

EH/OC/P08829  
10th January 2024

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

Dear Sir/Madam,

**22 Upper Woburn Place, London, WC1H OHW**

**Planning Application for installation of new front and side entrance doors, replacement of existing roof lanterns, installation of two new roof lanterns and installation of five new condenser units with associated acoustic enclosure.**

**Planning Portal Ref: PP-12695246**

On behalf of the applicant, Moreland Newman (UK) Limited, we write in support of a full planning application for proposed works of 22 Upper Woburn Place, London, WC1H, OHW.

In support of the application and for the Councils consideration, the following documents have been submitted electronically online via the Planning Portal:

- Application Forms – prepared by Rolfe Judd Planning
- Existing and Proposed Elevations – Prepared by Fresson & Tee Limited
- Environmental Noise Survey and Plant Noise Assessment Report – Prepared by Hann Tucker Associates
- Community Infrastructure Levy Form

**Site and Surroundings**

The terraced property is located on the Western side of Upper Woburn Place, between Woburn House and Endsleigh Court.

The application site area comprises only part lower ground and part ground floor of 22 Upper Woburn Place. The property is currently unoccupied, but was most recently used as offices (Class E). The previous tenant had been in place for a number of decades and this period of vacancy is the opportunity to refurbish and modernise the space. The lower ground and ground floors of this property has a dual/alternative use permitted for either offices (Class E) or educational facilities (F1).

The property is not listed; however, is located within the Bloomsbury Conservation Area. The site is also located within the Central London Area (CLA) and designated as a Protected Vista under the London View Management Framework (LVMF).

**OLD CHURCH COURT, CLAYLANDS ROAD, LONDON SW8 1NZ**

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Registered at the above address

### Relevant Planning History

The planning history available on Camden Council's planning records is limited, with the most relevant applications to this proposal listed in the table below.

Application Number	Description	Status
2007/0379/P	Retrospective application for three air condensing units on the rear wall at first floor in connection with existing offices, Class B1.	Granted 16/05/2007
2013/5203/P	Change of use of ground and lower ground floors from offices (Class B1) to a flexible use as either offices (Class B1) or education use (Class D1).	Granted 11/10/2013
2014/5207/A	The display of 1 x internally illuminated "FF" logo sign, 1 x non-illuminated "Freemans Solicitors" fascia sign to be displayed following the installation of 5 x advertisement panels over the existing entrance door.	Granted 22/09/2014

### Site Photos

Site photos of the property are provided below.

Property in need of modernisation and localised repair works	
Typical office space with existing ventilation units	Existing skylights

	
<p>Rear area where new skylights to serve lower ground floor space is proposed, along with new plant equipment</p>	<p>Lightwell area, taken from lower ground floor where AC units are proposed</p>

### Application Proposal

This proposal seeks to fully refurbish and modernise existing office floorspace, to ensure that its modern office requirements are met and avoid long periods of vacancy.

The refurbishment of the office floorspace will consist of the following elements listed below:

- Replacement of all existing roof lanterns to the lower ground floor;
- Installation of two new roof lanterns on the rear flat roof;
- Penetrations for WC extractor fans;
- Replacement of entrance doors (front, rear and lower ground floor and associated façade improvements;
- Installation of air conditioning through the installation of five new AC condensers and erection of associated acoustic enclosures.
- Full refurbishment and internal fit out.

For the purpose of the planning application, the proposal is described as:

*“Planning Application for replacement of new front and side entrance doors, replacement of existing roof lanterns, installation of two new roof lanterns and installation of seven new condenser units with associated acoustic enclosure.”*

### Skylights

As shown in the figure 1 below, the existing skylights that serve the north-western block of the lower ground office space will be fully replaced and two new roof lanterns will be installed to serve the south-western block of the lower ground office. The replacement and introduction of new sky lanterns at the rear will provide improved natural lighting for future officer users and the new double-glazed skylights will reduce heat loss and thus improve the overall sustainability of the building.

