

PD12601/RV/ARS/JA

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10 December 2019

Planning - Development Control
Camden Council
Camden Town Hall
London
WC1H 8ND

Planning Portal ref: PP-08172589

Dear Sir / Madam

**12 UPPER WOBURN PLACE, BLOOMSBURY, LONDON, WC1H 0HX
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
APPLICATION FOR PLANNING PERMISSION FOR THE INSTALLATION OF PLANT AT ROOF LEVEL**

We write on behalf of our client, 'Ambassador Hotel' c/o MTT Limited ("the client") we apply for planning permission for the removal of existing plant and the installation of plant equipment at the Ambassador Hotel at 12 Upper Woburn Place, Bloomsbury, London, WC1H 0HX ("the Site" or "the Building").

The description of the development for the proposed works is as follows:

"The removal of existing plant and the installation of new plant equipment at roof level of 12 Upper Woburn Place, Bloomsbury, London, WC1H 0HX"

Below, we set out a detailed overview of the proposed works and assessment against the relevant planning policy.

The Site

The Site falls within the jurisdiction of the London Borough of Camden ("LBC"). It is located at 12 Upper Woburn Place and comprises a 7 storey hotel, consisting of ground and 6 upper floors.

The Building is located within the Bloomsbury Conservation Area and is situated in relatively close proximity to the following listed buildings:

- "Two Lamp Posts" (Grade II);
- 1-9 and 9a, Woburn Walk (Grade II*);
- 4-18 and 4a-18a, Woburn Walk (Grade II*); and
- 2-16, Dukes Road (Grade II*).

Proposal

The works, which are the subject of this application, comprise the removal of the existing plant and the installation of new plant equipment at roof level. The reason being to provide higher quality plant equipment to facilitate the operation of the Hotel.

The Proposed Plant Areas drawing prepared by MTT Limited and submitted as part of this application indicates the area where the proposed plant would be located. We argue that the proposed location of the plant would have less of an impact on the surrounding listed buildings and the conservation area within which it is situated, than the plant currently in place. This is explained in more detail below.

The exact specification of the plant that will serve the unit is set out within the proposed plant specification attached to this application.

Planning Policy Framework

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.

The LBC statutory development plan comprises the following documents:

- London Plan (2015) with Minor Alterations (2016); and
- Camden Local Plan (2017).

In addition, the National Planning Policy Framework (2018) and the National Planning Practice Guidance (2014) are material considerations.

Planning and Heritage Assessment

Noise and Vibration

Policy A4 (Noise and Vibration) of the Camden Local Plan states that the Council will seek to ensure that noise and vibration is controlled and managed, with development having regard to the Noise and Vibration standards set out in Appendix 3. The policy states that planning permission will not be granted for:

- a. development likely to generate unacceptable noise and vibration impacts; or
- b. development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

Development will be granted for plant and machinery, if it can be operated without causing harm to amenity.

The proposed plant has not yet been finalised, however, the noise report has recommended limiting sound pressure levels for the proposed plant, to ensure that proposals meet Camden's plant noise standards. If permission is granted we recommend a planning condition is attached to the decision to ensure that proposed plant meets Camden's recommended limits. As such, there wouldn't be any negative impacts on the surrounding buildings in terms of noise.

In relation to vibration, the fans that form part of the proposed plant are internally isolated so that no vibration issues arise.

Odour

Policy A1 (Managing the impact of development) explains that odour is one of the key factors considered when assessing the impact of development on amenity.

The Odour Risk Assessment demonstrates that there is both high and very high risk of odour. As previously explained, the exact plant proposed is yet to be finalised, however, the submitted plant specification highlights that either a Carbon filtration or Ozone system can be used to mitigate 'very high' odour levels. The proposed plant would incorporate suitable filtration system which, would result in the plant having minimal impact on the surrounding buildings. We suggest that this is conditioned to give comfort that an appropriate system would be installed.

Design

Policy D1 (Design) states that the Council will seek to secure high quality design in development and will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

The proposed drawings submitted as part of this application outline the extent of the plant proposed.

In terms of visual impact, the proposal is to remove the existing plant (shown on the existing drawings). The existing plant is to be relocated at roof level behind the buildings to the north of Woburn Walk (shown on the proposed drawings) and would not be visible from street level. The proposed plant is to be situated within a plant enclosure meaning that it would be screened and would have a minimal visual impact on the surrounding area.

As such, we consider that the proposed plant would not give rise to any negative visual impacts, and it would preserve the character and appearance of the Conservation Area and the setting of the nearby listed buildings. The proposal would therefore be acceptable on the grounds of appearance.

Heritage Statement

Policy D2 (Heritage) states that the Council will seek to enhance heritage assets and their settings, including conservation areas and listed buildings. The policy explains that 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 convincingly outweigh that harm.

In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will *"require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area"*.

In relation to Listed Buildings, the council will resist development that would cause harm to the significance of a listed building through an effect on its setting. However, as explained, there would be no negative impacts in terms of noise, odour and setting, that can't be mitigated.

In terms of the impact of the proposal on both the Bloomsbury Conservation Area and the nearby listed buildings, the works are minor in nature and would result in the plant being relocated to an area that is more discreet than its current location. As explained above, the plant would be concealed within an enclosure and would not be visible at the proposed location.

In summary, the proposal is in accordance with the development plan and would preserve and enhance the character and appearance of the Conservation Area, as well as preserving the setting of the nearby listed buildings, as required by the Planning (Listed Buildings and Conservation Areas) Act 1990.

Administrative Matters

The following documentation has been submitted as part of this application:

1. Covering letter, including a Heritage Statement (this letter);
2. Application Form for Full Planning Permission, duly signed and dated;
3. Site Location Plan;
4. Existing and Proposed Drawings;
5. Plant Specification;
6. Noise Assessment;
7. Odour Assessment; and
8. Application fee of £462.00.

This application has been submitted online via the Planning Portal under ref. **PP-08172589** and the application fee of £487 (including £25 service charge) has been made.

We would be grateful if the Council could confirm receipt and validation of our application by return. If there are any queries, please contact (james.ainsworth@montagu-evans.co.uk / 020 3962 6456) or Anna Russell-Smith (anna-russell.smith@montagu-evans.co.uk / 020 7312 7498) in the first instance.

Yours faithfully,



Montagu Evans LLP