



16th March 2022

2022/0319/P & 2022/0787/L

Jennifer Dawson
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Formal objection to applications 2022/0319/P and 2022/0787/L for the installation of an extraction flue to the rear of 20 Warren Street.

Dear Jennifer,

The Fitzroy Square CAAC strongly objects to application 2022/0319/P and 2022/0787/L.

It is understood that the ground floor unit is a café and now falls within Class E. As such the owners wish to use the premises for cooking and require an extraction flue to safely disperse of fumes generated within the premises. This is a common occurrence across the conservation area and wider CAZ and it has become commonplace to permit extraction flues of an appropriate size when painted black on the rear elevations of non-listed buildings when not visible from the public realm.

The site is however Grade II listed and as such the statutory duty under Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies. This duty is to have '*special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*' There are also the relevant policies of the NPPF 2021 affecting designated heritage assets, specifically paragraph 199.

The proposal is to install a very large extraction flue onto the rear elevation of number 20. This rear elevation is unusual in that it is also visible from the public realm of the conservation area. The extraction flue is of such a size that it would have a considerable negative effect upon the appearance of this rear elevation, as it is in fact of a comparable width to the windows. In our view, this causes a degree of harm to the listed building, and through its visibility in the public realm, to the conservation area.

This harm should be dealt with under paragraph 202 of the NPPF 2021. The NPPF is clear that for harm to be permitted, public benefit must be present which outweighs that harm. The Camden Local Plan 2017 goes further to state that public benefit must convincingly outweigh any harm.

Having considered the submitted documents and particularly the planning statement there is little justification for the proposed flue, and nothing which could be weighed against this harm. As such, it is our view that this application should be refused.

The heart of the matter is whether it is generally acceptable for extraction flues and clearly visible plant to be installed upon the rear elevation of a listed building. While the applicant argues that the rear elevation does not contribute towards the significance of the listed building or CA, it is clear that

it does. All parts of a listed building may contribute towards its significance, and this is reflected in the fact that planning control is exercised over alterations to all parts (internal and external) of a listed building. There is no evidence that the rear elevation is not historic or at least has not been rebuilt in keeping with its original appearance. Any inappropriate alteration would therefore harm the historic appearance and by consequence significance of the listed building. In this case, the alteration is particularly dramatic and poorly designed and would cause a significant degree of harm.

It is appreciated that the occupants of the ground floor unit may wish to operate as a restaurant but not all uses and activities are compatible with a listed building, and this is indeed why stringent planning control exists over alterations to and use class changes within a listed building.

It should also be noted that the installation of this flue would likely necessitate internal alterations to the listed building which have not been detailed in the application.

We therefore strongly object.

Bloomsbury Conservation Areas
Advisory Committee