

# Firstplan

EAGLE HOUSE, 2-28 PROCTER  
STREET, WC1V 6NX

**PLANNING AND  
HERITAGE  
STATEMENT**



**Firstplan Ltd.**

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# DOCUMENTS

Document 1:	Extract from Kingsway Conservation Area
Document 2:	Extract from Bloomsbury Conservation Area

## SECTION 1: INTRODUCTION

- 1.1 This Planning and Heritage Statement has been prepared by Firstplan Ltd in support of a planning and advertisement application by Capital Eagle Ltd c/o Highbridge Estates for a property known as Eagle House, Procter Street, WC1. The application seeks planning permission for external works to the building at ground floor and installation of replacement plant at roof level to be undertaken at the same time as a package of internal refurbishment works (for which of course planning permission is not required).
- 1.2 The proposals will bring the existing office space up to a standard fit for purpose through an extensive renovation and modernisation. The external alterations also seek to enhance and improve the appearance and functionality of the property, and improve safety within the entrance passageway.
- 1.3 Section 2 of this document sets out the relevant background information including a brief description of the site and its location. Section 3 provides further detail regarding the proposals themselves. Section 4 highlights the relevant policy considerations. A Heritage Statement is provided in Section 5 and conclusions at Section 6. This Statement should be read in conjunction with the Design and Access Statement prepared by HUT Architecture.



## SECTION 2: RELEVANT BACKGROUND INFORMATION

### a) Site and Surrounding Area

- 2.1 The proposal site comprises Eagle House, number 2-28 Procter Street. It is located on the eastern side of Procter Street and runs between Eagle Street and High Holborn. The building forms part of an enclosure of three buildings running over the junction of Procter Street and High Holborn and up the eastern and western sides of Procter Street.
- 2.2 Eagle House is predominantly in B1 office use (all upper floors) and a mix of retail, café and leisure uses at ground floor. This mix of uses reflects the surrounding mix of uses in nearby development. In addition there are some residential units to the west of the application site and a hotel to the rear of the site.
- 2.3 A detailed description of the site and surrounding area is provided in the Design and Access Statement produced by HUT Architecture.

### b) Relevant Planning History

#### i) The Site

- 2.4 From the planning history records it appears that the proposal site dates back to the 1960's and comprised part of a larger office block which fronted Procter Street on both side and was then connected by a bridge section over sailing the High Holborn end of Procter Street. Around 2002/2003 complete refurbishment of the existing structure with new floors added at roof level was undertaken. The development included subdivision of the original building into three separate buildings, which appears to have been delivered under three separate planning consents. The three buildings now comprise the proposal site, namely Eagle House, together with Lion House and Procter House.
- 2.5 A number of planning applications are registered to the application site address. Those of most relevance are summarised below:
- 2.6 In May 2002 planning permission, subject to a Section 106 Agreement, was granted for: *“works of alteration and extensions, to include change of use of part of first floor from office to retail, the removal of the existing fourth floor and plant room and the*



*addition of a new fourth floor with a part mezzanine fifth floor for office use and new plant areas at roof level” (ref: PSX0004707).*

- 2.7 In August 2009 planning permission was granted for the: *“installation of new air conditioning unit at roof level to existing offices” (ref: 2009/2397/P).*

ii) The Surrounding Area

Procter House, 100-110 High Holborn and 1-3 Procter Street, WC1V 6DW

- 2.8 In December 2013, planning permission was granted for the property located directly opposite the application site for the: *“Installation of metal balustrade to 6th floor roof for provision of terrace and installation of new door and canopy to ground floor entrance on Procter Street” (ref: 2013/5507/P).*

**c) Informal Pre Application Discussions**

- 2.9 Pre application discussions have been undertaken with Elaine Quigley of Camden Council on an informal basis. Amongst other things this included email correspondence on 30th June, 2015 regarding planning application submission requirements and scope of works.



