

AC/P08481
23 August 2022

London Borough of Camden
Regeneration and Planning
5 Pancras Square
London
N1C 4AG

Dear Sir/Madam

27 GOODGE STREET, LONDON, W1T 2LD

**APPLICATION FOR FULL PLANNING PERMISSION FOR 6 NEW AIR SOURCE HEAT PUMPS
ON THE REAR FIRST FLOOR FLAT ROOF**

PLANNING PORTAL REF: PP-11467671

On behalf of our client, Shaftesbury CL Limited, we write in support of a planning application for full planning permission to install new plant (6No. air source heat pumps) on the rear first floor roof level of 27 Goodge Street ('the site').

In support of this application, the following documents and forms have been submitted electronically online via the Planning Portal:

- Planning Application Forms – *prepared by Rolfe Judd Planning;*
- Site Location Plan – *prepared by Fresson & Tee Architects;*
- Existing and Proposed Plans – *prepared by Fresson & Tee Architects;*
- Environmental Noise Survey and Plant Noise Assessment Report – *prepared by Hann Tucker Associates; and*
- Cooling Hierarchy (office and restaurant) – *prepared by QuinnRoss.*

The requisite application fee of £234.00 has been paid electronically online via the Planning Portal.

Site Location

The application site is located on the southern end of Goodge Street (A5204). The property is currently vacant but comprises a ground floor and front basement level commercial retail unit (Class E) and offices on the upper floors. Part of the basement is occupied by the restaurant in the neighbouring property (29 Goodge Street). The site is located within the Charlotte Street Conservation Area and the Central Activities Zone (CAZ).

The site's locality is characterised by a mix of uses, comprising predominantly retail and restaurant units at the ground floors and commercial office or residential use on the upper floors. This application relates to the use of the rear flat roof at first floor level for the location of plant serving the

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restaurant unit (ground and basement) and the upper floor office units.

Relevant Planning History

There is limited planning history for the site available on LB Camden's online planning portal. However, it can be seen that a retail use on site was established through application ref. 27562, which was approved in November 1978.

Application reference 2022/1494 was approved on 23 August 2022 for the "*Proposed reconstruction and extension of existing rear toilet block on second and third floors and rooflight on rear ground floor*".

An application is currently being determined by Camden Council for this site, as follows:

- 2022/3161/P: *Installation of new Shopfront*. Submitted 26th July 2022.

The Proposal

This application seeks planning permission to install roof plant on the rear flat roof comprising 6No. air source heat pumps to service the restaurant and office units at basement to third floors.

Three condenser units are proposed along the rear façade to service the restaurant; two units for heating and cooling and one fridge condenser unit. Three condenser units are also proposed along the north western boundary perpendicular to the rear façade to service the office units; with one unit for heating and cooling provided for each floor. Specifications for these units are provided within the Environmental Noise Survey and Plant Noise Assessment Report prepared by Hann Tucker Associates.

Variable Refrigerant Flow (VRF) type air source heat pump units are proposed for heating and cooling. The units proposed will be of the current generation with the latest energy efficient technology and feature a refrigerant with zero ozone depletion potential (ODP) and low global warming potential (GWP).

The proposed plant has been reviewed by Hann Tucker Associates who have recommended a number of acoustic attenuation measures to ensure an appropriate noise environment is achieved during day time and night time hours. In this case, the air source heat pumps will be housed in an acoustic enclosure which will be resiliently mounted to minimise the potential effects for noise and vibration. Two of the units will be arranged in a stacked arrangement, with a bespoke enclosure proposed.

With the recommended acoustic mitigation measures, the units will have the capability of operating 24 hours per day, 7 days per week.

Please see the submitted drawings from Fresson & Tee Architects and photographic schedule for further details.

We note that the changes approved by application 2022/1494/P, including the installation of a new flat skylight and a rear toilet extension, are required to be undertaken in order to install the new air source heat pumps. These works are identified on the proposed plans as being approved under a separate planning application.

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Planning Policy Considerations

Design and Heritage

Local Plan Policy D1 (Design) seeks to ensure high quality design in development, which respects local context and character, preserves the historic environment, comprises details and materials that are of high quality, and of most relevance, carefully integrates building services equipment. This includes ensuring that any required servicing equipment or ducting is contained within the envelope of a building, or located in a visually inconspicuous position.

