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Dear Sir/Madam

Summit House, Red Lion Square, WC1R 4QH
Application for Planning Permission and Listed Building Consent

On behalf of Kiraz 1 Gayrimenkul ve Yatirim Danismanligi A.S we write to submit an application at the above named site for Listed Building Consent and Planning Permission for the following:

'Installation of low level ducting and associated structures to serve existing plant equipment at roof level, including provision of screening to Dane Street elevation, and replacement of existing external lighting to terrace on Dane Street elevation'

This application is made following significant discussion with both planning and conservation officers, in response to a query to the council's planning enforcement team.

Specifically, this application proposes a solution to concerns over the dimensions of ducting and associated structures attached to the approved plant equipment on the roof of the building.

This proposal does not impact upon the interior of the building or create any additional floorspace.

In support of this application, in addition to this planning statement the following documents and reports are submitted:

- o Completed application forms and necessary certificates;
- o CIL Additional Information Form;
- o Site and Location Plans;
- o Existing, As-Built and Proposed Drawings, prepared by Buckley Gray Yeoman;
- o Design and Access Statement, prepared by Buckley Gray Yeoman; and
- o Addendum Heritage Statement, prepared by Savills Heritage.

The appropriate application fee of £462 will be paid separately.

Site and Surroundings

Summit house is a Grade II listed property sits on the south side of Red Lion Square, with Dane Street to the east, Eagle Street to the south and Yorkshire Grey Yard to the west which also provides service access to the rear of the building. With Red Lion Square immediately to the north, it is surrounded on its other sides by a mix of commercial and residential uses.

The immediate surrounding area is relatively diverse in style and appearance reflecting the mixture of residential and commercial uses. Immediately adjacent buildings include modern offices, a 19th century red-brick mansion block, Georgian townhouses and more functional mid-Twentieth Century residential blocks.

The building comprises basement, ground, first, second, third and part fourth floors (6 storeys in total, 5 storeys above ground). It is entirely in Class B1 office use but is currently vacant following an extensive refurbishment completed in accordance with planning permission and listed building consent granted in May 2017 (Refs: 2017/0077/P and 2017/0814/L).

Parts of the property date back to the 1920s, specifically part of the frontage facing onto Red Lion Square (which was completed by a first extension in the 1930s) and the rear corner facing Eagle Street.

The property was originally designed for Austin Reed tailors and is constructed with a steel frame clad with a deep yellow faience, emphasising the grid-like construction. The entrance door is recessed with original feature wooden doors, and the front of the building itself is set back from the street with a surrounding low wall covered with a decorative iron railing.

The south east corner of the building (forming part of the Dane Street and Eagle Street frontages) is not original and was built around 1960 as an extension to fill in the original zigzag shaped building to create the L shape it is today. The extension is clearly identifiable externally from the contrasting change in construction materials, with the extension comprising a brown brick outer wall.

A further glazed curtain walled extension facing into Yorkshire Grey Yard dates from 2001.

The building is situated within the Bloomsbury Conservation Area and the Red Lion Square / Queens Square sub-area. The *Conservation Area Appraisal and Management Strategy* specifically identifies Summit House as a “*distinctive 1920’s office building*”, although the Appraisal does not specifically classify the building beyond the statutory listing.

For many years, a range of plant equipment and associated structures to serve the building has been placed on the main roof area. In previous consents, these have found to be acceptable features on the building and in the context of its surroundings.

Planning History

The planning history for this building is extensive and dates back to the construction in the 1930s of an extension to the original building. Since then, many amendments and alterations have been undertaken including the previous replacement of plant equipment and associated structures on the roof.

The most recent consents in 2017 are of most relevance to the current application.

Reference	Description	Date	Status
2017/0077/P	Replacement of existing pavement lights; replacement of plant equipment at roof level; and provision of cycle parking within existing service yard	12 May 2017	Planning Permission Granted
2017/0814/L	Internal refurbishment of existing Class B1 office building (Grade II listed) including alterations to floorplate layouts, new flooring,	12 May 2017	Listed Building