## SECTION 3: APPLICATION PROPOSALS

3.1 The proposed works (for which planning permission for advertisement consent is sought) comprise the following:

- Relocation of entrance to Eagle Street passageway (new glazing to front and side elevations and new cladding);
- New feature back-lit signage, glazing and metal cladding panels to front and side elevations around new ground floor entrance and passageway linking Eagle and Procter Street;
- Refurbishment of external areas passageway soffit including new external lighting;
- Replacement metal gates to refuse area to be accessed from Eagle Street;
- Refurbishment of existing roof terrace including replacement balustrade and decking; and
- Replacement plant to roof level;

3.2 In addition a number of associated internal works are proposed (for which planning permission is not required). For completeness these include:

- Provision for new cycle storage at basement level ;
- Full internal refurbishment.

3.3 The proposals will deliver a much needed refurbishment and modernisation of the office space, complete with a new, more functional and visually attractive entrance area.



## SECTION 4: PLANNING POLICY

- 4.1 The Development Plan documents relevant to the consideration of the application proposals comprise:
- London Plan (2015 consolidated with alterations since 2011);
  - Core Strategy (2010)
  - Development Policies (DP) (2010)
  - Camden Site Allocations Plan (2013)
- 4.2 Due to the proximity of the site to the Bloomsbury Conservation Area, the respective Conservation Area Appraisal (dated 2011) is also relevant to the consideration of the proposal.
- 4.3 In addition, due regard has been had to the Camden Planning Guidance Document 'Design' in the context of the proposed signage.
- 4.4 The Proposals Map shows the site as being located in the following designated areas:
- Transport Safeguarding Area (Crossrail);
  - Growth Area – Holborn;
  - Central London Area (Clear Zone Region) CLA. This area also forms part of the Central Activities Zone (CAZ) designated in the London Plan; and
  - Archaeological Priority Area – London Suburbs.
- 4.5 In addition, the site is located adjacent to the Bloomsbury Conservation Area. It is also in relatively close proximity to the Kingsway Conservation Area, however substantial buildings divorce the application site from this Conservation Area.
- 4.6 The site has no site specific allocation in the Camden Site Allocations Plan (2013).
- 4.7 The principle considerations material to the determination of this application are in respect of the impact of the proposals on the character and appearance of the host property (design considerations); impact on the character and appearance of the adjoining Conservation Area (Heritage considerations); impact on residential amenity (primarily appropriate consideration/assessment of noise); and the acceptability of the advertisement element of proposal.





**a) Principle of the Development**

- 4.8 The principle of the development is only dealt with briefly given that the proposals are primarily for refurbishment / improvement works to an existing office building. The proposal will make best use of the existing building and will improve the office floorspace in this key office location within London. In this context it is relevant that the NPPF of course provides a presumption in favour of sustainable development of this type. Moreover, Policy 4.2 of the London Plan states that Boroughs should support the development and redevelopment of office provision to improve London's competitiveness, including enhancing its varied attractions for businesses of different types and sizes. At local level, Core Strategy Policy CS2 confirms that the Council will expect development in the growth areas to maximise site opportunities. With regard to Holborn in particular, the Core Strategy aims to secure provision of a mix of land uses, with offices and housing as the predominant use.

**b) Conservation and Design**

- 4.9 The following consideration of the proposals in the context of relevant Conservation and Design policies should be read in conjunction with Heritage Statement (Section 5 of this document) and of course the Design and Access Statement.
- 4.10 The key policies in this context comprise Policies: CS14, Promoting High Quality Places and Conserving our Heritage; DP24, Securing High Quality Design; DP25, Conserving Camden's Heritage; and CPG1, Design. In this context it is highlighted that the external alterations to the proposal are discrete in nature and will either result in no change to the existing appearance of the building or will comprise an improvement. Similarly they will maintain the relationship with the adjoining conservation area or will result in an improvement.
- 4.11 The alterations/relocation of the entrance of the property results in a more logical and functional entrance arrangement, improves the passageway area between Eagle Street and Procter Street. It is considered to improve the visual appearance of the host building and contribute positively to the surrounding area. As the entrance point to the conservation area it is considered to contribute positively in this respect.
- 4.12 The replacement gates are similar in form and scale to the existing gates, are located in the same set back/discrete location and as such raise no issues in design or



conservation terms. These will be operated by mechanical closers to ensure they close to screen the refuse storage beyond.

