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Planning Services
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Via Planning Portal

24 March 2023

Dear Sir / Madam,

Re: Full planning permission and display of advertisements with listed building consent for internal refurbishment works, including the subdivision of the existing retail unit, shopfront alterations, and new plant equipment at 127-129 High Holborn, WC1A 2AL

On behalf of our client, Hogarth Properties S.A.R.L (“Hogarth”), we’re pleased to enclose an application for full planning and display of advertisement with listed building consent for internal refurbishment works and shopfront alterations at 127-129 High Holborn, WC1A 2AL (“the Site”).

In addition to this planning covering letter, the submission comprises the following documents:

- Application Form, including Certificate of Ownership
- Community Infrastructure Levy (CIL) Additional Information Form
- Site Location Plan
- Full architectural drawing pack, including:
 - Demolition, existing, and proposed floor plans
 - Demolition, existing, and proposed sections
 - Demolition, existing, and proposed elevations
 - Detailed drawings
- Design & Access Statement
- Schedule of Works
- Heritage Statement
- Structural Report
- Acoustic Report
- Sustainability Statement

Site Context

The application site comprises the ground floor and basement of 127-129 High Holborn (“Norfolk House”), which is a Grade II Listed, 5-storey building, that is an early example of the work of Charles Holden.

The interior of the ground floor unit has generous floor to ceiling heights with large windows, which provide admirable natural light and was previously occupied by the Royal Bank of Scotland who have since vacated, and the unit currently remains un-occupied.

The ground floor and basement floors are currently made up of Class E use and are accessible from the corner of High Holborn and Southampton Place. The first, second, third and fourth floors are accessible from a separate entrance located on Southampton Place which have already seen similar works and refurbishment (approved under application refs. 2021/6111/L & 2021/5682/P).

Located approximately 450 ft from Holborn Underground Station which services the Central and Piccadilly Lines, the site is well connected and has access to green space from Bloomsbury Square Garden which is 0.1 miles from the proposal property.

Site Planning Designations

The key planning designations affecting the site are the following:

- Grade II Listed;
- Bloomsbury Conservation Area;
- Central Activities Zone (CAZ);
- Central London Frontage;
- Primary Frontage; and
- PTAL Rating of 6b (Best).

Planning History

There is limited relevant planning history associated on the site with most previous applications consisting of installations of new shopfronts, alterations to the frontage of the building, internally illuminated projecting boxes and signage. Details of the planning history for 127 & 129 High Holborn are listed below:

- **2016/1502/L** - Boarding up of two unused counters, and replacement of 4 no window marketing units affixed to internal glazing to High Holborn and Southampton Place elevations - **granted 13-04-2016**
- **2016/0505/A** - Display of 4 internally illuminated and 3 non-illuminated fascia signs, 2 internally illuminated projecting signs, 1 internally illuminated ATM surround and nameplate/security signs to replace existing - **granted 08-02-2016**
- **2016/0503/L** - Replacement of signage to existing bank - **granted 08-02-2016**
- **2012/1706/L** - Replacement of signage to existing bank - **granted 19-04-2012**
- **AD2407** - Display of a double sided internally illuminated projecting box sign located at fascia level on the western pilaster - **granted 26-09-1983**
- **36519** - Works of alteration to the frontage of 129 High Holborn (to amalgamate the property with the adjacent bank at 127-128) - **granted 04-07-1983**
- **AD2220** - The display of an internally illuminated double-sided projecting box sign located at fascia level on the western pilaster - **granted 08-02-1983**
- **23034R** - The installation of a new shopfront - **granted 06-07-1976**



- **22730** - The use of the ground floor and basement for banking purposes - **refused 13-05-1976**

As detailed within the supporting Design and Access Statement and Heritage Statement, historical photos and drawings suggest that the unit was originally subdivided into four retail units, with three shopfronts located along High Holborn, in addition to the corner entrance as is existing today. Over time, the expansion of the bank has resulted in a larger, singular unit as is present today.

The original plans indicate that the ground and basement retail space in Norfolk House were conceived as four independent units, each separated by North-South axis spine walls. The original elevations suggest that three of the four bays along High Holborn were left unfinished, allowing tenants to construct their own shop fronts within the openings of the stone piers and cornicing's. This interpretation is confirmed by the enclosed historic images within the Design and Access Statement.

The proposals that form part of this application, as discussed below, seek to reinstate much of the original and historic form of this part of Norfolk House.