	provision of secondary window glazing, replacement of services and ancillary facilities, enhancement of entrance lobby and waterproofing of basement areas; replacement of existing pavement lights; replacement of plant equipment at roof level; and provision of cycle racks within existing service yard		Consent Granted
LSX0204521	Submission of details of method statement of entrance hall ceiling repairs, stone floor repairs and plaster moulding repairs, pursuant to additional condition 2 (a-c) of listed building consent (Ref no. LSX0104868) dated 4th December 2001, as shown on: Method statement by Design Plastercraft Associates Ltd, dated 19th March 2002, Method statement by PAYE Stonework and Restoration Ltd, dated 30 April 2002.	23-01-2003	Grant Approval of Details (Listed Bldg)
PSX0204763	Retrospective applicant to install CCTV system to the exterior and ground floor interior and associated signage, as shown on drawing numbers: 1157/0/SE, 31555/CTV/00, 1157/ 0/SI, CCTV System Specification document, A4 sheet of Closed Circuit TV signs and 2 x A4 sheet detailing camera type.	08-05-2003	Grant Full Planning Permission
LSX0204762	Retrospective application to install CCTV system to the exterior and ground floor interior and associated signage, as shown on drawing numbers: 1157/0/SE, 31555/CTV/00 1157/0/SI, CCTV System Specification document, A4 sheet of Closed Circuit TV signs and 2 x A4 sheet detailing camera type.	08-05-2003	Grant Listed Building Consent
LSX0204862	Retrospective application for installation of a cathodic protection system to the Eagle Street elevation, as shown on drawing numbers: TE/N956/T406/ 01 RevA, 02 RevA, 03RevA, 04RevA. 1157-0-51, SK1, SK2 and Technical Report.	21-01-2003	Grant Listed Building Consent
LSX0104870	Installation of disabled access (Scheme 2). (Plans submitted).	08-05-2002	Withdrawn Application
PSX0104869	Installation of disabled access (Scheme 2). (Plans submitted).	08-05-2002	Withdrawn Application
PSX0104873	Demolition of existing rooftop staircase, construction of 4th floor office accommodation and balcony amenity area to west (Scheme 4). (Plans submitted).	08-05-2002	Withdrawn Application
LSX0104874	Demolition of existing rooftop staircase, construction of 4th floor office accommodation and balcony amenity area to west (Scheme 4). (Plans submitted).	08-05-2002	Withdrawn Application
LSX0204158	Installation of floodlighting to the Red Lion Square Elevation, as shown on drawing number: 1157-0-SP, FEL, RLS and 2 pages Floodlight specification.	07-05-2002	Grant L B Consent with Conditions
PSX0204157	Installation of floodlighting to the Red Lion Square Elevation, as shown on drawing number: 1157-0-SP, FEL, RLS, and 2 pages Floodlight specification.	07-05-2002	Grant Full Planning Permission (conds)
PSX0105482	Erection of new fence and gate enclosure to Yorkshire Grey Yard, the provision of access ramp and cycle parking facilities and alteration of recessed fire door on Eagle Street to window, as shown on drawing numbers; 1157-0-SP; YP1D; YP2D; YP4; YP5; and 3 pages of railing details.	02-05-2002	Grant Full Planning Permission (conds)
LSX0105483	Erection of new fence and gate enclosure to Yorkshire Grey Yard, the provision of access ramp and cycle parking facilities and alteration of recessed fire door on Eagle Street to window, as shown on drawing numbers; 1157-0-SP; YP1D; YP2D; YP4; YP5; and 3 pages of railing details.	02-05-2002	Grant L B Consent with Conditions
PSX0104871	External alterations including erection of glazed extension to	19-11-2001	Grant Full Planning

