

CC/JO/P6575  
05 July 2018

London Borough of Camden  
Planning Department  
Town Hall  
Judd Street  
London  
WC1H 9JE

**Planning Portal Ref: PP-07106149**

Dear Sirs

**193-197 High Holborn, London, WC1V 7BD**  
**Application for Planning and Listed Building Consent for the installation of an air conditioning system at fourth and fifth levels.**

We write on behalf of our client and the applicant, Mactaggart Inv Co Ltd, to submit a full planning application for the installation of an air conditioning system at the fourth and fifth floors of 193-197 High Holborn, alongside an application for listed building consent for the same work and the associated internal alterations at 4<sup>th</sup> and 5<sup>th</sup> floor levels.

This application has been submitted online via the Planning Portal and is accompanied by the following documents:

- Existing and Proposed Drawings prepared by Garnett & Partners
- Site Location Plan
- Design & Access Statement prepared by Garnett & Partners
- Acoustic Report prepared by Hann Tucker
- Specification details
- Heritage Statement prepared by Watermans
- Completed CIL Form

#### **Site Location and Surrounding Area**

The site is located on the south side of High Holborn, in close proximity to the junction with New Oxford Street within the Bloomsbury Conservation Area. The buildings on the site comprise the former Holborn Town Hall and Library which are Grade II Listed. The building extends to 4 storeys with a mansard roof/basement and has a decorative stone façade with Baroque details by Hall and Warwick 1906-08 and an eastern wing in the French Renaissance style by W Rushworth 1894. The building had a former part 3-4 rear wing which was extended in the early 2000s to form the current 5

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storey rear wing on the south western side of the building. The building is in office use (B1) at ground – fourth floor levels apart from the ground/basement of the former Holborn Library at the east of the site which is in use as a restaurant (A3). The building currently has no air conditioning system installed, which has resulted in a number of vacant units due to the heat within the building during warm weather.

The surrounding properties comprise a variety of buildings ranging from 4 to 11 storeys. The Victorian building directly to the east of the site at 199, 200 and 201 High Holborn is a Grade II Listed 5-storey building with a set-back roof extension. The building directly to the west of the site is a modern 9 storey office building with large roof level plant rooms and a 7 storey rear wing onto the Smarts Place frontage. Holborn Tower and Commonwealth House opposite the site are 10/11 storey buildings. To the rear of the site are connected modern 4-5 storey office buildings which front onto Dragon Lane and Stukeley Street. The closest residential properties are located at 19-33 Stukeley Street and Green Dragon House to the south east of the site. The buildings in the area are predominantly in use as offices at upper floor level, with retail/restaurant uses at ground floor. There are other listed buildings in the vicinity of the site including 127-129 and 207 High Holborn which are Grade II Listed and 208 which is Grade II\* Listed.

The site is located in the Central London Area and is within 200 metres of Holborn underground station, and within 500 metres of Tottenham Court Road underground station. It is also in close proximity to multiple bus stops and routes. This gives the site a PTAL rating of 6b (excellent).

### **Planning History**

The installation of plant to the roof area, the addition of a mezzanine floor and internal fit-out was granted on 22<sup>nd</sup> December 2003 (LPA ref: 2003/1379/P & 2003/1405/L).

Internal and external alterations at basement and ground floor level in association with a restaurant including the installation of air conditioning plant was approved on June 23<sup>rd</sup> 2004 (LPA ref: 2004/0813/P & 2004/0813/P).

### **Pre-Application Advice**

A pre-application site visit with the Council was undertaken on October 2<sup>nd</sup> 2017. This was to explore the potential for the erection of a fifth floor rear extension, the installation of roof plant and internal/external alterations to provide a new heating/cooling system. The fifth floor extension and rooftop plant are currently being prepared for submission as a separate application to the Council. In principle, the Council supported the installation of heating/cooling units, provided they do not harm existing internal features of historic significance.

### **Proposal**

The proposal seeks the installation of an air cooling system through associated plant units at the fourth and fifth floor levels of the building. These items of plant will be located internally at the fourth and fifth levels of the building, the specifications are detailed below.

#### Fourth Floor

9 x total concealed floor standing indoor units. These will comprise:

- 5 x PPFY-P40VLRMM-E Units;
- 4 x PPFY-P32VLRMM-E Units.

