



# Planning Statement

31 Southampton Row, Holborn

May 2024





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## EXECUTIVE SUMMARY

The proposal is for the refurbishment of 31 Southampton Row, Holborn, London, as part of a wider regeneration of the Bloomsbury Quarter (previously the Holborn Links Estate).

Bloomsbury Quarter is approximately 2.5 acres of contiguous land bounded by High Holborn, Southampton Row and Bloomsbury Square and comprises 32 freehold controlled properties made up of office, retail, and residential uses. Much of the estate, 26 buildings in total, are Listed and is located within the Bloomsbury Conservation Area.

Our client's vision is to provide for a reimagined Bloomsbury Quarter - a revitalised, modern estate that is fit and prepared to meet the needs of its occupiers and the wider community. As a combined estate sharing mutual values, it must be connected, integrated sympathetically and intellectually with the complexities of the conservation area and its listed buildings to maximise its true potential.

The proposed scheme at 31 Southampton Row has been informed by extensive pre-application engagement with the London Borough of Camden (LB Camden). Officers at LB Camden have expressed support for the overall scheme.

The proposal seeks to secure the sustainable long term viable future of the Site and will deliver a high-quality development that will restore and enhance the internal spaces and the Site's contribution to the character of the surrounding Bloomsbury Conservation Area. It will also significantly enhance the environmental credentials of the buildings and improve its energy efficiency.

It will secure the long-term viability of this part of Bloomsbury Quarter as an office and retail location, uses that are strongly encouraged within the Central Activities Zone (CAZ). The development proposals will also bring forward several significant public benefits. These include, but are not limited to:

- (a) Restoration and revitalisation of a Grade II listed heritage asset within the Bloomsbury Conservation Area;
- (b) Safeguarding the longevity of 31 Southampton Row as a commercial site;
- (c) Bringing back to life Sicilian Avenue with newer, higher quality retail tenants, with associated economic benefits;
- (d) Facilitating opportunities for skills development, training and apprenticeships and other economic benefits during the construction period;
- (e) Improving the sustainability and energy credentials at the Site, through improvements to the energy efficiency of the existing building.

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

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

## 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by hgh Consulting on behalf of Hogarth Properties S.A.R.L (“Hogarth”) in support of the proposed development at 31 Southampton Row, Holborn, London, WC1B 5HJ (“the Site”). The Site forms part of Bloomsbury Quarter (previously known as the Holborn Links Estate) and the proposed refurbishment follows a suite of planning applications seeking to upgrade and revitalise the commercial and office accommodation across the Estate.

1.2 This Planning Statement is submitted to the London Borough of Camden (the LPA) as part of the application submission for the following:

*“Full planning and listed building consent for internal refurbishments and external alterations, including creation of a new office entrance on Sicilian Avenue, reconfiguration of retail units, cycle parking, shower and changing facilities, and associated works.”*

1.3 This Planning Statement assesses the proposed scheme against the adopted development plan and other material planning considerations. It should be read in conjunction with the other supporting information submitted, which comprises:

- (a) Application form, including Certificate of Ownership;
- (b) Community Infrastructure Levy Additional Information Form;
- (c) Planning Covering Letter;
- (d) Full architectural drawing pack prepared by Hale Brown Architects, including:
  - Site Location Plan;
  - Existing, demolition and proposed floor plans;
  - Existing, demolition, and proposed external elevations and internal elevations;
  - Existing, demolition, and proposed sections;
  - Existing, demolition, and proposed roof plans;
  - Detailed drawings of new or replacement architectural features;
- (e) Design and Access Statement, prepared by Hale Brown Architects;
- (f) Schedule of Works, prepared by Hale Brown Architects;
- (g) Heritage Statement, prepared by Icen Projects;
- (h) Structural Report, prepared by Heyne Tillett Steel;
- (i) Acoustic and Vibration Report (including Plant Specification), prepared by Waterman;
- (j) Air Quality Assessment, prepared by Waterman;
- (k) Construction Management Plan Pro Forma, prepared by Gleeds/Workman;
- (l) Energy and Sustainability Statement (including BREEAM Assessment), prepared by Waterman; and

(m) Operational Management Plan, prepared by Hale Brown Architects and Knight Frank.