	courtyard to provide new lift/stair core, disabled access and installation of roof top plant. As shown on approved drawing numbers: EXISTING AL[7]301, 302, 310, 316, 330 to 334 (inclusive); AL[07]311 to 315; PROPOSED AL[7] 350, 351, 354; 1157-B-PGL, 1157-O-PGL A, 1157-1-4(incl)-PGL, 1157-R-PGL, 1157-0-XS, 1157-O-YEL, 1157- 0-EEL, 1157-0-DEL; Report relating to plant dated 6 August 2001 from Peter Deer & Associates; and letter dated 16th November 2001.		Permission (conds)
LSX0104872	Internal and external alterations including stone cleaning, erection of glazed extension to courtyard to provide new lift/stair core, disabled access and installation of roof top plant, As shown on approved drawing numbers: EXISTING AL[7]301, 302, 310, 316, 330 to 334 (inclusive); AL[07]311 to 315; PROPOSED AL[7] 350, 351, 354; 1157-B-PGL, 1157-O-PGL A, 1157-1-4(incl)-PGL, 1157-R-PGL, 1157-0-XS, 1157-O-YEL, 1157- 0-EEL, 1157-0-DEL; Report relating to plant dated 6 August 2001 from Peter Deer & Associates; and letter dated 16th November 2001; and drawing numbers AL[07]352 and 353.	19-11-2001	Grant L B Consent with Conditions
LSX0104868	Minor structural and non-structural internal modifications (Scheme 1), as shown on drawing numbers: tsp drawing no. 1712 AL(7) 100, 110, 112, 113, 114, 115, 120, 122, 123, 124, 125, 130, Bluu drawing no. 1157-1-EL rev A, 1157-2-EL rev A, 1157-1-PH and 1157-O-PGL rev B.	04-12-2001	Grant L B Consent with Conditions
L9600024	Infill of garage doors to form new office area, as shown on drawing nos. 200/16/93/01, 16.93.30.2, 9 and 10.	05-07-1996	Grant L B Consent with Conditions
P9600023	Alterations at rear involving infill of existing garage doors on the ground floor for B1 office use, as shown on drawing nos. 200/16/9301, 16.93.2, 9 and 10.	05-07-1996	Grant Full Planning Permission
9270079	The installation of air-conditioning plant at the rear of the building as shown on drawing numbers 21/91/101 21/91/102A 21/914/103C 21/91/111 21/91/112 21/91/113 and 21/91/114.	04-06-1992	Grant List.Build. or Cons.Area Consent
9200391	The installation of air-conditioning plant to the rear of the building as shown on drawing numbers 21/91/101 21/91/102/A 21/91/103/C 21/91/111 21/91/112 21/91/113 and 21/91/114.	04-06-1992	Grant Full or Outline Planning Permissn.
9270056	The replacement and raising of the basement area rooflight in the forecourt as shown on drawing numbers 21/91/101 21/91/103/B and 21/91/107 revised by letter dated 13 April 1992.	17-03-1992	Grant List.Build. or Cons.Area Consent
9200269	The replacement of a raised rooflight in the forecourt as shown on drawing number 21/91/107.	17-03-1992	Grant Full or Outline Planning Permissn
N15/19/C/65 24	The retention for a further limited period of covered gallery at second and third floor levels, linking the front and rear blocks of Summit House, Red Lion Square, Camden.	19-02-1969	Conditional
6525	The retention for a further limited period of a covered gallery at first floor level linking the front and rear blocks of Summit House, Red Lion Square, Camden.	19-02-1969	Conditional
N15/19/C/56 07	The retention of the boiler flue extension at Summit House, Red Lion Square, Camden.	31-07-1968	Permission
3759	The formation of a new window opening on the ground floor of Summit House, 12 Red Lion Square, Camden, fronting on to Eagle Street.	05-06-1967	Permission

9270079	The installation of air-conditioning plant at the rear of the building as shown on drawing numbers 21/91/101 21/91/102A 21/914/103C 21/91/111 21/91/112 21/91/113 and 21/91/114.	04-06-1992	Grant List.Build. or Cons.Area Consent
N15/19/C/27 94	The retention for a further limited period of the covered galleries at 2nd and 3rd floor levels linking the rear block in Eagle Street to Summit House, Red Lion Square, Camden.	25-11-1966	Conditional
1259	The erection and retention for a limited period of a covered gallery at first floor level linking the rear block in Eagle Street to Summit House, Red Lion Square, Camden.	12-01-1966	Conditional
TP22408/30 803	The erection of a temporary boiler flue to summit House, 11 & 13 Red Lion Square, Holborn.	07-01-1965	Conditional
TP22408/15 659/1959	The retention, for a further limited period only, of covered galleries at second and third floor levels linking a building in Eagle Street to Summit House, Red Lion Square, Holborn.	09-07-1963	Conditional
TP22408/N W/15659	The erection and retention for a limited period only for a covered gallery at second floor level linking a building with Eagle Street, to Summit House, Red Lion Square, Holborn.	19-01-1960	Conditional
TP22408/15 659	The erection and retention for a limited period only of a covered gallery at third floor level linking a building in Eagle Street, to Summit House, Red Lion Square, Holborn.	13-11-1959	Conditional
TP22408/19 236	The erection of an extension to Summit House, Red Lion Square, Holborn, on a site abutting on Eagle Street and Dane Street and its use in connection with the production of clothing and as storage, etc.	25-03-1957	Conditional
TP22408/12 2210/102918	The erection of an extension to the premises known as Summit House, Red Lion Square, Holborn, on a site abutting on Eagle Street and Dane Street, Holborn, subject to:- (1) the whole of the external walls being constructed of materials similar to and harmonising with those used in the existing portions of Summit House next the various streets; (2) all loading and unloading of goods to and from vehicles being carried on within the curtilage of the building; (3) the sanitary, ventilation, drainage and disposal of refuse arrangements, and any works to or under the public way being to the satisfaction of the Holborn Metropolitan Borough Council; (4) compliance with the provisions of the London Building Acts, 1930 and 1935, where they are not inconsistent with this consent, and with the by-laws in force thereunder; and (5) the work being commenced within six months and completed within eighteen months from 1st November, 1939, failing which the consent shall become null and void.	20-10-1939	Permission

