



**Date: 08/08/2023**  
**PINS Ref: APP/X5210/W/23/3317699**  
**Our ref: 2022/2989/P**  
**Contact: Miriam Baptist**  
**Direct line: 020 7974 8147**  
**Email: [Miriam.baptist@camden.gov.uk](mailto:Miriam.baptist@camden.gov.uk)**

**Planning Solutions Team**  
**Planning and Regeneration**  
 Culture & Environment  
 Directorate  
 London Borough of Camden  
 2<sup>nd</sup> Floor  
 5 Pancras Square  
 London  
 N1C 4AG

Dear Sir/Madam,

[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

**Appeal site: Holiday Inn London Bloomsbury, Coram Street, London, WC1N 1HT**

**Appeal by: IPA Architects**

**Proposal: Erection of new boundary enclosure to existing refuse yard comprising a raised brick wall and a series of mesh metal panels plus new metal screen gates to three existing vehicular access points.**

I refer to the above appeal against the Council's refusal to grant planning permission. The Council's case is largely set out in the Officer's delegated report. The report details the application site and surroundings, the site history and an assessment of the proposal. A copy of the report was sent with the questionnaire.

In addition to the information sent with the questionnaire, I would be pleased if the Inspector could take into account the following information and comments before deciding the appeal.

## **1. Summary**

- 1.1. The application site relates to a seven-storey building plus basement. It is located between Russell Square underground station to the south, the Herbrand Estate to the north, the Grade II Listed Brunswick Centre to the east, and the Grade II Frames Coach Station to the west. The surrounding area is characterised by a mix of commercial units and residential uses. The site is not within a conservation area itself but faces the Bloomsbury Conservation Area on 3 sides, and a number of listed buildings lie within the vicinity. See appendix 3 at end of letter for site plan.
- 1.2. The proposal relates to a triangular external yard to the west, which is used for servicing and refuse. See Appendix 2 at end of the letter for images. At present, there is a low brick wall interfacing with the streetscape ranging in height from 0.9m to 1.3m. The proposal seeks to add an additional 2.2m height to this boundary, which means that overall the wall would be up to 3.5m high from street level. It would be punctuated with metal grille panels and there would be new metal gates to vehicle entrances.
- 1.3. The proposal is considered to eliminate the open nature of the street by erecting a high wall around an external yard which would appear akin to a single storey extension. In comparison to the existing modest brick wall, the

high brick wall with metal insert panels is considered to look hostile and the panels to have a back-of-house appearance in this context.

1.4. The planning application was refused for the following reason:

*The proposed boundary enclosure, by reason of its bulk, height, design and location, is considered to be unsympathetic, incongruous and harmful to the character and appearance of the streetscape and the adjacent Bloomsbury Conservation Area and to the setting of adjacent Grade II Listed building, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.*

## **2. Comments on appellant's grounds of appeal:**

2.1. The appellant's grounds of appeal focus the proposal's visual screening of the refuse/service yard and improving the perception of safety. These are summarised below following appraisal of the site.

### **Site appraisal**

2.2. Policy D1 of the Local Plan seeks to secure high quality design which respects local context and character; preserves or enhances the historic environment and heritage assets in accordance with Policy D2; comprises details and materials that are of high quality and complement the local character; and preserves strategic and local views. Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

2.3. The application site is surrounded on 3 sides by the Bloomsbury Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended).

2.4. The Holiday Inn has been excluded from the conservation area as seen in Appendix 3, and the Bloomsbury Conservation Area Appraisal and Management Strategy refers to it as the '*out-of-scale late 20th century Holiday Inn building (which falls outside the Conservation Area)*'.

### **Summary of grounds of appeal**

2.5. The appellant highlights the need to screen the yard as it is unsightly.

2.6. The council agrees with the principle of keeping refuse areas visually tidy to not detract from the area, but would resist the proposed high and hostile boundary along this street. The council would also resist a single storey extension here, in terms of a future application, or comparative boundary height.

2.7. Alternatively an acceptable proposal would be designed to soften the interface with the street and listed building opposite. Although it is a somewhat messy

refuse and servicing yard there is a sense of openness along the street and scale which would be lost with a sheer wall punctuated with metal panels along the street which is comparatively modest in scale and width. At present there are views up to the properties on Coram Street.