1.4 The remainder of the Planning Statement is set out as follows:

- (a) **Section 2** describes the development Site, site designations and planning history;
- (b) **Section 3** details the pre-application feedback;
- (c) **Section 4** describes the proposed development;
- (d) **Section 5** sets out the relevant planning policy framework and guidance;
- (e) **Section 6** assesses the proposed development against relevant planning policies having regard to other material considerations;
- (f) **Section 7** sets out our summary and conclusions.

## 2.0 SITE BACKGROUND

### **Bloomsbury Quarter (formerly the Holborn Links Estate)**

- 2.1 Bloomsbury Quarter is approximately 2.5 acres of continuous land bounded by High Holborn, Southampton Row and Bloomsbury Square and comprises 32 freehold controlled properties made up of office, retail and residential uses. The Estate is located within the Central Activities Zone (CAZ) and the Bloomsbury Conservation Area and most of its buildings, 26 in total, are statutorily listed.
- 2.2 The Estate is located close to two Crossrail stations on the Elizabeth Line, Tottenham Court Road and Farringdon, and is a short walk from Holborn Underground Station.
- 2.3 Bloomsbury Quarter was acquired by CCP 5 Long Life (“CCP 5 LL”) in March 2020 and is managed by Alchemy Asset Management and Knight Frank. The Estate presents an opportunity to upgrade and revitalise the commercial and office accommodation; and enhance the appearance of the landmark Listed Buildings and public realm in accordance with local and regional objectives to create successful places.
- 2.4 Our client’s vision is to provide for a reimagined Bloomsbury Quarter - a revitalised, modern estate that is fit for purpose and able to meet the needs of both its occupiers and the wider community. As a combined estate sharing mutual values it must be connected, integrated sympathetically and intellectually with the complexities of the conservation area and its listed buildings to maximise its true potential.
- 2.5 Previous development across the Estate was carried out in a piecemeal fashion that failed to realise the true potential of the destination through the capitalisation that can be achieved through the creation of an integrated, connected place. The listed buildings have also been somewhat neglected and have not been treated sympathetically.
- 2.6 In its current form, the office accommodation falls well short of meeting modern business requirements in that it fails to provide inclusive, efficient flexible floor space that is market desirable, energy efficient and sustainable. Furthermore, the accommodation does not deliver the enhanced amenity and enriched smart places for collaboration which modern employers demand.
- 2.7 The architectural and cultural heritage of the estate is a major aspect to be celebrated and is something which, through a programmed approach to conserving where appropriate its significance; will add a rich texture and character to the future destination.

### **31 Southampton Row**

- 2.8 31 Southampton Row is a triangular, five storey building which borders Sicilian Avenue, Vernon Place, and Southampton Row. It comprises retail and office floorspace (Use Class E) at basement through to fourth floor, with residential floorspace (Use Class C3) occupying the fifth floor.

Figure 1: Existing building at 31 Southampton Row



- 2.9 The existing building is almost completely vacant. The aim of the proposals is to address configuration issues within the existing building and upgrade the existing accommodation to make it more attractive to incoming tenants, in order to secure the ongoing usability and viability of the building.

#### Historical Significance

- 2.10 31 Southampton Row, Sicilian Avenue and Vernon and Sicilian Houses are all contemporaneous and were constructed between 1906 and 1910 to the designs of R J Worley. The site is Grade II listed and incorporates three listings: Avenue Chambers (1-6 Vernon Place), 25-35A Sicilian Avenue, and 6-20 Sicilian Avenue.
- 2.11 31 Southampton Row is notable for its combined use of terracotta and brickwork. The upper floors were originally designed as residential flats, but that use has long since been abandoned and the upper floors are now in office use (with the exception of the fifth floor which remains in residential use). This has had a significant impact on the plan form of the building in that it has removed all the chimney stacks and fireplaces. Their removal has resulted in the consequential loss of most cornices and other original architectural features of the building.