- 4.13 The replacement plant has been located in the same location as existing permitted plant and is broadly the same scale and height as the existing. The proposals make no change to the very limited views that currently exist of some of the plant, although the proposed layout is considered to be more compact. From the rear of the building, the change in views along Eagle Street towards the site will be negligible.
- 4.14 In terms of the refurbishment of the roof terrace area – the only change that would be visible from public view points are the minor alterations to the balustrade. The inset balustrade is to be removed, whilst replacement balustrade of the same height and position is proposed to the existing balustrade line at the front of the Procter Street elevation. Replacement metal railings are proposed in line with the elevation treatment. Visually the changes are minor and do not form a prominent addition to the streetscene. Indeed the changes are unlikely to be discernible from the street scene given the elevated nature of the terrace and its set back position. As such the proposals are considered to preserve the character and appearance of the host building and surrounding area. As detailed in the Heritage Statement, the terrace is not now, nor will it be as a result of these proposals, visible from either of the nearby Conservation Areas.

### **c) Signage Proposals**

- 4.15 Paragraph 67 of the NPPF confirms that advertisements should be subject to control, but only in the interests of amenity and public safety, and should take account of cumulative impacts of all advertisements. It also highlights that advertisements should only be subject to detailed assessment by the local authority when there is an appreciable negative impact on a building or setting.
- 4.16 The Camden Planning Guidance Document (CPGD) states that all adverts and signs should respect the form, fabric, design and scale of the host building and setting. It adds that all signs should serve as an integral part of the immediate surroundings and be constructed of materials that are sympathetic to the host building and the surrounding area. It continues that interesting and unique styles of advertisements and signs will be considered acceptable where they are compatible with the host buildings and surrounding environment.



- 4.17 The CPGD also states that the type and appearance of illuminated signs should be sympathetic to the design of the building on which it is located. It adds that the method of illumination should be determined by the design of the building, and that such illumination should not be flashing or intermittent.
- 4.18 In accordance with the above the proposed signage at Eagle House is of a modest size and design, restricted to one panel of the newly clad/relocated entrance area. The signage has been designed to be discreet, utilising a stencil approach that restricts views of the lettering, and ensuring that the sign does not protrude from the surface of the elevation. The signage cannot be seen from views from Eagle Street toward the property. The illumination of the signage is also proposed to be low level, static and subservient to the surrounding levels of illumination, such as the nearby electronic advertisement board at the junction of Procter Street and High Holborn.
- 4.19 The proposals have been designed in conjunction with the wider refurbishment of the entrance area of the building. In doing so, the signage respects the form, fabric, design and scale of both its immediate surroundings, but also the wider building and the predominantly commercial environment within which it is situated. As such it would not be obtrusive in the streetscene nor have any potential to disturb residents or occupiers.
- 4.20 The location of the signage is such that it does not raise any potential for harm to either pedestrian or vehicle traffic. The proposal therefore raises no public safety concerns.

**d) Amenity**

- 4.21 Policies DP26, Managing the Impact of Development on Occupiers and Neighbours, and CPG6, Amenity, seek to protect new and existing dwellings to a reasonable degree. Office and hotel uses are not afforded that same level of protection. The application property is largely surrounded by Offices to the front and sides, with some residential to the north, and a hotel use to the rear.
- 4.22 The proposals include the replacement of existing roof plant. A full noise assessment setting out the calculated acceptable threshold for any plant to operate within has been undertaken and submitted as part of this application. The proposed plant would operate within these parameters and therefore would not give rise to an unacceptable impact in terms of amenity considerations.



