

Our Ref: 24228/MS/gc
Your Ref: PP-13153264
Email: mshearman@firstplan.co.uk

Broadwall House 020 3096 7000
21 Broadwall info@firstplan.co.uk
London SE1 9PL firstplan.co.uk

13 June 2024

London Borough of Camden
Development Management
Camden Town Hall
Judd Street
WC1H 9JE

Dear Sir/Madam,

PLANNING APPLICATION FOR THE INSTALLATION OF EXTERNAL PLANT – 1 WOBURN PLACE, RUSSEL SQUARE, LONDON, WC1H 0LQ

We have been instructed by our client, Farmer J Ltd., to submit the enclosed application online via the Planning Portal (ref: PP-13153264) for the installation of a comprehensive heating, cooling, ventilation and extraction system at the above address. The proposed HVAC equipment includes an extract duct, 4 no. extract fans, 4 no. AC condensers, 1 no. catering condenser, and an air handling unit, with the condensers positioned in the buildings front lightwell and the kitchen extract to discharge at high level to the rear. The plant will serve the ground floor commercial unit and enable our client to establish the site as a Farmer J restaurant.

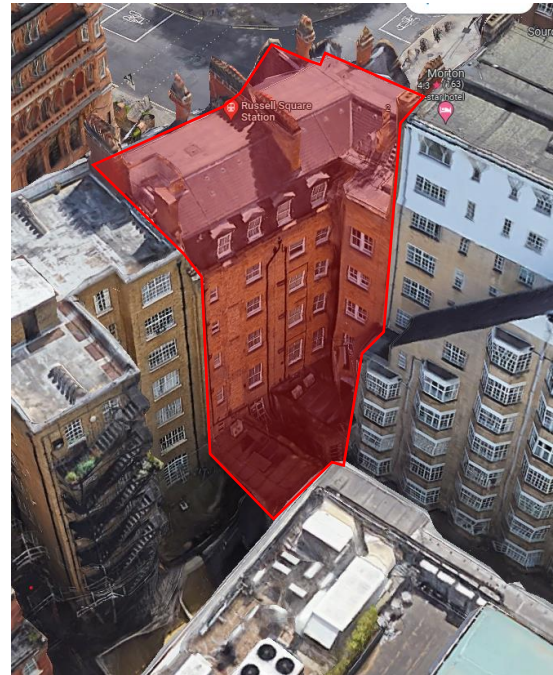
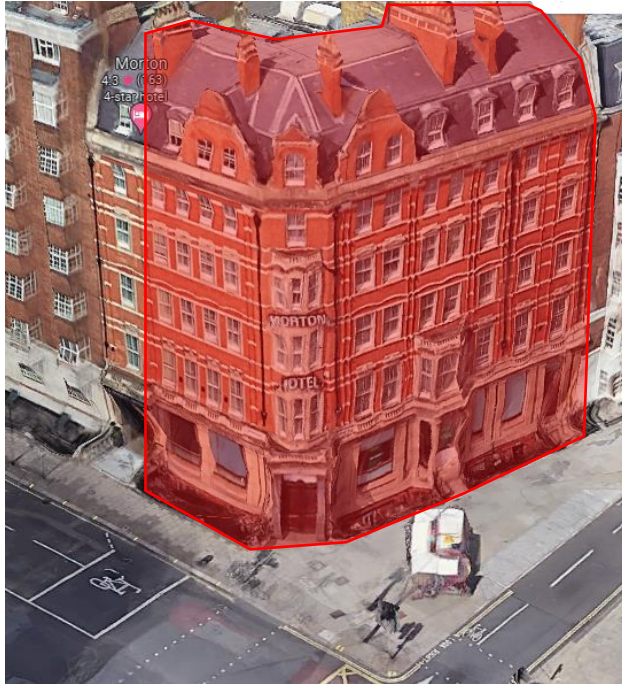
In accordance with national and local validation requirements the following documents are enclosed in support of the application:

- Completed Application Forms;
- Completed CIL Forms;
- Planning and Heritage Statement – included within this letter;
- Acoustic Report – prepared by ACA Acoustics;
- Fire Safety Statement – included within this letter;
- Site Location Plan;
- Bock Plan;
- Existing Ground Floor Plan (drawing no. 01000);
- Existing Fourth Floor Plan (drawing no. 01001);
- Existing Basement Plan (drawing no. 01099);
- Existing Sections (drawing no. 02000);
- Existing Elevations (drawing no. 03000);
- Proposed Ground Floor Plan (drawing no. 21000);
- Proposed Fourth Floor Plan (drawing no. 21001);
- Proposed Basement Plan (drawing no.21099);
- Proposed Sections (drawing no. 22000);
- Proposed Elevation (drawing no. 23000);

The requisite planning fee of £578 + £70 admin fee has been paid online via the planning portal. The remainder of this letter sets out the relevant planning considerations in respect of the application.

