

MADDOX PLANNING

PLANNING STATEMENT

LONDON & MANCHESTER

0345 121 1706

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8 GATE STREET, HOLBORN

DECEMBER 2021

Description of development

External alterations to the existing building including the installation of an entrance canopy and a new secondary entrance door; the creation of terraces; and installation of rooftop plant

Type of application

Full planning permission

Applicant

Rosy Investment Limited

List of supporting documents

1. Design statement
 2. Noise assessment
-

Development plan

The adopted development plan comprises:

1. Camden Local Plan, 2017
 2. London Plan, 2021
-

Policies map

The following designations on the policies map are particularly relevant:

1. Bloomsbury Conservation Area (sub area 9)
 2. Growth Area
-

Planning policies

The following adopted and emerging planning policies are particularly relevant:

| Document | Policy number | Policy title |
|-------------------|---------------|------------------------------------|
| Camden Local Plan | D1 | Design |
| | D2 | Heritage |
| | A1 | Managing the impact of development |

| | | |
|--|----|---------------------|
| | A4 | Noise and vibration |
|--|----|---------------------|

Other material considerations

Other material considerations include:

1. National Planning Policy Framework, 2021
 2. Camden Planning Guidance: Design, 2021
 3. Camden Planning Guidance: Amenity, 2021
-

Relevant planning decisions

| Reference/address | Description | Status/decision date |
|-----------------------------|---|-----------------------|
| PSX0004621 8 Gate Street | The change of use of the fourth floor from residential (Class C3) to office (Class B1a) | Refused 25/05/2000 |

Contents of this statement

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Site and area description

- 1.1 The site address is 8 Gate Street, London, WC2A 3HP. The site area is 356sqm. An aerial image of the site is shown below.



- 1.2 The site comprises of a five-storey building (plus lower ground floor level). The use of the building is offices, although the building is currently vacant whilst comprehensive refurbishment works are undertaken. The building is located on the eastern side of Gate Street, south of High Holborn and east of Kingsway. There is no existing soft landscaping on the site.
- 1.3 The site is accessed via Gate Street, where there are three entrance doors. There is no vehicular access on to the site. It has a PTAL rating of 6b (best) and is accessible by a range of modes of public transport. The site is located within a one-minute walk of Holborn underground station, and Chancery Lane underground station is located within a seven-minute walk. There a number of bus stops located in close proximity to the site on High Holborn and Kingsway.
- 1.4 The site is located in flood risk zone 1 and is therefore not at risk of flooding. The site is not listed but is located within the Bloomsbury Conservation Area. The site is located within close proximity of a number of listed buildings, including Africa House (Grade II) and 1 and 2 Lincolns Inn (and attached railings) (Grade II).
- 1.5 The site is located within central London and as such, the surrounding area comprises of a range of land uses including offices, cafes, restaurants, bars and public houses, places of worship and educational uses. Nearby buildings range in height from around six to nine storeys. The site is located within a dense urban location that is not characterised by soft landscaping or street trees. Lincolns Inn Fields is located to the south-east of the site.
- 1.6 Double yellow lines are set out on the highway outside the site. There are also parking spaces for motorcycles and cycle parking racks located on the pavement in front of the site.

Proposed development

- 2.1 The proposal is for external alterations to the existing building including the installation of an entrance canopy and a new secondary entrance door; the creation of terraces; and installation of rooftop plant.
- 2.2 The proposals include the installation of a black metal canopy above the ground floor entrance door. The canopy is proposed to be finished in powder-coated aluminium and designed in a modern style. It is proposed to paint the existing windows frames and metal fins in a dark grey colour. A replacement secondary entrance door is also proposed to be installed. The door provides access to a cycle store that is being provided as part of the overall refurbishment works. The new door is proposed to be finished in a dark grey colour.
- 2.3 A terrace is proposed at second floor level to the rear of the building. In order to gain access to the terrace, it is proposed to enlarge an existing window to provide a door. Metal railings are proposed to be fixed to the existing parapet as a means of enclosure to the terrace.
- 2.4 A terrace is also proposed on top of the existing roof. As per the second floor terrace, railings are proposed as a means of enclosure to the terrace. The terrace will be accessed via the existing staircase from the fourth floor level.
- 2.5 It is proposed to install new plant within an enclosure on the roof. Details of the proposed plant have been enclosed with the application submission. The proposed plant will replace existing rooftop plant.

