# **Daniel Watney**

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27 January 2022

Mr N Young London Borough of Camden 2nd Floor 5 Pancras Square c/o Town Hall Judd Street London WC1H 9JE

By Email Only

Dear Mr Young,

## 2021/2861/P 32-34 Spectrum House, London NW5 1LP

Further to our discussions and your email dated 13 October 2021 regarding the proposals for:

'Retrospective permission for existing plant and the proposed installation of 21.no plant units together with a three sided screen set behind a parapet wall'

Please find enclosed addendum information which seeks to clarify the proposals and relocates two existing condenser units from the entrance to the mews roof to the main roof.

The addendum information comprises:

Plans prepared by Weston Allison Wright

- Ground floor plans 4583-006B
- Roof plans 4583-007C
- Elevation 1 4583-008C
- Elevation 2 4583-009B
- Elevation 3-4 4583-010B
- Elevation 5 4583-011C
- Elevation 6 4583-012B
- Elevation 7 4583-013C
- Design and Access Statement

### Other documents

- Sustainability Technical Note prepared by XC02
- Review of Mechanical Services Plant and Proposals prepared by Hilson Moran
- Addendum Noise Assessment prepared by Mayer Brown
- Office agency evidence prepared by Edward Charles

### **Proposed alterations**

The proposed alteration to the scheme is to include the relocation of two further condenser units currently located on the roof of the tunnel leading into the mews. The purpose of the relocation of these units, is to further reduce the visual impact of the units across the site. The proposed relocated units make use of available space on the principal roof reducing the visual impact of the units presently located on the roof of the covered access leading to the mews building. These units will be located behind the proposed parapet. This amendment is shown on the plans listed above and considered in detail within the Design and Access Statement and addendum noise assessment.

The sustainability implications of the plant strategy are considered in the context of the development plan in this letter and the accompanying Sustainability Technical Note prepared by XC02. The requirement for the plant is set out in the accompanying letter prepared by Edward Charles.

The suggested amended description of development is:

'Retrospective permission for existing plant and the proposed installation of 23.no plant units together with a three sided screen set behind a parapet wall'

### The reason for the proposals

The accompanying letter prepared by Edward Charles explains why there is a need for each unit at Spectrum House to be capable of being comfort cooled and heated. Spectrum House is in a peripheral office location which is difficult to let owing to a plentiful supply of better quality office floorspace.

The Global Pandemic has exponentially accelerated a move to 'Working from Home' which is now a highly attractive option for small and start up businesses who traditionally would have let space at Spectrum House. This change to working practice has altered the office market considerably owing to the demand and supply imbalance.

Put simply, commercial floorspace that does not have basic amenities which include the ability to regulate temperature is unlikely to let. The Council is aware of the difficulties in letting floorspace at Spectrum House prior to March 2020, this is now significantly exacerbated.

These proposals will ensure that each commercial unit at Spectrum House is serviced and therefore each tenant is able to regulate the temperature of each commercial space.

#### The proposals

The application is accompanied by a review of mechanical services/plant proposals prepared by Hilson Moran, mechanical engineers and forms part of this addendum package of information.

This review sets out the proposals <u>do not comprise an air conditioning system</u>. Rather what is proposed is heating with the same system to have the ability to provide comfort cooling in peak summer months by the use of the pump system. The proposed roof mounted equipment is therefore heat pumps which are already in use across the site. What is proposed will replace gas boiler plant and wet heating systems.

Heat pumps are considered a renewable heating mode which will <u>reduce</u> the carbon consumption of the building by removing the gas based heating system and replacing with electric heat pumps. The number of roof mounted units is necessary because the proposed system is 'split' this means each unit is serviced.

Larger centralised units are available and these are installed in new developments. These are referred to as VRF systems. This option has been considered, however, the system is too big and heavy to be capable of being roof mounted without invasive structural reinforcement and significant visual impact. The scale of a VRF system also means that it would have a visual impact. Given that the site is located in a Conservation Area and any visual impact of plant is a sensitive matter for near neighbour, a VRF system would not be suitable in this location.

In summary, the proposals represent a consolidation of plant to reduce visual impact as well as the removal of a lot of equipment related to the use of gas to service the units. The equipment

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will be replaced with ASHP equipment which will allow the units to be individually serviced but principally naturally ventilated.

### Sustainability considerations

The Council's starting point is Policy CC1 'Climate change mitigation' of the Local Plan 2017. The policy states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

The policy states that the Council will:

a. promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;

The proposals will reduce the carbon dioxide emissions by replacing the old gas and wet heating system with a carbon reducing ASHP system. This system will allow the natural ventilation of the building, whilst ensuing it can be properly cooled on very hot days and heated as necessary.

The ability for each commercial unit to be serviced is essential to maximising the chance of the commercial floorspace being let, which has significant sustainability benefits not least reducing the likely obsolescence of the building.

