

JHM/TP/DP3194

04 March 2015

Planning Department  
London Borough of Camden  
Town Hall  
Argyle Street  
London  
WC1H 8ND

Dear Sir/Madam



DP9 Ltd  
100 Pall Mall  
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700  
facsimile 020 7004 1790

[www.dp9.co.uk](http://www.dp9.co.uk)

**HIGH HOLBORN HOUSE, 52-54 HIGH HOLBORN, LONDON, WC1V 6RL  
TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)**

On behalf of our client, MPG Holborn 2 Ltd, we submit an application for planning permission.

The development description is as follows:

*“Removal of existing plant and installation of 14 x heat recovery units at, ground, fifth and seventh floor”.*

The application is supported by the following documents:

- Cheque made payable to the London Borough of Camden for £385;
- Four copies of the completed application forms, certificates and schedules;
- Four copies of the completed Community Infrastructure Levy Additional Information Requirement form;
- Four copies of drawings prepared by Buckley Gray Yeoman Architects; and
- Plant Noise Assessment Report prepared by Sandy Brown Associates, dated 24<sup>th</sup> February 2014.

***The Site***

The site is located in Holborn, to the West of Grays Inn Road and to the East of Kingsway. The site is located on the north side of High Holborn and the main elevation faces due south. High





Holborn House is a 7-storey office building with a single basement level located on High Holborn. It is not a listed building, but it is located in the Bloomsbury Conservation Area.

### ***Planning History***

There have been various applications made for this property over the years. The applications of relevance are as follows:

- On the 14<sup>th</sup> August 2013 permission was granted for the installation of a metal balustrade to 5th floor roof for provision of terrace and replacement of 2 windows for door access (ref. 2013/3370/P).
- On the 29<sup>th</sup> January 2014 planning permission was granted for the installation of 7 x air-conditioning units at 1st, 5th and 7th floor levels (retrospective) (ref. 2013/7494/P).
- On the 9<sup>th</sup> April 2014 under the ref. 2014/1159/P permission was granted for the extension into internal lightwell at first floor level and installation of 3 x AC units at basement level.
- On the 10<sup>th</sup> July 2014 under the ref. 2014/2453/P permission was granted for the Installation of 2 x air-conditioning units in basement level lightwell.
- On the 23 October 2014 under the ref. 2014/4318/P permission was granted for the Installation of metal balustrade to provide 6th floor roof terrace, installation of 8 x air conditioning units and 7 x heat pumps at basement, ground, first, fifth and seventh floor.

### ***The Proposals***

The proposal is to remove a total of twenty redundant condenser units and providing fourteen new heat recovery units at High Holborn House serving several newly refurbished office floors.

As stated above, planning permission was granted for 15 condenser units (8 x air conditioning and 7 x heat pumps) in October 2014. These condensers were the incorrect specification and location for the optimum usage throughout the building. As such, this application is intended to supersede the previous application for the purposes of implementation.

The new heat recovery units are proposed to be installed in various locations at ground, fifth and seventh levels to best function for the office floors they serve. Six units are to be located at the ground floor at the base of the light well; five are to be located on the 5th floor roof terrace and three on the 7th floor roof.

Further details on the proposed items of plant and their locations are provided on the drawings and Plant Noise Assessment Report submitted in support of this application.

### ***Planning Policy Framework***

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts should be made in accordance with the Development Plan unless material considerations indicate otherwise.

### ***Development Plan***

The Development Plan for the Site is the London Plan (2011); the London Borough of Camden Core Strategy (2010) and Camden's Development Policies (2010).

### ***Local Planning Policy***

#### The Core Strategy

Camden's Core Strategy was adopted at a Full Council meeting on 8 November 2010. The Core Strategy sets out the key elements of the Council's vision for the borough and is a central part of their Local Development Framework (LDF).

#### Development Policies

Camden's development policies set out detailed planning criteria that the Council uses to determine applications for planning permission in the borough.

#### Bloomsbury Conservation Area Appraisal and Management Strategy

The site falls within Sub Area 9 that includes Lincoln's Inn Fields, Inns of Court and High Holborn. The Strategy states the following about High Holborn House, *'Designed by the architect George Vernon, the six storey neo-classical front is surmounted by a mansard attic*



*storey, and the entrance is emphasised by a double-height arched opening with a balconette on the central window above' (page 71).*

14–19 Flank of High Holborn House is described as making a positive contribution to the Bloomsbury Conservation Area (page 141).

### ***Planning Policy Assessment***

Policy at a national, regional and local level calls for new developments to demonstrate good design. Paragraph 58 of the NPPF states that decisions should aim to *'respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation'*. Paragraph 131 of the NPPF states that in determining planning applications local planning authorities should take account of *'the desirability of new development making a positive contribution to local character and distinctiveness'*.

Development Policy 12 (DP12) states that to manage potential harm to amenity or the local area, the Council will, in appropriate cases, use planning conditions and obligations to address noise/vibration, fumes and the siting of plant and machinery.

Policy DP24 states that the Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design. The policy requires that developments consider character, setting, context and the form and scale of neighbouring buildings and that they consider the character and proportions of the existing building, where alterations and extensions are proposed. The supporting text to the policy states that building services equipment, such as air cooling, heating, ventilation and extraction systems, ancillary plant and ducting should be contained within the envelope of a building or be located in a visually inconspicuous position.

Policy DP25 of the Development Policies states the Council will only permit development within conservation areas that preserves or enhances the character and appearance of the area.

Policy DP28 states that the Council will only grant permission for plant or machinery if it can be operated without cause harm to amenity and does not exceed our noise thresholds.

The six proposed condenser units at ground floor level are located within a lightwell which is fully enclosed in all sides and therefore will not permit any views of the condensers from any of the surrounding streets.

At fifth floor level five new units are proposed. These will be set back sufficiently from the parapet wall to avoid being seen from street level.

At seventh floor level three new condensers will sufficiently set back from the parapet wall to avoid being seen from street level.

On this basis it is considered that the proposed condenser units will be located in visually inconspicuous positions and therefore will preserve and enhance the appearance and character of the existing building and the wider conservation area. The condenser units will also not exceed the Council's noise thresholds and will not cause harm to amenity. As such the proposals comply with the aims of Core Strategy Policy CS15 and Development Policies DP12, DP24, DP25 and DP28.

***Conclusion***

These works are considered to be minor; will not cause harm to amenity and the condenser units will be located in visually inconspicuous positions in order to preserve and enhance the character and appearance of the Bloomsbury Conservation Area and therefore comply with the Council's planning policies at all levels.

We look forward to confirmation that the application has been registered. Should you have any queries please do not hesitate to contact Jonathan Marginson or Thomas Price of this office.

Yours faithfully

A black rectangular box redacting the signature of the sender.

**DP9**

Encs.