- 4.23 The existing roof terrace area is to be refurbished and does not give rise to any potential issues in respect of amenity considerations. Particularly given the mix of immediate surrounding land uses.
- 4.24 The proposed lighting within the soffit will be of a low level and simply represents an upgrading of existing light fixtures in this space. The development will not give rise to light spillage or cause harm to surrounding occupiers, in line with Policy DP26.



## SECTION 5: HERITAGE STATEMENT

- 5.1 The application site is located adjacent to the Bloomsbury Conservation Area as detailed at Document 1 attached to this Statement. In terms of distance it is also located in relatively close proximity to the Kingsway Conservation Area, as detailed at Document 2 attached to this statement.

### DOCUMENT 1 and 2

- 5.2 The NPPF sets out that there is a presumption in favour of the conservation of designated heritage assets. In this context it is therefore important to understand the character of the conservation area and how the existing building and proposals relate to its setting, in order to assess the impact of the proposals and the extent to which they preserve or enhance the asset overall.
- 5.3 The NPPF confirms at paragraph 128 that in determining applications, local planning authorities should require an application to describe the significance of the heritage assets affected, including any contribution made to their setting. The level of detail, however, should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

#### a) Existing Views of the Site from Conservation Areas

##### *Kingsway Conservation Area*

- 5.4 No part of the proposal will be visible from the Kingsway Conservation Area due to the height and bulk of existing buildings between that Conservation Area and the application site and the location of the proposed works. As such it is considered sufficient to have identified the Conservation Area, and the fact that the proposals will have no potential for impact on this Heritage Asset.

##### *Bloomsbury Conservation Areas*

- 5.5 As detailed above the Bloomsbury Conservation Area immediately abuts the rear boundary line of the application site and includes all of Eagle Street extending north, east and south from the application site. On this basis it is considered entirely appropriate to assess the character of this conservation area, including a nearby Listed



Building (both of which are designated assets) as well as identified “Positive Buildings” located in the vicinity.

**b) Character of the Bloomsbury Conservation Area (Including nearby Listed Building and Positive Building)**

- 5.6 The Bloomsbury Conservation Area covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln’s Inn Fields in the south and from Tottenham Court Road in the west to King’s Cross Road in the east.
- 5.7 As detailed above, this Conservation Area abuts the rear boundary line of the application site. Eagle Street itself comprises part of the Conservation Area and on the Bloomsbury Conservation Area Sub Areas Map, Eagle Street forms the boundary between two sub-areas. Sub Area 11, *Queen Square/Red Lion Square*, extending north from the northern half of Eagle Street. Sub Area 9, *Lincoln’s Inn Fields/Inns of Court/High Holborn*, Extending south from the southern half of Eagle Street.
- 5.8 The Bloomsbury Conservation Area Appraisal and Management Strategy (2011), includes a brief mention of Eagle Street (para 5.208) which states that:
- “Eagle Street, one of the oldest streets in this area, has been largely redeveloped with a mix of commercial properties which make little contribution to the Conservation Area”.*
- 5.9 There are 5 buildings on Eagle Street identified as “Positive Contributors”, Numbers: 37, 40, 41, 44 and 46. These are located on the northern side of Eagle Street. There is a further building identified as a “Positive Contributor” which comprises Turnstile house located to the rear of Eagle House.
- 5.10 The only elements of ‘Streetscape Interest’ identified within Eagle Street are the granite kerbs.
- 5.11 There is a Grade II listed property, located to the north east of the application site, namely number 12 Red Lion Square (Summit House) located on the corner of Red Lion Square and Dane Street. This building is orientated away from the application site.
- 5.12 The western end of Eagle Street, whilst within the Conservation Area is very much a service area / access point to the rear elevations of buildings along this road.