- 2.8. Although the Holiday Inn building is not itself within the conservation area its immediate surroundings are, and therefore it has a bearing on the historic context. There is a Grade II Listed building opposite and two traditional buildings either side of it - the red brick No 50 Bernard Mansions and at the red brick No 6 Herbrand Street at other end of the block.
- 2.9. A new wall equivalent to a single storey side extension is considered to add to the significant mass building which is already considered out of scale in terms of its context in the conservation area. It is likely to have a similar impact to that of a single storey extension. It will effectively result in loss of open space. Furthermore, the agent has stated that the applicant may well apply for the addition of a roof to enclose this area in the future. It is a fact that the Holiday Inn has not been included within the conservation area and that it is referenced as out-of-scale in the Conservation Area Appraisal and Management Strategy. For these reasons the building is considered to make a negative contribution to the area and therefore any development resulting in increased mass or dominance should be resisted or very carefully considered.
- 2.10. The appellant also states the proposal will improve security and the perception of safety on the street at night.
- 2.11. It is however likely that there are other viable boundary alterations that could improve the perception of safety along the street with less dominance.
- 2.12. Finally, the appellant references the section of high wall/enclosure already existing closer to the junction with Bernard Street, to which the proposal would be similar.
- 2.13. This existing tall brick enclosure is not considered to enhance or preserve the character of the surrounding area and is considered fairly crude in its context. Due to its short length, in comparison with the length of heightened wall proposed (approximately 8m, compared to 35m), it has less of a substantial negative impact. One suggestion from the council is that a boundary with sections at different heights is proposed. While it is appreciated that the top of compactors may be visible above a lower boundary, it is not considered that this will be a significantly harmful. It is considered that the numerous bins and wheeled cages are more significant in terms of detracting from the appearance of the area. A lower boundary would sufficiently screen those elements. Variations in height, railings or use of greenery could also be used to soften additional height necessary.
- 2.14. Overall, the Council still considers that the proposed high brick wall with metal panels would fail to respect, but instead would cause harm to the character and appearance of the host building and surrounding area, to the detriment of the character and appearance of the host building, the streetscene,

the adjacent Bloomsbury Conservation Area and the adjacent Grade II Listed building. In line with NPPF guidance, the Council considers that the harm to the designated heritage asset (the Bloomsbury Conservation Area), and the Grade II Listed building, amounts to “less than substantial harm” and the Council does not consider there to be any significant public benefits associated with the proposal that would outweigh the harm caused and therefore there is no justification for the proposed development. The Inspector is kindly requested to dismiss the appeal on this basis.

### 3. Conclusion

- 3.1. Based on the information set out above, and having taken account of all the additional evidence and arguments made, the proposal is considered to be contrary to Policies D1 and D2 of the Camden Local Plan 2017.
- 3.2. The information submitted by the appellant in support of the appeal does not overcome or address the Council’s concerns. The proposal presents no significant benefits that would outweigh the harm identified.
- 3.3. For these reasons the Inspector is respectfully requested to dismiss the appeal. However, should the Inspector be minded to approve the appeal, suggested conditions are included in Appendix 1.
- 3.4. If any further clarification of the appeal submission is required please do not hesitate to contact Miriam Baptist on the above direct dial number or email address.

Kind regards

Miriam Baptist  
Planning Officer  
Regeneration and Planning  
Supporting Communities

## **Appendix 1 – Suggested Planning Conditions**

1. The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall be carried out in accordance with the following approved plans: 22021-EX-001-00, 22021-EX-002-00, 22021-EX-003-00, 22021-EX-004-00, 22021-EX-005-00, 22021-EX-100-00 Existing Refuse Area Herbrand St West Elevation North Elevation, 22021-EX-100-00 Existing Refuse Area Herbrand Street Ground Floor Plan Section A, 2222021-LO-100-02 Proposed Alterations Refuse Area Herbrand St Ground Floor Plan Section A, 021-LO-100-02 Proposed Alterations Refuse Area Herbrand Street North Elevation West Elevation, Planning, Design and Access Statement dated July 2022 by IPA Architects.

Reason: For the avoidance of doubt and in the interest of proper planning.

