

Planning and Environment
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall
Judd Street
London
WC1H 9JE

28th July 2022

Dear Sir / Madam

TOWN AND COUNTRY PLANNING ACT 1990
SWAN HOUSE, 37-39 HIGH HOLBORN, LONDON, WC1V 6AA

Quadrant is instructed by Acai (Swan House) Limited to submit to you a planning application in respect of development at the above address for:

“Partial replacement of rooftop plant”

Accordingly, please find enclosed the following documents:

- Completed planning application form and Certificate A
- Plans as follows:

Plan Name	Reference
Site Location Plan	
Roof Level Plant Layout Existing	D6145.PA01 Rev B
Roof Level Proposed Replacement and New Plant Arrangement	D6146.PA02 Rev B

- Plant Noise Impact Assessment prepared by Mayer Brown

The planning application fee of £234, plus the Planning Portal’s administration fee of £32.20, has been paid online.

1. The Site

The application site is located on the north side of High Holborn, some 150m west of Chancery Lane underground station. The property has a return frontage on to Warwick Court, a pedestrianised route running north-south connecting High Holborn to Theobald’s Road.



Figure 1: Swan House, 37-39 High Holborn



Figure 2: View from Warwick Court, indicating lower floors to the rear

The building is not statutorily or locally listed, but it is located within the Bloomsbury Conservation Area which is defined as a heritage asset. Any works to the property will need to have regard to this designation.

The property comprises basement, ground and five storeys above, plus a mansard and provides some 1,920 sq m of Class E accommodation, as follows:

- Basement: vacant
- Ground floor: occupied by Vision Express and two vacant units
- First-sixth floor: currently providing office floorspace

The predominant character of the area is mixed commercial, generally with retail on the ground floors – comprising a mix of shops, financial and professional services and restaurants, with offices on the upper floors (Class E). Some buildings also accommodate Class F1 uses (formerly Class D1) on the upper floors, such as language schools and clinics, along with residential.

In design terms, the building adopts a neo-classical style, resting on a Portland stone plinth, with brown brick on the upper floors.

The property is described in the Bloomsbury Conservation Area Appraisal as follows:

Nos 37-39 is a restrained brown brick and stone six-storey neo-classical office building by Robert Angell and Curtis, dating from 1955-57, with a slate mansard storey and timber sash windows.

The main roof level above the sixth floor and the roof of the third floor contain a number of air handling units and chillers supporting the office accommodation within the building. The location of existing units is shown on Plan D6146 PA.01 Rev B submitted with the planning application.

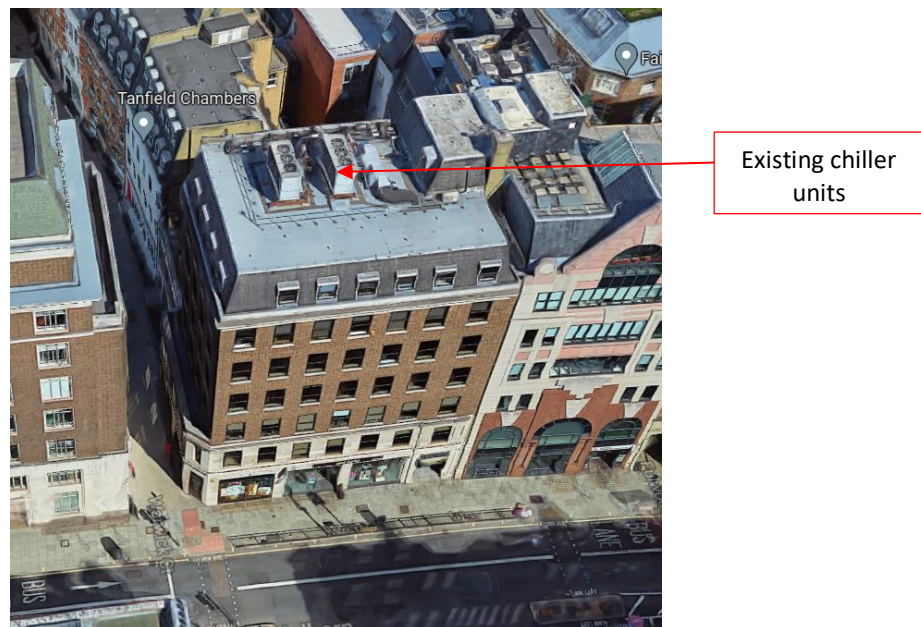


Figure 3: Existing plant on 6th floor roof

The existing units on the sixth floor roof are large (extending to 3m in length, 1.1m in width and 2.4m in height) and inefficient.



Figure 4: Existing chillers and air handling unit above 6th floor (to be removed)



Figure 5: Existing rooftop plant - coloured grey – visible from Chancery Lane

2. Planning History

There is an extensive planning history for the property dating back to the 1950s, much of which is not relevant to the current planning application, and we do not therefore set it out in this submission.

3. Proposed Development

The planning application proposes the part replacement of rooftop plant.