**c) Contribution of the application site to the character of the Conservation Area**

- 5.13 The application site is located at the western end of Eagle Street, with part of the existing building spanning across the pedestrian only passageway linking Eagle Street to Procter Street.
- 5.14 Whilst not within the Conservation Area – the application property does form the end or focal point of Eagle Street at this point. Indeed, Eagle Street comprises a narrow street flanked by four and five story buildings, focussing views towards a narrow section of the rear elevation of Eagle House. This elevation is modern in design and appearance and it makes a neutral contribution to the wider character and setting of the conservation area. As noted in the Conservation Area character appraisal above – this is very much a backland/service area to the rear of a number of properties on this part of Eagle Street.
- 5.15 There are very limited views of the gated service area which forms the rear part of the application site. The only viewpoints from the Conservation Area are if one is standing at the very eastern end of Eagle Street.
- 5.16 There are very limited views of the roof-area of Eagle House from Eagle Street.

**d) Impact of the Proposals**

- 5.17 The proposed works are not extensive and are located and designed to ensure that they do not result in any impact on views into or within the conservation area (*reference should also be made to the assessment of the proposals in the context of Conservation and Design Policies at Section 4 of this Statement*).
- 5.18 The relocated entrance to the application building and associated understated signage and lighting alterations to the Eagle Street/Procter Street passageway are considered to comprise a positive contribution to views into / out of the Conservation Area (albeit that these views will be limited). They provide a coherent design approach, improving the visual appearance and functionality of the building.



- 5.19 The replacement gates – will not be visible from all but the very western end of Eagle Street. However, from this one single vantage point it will result in an improvement visually on the existing gates, screening the refuse alley.
- 5.20 The proposed replacement plant (at roof level) is to be located in the same area as the existing plant, with no new or additional views of plant created. Views from Eagle Street will therefore not alter the existing relationship between the property and the Conservation Area.
- 5.21 The proposed alterations and refurbishment of the roof terrace area are on the western side of the host building, and entirely divorced from any views from the Conservation Area.
- 5.22 The proposed works are such that, due to their location and degree of separation, they do not raise any issue in respect of the nearby Listed Building nor the number of other buildings in the surrounding area which are identified as “Positive Contributors”.
- 5.23 The proposals do not impact on any identified views within the Conservation Area.
- 5.24 On the basis of the above the proposals are considered to contribute positively to the setting of the Conservation Area.