- 2.12 The ground floor is set out in bays with inserted shopfronts, flanked by Corinthian columns on low plinths which reach to the second-floor level, holding a blank terracotta frieze and modillioned cornice. The exterior is fitted with an array of window types, consisting of square headed casements, three and five bay windows, and oriels, all of which have fine terracotta detailing, and retain their leaded panes; these are all of high significance. In general, the exterior of 31 Southampton Row is of very high historical significance and lends much value to the aesthetic character of the surrounding Bloomsbury Conservation Area.
- 2.13 However, due care and attention has not always been paid in regard to retaining the historic fabric of the building. This is highlighted in the poor-quality repair works to the terracotta. There has been large scale reconstruction throughout the building's life span, including an additional floor inserted within the mansard roof. The interior has also seen several alterations; the partitions have been altered considerably and the majority replaced with modern fabric, altering the historic plan. Ceiling heights have been reduced by the introduction of the suspended ceiling, and internal cornices and skirting have largely been lost.
- 2.14 Overall, the building has been subject to major intervention historically and as a result the internal plan form and fabric of the building has been compromised. Section 3 of the Heritage Statement sets out in detail the historic changes that have been made to each floor level. The special interest of the building derives from its external architecture and association with the architect.

#### Planning History

- 2.15 The Site has been subject to numerous planning applications. Full details of the Planning History are set out below; this largely comprises internal alterations including alteration to partitions, and minor external alterations.

*Table 1: Relevant Planning History*

Application Reference	Address	Description of Development	Date Granted
31875	31 Southampton Row, WC1	The erection of an extension to the building on all floors within the existing light-well, the provision of new shopfronts and a new office entrance and the change of use of shop unit to 6 offices.	09.02.1981
33808	31 Southampton Row, WC1	Erection of an extension to the building on all floors within the existing light-well, the provision of new shopfronts and a new office entrance and the change of use of shop unit 6 to offices.	24.02.1982



8601244	31 Southampton Row, WC1	That in accordance with the requirements of Condition 8 of the planning permission dated 28th April 1985 (Reg. No.19020) which stated that office floor space should be let to independent firms in units not exceeding 2 000 sq.ft. or in such other sizes as the Council might specifically permit in writing the Council hereby agrees that 3 125 sq.ft. of the second floor to be occupied by Gabriel Duffy Group Limited as shown in red on the unnumbered submitted second floor plan.	09.07.1986
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8601927	31 Southampton Row, WC1	That in accordance with the requirements of Condition 8 of the planning permission dated 28th April 1975 (Reg. No.19020) which stated that office floor space should be let to independent firms in units not exceeding 2 000 sq.ft. or in such other sizes as the Council might specifically permit in writing the Council hereby agrees that 3 400 sq.ft. of the third floor be occupied by the Insurance Ombudsman Bureau as shown in red and blue on the unnumbered submitted third floor plan.	09.10.1986
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9400117	31 Southampton Row, WC1	Variation of Condition 08 of planning permission dated 28th April 1975 to permit office accommodation on first and second floors under one lease as shown on plans for 1st and 2nd floors	25.01.1994
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9470198	31 Southampton Row, WC1	Installation of partitions to form meeting rooms reception tea-bar and copier room at second floor level and the installation of VRV comfort cooling cassette units in new suspended ceiling with condenser unit on roof as shown on location plan 9403 and drawing numbers 9403/02 08 09 11 & 12 and 6 photographs.	23.06.1994
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9400958	31 Southampton Row, WC1	Installation of a roof-mounted condenser units. as shown on location plan 9403 and drawing numbers 9403/02 08 09 11 & 12 and 6 photographs.	23.06.1994
9470291	31 Southampton Row, WC1	Installation of new entrance with canopy and the refurbishment of the entrance hall. as shown on drawing numbers 94017/04 14 20 21 22 & 35A revised by letter dated 26th October 1994.	19.09.1994
9401446	31 Southampton Row, WC1	Installation of new entrance with canopy. as shown on drawing numbers 94017/04 14 20 21 22 & 35A revised by letter dated 26th October 1994.	19.09.1994
9470319	31 Southampton Row, WC1	Approval of details of rooftop condenser unit finish and colour pursuant to additional condition 01 of listed building consent dated 2nd September 1994 (Reg.no.HB/ 9470198) for the installation of VRV comfort cooling cassette units in new suspended ceiling with condenser unit on roof. (No drawings associated with this decision).	27.10.1994
9500820	31 Southampton Row, WC1	Removal of additional condition 08 attached to planning permission (Reg.No.19020) dated 28 April 1975.	01.05.1995
LS9604349R1 and PS9604349R1	31 Southampton Row, WC1	The installation of one new air conditioning compressor unit on the roof, as shown on drawing Nos: 2007/06A,07A	19.02.1997
2004/2312/P	31 Southampton Row London WC1B 5HJ	The change of use of 1st to 4th floors from office (Class B1)to mixed use office (Class B1)/education (Class D1).	30.06.2004

