

Our Ref: 23425/MS/dm
Your Ref: PP-12659305
Email: mshearman@firstplan.co.uk
Date: 22 January 2024

Camden Council
Planning - Development Control,
Camden Council,
Camden Town Hall,
London,
WC1H 8ND

Dear Sir/Madam,

PLANNING AND LISTED BUILDING CONSENT APPLICATIONS FOR THE INSTALLATION OF EXTERNAL PLANT AT 127-128 HIGH HOLBORN, HOLBORN, LONDON, WC1V 6PQ

We have been instructed by our client, Farmer J Ltd, to submit the enclosed planning and listed building consent applications for the above address. The applications relate to the installation of external plant / ventilation equipment to facilitate our client's occupation of part of the currently vacant ground floor commercial premises of the building to begin trading it as a 'Farmer J' restaurant. For completeness, we have also provided the applicants proposed internal fit out drawings, however, these works will be non-invasive and will not require planning permission.

In accordance with both local and national validation requirements, the submission is supported by the following documentation:

- Completed Planning and Listed Building Consent Application Forms;
- Completed CIL Form;
- Planning, Heritage and Design and Access Statement, contained within this letter;
- Site Location Plan;
- Block Plan;
- Existing and Proposed Ground Floor Plan;
- Existing and Proposed Roof Plan;
- Existing and Proposed Basement Plan;
- Existing and Proposed Section A;
- Existing and Proposed Section B;
- Existing and Proposed South Elevation; and
- Existing and Proposed East Elevation.

The requisite planning and administrative fees of £578 and £64 have been paid online via the planning portal (ref: PP- PP-12659305) The remainder of this letter sets out our supporting case for the proposals.

Site Background

The application site relates to the 5-storey Grade-II listed office building, located on the junction of Southampton Place and High Holborn. The majority of the buildings on High Holborn road include retail units at ground level with glazed frontages. The ground and basement floors, which form the basis of this application, are in retail use. The site was previously occupied by the Royal Bank of Scotland (RBS), who have since vacated. The former RBS premises are being sub-divided following on from applications by the landlord, and the space in question currently remains unoccupied – but the applicant is set to begin trading from the premises. The upper floors are in office use and are accessed via external steps on 13 Southampton Place.

The site is located within the Bloomsbury Conservation Area and has also been identified as a primary central London frontage. The site is located within an area of low risk of flooding.

Planning History

The following applications have been identified from the online register:

- Most recently application ref. **2023/1550/L** was made for: *External alterations at ground floor of Norfolk House, including; removal of three existing sets of windows, stone cill and infills on the High Holborn frontage, and replace with three new shopfronts; subdivide the one of the ground floor commercial units (Class E) into 2 x commercial units (Class E); installation of external rear extract duct at basement to roof level. Internal alterations at basement and ground floor levels and display of new signage* – Granted 17/10/2023, as part of the ingoing tenant’s work to the building. Prior to this application ref. **2023/1692/P** was made for *External alterations at ground floor of Norfolk House, including; removal of three existing sets of windows, stone cill and infills on the High Holborn frontage, and replace with three new shopfronts; subdivide one of the ground floor commercial units (Class E) into 2 x commercial units (Class E); installation of external rear extract duct at basement to roof level.* – Granted 17/10/2023
- **2021/1602/P** | *External alterations to reinstate stone surround and window frames to match existing following the removal of ATM, night safe and signage.* - Granted 30/06/2021
- **2019/3148/A** | *Display of 4x internally illuminated fascia signs, 3x non-illuminated fascia signs, 2x internally illuminated projecting signs and 1x internally illuminated ATM surround to existing bank (Class A2).* – Granted 01/05/2020
- **2019/3136/L** | *Replacement of existing external signage with new branded signage, including fascia with logo, atm surround and projection signage.* – Granted 16/09/2019
- **2018/3973/L** | *Installation of cabling to provide connections to new BT circuits and Cisco Wireless Access Points (wifi). All cable routes will utilise existing cable runs within the building. Drilling will be required to mount APs onto the walls or onto the ceiling where required.* – Granted 15/11/2018
- **2016/1502/L** | *Boarding up of two unused counters, and replacement of 4 no window marketing units affixed to internal glazing to High Holborn and Southampton Place elevations.* – Granted 09/05/2016
- **2016/0505/A** | *Display of 4 internally illuminated and 3 non-illuminated fascia signs, 2 internally illuminated projecting signs, 1 internally illuminated ATM surround and nameplate/security signs to replace existing.* – Granted 15/03/2016
- **2016/0503/L** | *Replacement of signage to existing bank.* – Granted 15/03/2016
- **2012/1707/A** | *Display of 3x non-illuminated fascia signs and 2x non-illuminated projecting signs to existing bank (Class A2).* – Granted 29/05/2012
- **2012/1706/L** | *Replacement of signage to existing bank.* - Granted 29-05-2012

