



London Borough of Camden 2nd Floor,
5 Pancras Square
c/o Town Hall,
Judd Street
31st January 2020

24 Southwark Bridge Road
London
SE1 9HF

T 0203 268 2018

Dear Sir/Madam,

Re: Planning application for Air Conditioning units, acoustic screen and PV panels on the roof of Tudor House, 35 Gresse Street, Fitzrovia, London W1T 1QY

We write on behalf of our client, Lothbury Property Trust Co Limited, in regards to the above site. This application seeks to apply for planning permission for new air conditioning (AC) condensers, an acoustic screen, and PV panels on the roof of Tudor House, 35 Gresse Street. This letter sets out the principle of development and assesses it against the adopted planning policies. The application is supported by the following documents;

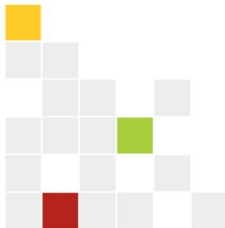
- Site Location Plan
- Existing and proposed site plans and elevations by Maber
- Acoustic Assessment by Cole Jarman
- Application form

Site and Surrounding Area

The site comprises Tudor House, a 5 storey commercial building located on Gresse Street. The area surrounding the site is mixed and is characterised by commercial buildings at the ground floor. It is our understanding that a number of residential properties exist at the upper floors of the surrounding buildings. The site is situated close to Tottenham Court Road and Oxford Circus stations. The site is situated within the Charlotte Street Conservation Area and is referenced as being a positive contributor to the conservation area. The site is within the vicinity of a number of Listed Buildings along Percy Street and Percy Mews to the north east of the site.

A number of AC units are noted within the vicinity of the site, including a recently approved unit at number 34 Gresse Street (details of this case are addressed in further detail below). Further to this observation, there are a number of commercial buildings within the vicinity that have rooftop plant. An initial desktop study shows a high number of such equipment located at roof level around the site area.

The site currently benefits from plant equipment at roof level, however this now requires replacement. The proposed development will support the applicant's wider refurbishment of the building which will allow them to modernise the office floorspace to secure a new tenant. The proposals will also allow the applicant to accord with modern sustainability requirements and regulations and the provision of this plant equipment will facilitate this.



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Planning History

The full planning history for the site is outlined in the table below.

Reference	Proposal	Decision
2015/6490/P	Installation of a 600mm diameter satellite dish and 1058mm long aerial on roof of 4-storey building (set-back from corner of Gresse Street and Rathbone Place).	Granted, November 2015
2006/3430/P	Retention of 2 no. wall mounted air conditioning units at first floor level and 2 no. free standing air conditioning units in basement lightwell associated with the office accommodation (Class B1).	Granted, July 2007
2005/5564/P	Removal and replacement of the main entrance door.	Granted, January 2006
2005/1689/P	Alterations to main entrance of office building.	Granted June 2006
2004/4132/P	Alterations to main entrance of office building.	Granted, October 2004
PS9705052R1	Installation of 5 air conditioning condensers (air cooled) to be mounted to a wall situated on roof. As shown on Plan 1, Plan 2, site plans and photographs.	Granted, December 1997

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Further to the permission for the site, consent was granted in 2019 (reference 2019/0521/P) for the installation of a plant unit at the roof of number 34 Gresse Street. The main planning considerations were listed as the impact on neighbouring amenity in regards to noise and vibration and the design and appearance of the unit. The submitted noise survey confirmed that the proposed unit would be acceptable and would not be detrimental in noise terms for surrounding residents. A number of planning conditions were attached to the decision to confirm the acceptability of the proposals. In regards to design and appearance, the officer stated that as the proposed plant was located within an existing plant well on the roof, the proposed installation complied with the necessary policies. Furthermore, it was considered that as the proposed unit would be shielded from view, and only glimpsed in long views, there would be no harm to the conservation area.

Planning Policy Context.

The site is situated within the London Borough of Camden. The Development Plan comprises the Local Plan (2017) and the London Plan (2016). Furthermore, the Council has a number of adopted CPGs including CPG 1- Design (July 2015 updated March 2019), CPG 6- Amenity (September 2011 updated March 2018) and CPG – Employment sites and business premises.

The relevant policies from the Local Plan are listed below;

- Policy A1 Managing the impact of development
- Policy A4 Noise and Vibration
- Policy D1 Design
- Policy D2 Heritage
- Policy TC4 (Town centres uses)

Principle of Development

The proposed development will seek to install a new air conditioning equipment within an acoustic screen and unit and PV panels on the roof of the building. The proposed equipment will serve the existing commercial space at Tudor House. The proposed plant equipment and PVs will accompany a wider refurbishment of the building to create high quality office floorspace. Upgrading the plant equipment and the energy efficiency and sustainability of the building will improve the operation of the building and will increase the attractiveness of the space for future tenants. The following section addresses the principle of development and makes an assessment against the adopted planning policies.