Background to the Submission

During 2017, extensive renovation and refurbishment of the entire building were completed in accordance with the planning permission and listed building consents that were granted earlier in the year (Refs: 2017/0077/P and 2017/0814/L). This included the installation of the plant equipment at roof level and associated structures and ductwork.

Following installation of this ductwork, concern was raised that the ductwork that was installed went beyond the approved scope of 'low-level'. The applicant has accepted this and has sought to respond to these concerns through revising the ductwork.

This application is the result of preparing an alternative solution to the form of the ductwork that had been installed. The proposal is the result of significant testing and discussion between the applicant's technical team, specialist contractors and the Council's planning and conservation officers.

All parties have worked to prepare a solution that significantly reduces the overall appearance of the ductwork whilst still ensuring that all elements of the installed plant equipment will be fully operational and meet necessary standards in terms of efficiency and acoustic output.

This submission also regularises the external lighting to the access terrace on the building's Dane Street elevation which was installed as a 'like-for-like' replacement of the existing lighting in this location.

Proposed Development

In light of the concerns raised with regard to the ducting 'as built', a revised solution has been prepared. Based upon both a detailed technical exercise and considerable discussion with the Council's planning and conservation officers, the revised layout of the ducting is the minimum required to ensure all equipment operates correctly whilst also minimising the appearance of the ducting and keeping it as low-level as is achievable.

This application relates solely to the ducting and associated structures serving the installed and approved plant equipment at roof level alongside the replacement lighting to the external access terrace on the Dane Street elevation. This application does not propose any changes to the building internally, nor to the plant equipment itself which was installed during 2017 in line with the previous consents.

This application therefore proposes significant reductions to the ducting that has been built on-site in order to respond to the position that the current installations fall outside of the scope of the existing consents.

Specifically, the following alterations are proposed:

- Lowering of the ductwork on the Dane Street elevation, including reversal of inlet and extract to lower the ducting from the installed air handling unit;
- Installation of a 'stepped' structure over the Dane Street ductwork for maintenance, to include a collapsible handrail to minimise visual impact;
- Installation of a perforated metal screen along the Dane Street elevation to minimise high level views from neighbouring residential properties;
- Lowering of the ductwork on the Yorkshire Grey Yard elevation to removal higher level joints;
- All metal ductwork to be finished with a white-coloured wrapping to further reduce appearance in local views; and
- Confirmation of installation of new lighting to external access terrace on Dane Street elevation on a 'like-for-like' replacement relative to previous lighting.

Further details are set out within the Design and Access Statement prepared by Buckley Grey Yeoman.

Planning Considerations

Given that this application does not relate to the plant equipment itself, which was approved as part of the consented schemes in 2017, this application should only be assessed in terms of the appearance of the ductwork and associated structures, how these relate to the relevant heritage assets (the building itself as a listed building and the wider conservation area) and how the visual amenity of nearby residents is maintained.

Protecting Visual Amenity

When considering visual amenity, Local Plan Policy A1 requires that the amenity of local residents should be maintained by any development proposal. In this case, the roof level of Summit House is visible from nearby residential units on both Dane Street and across Yorkshire Grey Yard.

The starting point for such an assessment is that the recent historic outlook from these locations has been onto plant equipment and associated structures on the roof of Summit House. The applications approved in 2017 made considerable effort to broadly maintain that character – of most importance was the decision to locate replacement plant equipment in similar locations to the previously existing kit such that the relationship with neighbouring properties was not materially changed.

This was found acceptable in approving the applications in 2017 and will not be altered by the current proposals.

