

Our Ref: 23425/MS/dm  
Your Ref: PP-12663050 and PP-12663097  
Email: [mshearman@firstplan.co.uk](mailto:mshearman@firstplan.co.uk)  
Date: 02 February 2024

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

Dear Sir/Madam,

## **LISTED BUILDING AND ADVERTISEMENT CONSENT FOR THE PROVISION OF SIGNAGE AT 127-128 HIGH HOLBORN, HOLBORN, LONDON, WC1V 6PQ**

We have been instructed by our client, Farmer J Ltd, to submit the enclosed Listed Building Consent and Advertisement Consent applications for the above address. The proposals will enable our client to take occupation of the vacant unit and begin trading it as a 'Farmer J' restaurant.

In accordance with both local and national validation requirements, the submission is supported by the following documentation:

- Completed Planning and Listed Building Consent Application Forms;
- Completed Advertisement Consent Application Forms;
- Completed CIL Form;
- Planning and Heritage Statement, contained within this letter;
- Site Location Plan;
- Block Plan;
- Existing and Proposed Ground Floor Plan;
- Existing and Proposed South Elevation;
- Existing and Proposed East Elevation;
- Proposed South Elevation Awnings Detail;
- Proposed Signage Details; and
- Internal Fit-Out Work Drawings.

The requisite planning and admin fees of £165 + £64 have been paid online via the planning portal (**ref: PP-12663050** and **PP-12663097**). The remainder of this letter sets out our supporting case for the proposals.

### **Site Background**

The application site relates to the 5-storey Grade-II listed office building. The building is located on the junction of Southampton Place and High Holborn. The majority of the buildings on High Holborn road include retail units at ground level with glazed frontages. The ground and basement floors, which form the basis of this application, are in retail use. This was previously occupied by the Royal Bank of Scotland (RBS), who have

since vacated, and the unit currently remains unoccupied. The upper floors are in office use, and are accessed via external steps on 13 Southampton Place.

The site is located within the Bloomsbury Conservation Area, and has also been identified as a primary central London frontage. The site is located within Flood Zone 1, with a low probability of flooding.

## Planning History

The following applications have been identified from the online register:

- Most recently application ref. **2023/1550/L** was made for: *External alterations at ground floor of Norfolk House, including; removal of three existing sets of windows, stone cill and infills on the High Holborn frontage, and replace with three new shopfronts; subdivide the one of the ground floor commercial units (Class E) into 2 x commercial units (Class E); installation of external rear extract duct at basement to roof level. Internal alterations at basement and ground floor levels and display of new signage* – Granted 17/10/2023, as part of the ingoing tenant's work to the building. Prior to this application ref. **2023/1692/P** was made for *External alterations at ground floor of Norfolk House, including; removal of three existing sets of windows, stone cill and infills on the High Holborn frontage, and replace with three new shopfronts; subdivide one of the ground floor commercial units (Class E) into 2 x commercial units (Class E); installation of external rear extract duct at basement to roof level.* – Granted 17/10/2023
- **2021/1602/P** | *External alterations to reinstate stone surround and window frames to match existing following the removal of ATM, night safe and signage.* - Granted 30/06/2021
- **2019/3148/A** | *Display of 4x internally illuminated fascia signs, 3x non-illuminated fascia signs, 2x internally illuminated projecting signs and 1x internally illuminated ATM surround to existing bank (Class A2).* – Granted 01/05/2020
- **2019/3136/L** | *Replacement of existing external signage with new branded signage, including fascia with logo, atm surround and projection signage.* – Granted 16/09/2019
- **2018/3973/L** | *Installation of cabling to provide connections to new BT circuits and Cisco Wireless Access Points (wifi). All cable routes will utilise existing cable runs within the building. Drilling will be required to mount APs onto the walls or onto the ceiling where required.* – Granted 15/11/2018
- **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 09/05/2016
- **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 15/03/2016
- **2016/0503/L** | *Replacement of signage to existing bank.* – Granted 15/03/2016
- **2012/1707/A** | *Display of 3x non-illuminated fascia signs and 2x non-illuminated projecting signs to existing bank (Class A2).* – Granted 29/05/2012
- **2012/1706/L** | *Replacement of signage to existing bank.* - Granted 29-05-2012

## Application Proposals

The signage sought is detailed on the drawings submitted in support of the application, prepared by Holland Harvey Architects, and are summarised below. Drawings detailing the proposed internal fit-out works have been included for completeness. However, this work is primarily decorative and non-invasive, and therefore planning permission is not required.