2005/0693/L	31 Southampton Row London WC1B 5HJ	Partial demolition of internal partitions to create office space.	04.03.2005
2005/3610/P	31 Southampton Row. London WC1B 5HJ	The installation of 20 air condition units and other air handling equipment at roof level in association with the refurbishment of the existing offices.	02.09.2005
2005/3612/L	31 Southampton Row London WC1B 5HJ	Works of refurbishment of the existing offices at ground to fourth floor levels involving removal of non-original walls, including the installation of air conditioning units and other air handling equipment at roof level.	02.09.2005
2008/4735/P and 2008/4834/L	21 & 31 Southampton Row London WC1B 5HA	Alterations to Sicilian Avenue footway including new paving scheme, replacement drainage, installation of umbrella anchors, and installation of new external lighting scheme.	10.11.2008
2012/5873/P and 2012/5874/L	Fifth Floor 31 Southampton Row London WC1B 5HJ	Change of use of fifth floor from 4 (1x2 and 3x3 bed) residential units (Class C3) to office (Class B1) accommodation.	13.11.2012
2019/1671/L	31 Southampton Row London WC1B 5HJ	Removal of modern partitions and construction of new ones to improve the layout of the existing flats. General refurbishment to meet current standards.	15.04.2019
2019/6298/L	31 Southampton Row London WC1B 5HJ	Removal of modern partitions and construction of new ones to improve the layout of the existing flats.	14.01.2020

2023/4988/L	31 Southampton Row London Camden WC1B 5HJ	Temporary installation of a site office at first floor level.	11.12.2023
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### Planning Designations

2.16 The key planning designations affecting the Site are the following:

- (a) Grade II Listed
- (b) Bloomsbury Conservation Area
- (c) Central Activities Zone (CAZ)
- (d) Archaeological Priority Area
- (e) PTAL Rating of 6b (Best)

2.17 Where relevant these are considered as part of the Planning Assessment in Section 6 of this Statement.

### 3.0 PRE-APPLICATION

- 3.1 The scope of this application has been agreed following a comprehensive programme of engagement with the local authority and key stakeholders, with feedback provided on three occasions in 2023.
- 3.2 The pre-application discussions and feedback were largely positive, with overall support for the proposed works. Where concerns were raised, we have listened to feedback and adjusted the scheme accordingly. A full summary of feedback is set out below.

#### Pre-Application 1 (July 2023)

- 3.3 The first pre-application scheme was presented to officers in July 2023 and set out the initial proposals for the refurbishment of Southampton Row. In summary, Officers' feedback was:
- (a) Officers would like to see more smaller retail units maintained.
  - (b) Officers would like further options to be explored for office users using the entrance on Vernon Place, to enable the use of the grand staircase - this should have a function within the building.
  - (c) Officers do not support the loss of historic chimney breasts.
  - (d) Further details requested regarding cycle parking facilities and automatic doors.
  - (e) The AHU should be positioned as discreetly as possible on the roof.
  - (f) Officer would like other options considered for the refuge area which was proposed in the centre of the staircase.
  - (g) Officers are supportive of reconfiguring and improving the office WC facilities and improving the existing grand staircase in form and function.

#### Pre-Application 2 (September 2023)

- 3.4 The client and project team reviewed Officers' feedback summarised above and sought to explore, where appropriate, alternative design solutions. This included a revised ground floor plan, as well as options to restore, utilise and celebrate the historic staircase; these amendments were enclosed within the second pre-application submission.
- 3.5 In response to the updated scheme, Officers provided the following feedback:
- (a) Officers would like to see the historic entrance on Vernon Place being retained.
  - (b) The change of use to office entrance and reception within two of the units on Sicilian Avenue is considered to harm the character of the street and building.
  - (c) The building should retain a greater number of smaller units on Sicilian Avenue consistent with its historic nature as a parade of small shops.
  - (d) The proposed reduction of the spine walls are acceptable.
  - (e) Officers would like to see alterations to the cycle facilities including a drying room included with the design.

- (f) There could be confusion with both residential and office users accessing the same staircase. The glazing between the office and the staircase is not supported.
- (g) Officers support the relocation of the refuge area.