## SECTION 6: CONCLUSIONS

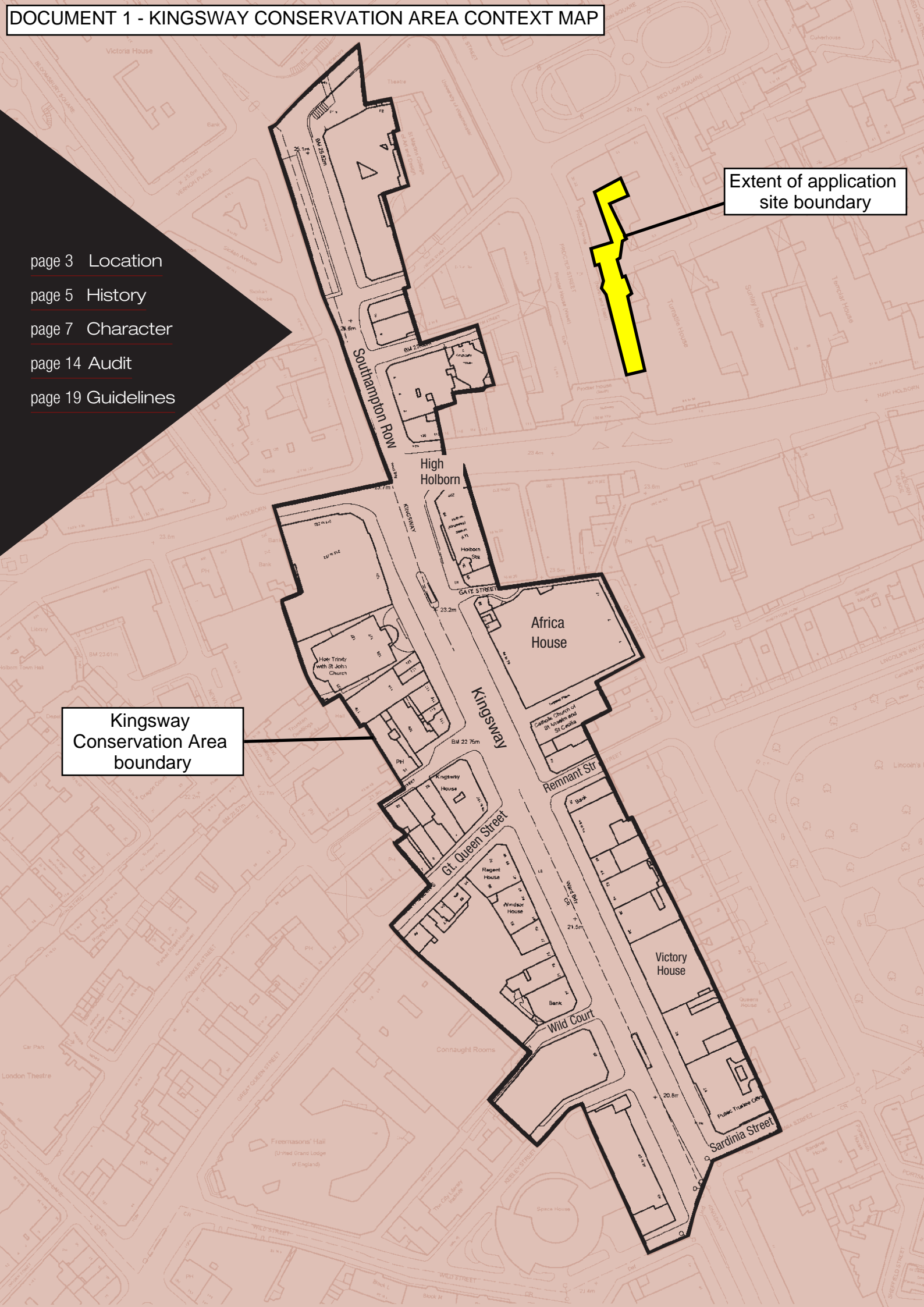
- 7.1 This application seeks planning permission for external alterations and refurbishment works to Eagle House, erection of replacement plant and the installation of new signage. In conjunction, but for which planning permission is of course not required, a range of associated internal alterations and refurbishment works are also proposed to upgrade the existing office floorspace.
- 7.2 The proposals have been comprehensively assessed and the following conclusions can be drawn which fully support the grant of planning permission and advertisement consent:
- The proposals comply with the key relevant policy requirements in terms of conservation, design and amenity considerations and as such should benefit from a presumption in favour of development;
  - The proposals have been carefully designed to take into account the setting of the nearby conservation area;
  - From those limited points where elements of the proposals can be seen in views into / out of the conservation area the proposals will result in a positive contribution;
  - The proposals will improve the visual appearance of the Eagle Street / Procter Street passageway – via the relocation of the entrance and new lighting.
  - The proposals have had due regard to the design of the host building and integrate well in terms of form and materials;
  - The advertisement proposal is designed and sited to ensure that it will not be obtrusive in the streetscene, does not have any potential to disturb residents or occupiers, and does not raise any potential for harm to either pedestrian or vehicle traffic;
  - The replacement plant has been located as per the existing plant, and a noise assessment has been undertaken which confirms that the proposals will not give rise to any amenity considerations.
  - Overall the proposals should be viewed as a welcome improvement and upgrading of existing office floorspace.



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Extent of application  
site boundary

Kingsway  
Conservation Area  
boundary





# DOCUMENT 2 - BLOOMSBURY CONSERVATION AREA SUB AREA CONTEXT MAP