Site Background

The site comprises a vacant commercial unit on the northeastern corner of Russel Square, sitting at the intersection of Woburn Place and Bernard Street. The unit was formally occupied by a bank but has sat vacant since 2021 when HSBC vacated the premises. It is positioned at ground and basement floors of the building, with the Morton Hotel occupying the upper floors. Aerial images of the site from the front and rear elevations are provided below at Images 1 & 2.



The ground floor frontage features a traditional stone design, reflective of its former bank use. The main access doors are positioned on the corner of the building, with glazed shopfront windows on either side that are set back from the street by way of lower ground floor lightwells to the front of the property, which are positioned behind black metal fencing and screened from public view. The lightwell on the Bernard Street accommodates 3 no. condensers on the left-hand side which serve the hotel on the upper floors, however the right-hand side lightwell is empty, and accordingly it is proposed to provide some additional condensers within this space to serve the ingoing restaurant at ground and basement level.

To the rear of the building there is a ground floor extension with a flat roof. This area is characterised by plant etc. and there is an existing duct that exits the roof and runs up the rear projection of the building to the seventh floor for high level discharge. It is intended to provide additional fans here for the extract duct and air intake louvres.

The property is not listed; however, it is located within the Bloomsbury Conservation Area and sits directly opposite the grade II* listed Russel Hotel. Accordingly, special care has been taken to ensure the plant proposals do not cause any harm to the designated heritage assets. The site is also located within the Central Activity Zone, where commercial development of this nature it encouraged.