**Pre-Application 3 (November 2023)**

3.6 In response to Officers’ feedback, the client and project team incorporated further amendments into the scheme design. These include the retention of three existing small retail units along Sicilian Avenue, the reinstatement of the residential entrance on Vernon Place, and a reconfiguration of the core layout with the grand staircase reinstated as a central circulation space. These amendments were submitted to the Council as part of the third pre-application. Officer’s feedback is summarised in Table 2 alongside a design response to each point.

*Table 2: LB Camden Pre-Application 3 Feedback*

LB Camden Pre-Application Feedback	Design Response
<p>The revised Ground floor plan is an encouraging step forward and the proposed office entrance on Sicilian Avenue is in line with the rest of the street frontage.</p>	<p>Noted and these proposals have been retained in the application submission.</p>
<p>Officers would like to discuss wayfinding for the Sicilian Avenue entrance as part of the planning application.</p>	<p>The office entrance will be located within one of the projecting glazed bays on Sicilian Avenue. Planters will be proposed either side of the office entrance, with new illuminated brass latticework fitted to the existing columns. This will have the effect of demarcating the office entrance from the other projecting glazed shopfronts.</p>
<p>The new residential entrance to Vernon Place and opening up the grand staircase is welcomed. Making alterations to the plan form consistent with the original residential entrance plan is a benefit to the property.</p>	<p>Noted and these proposals have been retained in the application submission.</p>
<p>Officers would like to understand the amount of intervention needed to open up access to the proposed lift.</p>	<p>Please refer to the DAS and drawings which set out in detail the proposed works.</p>
<p>Officers requested clarification on where the reception and concierge facilities for residential users are located.</p>	<p>The proposed reception and concierge is shared between office and residential users.</p>

<p>The entrance to the Cycle Store off Southampton Row is wide and looks to be accessible. However, Officers would like to understand how users would safely carry their bikes up and down stairs.</p>	<p>The proposed staircase incorporates a cycle guide rail which allows bicycles to be wheeled up and down (please refer to Section 3.9 of the DAS).</p>
<p>Officers remain concerned about how the grand staircase will function as a mixed circulation space. Lack of differentiation between office and residential users raises concerns on the basis that residential users should not have access to office floors and vice versa.</p>	<p>The grand staircase will principally be for residential use. Office users will be able to access the staircase for means of escape, in line with the building’s fire strategy.</p> <p>Day to day circulation around the building will be controlled via access controlled doors, with office and residential users being supplied with fobs that allow specific doors within the building to be opened.</p>
<p>Officers do not support the introduction of the glazed screen; the daily visibility for the office users is not considered to overcome the harm of this modern element in the central part of the building. Increasing the size of the rooflight instead to provide additional light would be supported by Officers.</p>	<p>The glazed screen has been omitted from the proposals following Officer feedback.</p>

3.7 Overall, following extensive pre-application discussions and the resulting amendments to the scheme design, feedback from Officers indicates their support for and agreement with the revised proposals, subject to some minor points of clarification identified in the table above.

#### 4.0 PROPOSED DEVELOPMENT AND WORKS

4.1 The proposed description of development is as follows:

*“Full planning and listed building consent for internal refurbishments and external alterations, including creation of a new office entrance on Sicilian Avenue, reconfiguration of retail units, cycle parking, shower and changing facilities, and associated works.”*

4.2 No change of use is proposed with this application.

4.3 Full details of the proposed works are set out in the accompanying Design and Access Statement, Schedule of Works, and architectural drawings. The key elements are summarised below:

- (a) Reconfiguring the retail units to help to meet market expectations, while maintaining the nature and feeling of Sicilian Avenue as a parade of smaller shops;
- (b) The addition of an office entrance on Sicilian Avenue, to improve the arrival experience to the offices;
- (c) Re-establishing the historic entrance from Vernon Place, to improve the arrival experience for residential occupiers;
- (d) Reduction of the structural spine walls to the upper office floors to meet market expectations and improve the existing accommodation;
- (e) Creation of new cycle and shower facilities at lower ground, with a dedicated entrance off Southampton Row;
- (f) Reconfiguring and improving the office WC facilities;
- (g) Upgrading of office floor servicing to facilitate wider energy and sustainability improvements;
- (h) Reinstatement of the grand historical staircase;
- (i) Upgrades to parts of the roof structure to accommodate a new dedicated plant compound area.