3. All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of Policies D1 and D2 of the Camden Local Plan 2017.



## Appendix 2 – Supporting Images

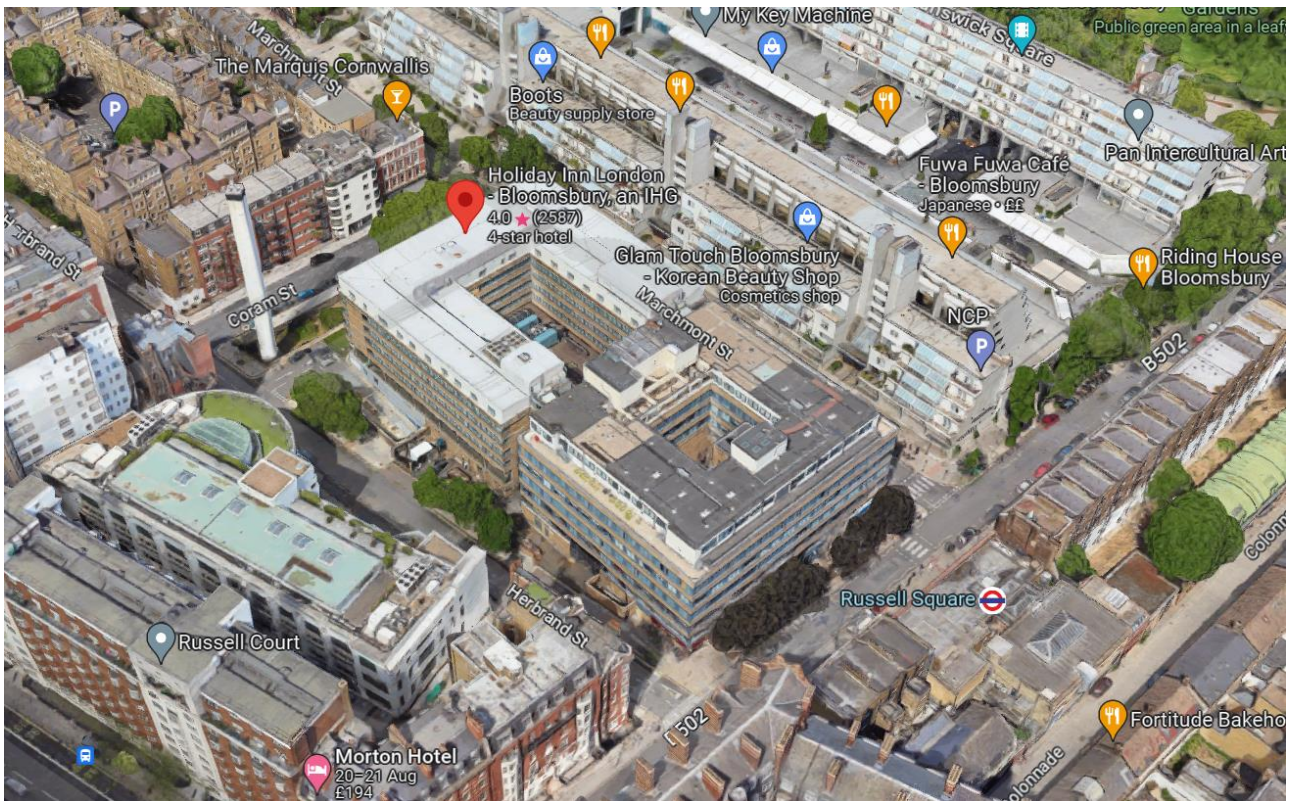


Figure (a): Aerial view of the Holiday Inn Bloomsbury

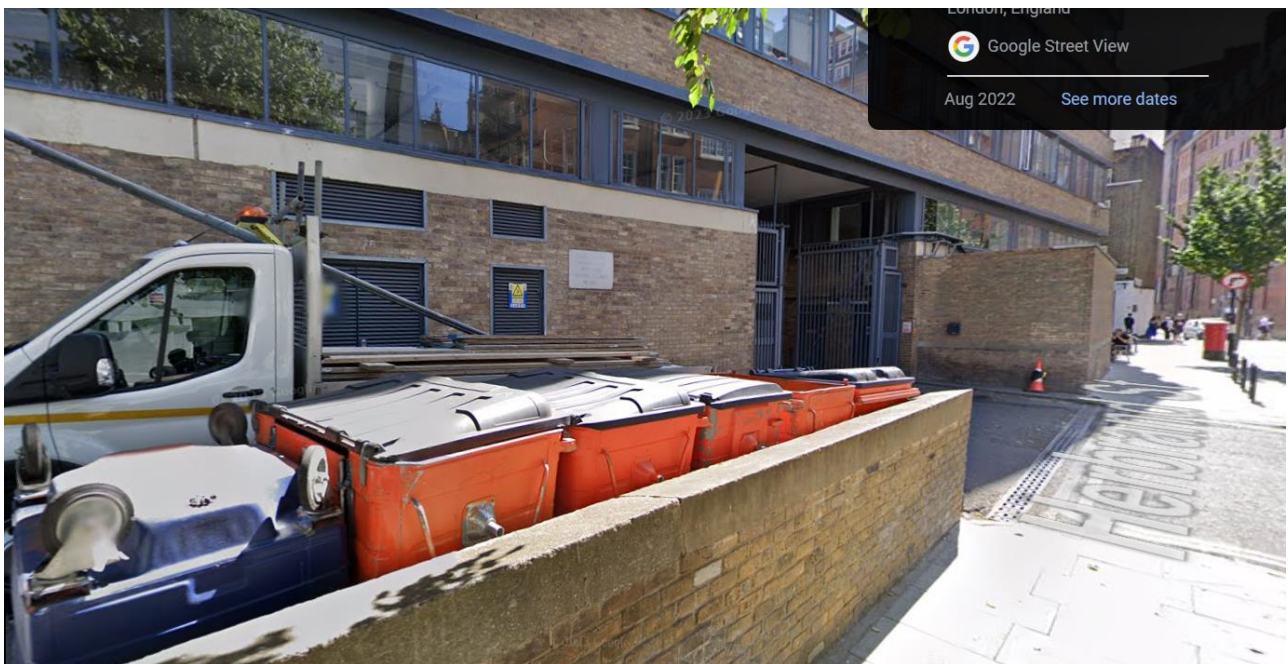


Figure (b): View of existing refuse/service yard looking toward Bernard Street. Bins do look unsightly but do not need a high boundary to be screened from view.





Figure (c): View of existing refuse/service yard looking toward Coram Street. Bins look unsightly but do not need a high boundary to be screened from view. Compactors are fewer in number.