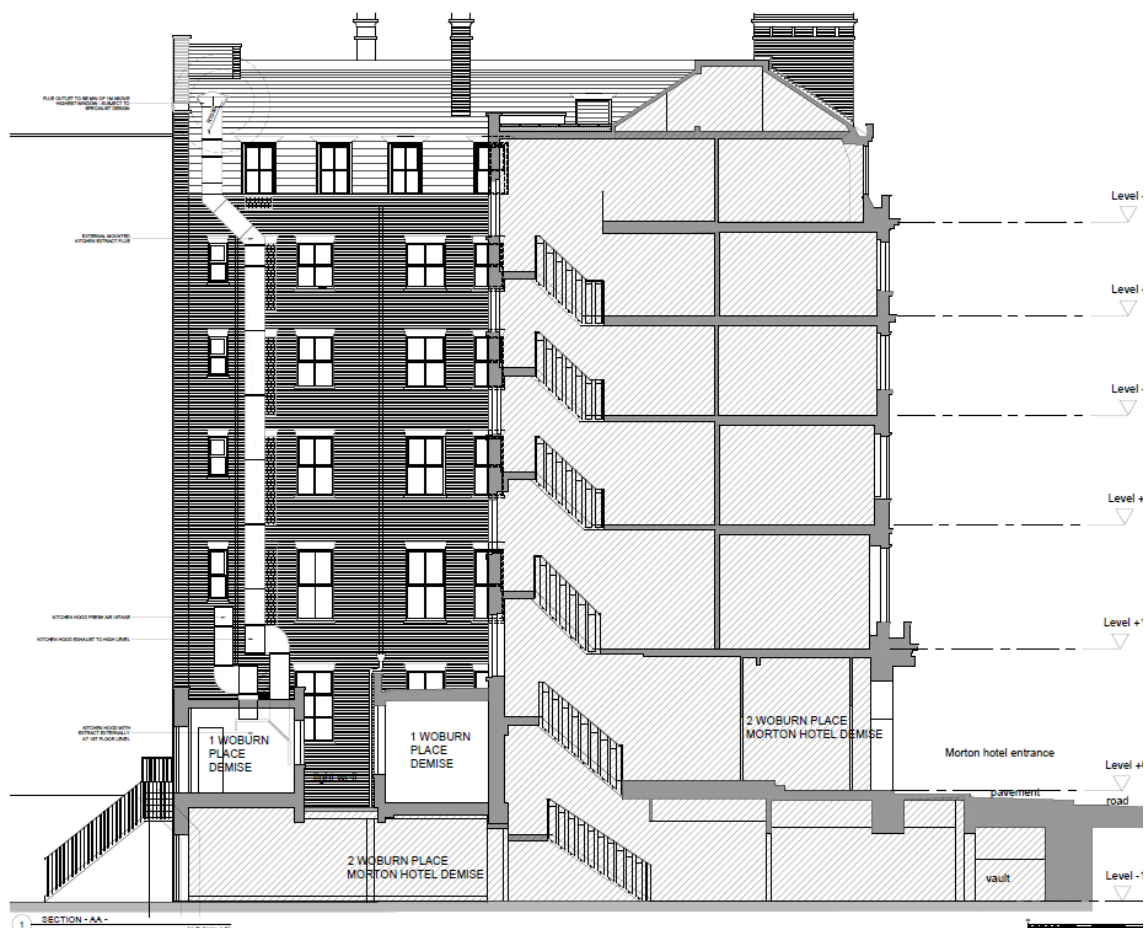
Planning History

The site features a limited planning history owing to its longstanding use as a bank. The planning history of relevance to the application proposals is set out below:

- In 1979, permission was granted for the change of use of the basement and ground floor from a hotel to a bank (ref: 29049);

- In December 2015, permission was granted for replacement ATM machines and associated works (ref: 2015/5049/P);
- On 16th March 2023, a Certificate of Lawfulness was granted confirming the property falls within commercial Class E (ref: 2022/37686/P);
- In March 2012, the Morton Hotel (who have their entrance at no. 2 Woburn Place but occupy the upper floors of the building) were granted permission for the installation of 3 no. condenser units in the basement lightwells to the front of the application site (1 Woburn Place), as well as the infilling of the rear courtyard at basement level to provide additional office floorspace (ref: 2013/0572/P). This approved some condensers within the lightwell to the front of the property;
- In July 2023, permission was granted for the reinstatement of entrance doors on Bernard Street as well as the installation of a kitchen extract flue to the rear of the building (ref: 2022/3781/P). This application was submitted by the landlord in order to ensure the unit was ready for an ingoing restaurant/bar operator, and establishes the principle of an extract duct within this section of the rear elevation. The applicant is seeking to utilise this duct, but is proposing some additional fans and louvres to ensure it meets their operational requirements, as set out within the following section of this letter. The approved duct can be seen below at Image 3.

Image 3 Approved rear extract duct



- Most recently, on the 28th of May 2024, permission was granted for the replacement of the existing timber frame shopfront and glass louvre fins on the Woburn Place and Bernard Street elevations with power coated aluminium framed shopfronts and louvres (ref: 2023/0904/P). This application was submitted by the landlord and will ensure the dated timber frontage is updated to meet the applicants' requirements as the ingoing tenant

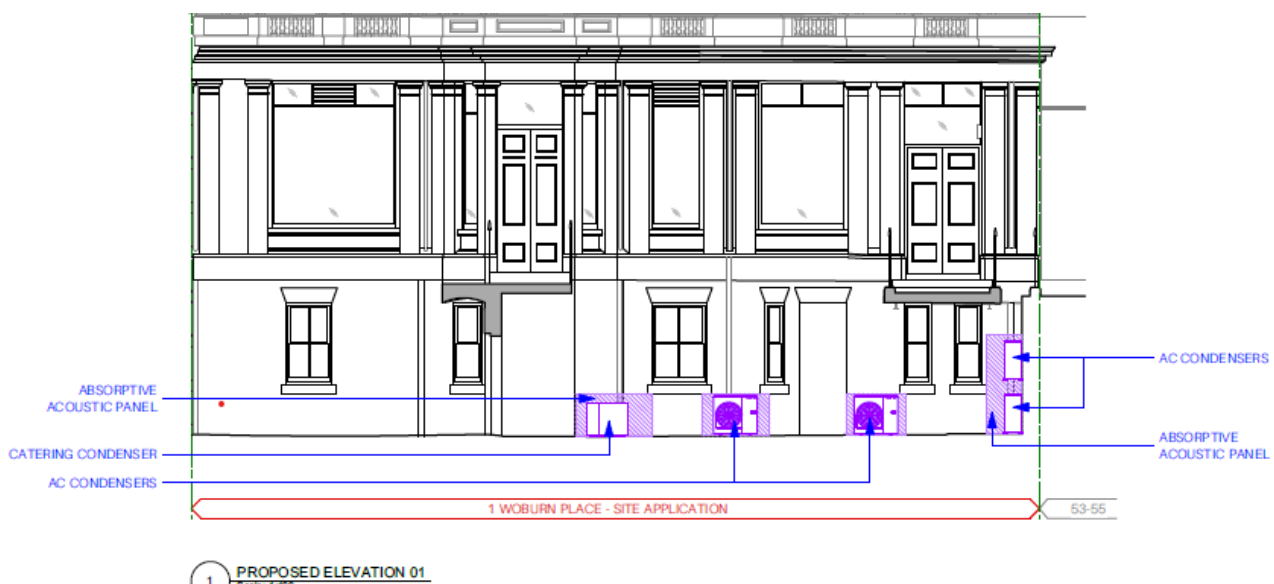
The site has been stripped back internally and is ready for an ingoing commercial operator. This application seeks consent for external signage, so that Farmer J can customise the unit in line with their branding requirements and will be supported by an application for HVAC to serve the restaurant and kitchen in due course.

