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Planning Department
London Borough of Camden
5 Pancras Square
London
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FAO: Jonathan McClue

31st October 2022

Dear Jonathan,

**Planning Application for the installation of a life safety generator
101 Camley Street, London. NW1 0NF**

On behalf of the Applicant, Camley Street S.a.r.l, please find enclosed a full planning application for the installation of a life safety generator at roof level on the northern block of 101 Camley Street. This generator is required to provide power for additional water sprinklers within the commercial floorspace, which are being installed in response to the latest Government guidance on fire safety.

Background

Planning permission for the site at 101 Camley Street was originally granted on 18th March 2015 for the demolition of the existing building and redevelopment of the site for a mixed use building ranging from 6-13 storeys and providing 2,220 sqm employment floorspace, 121 residential flats, a pedestrian footbridge and associated landscaping and public realm works (2014/4385/P as subsequently amended by 2016/4385/P and 2018/3682/P). This permission has been implemented and the building construction is nearing completion.

Proposals

The proposals comprise the installation of a life safety generator at roof level on the northern block of the development. The generator will provide power for the additional water sprinklers within the commercial floorspace, which are being provided to improve the fire safety of this accommodation in accordance with the expectations of future occupiers and market requirements. The nature of the proposals means that the generator will only be used when the water sprinklers are required, i.e. in the event of a fire. As such, it will generate no noise emissions on a daily basis.

Maintenance of the generator is anticipated to take place no more than once per month, or less if not required. Maintenance activities will take place during the daytime, when residential occupiers are least likely to be at home. Any testing associated with this maintenance will take place for a short period of time to minimise disturbance to residents. Prior to any testing, the management company of 101 Camley Street will seek to ensure that residents are aware that this will take place.

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The generator will be 1.46m x 3.86m in size and 2.27m high, which equates the top being at 68.87m AOD. For comparison, the existing plant on the roof is at 68.75m AOD (meaning the generator is only 12cm higher). The proposed installation incorporates an acoustic attenuation over-canopy and vibration mounts which will mitigate the noise and vibration impacts when the generator is in use.

The generator has been carefully sited adjacent to the lift overrun at roof level to minimise the potential visual impact. The Design and Access Statement includes a number of verified views which were identified within the previous Section 73 applications. The views demonstrate that the visual impact of the generator will be negligible and it will not materially alter the appearance of the building. In long distance views, the generator will sit in the context of the existing rooftop plant and will not be distinguishable from the permitted plant enclosure. At street level, neither the plant or generator is visible due to the projection of the penthouse eaves.

Planning Policy Assessment

The current Development Plan for LB Camden comprises the London Plan (2021), Camden Local Plan (2017), Site Allocations Plan (2013), and adopted Area Action Plans and Neighbourhood Plans. The Camley Street Neighbourhood Development Plan (2021) is relevant to this application site.

Requirement for additional fire safety measures

At a national level, fire safety is one of the key priorities for the Government; with the recent implementation of the Fire Safety (England) Regulations 2022 and the Building Safety Act amendments to the Fire Safety Order. This legislation forms part of the Government's response to the Independent Grenfell Tower Inquiry Phase One Report (2019). The Government's aim is to improve fire safety outcomes and protect the public from risk of fire by better supporting compliance and effective enforcement in all regulated premises.

This focus on fire safety is reflected in the expectations of occupiers and the market requirements for both residential and commercial accommodation.

While fire safety isn't specifically mentioned within the Camden Local Plan, para 7.34 acknowledges that fire escapes and associated building services equipment may be necessary for a building to function.

Amenity impacts

Local Plan Policy A4: Noise and Vibration relates to the control and management of noise and vibration from noise generating plant and machinery. Permission will not be granted for development likely to generate unacceptable noise and vibration impacts.

A review of the noise emissions associated with the generator has been carried out by Sharps Redmore, and submitted in support of this application. The baseline position for this review is the Sharps Redmore Acoustic Report which was approved under Planning Condition 17 of 2016/6311/P (discharged on 18th Oct 2019) (ref: 2019/5539P). This report included a noise survey which established the background ambient noise levels at appropriate locations.



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The established ambient and background levels are as follows:

Position	Daytime (L _{Aeq, 16 hrs} (dB)	Typical daytime background L _{A90, 5 mins} (dB)	Night-time L _{Aeq, 8 hrs} (dB)	Typical night-time background L _{A90, 5 mins} (dB)
1	62	54	59	44
2	60	52	58	42
3	58	56	55	50

When operational the proposed generator will have a noise emission level of 77dBA at 1m (approx 60dBA at 7m). This is estimated to be 3dB above the night-time and 7dB below the daytime background level at the neighbouring residential residences (which are located approximately 39m away). This level of noise fully complies with paragraph 6.100 of the Local Plan, which requires that emergency equipment such as generators to meet the noise criteria of no more than 10dB above the background level (L₉₀ 15 minutes).

With regard to occupiers of the development at 101 Camley Street, the generator is located within proximity of the penthouse balcony. Sharps Redmore estimate that the distance between the generator and the penthouse balcony is 3-5m, which would result in a noise level of 10-12dB above the daytime background level. The statement submitted by Sharps Redmore confirms that this noise level is acceptable within marginal tolerances and when considering the short duration of any noise event. The proposals would therefore accord with the aims of paragraph 6.100.

In summary, the life safety generator will not generate unacceptable noise or vibration impacts for the following reasons:

- The generator will have an attenuation cover and will sit on vibration pads in order to mitigate noise and vibration emissions as much as practicable.
- The generator will comply with the noise thresholds set out in paragraph 6.100 of the Local Plan which requires emergency equipment such as generators to meet the noise criteria of no more than 10dB above the background level (L₉₀ 15 minutes).
- The use of the life safety generator will be extremely limited, as it will only be required in the event of an emergency. On a day-to-day basis the generator will not be operational and will therefore cause no noise or vibration disturbance.
- It is noted that in the event of a fire, when the generator is required, there is almost certain to be disturbance from other associated activity such as emergency vehicle sirens and fire alarms. Therefore, the impact of the generator is unlikely to be prioritised by occupiers or neighbouring residents.
- It is anticipated that any testing associated with the maintenance of the generator will take place no more than once a month. Testing will take place during the daytime, when residential occupiers are least likely to be at home, and prior notice of testing will be given to residents by the management company of 101 Camley Street.

For these reasons it is considered that the installation of the generator will not generate unacceptable noise or vibration impacts and the proposals comply with Policy A4.

Visual impacts

Local Plan Policy D1 requires development to carefully integrate building services equipment and preserve strategic and local views.



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As demonstrated within the views included within the Design and Access Statement, the visual impact of the generator will be negligible and it will not materially alter the appearance of the building. The generator has been carefully sited on the roof and will sit in the context of the existing rooftop plant. It will not be distinguishable from this plant in long distance views. At street level, neither the plant or generator is visible due to the projection of the penthouse eaves. For these reasons it is considered that the proposals fully comply with Policy D1.

In summary, it is considered that the proposals are fully in accordance with the Camden Development Plan and planning permission for the life safety generator should be approved without delay.

If you have any queries or wish to discuss this application in more detail, please don't hesitate to contact me.

Yours sincerely,

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Mel Mantell
Associate

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