The proposed plant will be located at the rear of the site, with no visibility from the street, ensuring the units are fully screened from any public vantage point. The air source heat pumps will be located within acoustic enclosures to protect the existing character and appearance of the building.

Local Plan Policy D2 (Heritage) states the Council will require that development within a conservation area preserves or, where possible, enhances the character or appearance of the area.

The proposal will not have any material impact upon the existing character or appearance of the building and wider context of the Charlotte Street Conservation Area as the plant equipment will only be visible at the rear of the surrounding properties, with no visibility from the road or any public vantage points.

Amenity

Local Plan Policy A1 seeks to manage the impact of development to ensure that the quality of life of occupiers and neighbours is protected, and mitigation measures are provided where necessary. Factors relevant to this proposal include outlook, noise and vibration levels.

With regards to outlook and amenity, the condenser units have been positioned to avoid any windows on the rear elevation, ensuring that outlook is not adversely obscured. The condensers will be located at rear roof level, which is an appropriate location for mechanical equipment of this nature. First to third floors of the building are currently vacant offices, and as the condensers will be located within acoustic enclosures, the outlook from these upper level office units remains acceptable.

Policy A4 of the Local Plan (Noise and Vibration) states that the Council will seek to ensure that noise and vibration is controlled and managed. The policy also states that permission for noise generating development, including any plant and machinery, will only be granted if it can be operated without causing harm to amenity.

An Environmental Noise Survey and Plant Noise Assessment Report has been prepared by Hann Tucker Associates to address the likely noise levels associated with the proposed plant. A 24 hour background noise survey was undertaken on 11-14th February 2022 to determine the prevailing noise levels for the site. The anticipated noise levels have been taken from a distance of 1m from the nearest noise sensitive receptor (being the first floor windows of 4 and 5 Colville Place to the rear). In order to comply with Camden's noise and vibration thresholds, mitigation measures are proposed, including acoustic enclosures around all air source heat pumps. All plant will be resiliently mounted to reduce vibration.

Based on the proposed plant specifications and recommended mitigation measures, it is concluded in the report that local authority requirements will be achievable, thus ensuring an appropriate noise

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environment for surrounding residents. A condition of consent is offered requiring plant and acoustic mitigation measures to be in accordance with the specified noise emission limits set out in the Hann Tucker report.

Sustainability and Cooling Hierarchy

Policy CC2 of the Local Plan seeks to ensure that all development adopts appropriate climate change adaptation measures. This includes measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

A cooling hierarchy for both the restaurant unit and the upper floor offices has been undertaken by Quinn Ross. The report confirms that the air source heat pumps proposed are the most optimal solution in terms of efficiency, lack of contribution to local air pollution (no use of fossil fuels), and their minimal external plant space requirements.

The units proposed will be of the current generation with the latest energy efficient technology and feature a refrigerant with zero ozone depletion potential (ODP) and low global warming potential (GWP).

LED lights are proposed internally to limit internal heat gains. The units shall be located in an enclosure on the roof of the building. These will be sized to meet the heating load and will be selected from among the most space efficient available on the market.

As the building fabric is existing, there is limited opportunity to amend the floor to ceiling levels, and there is no natural ventilation proposed to the basement due to the building footprint occupying the entire site area. Allowance has been made for mechanical ventilation to allow fresh air into the units, reducing the cooling demand, however active cooling will be required in warmer temperatures to prevent overheating.

The proposal therefore demonstrates that the most environmental and energy efficient measures will be used where possible, in accordance with the cooling hierarchy.

In the context of the aforementioned policies, the proposed building alterations for 6No. new condenser units to service the basement and ground floor restaurant and the first to third floor offices can be considered supportive of those Local Plan policies.

Summary

This application seeks full planning permission for the installation of 6.No air source heat pumps on the rear flat roof of 27 Goodge Street.

As outlined above, the proposed servicing equipment will be appropriately located and designed to ensure the wider Conservation Area is not impacted and will adequately equip the future restaurant operator and office units with the required condenser units for heating and cooling. The proposed acoustic screening will adequately mitigate and noise created from the units during day time and night time hours.

We trust that the enclosed information is sufficient for you to validate our client's planning application and we look forward to a swift and positive outcome. Should you require any further information and would like to arrange a site visit please do not hesitate to contact the undersigned.

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Yours faithfully

Ailish Collins

For and on behalf of
Rolfe Judd Planning Limited