Application Proposals

This application seeks planning permission for the installation of external plant within the front lightwells of the building and to the rear, so that Farmer J can take occupation of the vacant commercial unit and begin trading it as a restaurant. Specifically, permission is sought for the provision of 4 no. AC condensers and 1 no. catering condenser within the lightwell to the front of the property, and for the installation of attenuator and extract fans to the approved duct on the rear elevation and an air intake louvre – to provide the kitchen with fresh air intake and outtake.

The condensers will be positioned at lower ground floor level within the external lightwell on the Bernard Street elevation. They are to be positioned on the right-hand side of the lightwell, which is currently empty, and will comprise of 2 no. stacked AC condensers, 2 no. individual AC condensers, and 1 no. catering condenser – with them all appropriately housed within acoustic enclosures. The proposed condenser layout can be seen below at Image 4.

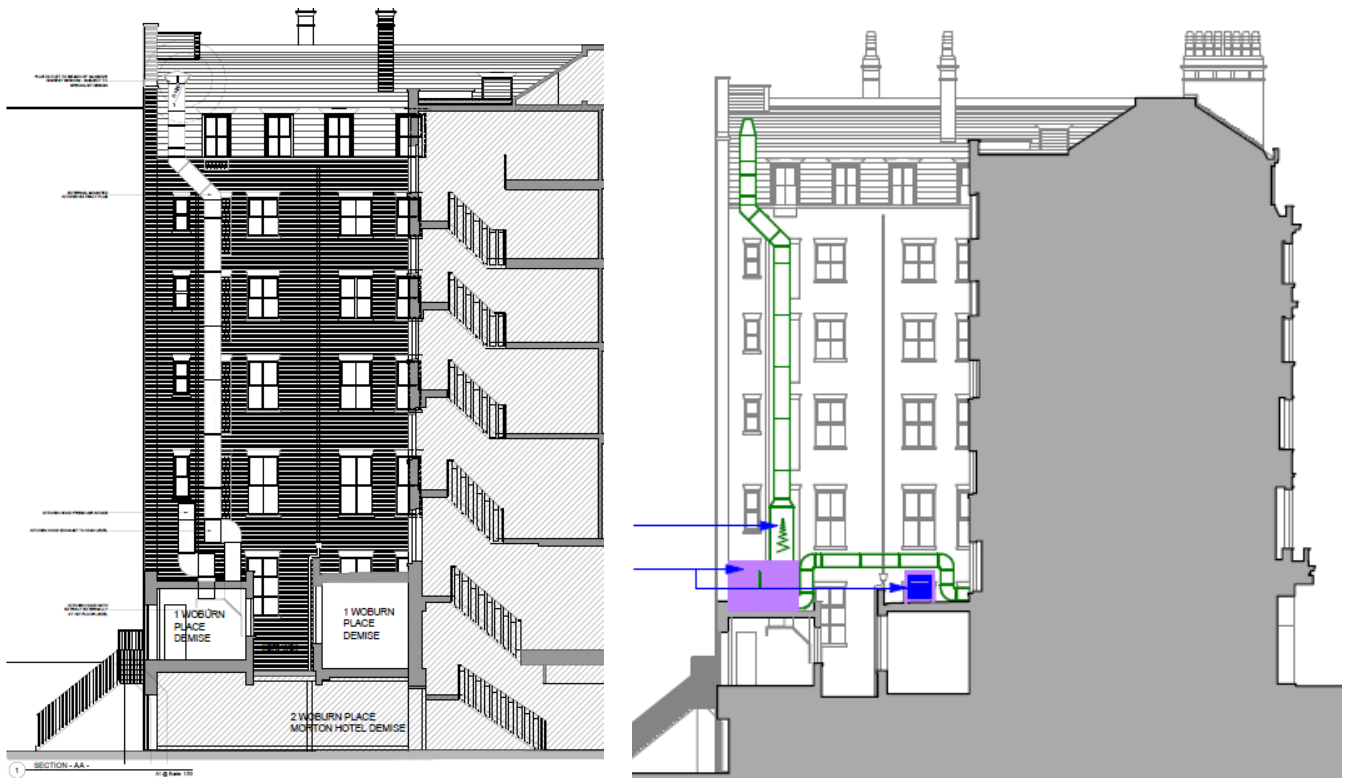
Image 4 Proposed Condensers within front lightwell



