option to ensure the office building can continue to provide modern suitable facilities.

PLANNING POLICY CONTEXT

The NPPF (section 1) aims to *build a strong and competitive economy*. In accordance with this, paragraphs 18 and 19 state that the Government is committed to securing economic growth in order to create jobs and prosperity and ensuring that the planning system does everything it can to support sustainable economic growth. It also states that significant weight should be placed on the need to support economic growth through the planning system. In addition, paragraph 20 recognises the requirement for LPAs to meet the development needs of business in terms of planning.

The policy approach for economic growth is also strongly supported within the London Plan (Further Alterations, 'FALP', March 2015), specifically;

- Policy 4.1 promotes the *"continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces"*;
- Policy 4.2 encourages *"renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility"*;

This support continues through the Development Plan and is reflected within the Core Strategy (2010); including Policy CS8 which promotes a successful and inclusive Camden economy. Along with the high level support for economic growth, policies relating to design and the Conservation Area are relevant. These include the Development Policies Document (2010) and the Fitzrovia Area Action Plan (March 2014), along with the Bloomsbury Conservation Area Appraisal and Management Strategy (2011). The Camden Planning Guidance Design (CPG 1) contains a specific section on building services equipment, which cross-references to relevant Development Policies: including DP24, DP26, and DP28. With regards to retrospective installations, CPG 1 states that consideration should be given to screening, visibility concerns, materials, and safety and security.

The proposal is considered the most suitable location for the equipment; balancing the removal of redundant equipment, installation and maintenance issues, and minimising visual impact. On the first floor, the proposal locates equipment near to existing service equipment and colours it a mid grey to further minimise visual impact. To reduce noise levels in accordance with policy and ensure it does not adversely effect the amenity of the neighbouring residential property acoustic screening has been proposed, as shown on the enclosed drawings. In addition, the 'Noise Impact Statement' (August 2015) provides the technical details demonstrating compliance with the relevant noise policies and concludes that *'... the proposed plant installation complies fully with relevant national and local planning policy...'*

The units proposed at first floor level will reflect the existing units and continue to run along the central portion of the flat roof. This location means that the units are located furthest from the adjoining properties and also screened by the louvres. To ensure compliance with noise policies, acoustic louvres have been added to reduce noise levels to below background levels.

Notwithstanding the benefits of the chosen location, this particular element of the building is completely screened from public view being surrounded by the existing building on three sides and the flank wall of adjoining buildings to the north. As such, the proposed units will have no impact upon visual amenity, nor any impact upon the Conservation Area.



At 7th floor level a proposed air handling unit replaces the existing generator which is to be relocated to the basement. Therefore, this area already accommodates existing plant, albeit that the proposed new equipment will be of modern design and better in environmental and visual terms as it incorporates an architectural louvre to screen the equipment.

The proposal also takes the opportunity to provide a louvered screen to enclose the proposed air handling unit. This louvered screen is located to the rear of the plant area on the 7th floor set back approximately 1.6 metres from the building frontage, rising to approximately 2.2 metres in height; not exceeding the height of the existing mass either side.

Due to the set-back, the enclosure and the plant would not be visible from any of the surrounding roads as a result of screening from neighbouring buildings or the existing configuration from the rear of Whittington House itself. As this is currently open to views, this will visually enhance this elevation. This is best shown within the Design & Access Statement where "before and after" photographs are provided.

As the Noise Impact Statement concludes, noise emissions will be controlled within policy requirements and *'the proposed plant installation does not, therefore, raise any significant or other adverse noise impact concerns.'*

Conclusion

Overall, it is concluded that the proposed plant is well located and hidden from any public view point. As such, it has no impact upon the visual amenity of the building itself or the Conservation Area. In fact, the proposed screening will result in visual improvement to the 7th floor.

The proposed units are also well designed and, due to the incorporate of acoustic screening, will not result in any noise impact upon neighbouring properties.

The proposals therefore accord with both national and local policy.

In light of the information provided, we trust you will be able to support this application and approve the scheme under delegated powers. We look forward to working with you, discussing the application during the period of determination and receiving the formal letter of acknowledgment.

If there is any further information you require to assist with the consideration of the application, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in grey ink, appearing to read "J Williams", is positioned above the typed name.

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