

London Borough of Camden
Planning Department
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08 September 2023
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BY EMAIL ONLY

Dear Sir/Madam

Application for Installation of Heating, Ventilation and Air Conditioning (HVAC) equipment, at 24-28 Bloomsbury Way, London WC1A 2SN

Rackham Planning are instructed by Runway East (“the Applicant”) to submit an application for planning permission for installation of HVAC equipment at 24-28 Bloomsbury Way, London WC1A 2SN (“the Application Site” / “the Site”).

The proposed external HVAC equipment (a new unit and ducting) will be located within a passageway/lightwell adjacent to the lower ground office accommodation along the south-western edge of the application site. The existing building is already in an office use.

The building is occupied by Runway East, a serviced office provider established in 2014. The company currently operates nine serviced office buildings across the UK including six in London. The site subject to this application proposal is a new acquisition, with a target opening date later in 2023.

The building is currently undergoing a sustainably focused internal re-fit and this application proposal will help to facilitate the enhancement of the building in order to deliver 45,000 sqft of flexible and attractive office space to suit modern businesses.

Site and Surroundings

The site is part of a development block that is located immediately to the north of the junction between the A40 Bloomsbury Way and Bury Place, approximately 30m south-west of Bloomsbury Square Garden, and 80m south-east of the British Museum. Great Russell Street runs to the north of the block.

The surrounding area has a distinctive gridded street pattern of containing small blocks of development with prevailing scales of 4-6 storeys. The area was first comprehensively re-developed in the late 17th Century with many of the terraces being rebuilt and re-fronted during the mid-19th Century, adding variety to elevational treatments along the streets. The wider area contains a range

of uses including residential, business, and culture and entertainment, with the British Museum and Nicholas St George’s Church being among the most significant and prominent buildings.

The building subject to this application is four storeys in scale, with additional floorspace accommodated at lower ground / basement level and within a mansard roof. The ground floor façade is in stone, with the upper floors faced in red brick, with stone detailing.

The frontage to Bloomsbury Way is approximately 30m in width and the building extends back some 45m within the plot. It adjoins Charlton House (23 Bloomsbury Way)/5 Bloomsbury Garden Square to the north-east, and 29 Bloomsbury Way (occupied by Richer Sounds) to the south-east, with Russell Chambers, a Mansion style block, also adjoining to the east and fronting Bury Place.

According to the Local Plan Policies Map, the site is within the following designated areas:

- Bloomsbury Conservation Area;
- Central London Area (CLA); and
- Archaeological Priority Area (2017).

However, there are no other relevant designations covering the site and the site is not covered by a Neighbourhood Plan Area or Forum.

According to the Historic England Map, the adjacent Charlton House (23 Bloomsbury Way)/5 Bloomsbury Garden Square and the railings are Grade II Listed, with 6 Bloomsbury Garden Square together with the railings and lamp holder being Grade II* Listed.

Other Listed Buildings in the immediate surrounds of the site include, the White Hall Hotel (9-11 Bloomsbury Garden Square (Grade II), 14 Bloomsbury Garden Square (Grade II), the Royal Pharmaceutical Society buildings at 16-17 Bloomsbury Garden Square (Grade II), 66-71 Great Russell Street (Grade II). In addition, 20-21 Bloomsbury Way, diagonally opposite the site frontage to the south-east is also Grade II Listed.

Bloomsbury Conservation Area Appraisal and Management Strategy (Adopted 18 April 2011) confirms that the application site/subject building is a ‘positive building’ in the context of Sub Area 7 (Museum Street/Great Russell Street) of the Conservation Area. The remainder of the buildings within the development bloc, including those immediately to the south-east along Bury Place are also deemed to be positive buildings.

Given that the proposals involve the installation of relatively low-key plant within the lower ground floor of a lightwell area between two tall buildings, there is considered to be negligible impact on surrounding heritage assets.

Planning History

The recent Planning history of the site is summarised in the table below, sourced from the Council’s online records. However, all previous proposals were progressed prior to the current applicant having an interest in the building.

Reference	Proposal	Decision	Date
2017/6518/P	Installation of 3 x air conditioning units at lower ground floor within the partially enclosed passage.	Granted	Feb 26 2018

2012/3397/P	Installation of a condenser unit on south-west elevation at lower ground floor level of office building (Class B1)	Granted	Oct 2 2012
2012/2076/P	Erection of a roof extension and terrace at fourth floor level of office building (Class B1).	Withdrawn	Jun 29 2012
2012/0790/P	Variation of condition 3 (development built in accordance with approved plans) of planning permission ref 2011/1243/P dated 23/05/2011 for the installation of roof level plant within acoustic enclosure and replacement of all windows from aluminium to crittall framed double glazed windows of offices (Class B1a), namely for the installation of a condenser on the south-west elevation at lower ground floor level.	Withdrawn	Jun 15 2012
2011/1243/P	Installation of roof level plant within acoustic enclosure and replacement of all windows from aluminium to crittall framed double glazed windows of offices (Class B1a)	Granted	May 23 2011

The approved proposal for *'Installation of 3 x air conditioning units at lower ground floor within the partially enclosed passage'* confirmed that the use of the building was B1a Office. The submitted drawings showed that the approved plant was located at the north-western corner of the site and building, in the adjacent to 25-36 Russell Chambers.