Pre-Application

The scope of this application has been agreed following pre-application engagement with London Borough of Camden planning and conservation officers, as part of a wider Planning Performance Agreement that covers the Holborn Links Estate,

In sum, the pre-application discussion and feedback were generally positive, with overall support for the proposed works. Following the feedback, further historic research has been undertaken to inform the design.

The Proposal

The proposed development seeks full planning permission and display of advertisements with listed building consent for internal refurbishments, shopfront alterations, and new plant equipment. The internal refurbishment works would see the creation of an additional retail unit through a single subdivision.

Full details are outlined within the enclosed Design and Access Statement and supporting drawings; however, have been summarised below.

Shopfront Alterations

The proposed shopfront alteration works along High Holborn are limited to Bays 01 - 03 only, or (129, 128 & 127 High Holborn), as shown on the enclosed drawings. The final bay, closest to the Banks corner entry is understood to be original and has therefore been left as existing.

Three, identical, shopfronts are proposed within these bays. The shopfront within Bay 01 is the main, and only, means of access into a newly created retail unit. The shopfront within Bay 02 is only to be a means of escape, as required by Building Regulations. The shopfront within Bay 03 looks identical to Bay 01 and 02; however, will be fixed shut.

The proposed shopfronts incorporate a timber framed, glazed facade, and timber clad stall-riser. Centrally located timber framed, glass double doors incorporate a half-moon fan light, with timber mouldings to match the adjacent, existing window.

Signage zones are proposed on the stone piers either side of the office entrance consisting of 355x255 polished brass signs mechanically fixed to the wall.

Along Southampton Place, alterations are proposed to the existing windows to improve fire performance of the glazing. The design and form of these windows will otherwise remain as existing.

Internal Alterations

Various internal alterations are proposed at ground and basement level, to improve the commercial offering of the space. This includes:

1. Reinstatement of retail space at 129 High Holborn as a standalone unit at ground floor level, through infilling modern voids.
2. Removal of non-original staircase within 129 High Holborn.
3. Strip out of non-original partitions, finishes and fittings.
4. Minor enlargement of spine wall openings between 127 and 128 High Holborn.
5. Removal of existing hoist lift.

Plant Equipment

A kitchen duct is proposed to the rear of the building, which will run up the building externally to roof level.

Planning Policy and Guidance

Listed Building Consent

Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas. Section 16 of the Act states that:

“[..]In considering whether to grant listed building consent for any works the local planning authority all the Secretary of State showed had special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.

In considering whether to grant listed building consent the decision maker shall:

“... 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.”

Section 72 of the Act sets out a similar duty regarding conservation areas, namely the desirability of preserving or enhancing the character or appearance of a conservation area:

“[...]With respect to any buildings or other land in a conservation area, special attention should be paid to the desirability of preserving or enhancing the character or appearance of a conservation area”.

Paragraph 199 of the National Planning Policy Framework (July 2021) (NPPF) states that, in terms of assessing the impact of a proposed development on the significance of a heritage asset:

“...great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

Where a development would lead to “less than substantial” harm, paragraph 202 of the NPPF advises that:

“...this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

London Plan

In March 2021 the Mayor adopted the London plan. This is operative as the mayor’s special development strategy and forms part of the development plan for Greater London. The policy pertaining to heritage includes HC1 Heritage conservation and growth:

“(C) development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets significance and appreciation within their surroundings. The commutative impacts of incremental change from development on heritage assets and the setting should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations earlier on in the design process. A summary of the key policies from these documents are identified below”.

Other relevant policies include:

- Policies GG2, GG5 and GG6 set out London’s “Good Growth” strategy – that which is socially and economically inclusive and environmentally sustainable;
- Policies D4 and D14 provide guidance on the approach to delivering good design;
- Policies E1 – E3 sets out London’s economic strategy for growth and development;
- Policy HC1 provides guidance on heritage conservation and growth; and
- Policy SD5 gives strong support to office development in the CAZ.

Camden Local Plan

- Policy G1 states that the Council will create the conditions for growth to deliver facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings.
- Policy E1 sets out to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.
- Policy E2 encourages the provision of employment premises and sites in the borough.
- Policy A4 will seek to ensure that noise and vibration is controlled and managed. Development should have regard to Camden's Noise and Vibration Thresholds. Planning permission will not be granted if development is likely to generate unacceptable noise and vibration impacts or, if development sensitive to noise is proposed in locations which experience high levels of noise, unless appropriate attenuation measures can be provided.
- Policy D1 sets out the design requirements to secure high quality design in development. The Council will expect excellence in architecture and design and 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.
- Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings. This policy reiterates the requirements of the NPPF.
- Policy CC1 requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy sets out several requirements including the promotion of zero carbon development and the encouragement of sensitive energy efficiency improvements.