Application Proposals

This application proposes the installation of a new external kitchen extract duct, which exits the roof of the ground floor rear extension, rising to the roof of the building where it terminates. An air intake louvre will be

installed to the rear of the building at first floor level. Previous application ref. **2023/1550/L** made by the landlord gained permission for the installation of an air intake louvre within the structural opening in the existing window at basement level. Additionally, 7no. double height air conditioning condensers will be installed to the roof, alongside safety rails and a ladder. An air conditioning condenser will also be installed at basement level on the southeast elevation.

Planning Policy

The statutory development framework for the site is composed of the Camden Local Plan (adopted 2017), the Policies Map, and the London Plan (2023). The National Planning Policy Framework (NPPF) (2023) forms a material consideration, as does local supplementary guidance.

The National Planning Policy Framework (2023)

The NPPF provides the overarching planning policy guidance for development across England. It states:

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”

Paragraph 85 states that planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt. As such, significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Paragraph 131 outlines that good design is one of the fundamental factors in ensuring sustainable development and contributes to creating:

“Better places in which to live and work and helps make development acceptable to communities.”

Furthermore, **Paragraph 135** sets out that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development. Similarly, development should create places that maintain a high standard of amenity for existing and future users.

Paragraph 205 states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

London Plan (2021)

This document sets out the spatial strategy for London over the next 20-25 years.

Policy D4: ‘Delivering Good Design’ seeks to ensure that high standards of design are upheld throughout the planning process.

Policy D14: ‘Noise’ states that to improve health and quality of life, proposals should seek to mitigate noise without placing unreasonable restrictions on existing noise generating uses. Noise should be mitigated through sufficient acoustic design.

Policy HC1: *'Heritage Conservation and growth'* confirms that proposals affecting heritage assets should conserve or enhance their significance.

Camden Local Plan (2017)

Policy A4: *'Noise and Vibration'* 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.

Policy D1: *'Design'* states that the Council will seek to secure high quality design in development, but requiring development to respect local context and character, and preserving or enhancing the historic environment and heritage assets in accordance with Policy D2 Heritage.

Policy D2: *'Heritage'* states the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. To preserve or enhance the borough's listed buildings, the Council will:

- i. Resist the total or substantial demolition of a listed building;
- ii. Resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- iii. Resist development that would cause harm to significance of a listed building through an effect on its setting.

Policy D3: *'Shopfronts'* states The Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features. Consideration will be taken of the existing character, architectural and historic merit and design of the building and its shopfront.

Policy CC1: *'Climate change mitigation'* states 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.

Policy CC2: *'Adapting to climate change'* states all development should adopt appropriate climate change adaptation measures such as measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

Camden Planning Guidance – Amenity (2021)

Section 6 of the Camden Planning Guidance Amenity, published January 2021, gives guidance on noise and vibration.

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

This document states that the initial designation of Bloomsbury as a conservation area in 1968 sought to protect elements of development from the Georgian and earlier eras, but excluded areas where there had been significant later redevelopment. There have since been numerous subsequent extensions that have mostly reflected a growing appreciation of Victorian and Edwardian and high-quality 20th century architecture.

Planning and Heritage Assessment

i. Heritage

The application site is located within the Bloomsbury Conservation Area and sits on the ground and basement floors of the Grade II Listed building. Accordingly, these form the relevant heritage assets when assessing the scheme. The buildings listing describes the premises as follows:

'CAMDEN

TQ3081NW HIGH HOLBORN 798-1/100/830 (North side) 14/05/74 Nos.127 AND 129

II

Office block, now a bank. c1904. By H Percy Adams and Charles Holden. Portland stone with granite ground floor. 4 storeys and attic. 4 bays to High Holborn, splayed corner, 4 bay return to Southampton Place. Free Classical manner with rusticated pilasters between bays carrying sill string at 3rd floor level. Round-arched entrance on corner with bracketed stone balcony above. Architrave windows, those on 1st floor with broken cornices alternating with Venetian style. Bracketed cornice, above which attic. Corner surmounted by a turret. INTERIOR: not inspected.'