To the rear of the building, it is proposed to provide additional fans and attenuation to the extract duct approved under application 2022/3781/P, so that the duct meets Farmer J's operational requirements and satisfies environmental standards.

The approved duct will run up the rear elevation of the building in exactly the same location, however it is proposed that the duct will exit a slightly different point of the rear projection (so that it is closer to the kitchen), and that there will be additional fans, acoustic enclosures, and attenuators to ensure noise and odour breakout is limited, and that air can adequately pass through the duct to be discharged at high level. It is also proposed to include an air intake louvre at rear first floor level which will serve the restaurant. Overall, the physical changes are minimal, but will ensure the rear plant arrangement works for the applicant. The approved rear plant, and proposed additional mitigation can be seen overleaf at Images 5 & 6.

Images 5 & 6 Approved rear duct (left) and proposed rear plant arrangement with air intake louvre and additional mitigation (right)



Following recommendations from the applicant's acoustic consultant, noise attenuation elements have been incorporated into the proposed scheme (as shown on plans and detailed within the acoustic report). Of note, it is proposed that the condensers will be positioned within acoustic enclosures to restrict noise breakout, and that the duct will be fitted with mounted attenuators and vibration isolators. This will ensure noise/odour breakout from the equipment is limited and the proposal does not negatively impact neighbouring amenity.

The HVAC proposals can be seen in full within the accompanying drawing pack prepared by Holland Harvey architects.

Planning Policy

The statutory development plan for Camden consists of the Camden Local Plan (2017), the Proposals Map (2017) and the Camden Planning Guidance. The relevant policies are discussed below.

Policy G1 outlines that the Council will support development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.

Policy D1 confirms the Council will seek to secure high quality design in development. Specifically, it is required that development (inter alia):

- is sustainable in design and construction;
- respects local context and character;
- preserves or enhances the historic environment and heritage assets;
- uses details and materials that complement the local character;
- integrates well with the surrounding streets, and contributes positively to the street frontage;
- preserves strategic and local views;
- provides a high standard of accommodation for housing.

Policy D2 seeks to protect and, where appropriate, enhance the character and appearance within conservation areas.

Policy A1 states that the quality of life for both occupiers and neighbours will be protected. When assessing new applications, the Council will consider:

- Visual privacy and outlook.
- Sunlight, Daylight and Overshadowing.
- Artificial lighting levels.
- Impacts of the construction phase.

Heritage Assessment

The application site is not statutorily listed, however it is located within the Bloomsbury Conservation Area. As such, the Bloomsbury Conservation Area Appraisal forms the relevant heritage guidance for consideration within this application.

The site is located within the Bloomsbury Square, Russel Square, and Tavistock Square sub area of the conservation area which is characterised by large attractive buildings set out amongst spacious public squares. Russel Square, where the site is located, is described as being the largest of Bloomsbury's squares and is recognised for its sense of openness in the Conservation Area with views of landmark buildings in all directions. The CA appraisal recognises that the space is defined by cast-iron boundary railings which divide the space from building frontages. There is no specific reference to the application site itself, however the grade II* listed hotel on the other side of the street is highlighted for its French renaissance style architecture which forms a prominent landmark building.

