

From: Bloomsbury Association <bloomsbury@me.com>
Sent: 10 May 2015 23:25
To: Planning
Cc: Chairman@BCM Spyker; Mark de Rivaz; Robert Bargery;
ajsjennings@hotmail.com; Ampoma, Nanayaa; Bloomsbury
Association
Subject: APPLICATIONS FOR PLANNING PERMISSION 2015/1284/P,
2015/1719/P

53 BEDFORD SQUARE

LONDON WC1B 3DP

Applications for planning permission: 2015/1284/P, 2015/1719/P

Applications for listed building consent: 2015/1633/L, 2015/2077/L

The Bloomsbury Association object to these applications and wish to make the following comments.

- 1 The broad principles established in national policy and guidance on the historic environment are reflected in the London Plan. Its policies seek to ensure that the protection and enhancement of historic assets in London is based on an understanding of their special character, and form part of the wider design and urban improvement agenda. The characteristics of 21st century air-conditioning units are not compatible with a policy that seeks to protect these values nor are they compatible with the 'presumption in favour of sustainable development' through which development decisions will be made on the basis of national policy enshrined in the Localism Act 2011. They also fail to meet the objectives of PPS 5 and Policies DP24 and DP25 of the Council's Local Development Framework.

It is a wider precedent that is causing us such concern here and that is the proliferation of highly visible and audible external air conditioning equipment in recent planning applications for listed buildings in the Bloomsbury Conservation Area. We have argued that these buildings are of high thermal capacity, were purpose designed for natural ventilation and do not need air-conditioning. To propose otherwise is contrary to the objectives of Policies DP24 and DP25 of the Council's Local Development Framework.

Often the internal building services installation is designed sympathetically but its external impact is always a concern. The effect on the setting of the listed building, its asset value in the public realm and its impact on the conservation area are often ignored, which is contrary to the principles established in PPS5. The current proposal for external air conditioning does not include for these nor does it reflect the high standards of design required by Policy DP22 and that the Association expects for alterations to a listed building in the Bloomsbury Conservation Area.

There is a long history of noise nuisance associated with external air-conditioning equipment in this area, dating back to 1997. Noise emissions from equipment serving the St Giles Hotel have been regularly monitored by the Council's Environmental Health Team and have been found to be at a level that constitutes a statutory nuisance. A Noise Abatement Notice was served in December 2000 under the Environmental Protection Act 1990 / Noise and Statutory Nuisance Act 1993 in order to protect the amenity of residents directly opposite in Bedford Court Mansions. An application to install air conditioning equipment in the basement of 40 Bedford Square has been approved (2011/1716/P), despite objections from neighbours.

With this background, the Association consider that is inappropriate for further external air-handling equipment to be added that may compound what is already a severe problem by further degrading the noise climate, particularly on the roof of a building directly opposite residential buildings. Whilst this solution might be expedient, it should not be considered in isolation. Local residents are suffering from the expediencies of the past and a more holistic approach is now needed.

- 2 We are very concerned about the positioning of the proposed extract equipment and air-conditioning condensers at roof level on the Bedford Avenue 'mews' frontage of 53 Bedford Square. Our concerns are three-fold: the visibility of roof mounted plant from taller buildings such as the main grade I listed house at 53 Bedford Square, from Bedford Court Mansions and from other grade II listed houses on the eastern side of Bloomsbury Street; noise emissions and their impact on adjacent residential uses, and the precedent that all this will set.

The application documents include a noise survey and plant assessment report that is submitted in support of the proposal. It concludes with the comment that noise emissions from the air-conditioning equipment can be controlled with the use of specialist acoustic enclosures but as the services design is only 'conceptual', no details are provided. Whatever your views might be on the energy responsibility of installing

air-conditioning in a Grade I listed Georgian building that was purpose designed for natural ventilation and is shaded from sun by trees on its south side, the lack of any definitive proposals for designing out noise emissions is our principal reason for objection, particularly as the provision of a noise rated enclosure to equipment at roof level would increase its visual prominence.

We understand that Camden guidance is that noise levels adjacent to residential uses should be measured at 1m external to a sensitive façade and not in a sheltered courtyard 'on site'. Furthermore, the report indicates that some background noise levels were measured on weekdays when the noise of passing vehicles on the street is at its greatest. Weekend levels should be the base line.

The noise impact assessment considers the impact on residential uses in Bedford Court Mansions and makes proposals for sound attenuation in order to mitigate noise emissions. It does not consider the impact on residential buildings that are closer, indeed directly opposite, on the eastern side of Bloomsbury Street. We are therefore sceptical of its conclusions. This is contrary to LDF Policies DP 26, DP27 and DP28. DP26 states '*The Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.*'

No conclusive design information is provided to confirm that noise emissions from the equipment will be contained within permitted limits when heard from the nearest residential buildings as required by Development Standard DS6 of the Council's UDP and LDF Policies DP26 and DP28. Given the proximity of adjacent residential buildings on Bedford Avenue and Bloomsbury Street, whose amenity will be directly affected, the application should not be accepted on this basis.

The Association supports good quality design that will enhance Bloomsbury's townscape. In its present form we are concerned that this proposal may not meet the high standard required by Policy DP30 and we look to the Council to refuse the applications. If further information/clarification is sought from the applicant, we would wish to be consulted on any revised proposals.

We would be grateful if you would let us know of the officer recommendation, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee.

Stephen Heath
On behalf of the Bloomsbury Association

Copies to:
Chair, Bedford Court Mansions
Steward, Bedford Estate
Robert Bargery, Georgian Group
Anthony Jenkins, Bloomsbury Conservation Area Advisory Committee
Nanayaa Ampoma, London Borough of Camden
Chair, Bloomsbury Association