### External Signage Proposals

- 3 no. Projecting Signs. Externally illuminated by trough lighting;

- 1 no. Digital Collections Screen;
- 1 no. Individual brass lettering 'Farmer J' fixed to façade;
- 3 no. White vinyl signage applied to external face of glazing;
- 3 no. Retractable branded awnings;
- 1 no. Brass Plaque Sign; and
- 1 no. Illuminated menu board.

## Internal Signage Proposals

- 1 no. Internally suspended 'ONLINE COLLECTION' illuminated signage;
- 2 no. Internally suspended 'Farmer J' Illuminated Signage (1x small and 1x large); and
- 1 no. Illuminated A3 menu hung internally.

## **Planning Policy**

The statutory development framework for the site is composed of the Camden Local Plan (adopted 2017), the Policies Map, and the London Plan (2023). The National Planning Policy Framework (NPPF) (2019) forms a material consideration, as does local supplementary guidance.

### The National Planning Policy Framework (2023)

The NPPF provides overarching policy guidance for England. The document emphasises the presumption in favour of sustainable development; Section 12 discusses the importance of achieving well designed places whereby a high standard of amenity should be maintained. Section 16 requires proposals affecting heritage assets to describe the significance of any heritage assets affected in a manner proportionate to their importance.

### London Plan (2023)

This document sets out the spatial strategy for London over the next 20-25 years.

**Policy D4:** *'Delivering Good Design'* seeks to ensure that high standards of design are upheld throughout the planning process.

**Policy D14:** *'Noise'* states that to improve health and quality of life, proposals should seek to mitigate noise without placing unreasonable restrictions on existing noise generating uses. Noise should be mitigated through sufficient acoustic design.

**Policy HC1:** *'Heritage Conservation and growth'* confirms that proposals affecting heritage assets should conserve or enhance their significance.

### Camden Local Plan (2017)

**Policy D1:** *'Design'* states that the Council will seek to secure high quality design in development, but requiring development to respect local context and character, and preserving or enhancing the historic environment and heritage assets in accordance with Policy D2 Heritage.

**Policy D2:** *'Heritage'* states the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, and listed buildings. The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss to preserve or enhance the borough's listed buildings, the Council will:

- i. Resist the total or substantial demolition of a listed building;

- ii. Resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and
- iii. Resist development that would cause harm to significance of a listed building through an effect on its setting.

**Policy D3: 'Shopfronts'** states The Council will expect a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features. Consideration will be taken of the existing character, architectural and historic merit and design of the building and its shopfront.

**Policy D4: 'Advertisements'** states The Council will require advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail. We will support advertisements that:

- i. Preserve the character and amenity of the area; and
- ii. Preserve or enhance heritage assets and conservation areas.

We will resist advertisements that:

- i. Contribute to an unsightly proliferation of signage in the area;
- ii. Contribute to street clutter in the public realm;
- iii. Cause light pollution to nearby residential properties or wildlife habitats;
- iv. Have flashing illuminated elements; or
- v. Impact upon public safety.

#### Camden Planning Guidance: Advertisements (2018)

This document states that in general, the most satisfactory advertisements are those which take into account, the character and design of the property, the appearance of its surroundings, and the external fabric of the host building.

#### Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

This document states that the initial designation of Bloomsbury as a conservation area in 1968 sought to protect elements of development from the Georgian and earlier eras but excluded areas where there had been significant later redevelopment. There have since been numerous subsequent extensions that have mostly reflected a growing appreciation of Victorian and Edwardian and high-quality 20th century architecture.

### **Planning and Heritage Assessment**

The proposals within the submitted applications are modest in scale, but essential to ensure Farmer J's tenancy within the application site.