Planning Assessment

Principle of Development

The principle of the proposed refurbishments and alterations is strongly supported by will policies G1 of Camden's Local Plan and E1 of the London Plan, as the application will facilitate a new economic opportunity for the site and act as a catalyst for economic growth and benefit for the local community and residents. The proposed alterations reinstate an additional retail unit that will enhance employment opportunity on the application site.

Camden LBC, in pre-application discussions, considered there to be nothing controversial regarding the proposals.

The proposed works would increase the buildings' attractiveness to the market and actively contribute towards securing their viable long-term future, which would enable their heritage significance to be preserved (i.e., para 196 of NPPF).

Heritage and Design

In keeping with London Plan Policy HC1, and Camden Local Plan Policy D1, the proposals aim to protect and preserve the elements of historic significance and, where necessary, sensitively remove and replace tired and unsympathetic modern fittings.

The proposed internal alterations and refurbishments would see the reinstatement of a retail unit at 129 High Holborn, which would reflect the historic plan form of the site. Meanwhile, the proposed shopfront alterations reflect the original purpose of the site and have been designed in keeping with the wider historic design and detailing.

This programme of external, advert signage, internal refurbishment and restoration would significantly enhance the character and appearance of this Grade II heritage asset. These proposals would therefore accord with Local Plan Policy D2.

Given the improvements being made to the quality and appearance to the principal elevation, and internal plan form, it is considered that there is no harm to the buildings' significance with reference to paragraphs 193-196 of the NPPF.

The architectural and historic special interest of the site is enhanced through the programme of sensitive refurbishment and restoration. This would increase the buildings' attractiveness to the market and actively contribute towards securing their viable long-term future, which would enable their heritage significance to be preserved.

In support of this submission, a Heritage Impact Assessment has been provided. This concludes that the proposals will have a neutral impact on the listed building.

Amenity

The proposed external kitchen duct is considered to be appropriate within this location.

A Plant Noise Assessment has been submitted in support of the proposal, which demonstrates there is no detrimental harm to existing amenities.

Structural Changes

In regard to structural changes, all works will be carried out sympathetically to the historic fabric of the building and in line with any guidance or requirements set out by the local Conservation Officer and England Heritage.

The existing internal and external fabric shall be suitably protected throughout the entire duration of the works and the contractor undertaking the works shall have relevant listed building experience.

A summary of the proposed structural works is provided within the supporting Structural Statement.

Energy and Sustainability

In support of the application, a sustainability technical note and MEP Tenant Guide has been prepared. This provides guidance on the energy and sustainability standards that should be achieved by future tenants.

Conclusions

Paragraph 7 of the NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generation to meet their own needs. Paragraph 8 identifies the three overarching and interdependent objectives:

- a) “An economic objective - to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth, innovation, and improved productivity; and be identifying and coordinating the provision of infrastructure.
- b) A social objective - to support strong, vibrant, and healthy communities, by ensuring that sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.
- c) An environmental objective - to contribute to protecting and enhancing our natural, built, and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

As we have identified in this letter, the proposed works to 127-129 High Holborn would significantly enhance the quality of the retail accommodation and would enable it to meet the expectations of modern commercial occupiers. This aspiration is strongly supported by Local Plan Policy E1.

The refurbishments would increase the building’s attractiveness to the market and actively contribute towards securing its viable long-term future, enabling its heritage significance to be preserved, in keeping with paragraph 196 of the NPPF.

Public Benefit

Overall, the development proposals will bring forward several significant public benefits. These include, but are not limited to:

- Restoration and revitalisation of a Grade II listed heritage asset within the Bloomsbury Conservation Area.
- Safeguarding the longevity of 127-129 high Holborn as a commercial site.
- Reinstating elements of the historic plan form of 127-129 high Holborn.
- The construction phase will facilitate opportunities for skills development, training, and apprenticeships.

We consider that the substantial and wide-ranging benefits associated with the proposed development, as identified in the Statement and the supporting documents, would significantly outweigh any adverse impacts.

We assessed against the policies in the Framework taken as a whole, the proposed development constitutes sustainable development.

Yours sincerely

Samuel Brodie
Assistant Planner