# b. require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;

The proposals do not constitute major development, but do reduce carbon dioxide emissions through the decommissioning of the inefficient heating systems and hot water radiators. The installation of the ASHPs have a high coefficient performance which will result in a notable improvement in energy efficiency and associated carbon emissions throughout the building.

c. ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;

The proposals will make the existing commercial floorspace considerably more attractive to let and therefore improve the offer of lettable commercial floorspace a very short distance from Gospel Oak Station, walking distance from Tufnell Park underground and Kentish Town overland and numerous bus routes.

### d. support and encourage sensitive energy efficiency improvements to existing buildings;

These proposals represent a significant energy efficiency improvement through the removal of plant related to an inefficient system and the installation of plant related to the introduction of an ASHP (electric) system. The enclosed Design and Access Statement shows that the proposals are sensitive to the location of the building in a Conservation Area.

# e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building;

The proposals do not constitute substantial demolition, or any demolition. Indeed the proposals intend to avoid the building becoming obsolete by ensuring it is properly serviced and therefore optimising the chances of the commercial floorspace being let.

f. expect all developments to optimise resource efficiency

The introduction of ASHPs will result in considerable energy efficiency.

#### Conclusion in relation to Policy CC1

The proposals will fully comply with the relevant part of Policy CC1 (the subsequent criteria deals with decentralised networks).

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Policy CC1 is supplemented by Camden Planning Guidance Energy efficiency and adaption. Section 3.14 states that it is the intention of the Local Plan 2017 to discourage active cooling (air conditioning). The proposals meet this policy objective through the use of ASHPs.

### Air conditioning is not proposed.

The proposed method of heating and cooling the building as described in the previous paragraphs and in the Hilson Moran report is through the use of ASHPs which is an inherently sustainable method of heating and cooling, allowing the use of natural ventilation. The proposed use of ASHPs will replace the far less sustainable gas boiler system.

The proper heating and cooling of the units, as is expected by any office occupier, will enable the continued use of the building extending its lifecycle and reducing its obsolescence.

The proposed servicing strategy complies fully with the policy objectives of the London Plan's Energy Hierarchy which considers ASHPs as a low/zero carbon technology for the supply of space heating, cooling and hot water within the building. This will contribute to the reduction of regulated CO2 emissions as part of the Be Green stage of the Energy Hierarchy.

This strategy also complies with the GLA's intention to fully integrate electric based heat pump technologies in new and existing buildings across London, enabling Spectrum House to benefit from the anticipated decarbonisation of the UK's national electricity grid and approach zero carbon by 2050.

Local Plan policies regarding sustainability are supplemented by Camden Planning Guidance for Energy efficiency and adaption, January 2021 (CPG). Paragraph 10.8 states that the Council will discourage the use of air conditioning and excessive mechanical plant owing to the resulting energy consumption and because of the amount of plant space used.

The CPG states that buildings that may need to be comfort cooled should take advantage of ASHPs. Paragraph 10.11 of the CPG states that air conditioning should not be specified in developments where it has been demonstrated that passive and other measures proposed have successfully addressed the risk of overheating.

### Closing

The Council considers the proposed and existing plant to be 'development' and therefore will apply its sustainability policies when assessing the acceptability of the proposals. This letter, supplemented with the Sustainability Technical Note, demonstrates that the proposals are compliant with the relevant development plan policies.

The Council has raised concerns regarding the amount of plant proposed. The requirement for the number of units is explained in the accompanying Hilson Moran assessment, which confirms that a centralised system is not achievable because of its size and weight. Such systems are appropriate for new build development which allow specific design solutions to accommodate centralised systems.

The need for separate units will also allow for the separate servicing of each commercial unit in order to provide tenants with the ability to manage their own environments. This is important to enhance the letability of the units which is critical in peripheral locations and given the prevailing circumstances in the office market, set out in the accompanying letter from Edward Charles.

The Council is urged to give proper consideration to the future of the building and therefore its viable use. It is inherently the most sustainable option for the building to remain and to be improved to optimise its use. The sustainability benefits of this are set out in XCO2's note. The economic benefits address a core corporate principle of the Camden Council.

It is a stated aim of the Council to generate inward investment and employment opportunities to the borough. Spectrum House provides an opportunity to deliver quality workspace encouraging businesses to the borough.

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However, the reality is that the Global Pandemic has substantially changed working practices reducing the demand for office floorspace, this mean that supply outstrips demand. This means that space needs to be as attractive as possible for potential occupiers to ensure inward investment and the sustainable occupation of the building extending its life. Ensuring tenants can offer a temperature regulated workspace is now a basic expectation of the market.

I trust that this letter and accompanying documents provide a full explanation as to why the proposals are necessary.

We note your confirmation that the Council's Environmental Health officer has not raised any objections to the proposals. The addendum acoustic report confirms the minor repositioning of two units does not alter this conclusion.

The Design and Access Statement sets out in detail the assessment undertaken that demonstrates that the proposals will not be visible from any public vantage point and therefore will preserve the character and appearance of the Conservation Area.

Please do not hesitate to contact Charlotte Yarker at these offices should you require any further information (cyarker@danielwatney.co.uk).

Yours sincerely

Daniel Watney

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