Noting the building's description, it is clear that the majority of its historic value lies above the ground floor. The description states the materiality of the ground floor to be granite, whilst the above floors are Portland stone. Additionally, the 'Architrave windows, those on 1st floor with broken cornices alternating with Venetian style. Bracketed cornice, above which attic. Corner surmounted by a turret'. The ground floor frontage is less significant, and whilst the 'rusticated pilasters between bays' cover all floors, the key historic value on the ground floor lies with the 'round-arched entrance on corner with bracketed stone balcony above'. Permission (ref. 2023/1550/L) has recently been granted for modern alterations to the ground floor exterior façade. The ground floor exterior façade has previously been granted permission for more modern alterations.

In any event, the external works proposed by this application are limited to the rear of the building and the roof, so will be hidden discretely away from any public views. Internally, the works simply consist of the ducting and pipe work required to connect the external plant to the kitchen/ fridge/ freezer. As such, the listed building and the wider Bloomsbury Conservation Area will not be undermined, or indeed, tangibly impacted by the proposals. The proposals adhere to heritage policies in respect of sustaining the listed building and will ensure the currently vacant premises can be put to a long-term viable use, enhancing the building and the wider area's economic vitality.

In the light of the above, it is not considered that there will be any detrimental impact on the relevant heritage assets – in fact, the proposals will offer heritage benefits by ensuring the building / premises can be put to a positive, productive long-term use.

ii. Amenity

Permission has already been granted for the air intake louvre (ref: 2023/1550/L). These applications seek permission for a new extract duct, an air intake louvre at the rear of the building at first floor level, 7no. double height AC condensers, and an air conditioning condenser at basement level. The extract duct will include silencers to ensure it does not cause unacceptable noise and will be placed to the rear of the building to avoid any possible odours entering neighbouring buildings.

The enclosed Plant Noise Impact Assessment undertook research to investigate the implications of the scheme; the Report concluded that cumulative noise from the new plant will comply with all relevant BRE guidelines.

iii. Visual Impact

It must be noted that the external plant will be placed to appropriately screen it from neighbouring properties. The extract duct will be placed at the rear of the building so that it is hidden, and the 7no. double height air conditioning units will be placed on the roof. Therefore, there will be negligible impact on the visual amenity of the listed building or surrounding Conservation Area.

Sustainability

Policy CC2 of the Local Plan sets out that the Council will seek to ensure that development is resilient to climate change. The Council states that all development should adopt appropriate climate change adaptation measures such as measures to reduce the impact of overheating, as set out in Policy CC2(d). Furthermore, the *Energy Efficiency and Adaptation CCG (2021)* states that 'Active cooling will only be permitted where its need is demonstrated and steps in the cooling hierarchy are followed.'

In this application's case, as cooking will be taking place at the site, as well as a cold storeroom, refrigeration and ventilation systems will be required. As a result of this, ensuring the equipment doesn't overheat will require air conditioning units. These units will be essential in ensuring an adequate temperature for dining. In some cases, adapting the building to effectively manage room temperature is a possibility, however, the application site is a Grade II listed building, making adaptations challenging, and therefore air conditioning units are a necessity. This is also inline with a number of restaurants in the vicinity.

Design and Access Statement

i. Use

The proposed plant equipment is required in conjunction with the restaurant use of the ground floor premises.

ii. Scale and Amount

This proposal does not affect the scale or quantum of development onsite.

iii. Layout

The kitchen extract duct will exit the roof of the ground floor rear extension, rising to the roof of the building where it terminates. The air intake louvre will be installed to the rear of the building at first floor level. Additionally, the 7 double height air conditioning condensers will be installed to the roof and the air conditioning condenser will also be installed at basement level on the southeast elevation.

iv. Appearance

All equipment is either to the rear of the building, on the roof, or the basement, so it will not visually impact the appearance of the building.

v. Access

Existing access arrangements to and from the site will remain unchanged by the application proposals.

Conclusions

In conclusion, we consider the proposals put forward by these applications are entirely appropriate to the significance of the listed building and its location within the Conservation Area and represent a significant investment on the part of our client. They will enable them to take occupation of this vacant listed building and ensure its long term viable, productive use, contributing to the economy and vibrancy of the surrounding area. Indeed, the proposals are in compliance with the Council's policies and guidance on design, amenity and conservation area management. They will bring a reputable and popular operator to the area, therefore enhancing the vitality of the wider area.

I therefore trust that you have sufficient information to validate and approve the application, however, should you have any queries then please do not hesitate to contact me. Otherwise, I look forward to discussing the application proposals with you in due course.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'firstplan' in a cursive, lowercase font.

MARK SHEARMAN
Director