In determining the application, the planning officer noted objections from the owner of 19 Russell Chambers, who raised concerns about the separation distance between the proposed equipment, and the potential for noise to be amplified by the lightwell. However, the officer considered that the location of the plant at lower ground level was acceptable given the conclusions of the submitted noise assessment and the application of appropriate conditions.

Application Proposal

As noted above, in order to facilitate the refurbishment of the office building by the new operator, Runway East, external additions are required including enhancement of the Heating, Ventilation and Air Conditioning (HVAC) system.

The application is supported by the following documents:

- Application forms and certificates;
- I-90-107.P00 Site Location Plan 1:1,250
- I-90-102.P00 Existing Plan 1:100 @ A1
- M-LG-001.C03 Proposed LGF Mechanical Services Layout 1:100 @ A1
- M-XX-001.CO1 Proposed Ventilation Details 1:20/1:50 @ A1
- HVAC Technical Specifications
- Noise Assessment by 24 Acoustics:

Drawing 001.C02 by VBS shows the location of the proposed Helios Air RH3000 mechanical ventilation unit, under the existing metal staircase at the northern end of the passageway, together with proposed elevated extract and supply ducting within the same lightwell/passageway area to the south-west of the building. This is also the same area subject to the approved 2017 air conditioning proposals discussed above.

The proposals also include the installation of plant within internal areas of the building, and while these elements do not require planning permission, the main internal ventilation unit has also been included in the Noise Assessment.

It is understood that the proposed Units will only operate during office hours (08:00 to 18:00 Monday to Friday).

Planning Policy and Assessment

In physical terms, the proposals are small scale and limited to the small passageway/lower lightwell area, to the south-west of the lower ground floor of the building. As a result, visual impact is extremely limited, only being visible to windows within the lightwell above first floor level, and any impacts are likely to be related to noise generated by the HVAC system.

Paragraph 6.1 of the Local Plan (2017) introduces Policy A1 (Managing the Impact of Development) by noting that due to mixed and intensive uses within the area and the central location of the borough within the wider City, amenity is particularly important.

The Policy states that "the Council will seek to protect the quality of life of occupiers and neighbours." It then makes clear that the Council will "grant permission for development unless this causes unacceptable harm to amenity." The policy lists 'noise and vibration' as potential issues under part (j) of the Policy.

Paragraph 6.20 clarifies that *"where uses sensitive to noise are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application."*

Policy A4 (Noise and Vibration) states that *"the Council will seek to ensure that noise and vibration is controlled and managed."* It also states that *"development should have regard to Camden's Noise and Vibration Thresholds."* These are enclosed under Appendix 3 of the Local Plan.

The Policy then sets out two scenarios where permission will not be granted:

- a. development likely to generate unacceptable noise and vibration impacts; or
- b. 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.

The final part of the policy states that the Council *"will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity."*

As noted above, the proposed replacement HVAC equipment is to be installed in a similar location to the existing plant, which was approved in 2017. The proposed equipment has been subject to the accompanying Noise Assessment by 24 Acoustics.

The Noise Assessment Report was undertaken following site visits and environmental noise measurements made on site between 10th to 15th August 2023.

The Report highlights that the nearest residential properties are in the Russell Chambers building which share the lightwell with 24-28 Bloomsbury Way. Due to the high level boundary wall screening the lower floors of the residential block, the 2nd floor windows are considered most likely to be sensitive to changes in noise climate. The monitoring equipment was therefore installed within the lightwell, to give the most appropriate and accurate representation of these nearby residential properties.

The Report acknowledges the Noise Assessment Criteria as included under Appendix 3 of the Camden Local Plan, and in turn the British Standard (BS 4142: 2014) referenced by the Criteria, which sets a threshold of an adverse and significant adverse impact when comparing rating levels of proposed equipment to the background noise levels. It also notes that where the rating level does not exceed background noise level, this is an indication of low impact.

Background noise levels were recorded to be consistent at 39dB during the day, due to existing neighboring plant and distant road traffic noise. This means that the Camden Council requirement not to exceed 10dB below the background noise level would set a proposal specific requirement of 29dB during operating hours.

The Assessment then considers the noise levels that would be generated by the introduction of the two plant units (one internal and one external within the lightwell). Given the manufacturer specifications for the proposed HVAC units, and the background noise measurements, the report then specifies attenuation measures for the units to ensure that the required level below background noise can be achieved.

The Report concludes that on this basis, the proposed plant will achieve Camden Council's criterion for noise emissions and is, therefore, acceptable. On this basis, the proposal is considered to meet the requirements of Camden Local Plan Policies A1 and A4.

On this basis, the proposal is considered to meet the relevant planning requirements, while also facilitating the wider refurbishment of the building and improvement of office stock.

If you wish to discuss any issues raised herein, please do not hesitate to contact either Stuart Rackham (07841 674794/ stuart@rackhamplanning.co.uk).

Yours faithfully



Rackham Planning Limited

Enc. Application Documents