As shown on the Plant Layout Existing Plan, the following units will be removed:

- Chillers marked CH1 and CH2 (Delonghi STRAT/B/0501)
- Air handling units marked AHU1 and AHU2 (Nuaire)
- Redundant pipework

Four new Daikin units (REYQ10) are proposed on the roof of the 6th floor, as shown on Plan PA02/B. No new units are proposed on the 3rd floor.

The dimensions of each unit are as follows:

- Height 1.69m
- Length 93cm
- Width 77 cm



DAIKIN UNIT

The new units are considerably smaller and more efficient than the existing units, enabling them to be discretely located on the roof. They will be installed onto the existing (retained) steel frame from the removed chillers.

4. Policy Compliance

We consider the following policies to be relevant to the application proposals.

London Plan, 2021

- **GG5 Growing a Good Economy:** the site falls within the CAZ where new economic activity is encouraged.
- **Policy D3 Optimising Site Capacity Through a Design Led Approach:** highlights the need to accommodate growth in a manner which has regard to noise and air quality.

- **Policy D13 Agent of Change:** seeks to allow growth whilst mitigating and managing noise impact.
- **Policy D14 Noise:** seeks to reduce, manage and mitigate noise.
- **Policy E1 Offices:** encourages improvements to the quality, flexibility and adaptability of existing offices.
- **Policy HC1 Heritage Conservation and Growth:** advises that development should identify, value, conserve, restore and re-use heritage assets, including listed buildings and conservation areas.

Camden Local Plan 2017

The Proposals Map accompanying the Local Plan indicates that the site falls within the Holborn Growth Area, the Central London Area, a Viewing Corridor and the Bloomsbury Conservation Area.

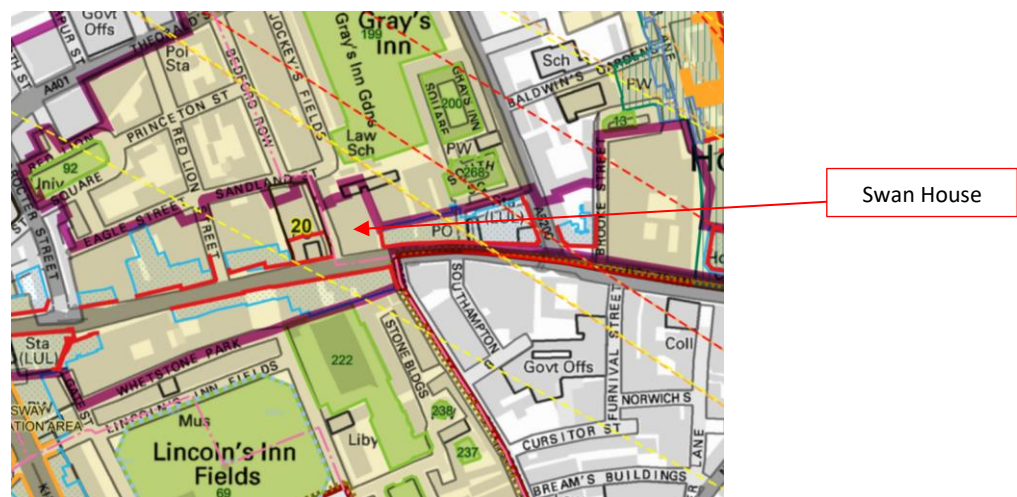


Figure 6: Extract from Camden Local Plan Proposal Map



As such, the following planning policies are considered to be relevant to the application proposal:

- **Policy E1: Economic Development:** promotes a strong economy with a stock of good quality business premises to meet the needs of the borough.
- **Policy E2 Employment Premises and Sites:** seeks to protect existing employment sites and premises.
- **Policy A4 Noise and Vibration:** seeks to control noise and vibration in accordance with thresholds set out in Appendix 3 of the Plan
- **Policy D1 Design:** promotes high quality design

- **Policy D2 Heritage:** The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

The proposed development will meet a number of key policy objectives by:

- Upgrading existing office stock to a standard which meets tenants' demands in terms of providing an internal environment which is appropriately cooled (Policies GG5, E1 and D3 of the London Plan and Policies E1 and E2 of the Camden Plan).
- Ensuring that the proposed noise levels are within appropriate parameters, as set out in the Plant Noise Impact Assessment submitted with the planning application (Policy D14 of the London Plan and Policy A4 of the Camden Local Plan).
- Not impacting on the Viewing Corridor, as the new units are some 70cm lower in height than the existing units.
- Respect the location of the building within the Bloomsbury Conservation Area and not harm the heritage asset (Policy HC1 of the London Plan and Policy D2 of the Camden Local Plan). The proposed units are smaller than the existing units, reducing visibility from key vantage points within the Conservation Area. Furthermore, there will be significant benefits of removing redundant plant from the roof, particularly the units located on the roof of the third floor. Whilst not prominent in the street scene, the plant is visible from the upper floors of neighbouring properties.

We trust the enclosed provides you with sufficient detail to consider these proposals. In the meantime, should you have any queries, please do not hesitate to contact Louise Morton at Quadrant.

Yours faithfully

LOUISE MORTON

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