The main issues for consideration in relation to these proposals are, therefore, the design and appearance of the proposed advertisements and their impact on the listed building, and the impact on surrounding amenities. These matters are discussed in turn below.

#### i. Designations

The application site is located within the Bloomsbury Conservation Area and sits on the ground and basement floors of the Grade-II Listed building. Accordingly, these form the relevant heritage assets when assessing the scheme. The buildings listing describes the premises as follows:

'CAMDEN

TQ3081NW HIGH HOLBORN 798-1/100/830 (North side) 14/05/74 Nos.127 AND 129

II

*Office block, now a bank. c1904. By H Percy Adams and Charles Holden. Portland stone with granite ground floor. 4 storeys and attic. 4 bays to High Holborn, splayed corner, 4 bay return to Southampton Place. Free Classical manner with rusticated pilasters between bays carrying sill string at 3rd floor level. Round-arched entrance on corner with bracketed stone balcony above. Architrave windows, those on 1st floor with broken cornices alternating with Venetian style. Bracketed cornice, above which attic. Corner surmounted by a turret. INTERIOR: not inspected.'*

Noting the buildings description, it is clear that the majority of its historic value lies above the ground floor. The description states the materiality of the ground floor to be granite, whilst the above floors are Portland stone. Additionally, the 'Architrave windows, those on 1st floor with broken cornices alternating with Venetian style. Bracketed cornice, above which attic. Corner surmounted by a turret'. The ground floor frontage is less significant, and whilst the 'rusticated pilasters between bays' cover all floors, the key historic value on the ground floor lies with the 'round-arched entrance on corner with bracketed stone balcony above'. Permission (ref. **2023/1550/L**) has recently been granted for modern alterations to the ground floor exterior façade.

In the light of the above, it is not considered that this application will provide any detrimental impact on the relevant heritage assets. This application is for the installation of various signage both internally and externally displayed on the ground floor of the application site. It has been ensured that the signage does not harm any of the aforementioned historic architectural features of the building.

## ii. Impact Assessment

The National Planning Policy Framework sets out the clear policy that there is a presumption in favour of the conservation of designated heritage assets, in this case, the Bloomsbury Conservation Area and the Grade-II listed building. Therefore, the main considerations relevant to this application are the impact of the proposals on the character, appearance and significance of the Grade II listed building and the wider Conservation Area.

This application's proposals relate solely to the installation of internally suspended and external signage. It is considered that the proposed signage will not detract from the historic value of the building in anyway, nor will they cause any substantial harm to the heritage asset. The signs are of a simple, contemporary design that has been designed in accordance with the listed building and surrounding conservation area. They have all been designed to an appropriate scale and proportion and will be illuminated to a level that is appropriate to its location. The fascia signs will not be internally illuminated, rather it is intended that they will be illuminated via LED trough lights. The proposals are therefore considered to meet the requirements of **Policies D2 and D4**.

The application proposals will, therefore, have no impact on the significance of the building or its setting, as well as fully accord with the heritage policies set out above.

## Design and Access Statement

### i. Use

This application relates to the installation of signage to the application site, as such, no changes to the application site's use is proposed.

ii. Scale and Amount

The proposed signage will not change the scale of the property, but rather improve it's external appearance.

iii. Layout and Appearance

The proposals involve minor alterations to the external layout, that seek to refresh and enhance the building's external appearance. All advertisements are of limited illuminance levels, suitable to the location.

iv. Landscaping

The application proposals will have no impact on the landscape of the site.

v. Access

The application proposals will have no impact on the access to the site.

## Conclusions

In conclusion we consider the proposals put forward by these applications are entirely appropriate to the significance of the listed building and its location within the Conservation Area and represent a significant investment on the part of our client. They will enable them to take occupation of this vacant listed building and ensure its long-term viability. Indeed, the proposals are in compliance with the Council's policies and guidance on design, amenity and conservation area management. They will bring a reputable and popular operator to the area, therefore enhancing the vitality of the wider area.

I therefore trust that you have sufficient information to validate and approve the application, however, should you have any queries then please do not hesitate to contact me. Otherwise, I look forward to discussing the application proposals with you in due course.

Yours faithfully,



MARK SHEARMAN  
Director