Camden seeks to manage the impact of development and ensure that proposals do not impact the amenity of neighbouring occupiers and residents (policy A1). Furthermore, Policy TC4 (town centre uses) requires all proposal to assess and minimise the impact of the development on nearby uses and to not impact the residential amenity of surrounding neighbours. The supporting text of this policy states that the council will use, where necessary, planning conditions to manage any potential harm to the amenity of a surrounding area and makes specific reference to noise and vibration. Furthermore, Camden also has policies which specifically relate to noise and vibration. Policy A4 states that the council will seek to ensure that noise and vibration is controlled and managed. Proposals must have regard to Camden's Noise and Vibration Threshold. The documentation states

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that they will not grant planning permission for development that will likely generate unacceptable noise and vibration impacts, or development sensitive to noise in locations which experience high levels of noise. For plant and machinery, permission will only be granted where it is demonstrated that the operation can occur without any harm to amenity.

Further to the policies on plant equipment, Camden has policies which seek to promote sustainable development across the borough. Policy CC1 (climate change mitigation) requires all developments to promote zero carbon/carbon reductions and should support and encourage sensitive energy efficiency improvements to existing buildings.

In order to comply with these policies, care and attention has been paid when designing this scheme. In regards to the new AC units, a full noise impact assessment has been undertaken (which is addressed in detail below) and thought has been given to how the unit will function in this location. Furthermore, an acoustic screen is proposed to shield the proposed air conditioning units. This will assist in the reduction of any noise emitted from the equipment.

The plans which show the proposed unit, demonstrate how this will be appropriately screened from view from the public realm meaning that there will be no impact to the visual amenity of surrounding residents. The plans also show the proposed acoustic screen which will be incorporated into the proposals.

To support the application, Cole Jarman have undertaken a full noise impact assessment to assess the potential impact of the proposed development. This assessment has been undertaken using best practice guidance and Camden's relevant policies and guidance. The report measured the background noise levels at the site from two different positions on both the front and rear facades. The testing confirmed that the noise climate perceived onsite was dominated by activity on the surrounding roads, with elevated noise levels during traffic activity along Rathbone Place. The report has assessed the proposed plant equipment against Camden's guidance and policies and confirms that the proposed mitigation measures are suitable for the unit and would ensure that the prescribed limits are complied with. It is therefore considered that the proposed development complies with the Council's requirements and should be considered acceptable.

As the site is situated within a conservation area, it is necessary to make an assessment of the proposals in heritage terms. The importance of protecting and enhancing heritage assets is outlined in all levels of planning policy. The NPPF (paragraphs 189-202) outlines how proposals should be assessed in regards to their impact on the surrounding heritage assets and conservation area as a whole. Furthermore, the Camden Local Plan (policy D2) requires proposals to preserve and where appropriate enhance the borough's rich and diverse heritage as well as their settings, including conservation areas and listed buildings.

In line with the emphasis on protecting and enhancing heritage assets, attention has been paid to the proposed development and the impact that this will have on the building and surrounding areas. As is shown on the accompanying plans (00102) the proposed plant equipment is set back away from the parapet and will be screened from view behind the existing roof structure. It is considered that the proposed development therefore has no impact on the surrounding heritage assets. Furthermore, when assessing this proposal it is important to consider the context and the changes that have already been permitted within the vicinity. As outlined above, consent was granted in 2019

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for an AC unit on the roof of number 34 Gresse Street which the officers confirmed was acceptable in heritage and design terms. Furthermore, from desktop research, it is noted that a number of other buildings within the vicinity also benefit from AC and plant equipment. It is therefore considered that the roofscape of buildings within the vicinity have been substantially altered and the additions have been considered to have no impact to the conservation area. Therefore confirmed the proposed addition at this site will have no harm to the conservation area or the surrounding listed buildings and is therefore in accordance with the heritage and conservation policies.

Summary and conclusions

This application seeks consent for the installation of plant and PV equipment at the roof level of Tudor House, Gresse Street. The proposal is accompanied by existing and proposed plans as well as a full acoustic assessment of the proposed development. The NIA confirms that the proposed development is suitable for the site and the surrounding area and will not have any undue impacts in regards to noise. The proposals have been designed in accordance with the Council's policies and the are considered to comply with the relevant sections of the Plan. It is therefore considered that the proposed development is acceptable and should be granted consent without delay.

We trust you have all you require to validate this application and allocate it to an officer, however, if you require anything further, please don't hesitate to contact me.

Yours sincerely



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