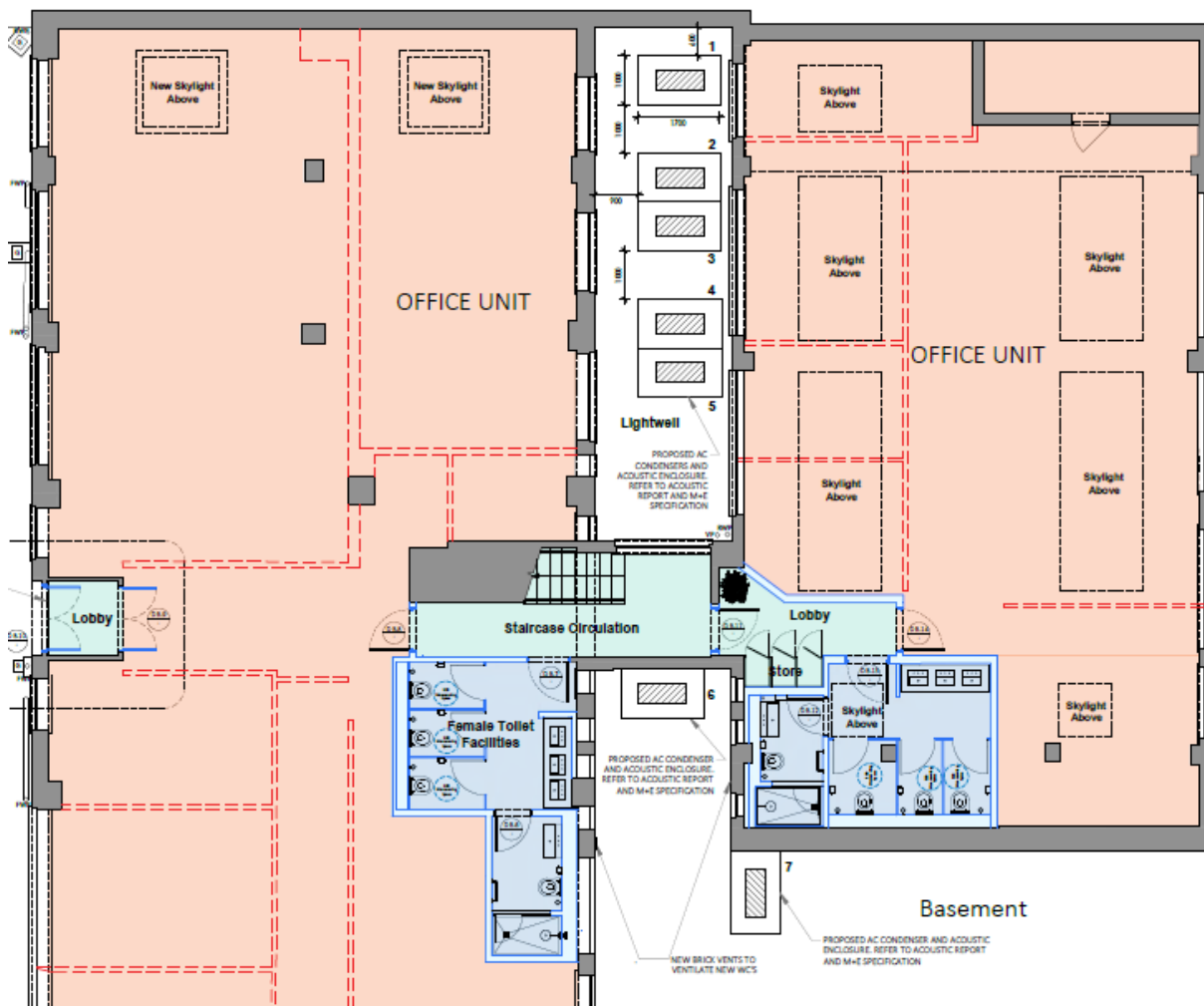


Figure 1: Floor plan drawing of lower ground floor showing locations of replacement roof lanterns and new skylights

### AC Condenser units

As shown in figure 1 above, this application seeks to install five proposed air condenser units in the rear lightwell of the building. The lightwell is fully enclosed and is not visible from street level or across wider views of the conservation area.

### Entrance improvements

The existing front and side entrance doors will be replaced with new Crittle doors that will have a mix of solid dark panels (RAL 9004) at the bottom and clear glazed panels at the top.

The front entrance will undergo a number of façade improvements with the installation of a external signage area within the existing recess, installation of a concealed security shutter, new recessed lighting, new rendered brickwork and the existing ramps to be refurbished with tiles.

The proposed side entrance door will be of the same style, but will have a fanlight installed instead of a signage area.



For further details regarding the entrances please see the submitted drawing nos. a-600-P1 & A-601-P1.

### **Policy considerations**

#### Land Use

The site has an existing flexible use as either offices (Class B1) or education (F1) use granted by planning application 2013/5203/P on 11<sup>th</sup> October 2013. The proposed alterations to the property would support the continued use of the space for office use and ensure that this use can be safeguarded in the future by providing modern higher quality office floorspace.