Noting the site's position within the conservation area, the works have been carefully designed to ensure there is no harm to the attractive frontage of the property, or which would impact the spacious qualities of Russel Square. The condensers have been positioned within the front lightwell where they are entirely hidden from public view, and will not harm the original cast-iron boundary in any way. The remaining plant is positioned to the rear of the building, in an already established plant area – and will also be entirely hidden from street level and will not be visible from the wider Conservation Area due to the concealed position of the lower ground floor rear extension. The proposals will not harm the ornate features on the front of the building or detract from the grade II* listed Russel Hotel, therefore having no negative impact on the conservation area. Rather, the proposals will bring the commercial space back into a productive viable long-term use that will enhance the vitality and viability of the Conservation Area to its benefit. They will enable this vacant bank building to be truly celebrated, opening the interior up to members of the public, and should therefore be welcomed.

Planning Assessment

The key planning considerations to this application relate to the impact the proposed plant will have on the setting of the host building and surrounding conservation area in design and heritage terms, and the implications of the external plant on the surrounding amenities.

With regards to external appearance, the proposals have been designed and positioned to minimise visual intrusion. This has been achieved through restricting the plant as much as possible to the inside of the building, with the only external plant, as detailed on the plans, comprising of the condensers within the front lightwell, and the additional fans, acoustic enclosures, and attenuators to the approved duct on the rear elevation, as well as the provision of an air intake louvre. The condensers in the front lightwell will be completely hidden from view to members of the public passing by, with it only possible to view them by leaning over the high metal gates enclosing the lightwell – which act as a good natural screen. To the rear, the approved duct will remain in its approved location, which is tucked away from public views and vantage points, particularly within the wider Conservation Area. It is fixed to the rear projection of the building, away from any sensitive windows, and will remain exactly as it is. The application simply seeks to provide additional fans and attenuators to the duct so that it suits the applicants' operational requirements, however these will all be

positioned at the base of the duct on the rear first floor projection, in an established plant area that is entirely screened. It is therefore considered that the sensitively designed plant is entirely acceptable in design terms with regard to causing no harm to the character and appearance of the Conservation Area.

The proposed locations of the plant, within a hidden front lightwell, and on a rear first floor projection that is an established plant area, therefore represent an ideal location for HVAC – and will ensure the unit is ready for Farmer J to operate and serve their kitchen. Overall, it is considered that the proposals are of the highest quality design and accord with Camden design policies D1 & D2, and London Plan Policy D4.

In order to demonstrate that the proposed extract, air intake and condensers will not have any detrimental impact on neighbouring amenities, an acoustic survey has been undertaken and a noise impact assessment has been prepared by ACA Acoustics in support of this application. This has taken consideration of the nearby Morten Hotel on the upper floors of the building, as well as other sensitive receptors, and confirmed that during its operation the plant, when installed with recommended mitigation measures, will not cause any undue disturbance to nearby residential properties. Appropriate mitigation will be provided to assist in achieving recommended noise levels, including duct mounted attenuators for the fans, heavily insulated 'EF1 & AHU1' Acoustic enclosures for the condensers, absorptive acoustic panels for the condensers, and vibration isolators - which the applicant is committed to installing. The proposal will not therefore have any negative impact on the neighbouring buildings. The results of the noise assessment also adhere with the Council's standards and requirements on noise control.

The proposal is, therefore, a well-considered, and entirely necessary solution to ensure the required extraction of the restaurant use. Much of the ducting and other elements of the HVAC system are contained internally or have already been approved, with the remaining elements limited to the front lightwell (that is well screened) and the already established rear plant area, where they are screened and positioned away from any sensitive receptors. Accordingly, the proposal is considered to fully comply with the aforementioned national and local policies and guidance documents, and will not have any consequential impact on residential amenities and should therefore be supported.

Conclusion

In conclusion, we consider the proposals put forward by this application as entirely appropriate to the significance of the site and represents a significant investment on the part of our client. The plant equipment will ensure the necessary environmental standards are met. Indeed, the proposals are in compliance with the Council's policies and guidance on design and amenity. They will bring a reputable and popular operator, Farmer J, to the area, bringing this prominent corner unit back into an active use and ensuring its long term viability – whilst also enhancing the vitality of the Camden area.

Further to this, the Noise Impact Assessment submitted in support of this application demonstrates that the noise levels accord with the Council's limits and will subsequently have no detrimental impact on neighbouring amenities.

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,



MARK SHEARMAN

Director