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#### Fifth Floor

- 1 x PURY-P400YNW-A Unit, to serve the 4<sup>th</sup> and 5<sup>th</sup> floor of Suite A. The dimensions of the unit are 1340 x 740mm;
- 3 x PFFY-P32VLRMM-E Concealed Floor Standing Indoor Units;
- 1 x CMB-P108/1012/1016V-JA 12 way BC Controller;
- A hardwood fixed screen.

The external air conditioning unit will be located at 5<sup>th</sup> floor level on a small roof terrace. It will sit adjacent to an existing single cassette unit and will be concealed behind the parapet wall of the terrace. It will not be visible from public view. All of the proposed piperuns will be concealed within a combination of the ceiling and floors. The internal air conditioning units will be concealed within the joinery and will therefore not be visible. All of the proposed materials are to match the existing.

#### **Planning Considerations**

Local Policy E1 (Economic development) states that the Council will secure a successful and inclusive economy by creating the conditions for economic growth and harnessing benefits for local businesses. In particular they will support businesses of all sizes, and maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes.

Local Plan Policy E2 highlights that having a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility is vital to maintaining and developing Camden's successful economy. The Council will seek to ensure that existing and future employment uses can operate effectively without being in conflict with other sensitive uses.

The air conditioning system will assist in supporting a future tenant through maintaining workable premises for them to operate from, and thus supporting the above policies and supporting the B1 office use.

#### Amenity

Local Policy A1 (Managing the impact of development) states that the Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. The Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected and will require mitigation measures where necessary. The factors we will consider include: visual privacy, outlook; sunlight, daylight and overshadowing; transport impacts, noise and vibration levels and odour, fumes and dust.

Under Local Plan Policy A4, the Council seek to ensure that noise and vibration is controlled and managed. Development should have regard to Camden's Noise and Vibration Thresholds. Planning permission for noise generating development, such as plant and machinery, will only be granted if it can be operated without causing harm to amenity. The proposed plant items have all been discretely located, either on the roof of the property or concealed within the joinery of the existing building. As such they will not be visible from public view. The application is also supported by an acoustic report, which confirms that the proposal is within the relevant noise guidelines.

Local Plan Policy D1 notes that development should carefully integrate building services equipment.

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The Council will also resist development of poor design which fails to take the opportunities available for improving the character and quality of an area and the way it functions. As previously stated the unit is discretely located to the rear of the property and will be shielded from view by the parapet wall.

#### Heritage & Design

Local Plan Policy D1 (Design) states that the Council will seek to secure high quality design in development and will require that development respects local context and character and comprises details and materials that are of high quality and complement the local character.

Local Plan Policy D2 (Heritage) states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings. The Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist proposals for alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal outweigh that harm.

The heritage statement has confirmed that the fourth and fifth floors of the building largely comprise modern features, and that the proposals will not have any detrimental impact upon the heritage value of the floors or the overall building. As such, the proposal would result in very limited impact on the special architectural and historic interest of the listed building of the character and appearance of the conservation area, and the benefits derived from providing enhanced commercial floorspace fit for modern purposes should be considered to outweigh this very limited harm

#### **Conclusion**

This application seeks planning permission for the installation of an air conditioning system at the fourth and fifth floors of Holborn Town Hall. This will provide air conditioning for the offices at this level. It will facilitate the enhancement of the space for prospective tenants and will create high quality improved office floorspace in the CAZ in line with Camden's policy. The scheme clearly brings benefit in the form of the increased and improved commercial accommodation to reflect current demand and provide a more healthy work environment for the businesses occupying the building.

The proposal has been sympathetically designed to respond to the existing local character and context of those neighbouring buildings and the surrounding conservation area whilst providing an enhancement to the building's existing office function. The proposal will not result in any detrimental impact upon the architectural or historic value of the listed building.

In summary we consider that this proposal should be considered favourably for the following reasons:

- In line with paragraph 126 of the NPPF the proposal will increase the ability of this heritage asset to be put to a viable use and will allow it to compete in the modern marketplace. It will also facilitate its use as an employment generator and as a home for potential SME businesses.
- The proposals will not result in any loss of historic fabric of the existing listed building.

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- The external plant will not impact upon the appearance of the building nor will it cause any noise impact upon residential amenities.

We trust that the submitted documents and supporting information is sufficient for the Council to validate the application and we look forward to a swift and positive outcome. However, should the Council require any further information or would like to arrange a site visit, please do not hesitate to contact the undersigned.

Yours faithfully

*Casey Conduct*

For and on behalf of  
Rolfe Judd Planning Limited