Policy E1 Economic Development of the Camden Local Plan (2017) seeks to maintain a stock of premises that are suitable for a variety of businesses activities, for firms of differing sizes. Part F of Policy specifically states that new office development should be directed to growth areas such as the Central London Area (CLA). As the proposals seek to maintain and enhance the existing office stock within the CLA it is therefore compliant with Policy E1 and the economic aims of the Camden Local Plan. As the Council will likely be aware, there has been a particular drive for high-quality office space since the Covid-19 pandemic, with poor quality office space proving very challenging to let. Modernisation of the office space is therefore economically essential.

#### Design and Heritage

As the site is located within the Bloomsbury Conservation Area and is in close proximity to several Grade II Listed Buildings, the proposal has been sensitively designed to preserve the character and setting of the heritage assets.

The Bloomsbury Conservation Area was initial designated in 1968 and sought to protect elements of development from the Georgian and earlier eras. Since the original designation the conservation area has been amended to reflect a growing appreciation of Victorian and Edwardian and high quality 20<sup>th</sup> century architecture.

The site is located within Sub Area 6 of the conservation area, which is characterised by three-four storey late 18<sup>th</sup> and 19<sup>th</sup> Century terraces, surrounding a sequence of linked formal spaces, namely Bloomsbury Square, Russel Square and Tavistock Square. The site is located in the Tavistock Square Area, where there is a greater number of large-scale 20<sup>th</sup> Century buildings and prevalence of hotel uses. There is some consistency in the use of materials: red brick with stone dressings predominates, reflecting the facade of the British Medical Association building in Tavistock Square, although later buildings employ a sizeable amount of concrete. With the exception of the fine examples of the BMA, and Woburn House on the north side of Tavistock Square, the buildings facing the north, east and south sides of the square are all representative examples of mid 20th century commercial and residential architecture, and by virtue of their scale, facing materials and design sit comfortably in their context.

Policy D1 Design of the Camden Local Plan (2017) requires that development:

- A. Respects local context and character;
- B. Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- C. Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- E. Comprises of details and materials that are of high quality and complement the local character;
- F. Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the

- street frontage;
- G. is inclusive and accessible for all;
- I. is secure and designed to minimise crime and antisocial behaviour;

Policy D2 Heritage of the Camden Local Plan (2017) states that the council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. For applications within Conservation areas that council will:

- E. Require that development within conservation areas preserve or, where possible, enhances the character of appearance of the area;

The majority of the elements of this proposal are internal or are located to the rear of the property and as such will not be viewed from either street level or across longer views across the conservation area. The proposed changes to the front entrance of the site, will use high quality materials that respect the local context and improve the legibility and visibility of the site. The side entrance will retain the existing ramp and the front entrance will remain step free, to ensure that the building is accessible to all users. The concealed security shutter will provide greater security to the building and will ensure that the street frontage will remain attractive and fit in with the wider conservation area.

Overall, the proposal has been carefully designed to ensure that it preserves and enhances the conservation area and complies with the relevant design and heritage policies.

### Amenity

Paragraph 191 of the NPPF (2023) states that:

*"Planning Policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

- a) *Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life*
- b) *Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.*

Paragraph 193 of the NPPF (2023) states the following:

*"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.*

Policy A4 Noise and Vibration of the Camden Local Plan (2017) states that development should have regard to Camden's Noise and Vibration Thresholds (Appendix 3). We will not grant planning permission for:

- 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 policy goes on to state 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”.

An Environmental Noise Survey and Plant Noise Assessment Report prepared by Hann Tucker Associates has been submitted to support this planning application. The assessment recommends that an individual or combined acoustic enclosure is installed to ensure that the proposed plant units are in line with the Local Authority requirements. The results of the assessment conclude that the proposed plant machinery, in conjunction with the recommended attenuation (described above) should be capable of achieving the proposed environmental noise criteria at the nearest noise sensitive windows in line with the requirements of the Local Authority.

The accompanying report thus demonstrates that the proposal is in line with the NPPF (2023) the Local Plan (2017) and all other relevant noise criteria.

### Summary

The proposal seeks to modernise existing office floorspace by improving the front and side entrances, improving the sustainability of building and provide enhanced lighting condition by the install of roof lanterns, and the installation of air conditioning.

The proposals have been carefully designed to ensure that they preserve and enhance the character and appearance of the conservation area. Furthermore, as demonstrated by accompanying Environmental Noise Survey and Plant Noise Impact Assessment Report, the proposed plant machinery can achieve the required noise standards through the recommended mitigation measures.

We trust the information provided is sufficient for the Council to validate the application and we look to a swift and positive outcome. Should you have any queries, please do not hesitate to contact the undersigned.

Yours faithfully,

*Ellis Heath*

Ellis Heath / BSc (Hons) MA  
Rolfe Judd Planning Limited

10th January 2024