4.4 Many of the elements of these works affect only the interior of the buildings. They are not, therefore “development” requiring planning permission under sections 56 and 57 of the Town and Country Planning Act 1990.

4.5 However, as the Site consists of statutorily Listed Buildings (Grade II), all the works are considered to affect the character of the Listed Buildings and would therefore require Listed Building Consent under sections 7 and 8 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

4.6 As the external works would require planning permission, this submission wraps both the Listed Building Consent (LBC) and Planning Permission (PP) elements into one application.



## 5.0 PLANNING POLICY AND GUIDANCE

- 5.1 Given that the works include alterations to a Listed Building, there are legal provisions that relate to the Listed Building Consent application and the determination of a Planning Application, as detailed below.

### Listed Building Consent

- 5.2 Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.
- 5.3 Primary legislation under Section 66 (1) of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or Secretary of State, as relevant, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.
- 5.4 Section 72(1) of the Act, meanwhile, states that:

*“In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

- 5.5 Paragraph 205 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”.*

- 5.6 Where a development would lead to “less than substantial” harm, paragraph 208 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.”.*

### Statutory Development Plan

- 5.7 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.
- 5.8 The Development Plan for the purpose of the determination of this planning application comprises The London Plan (2021) and Camden’s Local Plan (2017).
- 5.9 A summary of the key policies from these documents are identified below.
- 5.10 Camden is in the process of preparing an updated Local Plan and held a consultation on the Regulation 18 version of the plan between January and March 2024. Paragraph 48 of the NPPF states that:

*“Local planning authorities may give weight to relevant policies in emerging plans according to:*

*a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given) [...]”*

5.11 Camden’s emerging plan is at a relatively early (Regulation 18) stage. It is therefore considered that only limited weight should be attached to policies within the emerging plan.

#### **London Plan (2021)**

5.12 The most relevant policies in the London Plan are identified below:

- (a) Policies GG2, GG5 and GG6 set out London’s ‘Good Growth’ strategy for development which is socially and economically inclusive, and environmentally sustainable.
- (b) Policies D4 and D14 provide guidance on the approach to delivering good design.
- (c) Policies E1, E2 and E3 set out London’s economic strategy for growth and development.
- (d) Policy HC1 provides guidance on heritage conservation and growth.
- (e) Policy SD5 gives strong support to office development in the CAZ.
- (f) Policies T1 - T6 set out the strategy for transport in London.

#### **Camden Local Plan (2017)**

5.13 The most relevant policies in Camden’s Local Plan are identified below:

- (a) 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.
- (b) 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 residents and businesses.
- (c) Policy E2 encourages the provision of employment premises and sites in the borough.
- (d) Policy A4 resists unacceptable noise and vibration impacts.
- (e) 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.
- (f) 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.

- (g) Policy CC1 requires all developments to minimise the effects of climate change and encourages 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.

#### **Camden Draft Local Plan (2024)**

5.14 As set out above, Camden's emerging Local Plan is at an early stage (Regulation 18) and therefore limited weight can be attached to its policies. Nonetheless they provide an indication of the future direction of travel and the Council's priorities; relevant policies are summarised below.

- (a) Draft Policy CC2 supports the repurposing, refurbishment and re-use of existing buildings and seeks to prioritise this approach over demolition.
- (b) Draft Policy CC5 sets out that the Council will support adaptations and improvements to existing buildings to make them more energy efficient and reduce the energy needed to occupy the building.
- (c) Draft Policy IE1 seeks to grow a successful and inclusive economy in Camden, including support for businesses and enterprises of all types and sizes, and ensuring that workspace is well laid out, functions well for its intended users and can adapt to changing working practices.
- (d) Policy IE2 sets out that the Council will support proposals involving additional office floorspace and refurbishment of existing stock within parts of the Central Activities Zone where there is an established commercial or mixed-use character.
- (e) Policy D5 seeks to preserve and where appropriate, enhance Camden's rich and diverse heritage assets.