The revised proposals for the ductwork between the operational plant equipment minimises the scope and extent of these structures as far as is possible. As previously noted, ducting is significantly lowered compared to the as-built layout, all ducting will be wrapped in a white finish to minimise visual appearance, the required maintenance step-over structure will include a collapsible handrail and a metal screen will be installed along the Dane Street elevation.

Taken together, these design proposals will ensure that the visual impact upon nearby residents is minimised. The result will not be materially different from the existing situation and not materially different from the historic character of the roof level.

With regard to the lighting on the access terrace on the Dane Street elevation, this has been installed on a 'like-for-like' replacement of the existing lighting to the extent that the existing fixing points have been reused. There is no increase in quantum of lighting proposed.

A full technical specification is provided as part of the Design and Access Statement that is submitted with this application. A commitment can also be made to ensuring that the lighting is not left turned on outside of required operation – the lighting is only required to ensure safe maintenance access to the roof and will not need to be lit at any other time.

The proposals therefore meet the expectations of Policy A1. Further details are set out within the submitted Design and Access Statement.

Assessing Heritage Assets

When considering any development that affects heritage assets, consideration must be given to Local Plan Policy D2 which seeks to ensure that such assets are not harmed by development.

An addendum Heritage Statement has been prepared which addresses the specific effects of the proposed ductwork upon the property as a listed building and the wider conservation area. This highlights that the

heritage value of Summit House is predominantly accrued from its façade to Red Lion Square and Dane Street, the fragments of original internal features that survive and the overall character of the building as a 'head office' type building.

In this context, the proposed ductwork will not impact upon the value of Summit House as a heritage asset. A range of plant equipment and associated structures have been installed on the roof of the building for many years and this does not impact upon the building's qualities. The current proposal is an alteration of this and maintains the existing values of the building.

In regard to wider views of the building within the Bloomsbury Conservation Area, this proposal will have no material impact. As highlighted in images within the submitted Design and Access Statement, the revised ductwork and structures will not be visible from any public view point in the streets in the local area. The low level of the ductwork, the set-in from the street elevations and the existing form of the building (including the high parapet on the Red Lion Square elevation) means that the ductwork will not be visible.

Given the above, the proposals will have no material effect upon the quality of either the property as a listed building or the Bloomsbury Conservation Area more widely. As such, the proposals will comply with the expectations of Policy D2 to protect heritage assets.

Summary of Planning Considerations

Every effort has been made to minimise the extent and appearance of the ductwork to the approved plant equipment whilst still ensuring that the equipment still operates efficiently and without creating concerns in regard to acoustic performance. The design now put forward has been extensively testing and is put forward as the minimal requirement whilst maintaining the necessary performance.

In terms of public views, this layout will not be visible from street level within the local area and including the Bloomsbury Conservation Area. As such, the proposal will maintain the quality of both the listed building and the conservation area.

In terms of private views from neighbouring residential properties, the lowering of the ducting significantly reduces its appearance relative to the as-built configuration. The revised layout will reflect the existing character of the rooftop which has hosted plant equipment and associated structures for many years. As such, there will be no significant change in outlook relative to the historic situation and amenity will be maintained.

Conclusions

This application will regularise the provision of ducting to the existing installed plant equipment on the roof of Summit House through a revised approach that significantly reduces the extent of the ducting relative to that which has been initially installed on-site. The ducting now proposed has been designed to be the minimum necessary to ensure the full operation of the approved plant equipment to meet all regulatory requirements.

A number of features have been utilised to further reduce any views of the ducting including a screen to the Dane Street elevation, the application of a white finish to the metal ductwork and provision of access steps that can be folded down when not in use.

These features are in addition to the overall reduction in the height of the ducting which means that as per the original approval the plant equipment and associated structures will not be visible from street level anywhere around the site or from within the conservation area. The proposal therefore has no material impact upon the relevant heritage assets.

The lighting on the access terrace to the Dane Street elevation of the building replicates that which had previously been on-site, including the previous fixing points into the building's structure. Use of this lighting,

which is required only when the roof is access for maintenance purposes, can be controlled to ensure it does not cause any amenity disturbance.

These proposals therefore maintain the value of both the listed building and the conservation area as heritage assets and will not materially impact upon the amenity of neighbouring residents.

I trust that everything is in order. Should you need to discuss this application further, please do not hesitate to contact me as set out at the head of this letter.

Yours faithfully

A handwritten signature in black ink that reads "Nigel Dexter". The signature is written in a cursive, slightly stylized font.

Nigel Dexter
Associate