Considerations

- 3.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material consideration indicates otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Section 1 of this statement. The main planning considerations are considered to be:

- Design and impacts to heritage; and
- Impacts to amenity.

Design

- 3.2 Policy D1 of the Local Plan states that the Council will seek to secure high quality design in development. The Council will require that development:
- a. respects local context and character;
 - b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
 - c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
 - d. is of sustainable and durable construction and adaptable to different activities and land uses;
 - e. comprises details and materials that are of high quality and complement the local character;
 - f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
 - g. is inclusive and accessible for all;
 - h. promotes health;
 - i. is secure and designed to minimise crime and antisocial behaviour;
 - j. responds to natural features and preserves gardens and other open space;
 - k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
 - l. incorporates outdoor amenity space;
 - m. preserves strategic and local views;
 - n. for housing, provides a high standard of accommodation; and
 - o. carefully integrates building services equipment.
- 3.3 Policy D1 goes on to state that the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 3.4 Camden's Design CPG sets out that the Council is committed to excellence in design and schemes should consider:
- The context of a development and its surrounding area;
 - The design of the building itself;
 - The use and function of buildings;
 - Using good quality sustainable materials;
 - Creating well connected public spaces and good quality public realm;
 - Opportunities for promoting health and well-being;
 - Opportunities for improving the character and quality of an area.
- 3.5 In relation to heritage, the Design CPG notes that:
- Camden has a rich architectural heritage and we have a responsibility to preserve, and where possible, enhance these areas and buildings.

- The Council will only permit development within conservation areas that preserves and where possible enhances the character and appearance of the area.
- Our conservation area statements, appraisals and management plans contain further information and guidance on all the conservation areas.
- The significance of 'Non-Designated Heritage Assets' (NDHAs) will be taken into account in decision-making.
- Historic buildings can and should address sustainability and accessibility.
- Heritage assets play an important role in the health and wellbeing of communities.

3.6 In relation to balconies and terraces, the Design CPG states that consideration should be given to:

- Detailed design to reduce the impact on the existing elevation;
- Careful choice of materials and colour to match the existing elevation;
- Possible use of setbacks to minimise overlooking – a roof terrace need not necessarily cover the entire available roof space;
- Possible use of screening (frosted glass etc) to prevent overlooking of habitable rooms in residential properties or nearby gardens, without reducing daylight and sunlight or outlook.

3.7 In relation to building services equipment, the Design CPG notes that building services equipment should:

- not harm occupant or neighbour amenity, health and/or wellbeing;
- be incorporated into the host building aesthetically;
- have a minimal impact on the environment; and
- not harm listed buildings, conservation areas or streetscapes.

3.8 The site is located within the Bloomsbury Conservation Area. The site is also located within the setting of Africa House (Grade II listed), and within the wider setting of numbers 1 and 2 Lincolns Inn (and attached railings) (Grade II listed). Impacts to heritage are therefore a consideration.

3.9 As noted, the proposal is for external alterations including the installation of a canopy above the entrance at ground floor level, installation of a secondary entrance door and painting the existing windows frames and metal fins on the front elevation; the installation terraces; and the installation of rooftop plant.

3.10 The proposed entrance canopy is proposed to be constructed of a high quality black metal material and incorporates a modern design. It will provide much needed shelter for anyone entering the building and will assist in identifying the main entrance to the building.

3.11 The proposal to paint the existing window frames and metal fins on the front elevation in a dark colour will enhance and upgrade the appearance of the building. The installation of a new secondary entrance door at ground floor level will also enhance the appearance of the streetscene through upgrading the secondary entrance door.