#### **Other Material Planning Considerations**

##### *National Planning Policy Framework*

- 5.15 The revised National Planning Policy Framework (NPPF) was published in July 2018 and was updated in 2019, 2021 and 2023. This sets out the Government's planning policies for England and how these are expected to be applied. The National Planning Practice Guidance (NPPG) which is regularly updated sits alongside the NPPF and provides guidance on how the policies should be applied.
- 5.16 Both the NPPF and NPPG are important material considerations in the determination of planning applications. Central to the NPPF is the presumption in favour of sustainable development in paragraph 11. It advises that, for decision-taking, this means approving development proposals that accord with the development plan without delay.
- 5.17 With reference to the proposed development, key chapters from the NPPF include:
  - (a) Chapter 2 - achieving sustainable development
  - (b) Chapter 6 - delivering a strong, competitive economy

- (c) Chapter 8 - promoting healthy and safe communities
- (d) Chapter 11 - making effective use of land
- (e) Chapter 12 - achieving well-designed and beautiful places
- (f) Chapter 16 - conserving and enhancing the historic environment

5.18 The National Design Guide (2019) also provides guidance outlines and illustrates the government's priorities for well-designed places by focussing on good design, helping to inform development proposals and their assessment by local planning authorities.

*Camden Planning Guidance*

- (a) Amenity CPG (January 2021)
- (b) Design CPG (January 2021)
- (c) Employment Sites and Business Premises (January 2021)
- (d) Town Centres and Retail (January 2021)

**Key Planning Policy Considerations**

5.19 Given the scope of works, the most relevant planning and heritage considerations are as follows:

- (a) Principle of Development
- (b) Heritage and Design
- (c) Noise and Vibration
- (d) Energy and Sustainability

5.20 The relevant policy and materials considerations within each of these topics are discussed in Section 6 below.

## 6.0 PLANNING ASSESSMENT

- 6.1 Having set out the relevant planning policy considerations, this section assesses the merits of each of the elements of the proposed development considering planning policy and other material considerations. This Statement also considers the proposals in light of the Pre-Application advice received from LB Camden.
- 6.2 The works at each level are as set out in the submitted Schedule of Works.

### Principle of Development

- 6.3 The principle of both internal refurbishments, and external alterations, are strongly supported within Camden and London Plan policy.
- 6.4 At Policy G1 of Camden's Local Plan, the Council sets out that it will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes best use of its site, considering quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 6.5 In relation to economic development, London Plan Policy E1 supports improvements to the quality, flexibility, and adaptability of office space. Local Plan Policy E1 states that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for residents and businesses. Local Plan Policy E2, meanwhile, writes that the Council will seek to protect and enhance existing employment premises and sites.
- 6.6 The Site is within the Central Activities Zone (CAZ) where office uses are strongly supported. The London Plan, at Policy SD5, strongly supports the provision of office space in the CAZ. Camden's Local Plan, at Policy E2, supports uses that support the functions of the CAZ.
- 6.7 The proposed refurbishment of 31 Southampton Row would significantly enhance the quality of the office accommodation and would enable it to meet the expectations of modern commercial occupiers.
- 6.8 The aspiration aligns clearly with Camden and London policy and is therefore considered acceptable in principle.
- 6.9 Indeed, at pre-application discussions, LB Camden officers were very supportive of the scheme in principle.

### Heritage and Design

- 6.10 London Plan Policy HC1 requires development proposals which affect heritage assets to conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.11 Local Policy D1 requires that development preserves and enhances the historic environment and heritage assets. In keeping with Local Policy D2, the Council will not permit the loss of or substantial harm to a designated heritage asset, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

- 6.12 Section 6 of the Heritage Statement provides a detailed assessment of the heritage impacts of each component of the proposals. The proposals would result in a number of heritage benefits, including:
- (a) Providing spaces which will ensure the continued use of the building, aiding its long-term viability and maintenance;
  - (b) Sensitive repair and restoration of key historic features of interest including existing windows, brickwork and stonework. This includes revealing features which have historically been concealed;
  - (c) Removal of all redundant services both internally and externally, improving the appearance and sustainability/efficiency credentials of the site;
  - (d) Reinstatement of the historic staircase; and
  - (e) Creation of retail units which appeal to the market aiding with the revitalisation of Sicilian Avenue.
- 6.13 Overall, the concept for the proposed development seeks to prioritise historic fabric, minimising interventions, and reinstating historic form where possible. A comprehensive approach has been taken to understand the historic development and phasing of the original buildings.
- 6.14 The Heritage Statement concludes that the proposed development would be sympathetic to the site and to the setting of the surrounding heritage assets. It would preserve the character of the existing building while enhancing its contribution to the Conservation Area through the necessary aesthetic and functional repairs.
- 6.15 Due to the nature of the proposals, no harm is anticipated to the character and appearance of the Conservation Area (and the significance of other heritage assets within it) from the Proposed Development.
- 6.16 In summary, the proposals will ensure that the significance of the heritage asset and its setting will be protected and where possible, enhanced. There is a potential risk of low-level harm to the site through the marginal loss of historic fabric. However, the Heritage Statement concludes that the historic value of the Site will be preserved and there are heritage benefits and substantial public benefits offered by the proposal as a whole which would outweigh any low-level harm.
- 6.17 Overall, therefore, the proposals are in alignment with the London Borough of Camden's policies on listed buildings and in alignment with the requirements of the NPPF Chapter 16.

