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Our Ref: 16024/SH/jd
Your Ref: PP-04752949

Date: 29 January 2016

Planning and Built Environment,
LB Camden Council
5 Pancras Square
London
N1C 4AG

Dear Sir/Madam,

**APPLICATION FOR PLANNING PERMISSION - 1NO. BACKUP DIESEL GENERATOR
THE UGLY BROWN BUILDING, 6A ST. PANCRAS WAY, LONDON, NW1 0TB**

We have been instructed by our client, Maris Interiors LLP, on behalf of Ted Baker, to submit this planning application for the installation of a backup generator and associated pipework within the private ground floor parking area of Ted Baker's international headquarters in St. Pancras.

Ted Baker operate their global IT Hub from this location and these works are proposed in order to ensure that IT provision is maintained in the event of a power failure. Following pre-application discussions with Camden Council, it was advised that planning permission be sought for the proposed internal generator and associated minor works.

The application is comprised of the following information, which has been attached:

- Completed forms and certificates;
- Completed CIL form;
- Heritage Impact Assessment, included within this letter;
- Noise Assessment;
- Details of Generator and CAE Attenuation Enclosure;
- Plans:
 - Site Location Plan and Block Plan (ref: 21250_OS);
 - Ground Floor Existing General Arrangement (ref: 21250_EGA);
 - Internal Elevation and Section A (ref:21250_ELEV);
 - Existing External Rear Elevation (ref:21250_ERE)
 - Internal Enclosure Arrangement Plan (21250_HCL)
 - Ground Floor Proposed General Arrangement (ref: 21250_PGA);
 - Existing External Rear Elevation (ref:21250_PRE); and
 - Proposed Sections B and C (ref:21250_SC1);



Site Description

This application relates to part of the private ground floor parking area of a five storey commercial building - 'The Ugly Brown Building' - located on the East side of St Pancras Way,

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with the Regent's canal and towpath to the East, and Granary Street to the South. Along the eastern elevation of the building, fronting the canal, there is a significant amount of existing external plant, including condenser units set within a sunken walkway, below the level of the towpath. Railings run along the towpath boundary, separating the two areas, with a concrete paved slope down to the walkway. Both the towpath and walkway are private property and not open for public access.

The property is not listed, although it is located in the Regent's Canal Conservation Area. Within the Regent's Canal Conservation Area Appraisal the building is identified as making a negative contribution to the character and appearance of the conservation area. The pillar box to the South-West of the site is Grade II listed. However, the proposals will have no impact upon this historical landmark.

Relevant Planning History

6a St. Pancras Way has been subject to a number of planning applications mainly relating to the installation of plant and telecommunication towers. Of note, use of the canal side elevation's sunken well to satisfy the previous operative needs of tenants has been established through applications **PE9900505** and **2012/0908/P**.

Application Proposals

This application is prepared in support of the proposed installation of a single backup generator and associated works, sited at ground floor level within the private internal carpark.

In order to accommodate the above, it is proposed to replace a single parking space within the internal carpark with a purpose built concrete enclosure for a backup generator. The generator itself will be a 150kVA diesel generator (make: Perkins 1106A-70TG1) which will be fitted with additional noise vibration attenuation via a CAE Modular Acoustic Enclosure and fuel tank. These works are internal and, in our view, do not require permission. However, for completeness, the details have been included.

The exhaust pipe that runs from the generator, to an external point, will be routed through the existing louvres and will be extended up the façade, fitted securely to the curtain wall mullion. The pipework constitutes the only external alteration.

Relevant Planning Policy

The statutory development plan for the site comprises the London Plan 2011 (Further Alteration to London Plan 2015), Camden Core Strategy 2010-2025 (adopted 2010) and the Camden Development Policies 2010-2025 (adopted 2010).

Camden Core Strategy 2010-2025 (2010)

Policy CS14 requires that schemes are designed to a high standard, such that they preserve and enhance heritage assets, including listed buildings and conservation areas, and their settings.

Camden Development Policies 2010-2025 (2010)

Policy DP24 states that all development must be to the highest possible standard of design considering the setting and context of the development to the host building and the wider neighbourhood, the quality and appearance of materials and accessibility. It also states that appropriate locations for building services equipment must be incorporated in meeting this aim.

Policy DP25 provides guidance on the relationship between development proposals and heritage assets. Proposals should protect and enhance the character and appearance of conservation areas.

Policy DP26 guides development to avoid any harmful effects on the amenity of existing and future occupiers. Specifically the council will determine applications on the following factors:

- a) visual privacy and overlooking;
- b) overshadowing and outlook;
- c) sunlight, daylight and artificial light levels;
- d) noise and vibration levels;
- e) odour, fumes and dust;
- f) microclimate;
- g) the inclusion of appropriate attenuation measures.

Policy DP28 specifically looks to safeguard against noise pollution and vibration by advocating proposals with attenuation measures included as part of any sensitive proposals.

Heritage Impact Assessment

The application property is located in the Regents Canal Conservation Area. Accordingly, this forms the designated heritage asset relevant to this application.

Regents Canal Conservation Area Character and Impact Appraisal

The Regents Canal Conservation Area gains its historical importance largely from the hidden nature of the canal. The townscape varies right through the conservation area from its historic industrial importance through to canal side terraces representative of "high tech architecture", specifically the works of Nicholas Grimshaw. The surrounding townscape largely turns its back on the canal creating a quiet tranquil space distinct from the business of the surrounding city.

The external component of the proposed application is minor in relation to the elevation to which it is fixed and given the lack of any publicly accessible view of the application site, the pipework will have no impact on the character or historical assets of the Regents Canal Conservation Area, as per policies CS14 and DP 25.

Planning Assessment

The proposals include the minor addition of external pipework attached to an internal backup generator. This is required to fulfil the operational requirements of Ted Baker. Specifically, the generator is required to provide a backup to the IT system, which forms their global IT Hub. As such, the applicant cannot afford any loss of connection in the event of a power failure.

The internal generator in itself is insignificant, and the predicted noise levels are acceptable and will have no impact on neighbouring uses, in line with Policy DP24. The proposals will also not impact upon the air quality of the area due to the extremely occasional use of the proposed generator (to be used only in emergency) and given that the exhaust pipe is located adjacent to the canal, private towpath and walkway where there is no public access.

Given the limited expected use of the backup generator, there will be negligible impact on the amenity of any future occupiers on or around the site. However, should the backup generator be required, the appropriate attenuation methods have been put in place to protect against noise and vibration, as demonstrated within the Planning Compliance Report prepared by KP Acoustics.



Considering the above, it is our position that the amenities of the host building and surrounding buildings are protected, in line with policies DP25 and DP28.

Conclusion

Overall, it is therefore considered that the proposed installation of the backup generator and pipework is in compliance with the Council's policies and guidance, and should be supported.

I trust that you have sufficient information in order to validate the application, however, should you have any queries then please do not hesitate to contact me.

Yours faithfully,



SAM HARPER
Director

Enc.