3.12 The terrace proposed at second floor level will be enclosed with metal railings, and therefore will not be visually intrusive. The roof terrace is proposed to be set back from the front and rear façades of the building. It is proposed to be enclosed with metal railings which will have a light-weight appearance. The terrace is limited in size and therefore is not anticipated to be visible from street level.

3.13 The proposed roof plant will replace existing plant that is located on the roof. It will be constructed within an enclosure and is not anticipated to be visible from the street. The setting of the Bloomsbury Conservation Area and nearby listed buildings will therefore be preserved.

3.14 Overall, the proposals will enhance the appearance of the existing building through the provision of a number of interventions that will modernise and simplify the aesthetic of the front façade. The proposals are minor in scale and are considered to preserve the setting of the Bloomsbury Conservation Area and nearby listed buildings. The proposals incorporate a high quality design, in accordance with policies D1 and Camden's Planning Guidance.

Impacts to amenity

- 3.15 Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The Council will grant permission for development unless this causes unacceptable harm to amenity.
- 3.16 Policy A4 of the Local Plan seeks to ensure that noise and vibration is controlled and managed. It states that development should have regard to Camden's Noise and Vibration Thresholds (Appendix 3 of the Local Plan). Planning permission will not be granted for development likely to generate unacceptable noise and vibration impacts; or development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.
- 3.17 A noise impact assessment has been submitted with this planning application. The report confirms that a noise survey was undertaken from Thursday 4 to Friday 5 November 2021. The measured noise levels are considered to be representative of those occurring at the nearest façade of 10 Gate Street. It was observed at the start and end of the survey period that environmental noise levels were dominated by various items of plant equipment serving the adjacent buildings. The existing plant on the roof of the building was not operational when the survey was undertaken as the building was vacant.
- 3.18 As set out in the report, the noise emitted by the proposed condenser units and ventilation unit has been calculated from the manufacturers' data. The total combined noise level at the nearest noise-sensitive receptor is calculated to be 46dB(A).
- 3.19 The report confirms that a noise survey has been carried out to establish existing background noise levels at noise sensitive receptors near to the proposed plant equipment installation. This indicates that when the proposed equipment is operating the typical background noise level would be 53dB LAF90. The noise report concludes that the total plant noise rating level is expected to be approximately 7dB below the background noise level. Based on guidance set out in BS4142:2014, it is concluded that there would be minimal impact on any nearby residential receptors.
- 3.20 The proposed plant is therefore not expected to result in any unacceptable noise impacts in accordance with policies A1 and A4 of the Local Plan.
- 3.21 The proposed terrace at second floor level is limited in size and does not directly face any residential properties. The rear of the site is well separated from the nearest buildings. The proposed roof terrace is located on top of the roof of the building and is therefore well separated from nearby buildings. Due to the central London location of the site, it is not anticipated that the terraces will result in any unacceptable noise or disturbance, particularly as the area surrounding the site is largely characterised by commercial uses. There are several roof terraces within the vicinity of the site, and the proposed terraces are only likely to be used during office hours. It is also not anticipated that the terraces will result in any overlooking towards residential properties.
- 3.22 In summary, it is not considered that the proposals will result in any unacceptable harm to the amenity of nearby occupiers through noise impacts, overlooking, or loss of privacy, in accordance with policies A1 and A4.

Conclusions

- 4.1 This application is for external alterations to the existing building including the installation of an entrance canopy and a new secondary entrance door; the creation of terraces; and installation of rooftop plant at 8 Gate Street, London, WC2A 3HP.
- 4.2 This statement demonstrates that the proposal is in accordance with the material policies in the development plan. The proposal enhances the appearance of the building, thereby preserving the character and appearance of the Bloomsbury Conservation Area and nearby listed buildings. The proposals do not result in any harmful impacts to amenity, through either noise disturbance or overlooking.

Benefits of the proposal

- 4.3 The proposal enhances the appearance of the building through the installation of a contemporary, high quality new entrance canopy and through painting the existing window frames and metal fins in order to rejuvenate the appearance of the front facade. The proposal also provides terraces for the use of future employees, thereby enhancing the quality of the facilities provided on the site.
- 4.4 It is therefore requested that planning permission is granted for the proposals, without delay.