#### **Noise and Vibration**

- 6.18 As part of the upgrade to the building services strategy there will be an increase in the plant required at roof level. The plant deck will be set back from the ride of the mansard to minimise visual impact. Verified Views are enclosed in the DAS which demonstrate that the visual impact of the proposed plant is minimal.
- 6.19 An Acoustic / Noise Impact Assessment has been submitted in support of the proposal, which concludes that, with suitable noise mitigation measures in place to control the noise emissions of the proposed fixed mechanical plant items, the noise impacts of the development proposals would be negligible.

## Energy and Sustainability

- 6.20 As demonstrated in the supporting reports, the Applicant is committed to delivering a sustainable development that aligns with Camden's Local Plan requirements.
- 6.21 The proposed scope of works seeks to significantly improve the energy efficiency and sustainability credential of the Site, as far as is possible given the statutory listing.
- 6.22 The proposal will include the following energy efficiency measures:
- (a) Fabric thermal improvements to the roof;
  - (b) Upgraded glazing;
  - (c) Mechanical ventilation heat recovery;
  - (d) Energy efficient dimmable LED light fittings with daylight and presence detection control;
  - (e) Air source heat pump systems (ASHP) for heating and cooling; and
  - (f) ASHP fed hot water system for basement changing room area in addition to instantaneous hot water.
- 6.23 The proposal will provide significant improvements in thermal performance, water, and energy consumption, whilst minimising construction and demolition waste through the reuse of existing materials, including significant efforts to preserve and minimise disruption to historical elements of the building during construction.
- 6.24 The refurbishment will result in a 42% improvement over baseline emissions using SAP10.2 emission factors as a result of the energy efficiency measures set out above.
- 6.25 Meanwhile, the BREEAM Pre-Assessment Report indicates that the proposals can meet all the minimum level requirements for to target an Excellent rating. A score of 74.59% is predicted, which is indicative of an Excellent rating.

## 7.0 SUMMARY AND CONCLUSIONS

### Presumption in Favour of Sustainable Development

- 7.1 This Planning Statement has been prepared by hgh Consulting in connection with the proposed refurbishment of 31 Southampton Row.
- 7.2 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 generations to meet their own needs. Paragraph 8 identifies 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 types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) a social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) an environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*
- 7.3 As we have identified throughout this Statement, the proposed refurbishment of 31 Southampton Row would significantly enhance the quality of both the office and retail accommodation and would enable it to meet the expectations of modern commercial occupiers. This aspiration is strongly supported by Local Plan Policy E1.
- 7.4 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 205 of the NPPF.

### Public Benefits

- 7.5 Overall, the development proposals will bring forward several significant public benefits. These include, but are not limited to:
- (a) Restoration and revitalisation of a Grade II listed heritage asset within the Bloomsbury Conservation Area;
- (b) Safeguarding the longevity of 31 Southampton Row as a commercial site;



- (c) Bringing back to life Sicilian Avenue with newer, higher quality retail tenants, with associated economic benefits;
  - (d) Facilitating opportunities for skills development, training and apprenticeships and other economic benefits during the construction period;
  - (e) Improving the sustainability and energy credentials at the Site, through improvements to the energy efficiency of the existing building.
- 7.6 We consider that the substantial and wide-ranging benefits associated with the proposed development, as identified in this Statement and the supporting documents, would significantly outweigh any adverse impacts.
- 7.7 When assessed as policies in the Framework taken as a whole, the proposed development constitutes sustainable development.



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