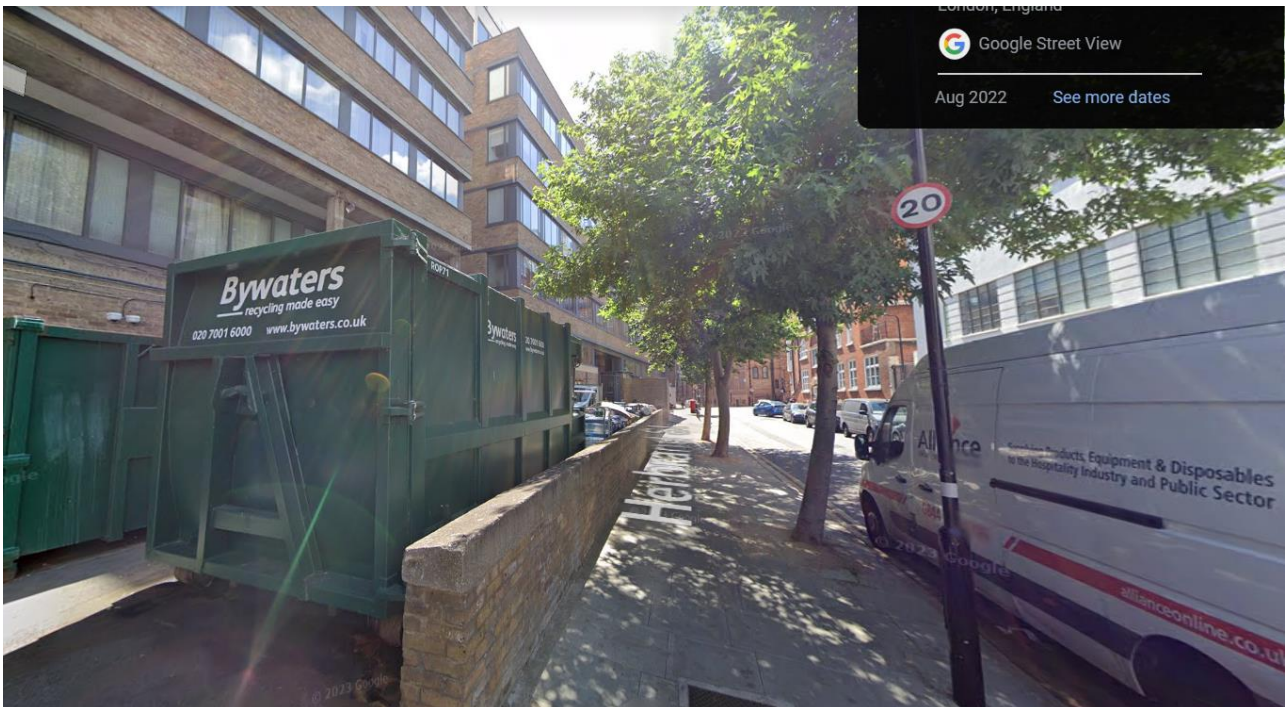


Figure (d): View of existing refuse/service yard with refuse compactors.





Figure (e): View of existing tall refuse enclosure close to the junction with Bernard Street.

### Appendix 3 – Heritage Map

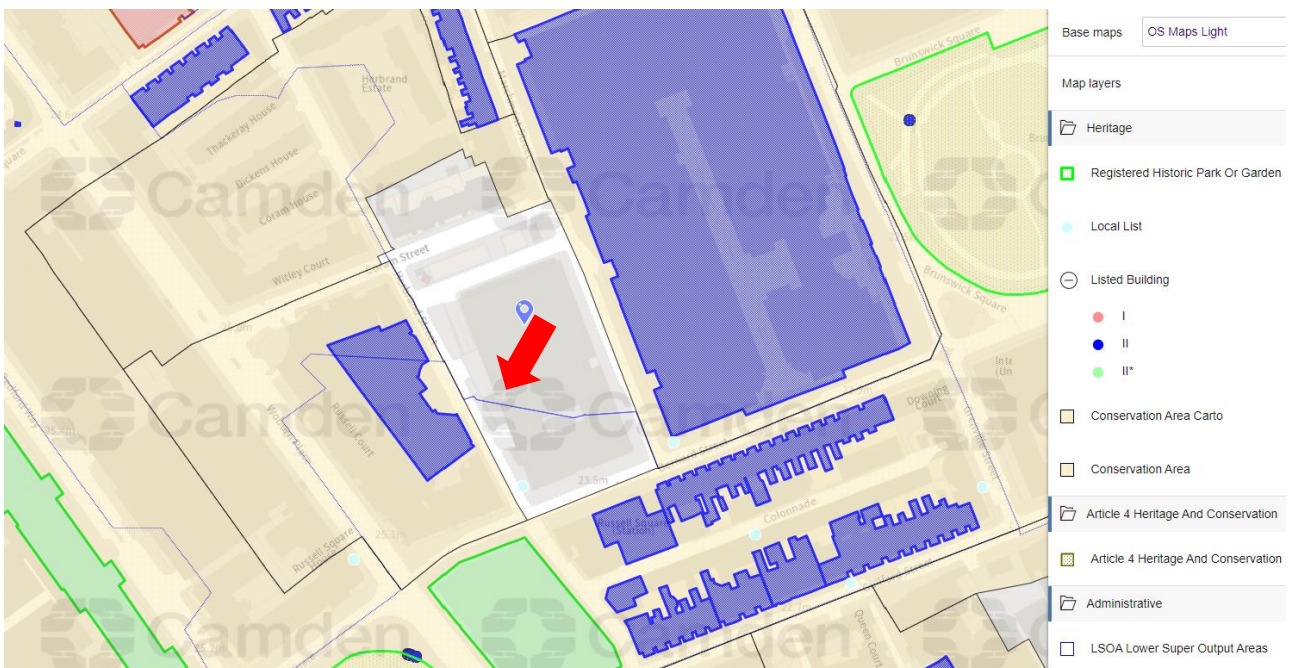


Figure (f): Heritage map showing surrounding conservation area in yellow, Listed Buildings in blue and red, and registered historic parks/gardens in green. Application site marked with red arrow.  
(Source: Camden GISMO)