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Dear Sir / Madam

**22 SOUTHAMPTON PLACE, WC1A 2BP
PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 (AS AMENDED)
APPLICATION LISTED BUILDING CONSENT**

On behalf of our Client, Triangle Investments, we are applying for listed building consent for proposed internal works at no. 22 Southampton Place, WC1A 2BP.

The proposed description of development is as follows:

“Internal refurbishment works including the replacement of the existing lift, removal of partition walls and associated works”.

The application for planning permission and listed building consent comprises:

1. Application covering letter with Heritage Statement (this letter);
2. Listed Building Consent Application Forms;
3. Schedule of Application Drawings;
4. Site Plan;
5. Site Location Plan;
6. ‘Existing’ and ‘Proposed’ and ‘Demolition’ Application Drawings prepared by Savills; and
7. Design and Access Statement prepared by Savills;

The Site and Surrounding Area

The application proposals relate to no. 22 Southampton Place, a 6 storey (LG, G + 4) building which is located on the western side of Southampton Place. The Site is located within the administrative boundary of the London Borough of Camden.

The Site is currently used as offices (Use Class B1a). The Site is part of a Georgian terrace which comprises 9 Grade II* listed buildings (Nos. 14-22 Southampton Place). The Site is bounded to the:

- North, by 23 Southampton Place;
- East, by Southampton Place itself;
- South, by 21 Southampton Place; and
- West, by Nos. 2-3 Bloomsbury Square.

The site is located within the Bloomsbury Square Conservation Area and is located within the immediate proximity of:

- Bloomsbury Square, a Grade II listed park and garden;
- Nos. 46-47 Bloomsbury Square, a Grade II listed building;
- Nos. 1-8 Southampton Place, a Grade II* listed terrace;
- No. 1 Bloomsbury Square, a Grade II listed building;
- Nos. 2-3 Bloomsbury Square, a Grade II listed building; and
- No. 21 Barter Street, a Grade II listed building.

No. 22 Southampton Place was listed Grade II* on 24 October 1951 as part of a terrace. The listing includes the railing attached to the front of the terrace. The list description and boundary of the conservation area are enclosed at **Appendix 1** of this letter.

Legislative and Planning Policy Context

Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') sets out the statutory duty of decision makers considering applications for listed building consent development. In considering whether to grant listed building consent the decision maker shall:

"... have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

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

National policy on the historic environment is set out in Chapter 12 of the National Planning Policy Framework (NPPF), which emphasises the great weight to be given to preservation and/or enhancement of designated heritage assets. The designated heritage asset here is the Grade II* listed No.22 Southampton Place. The site is also within the Bloomsbury Conservation Area.

Development plan policy relating to the historic environment generally reflects the statutory provisions of section 16 and 72 of the Act and national policy. The relevant heritage policies contained within the London Plan (Policy 7.8 Heritage Assets and Archaeology) and Camden Development Policies 2010-2025 (Policy DP25 Conserving Camden's Heritage and CS14 Promoting high quality spaces and conserving our heritage) seek to protect and retain the special interest of heritage assets.

In accordance with the development plan policies set out above and paragraph 128 of the NPPF we discuss below the impact of the proposed development upon the significance of the heritage asset. First, we describe the historic development and significance of the heritage assets, in a level of detail sufficient to understand the potential impact of the proposals on the significance heritage assets.

Historic Development

Southampton Place is located within the Bedford Estate, to south of Bloomsbury Square and north of High Holborn. The Bloomsbury holdings of the Duke of Bedford originated as the estate of Thomas Wriothesley, later the 1st Earl of Southampton and Lord Chancellor of Henry VIII, who acquired them at the dissolution of the monasteries in the mid-16th century.

The Bloomsbury area represents a period of London's early expansion northwards, dating from the mid-17th century, which continued through to the mid-19th century. The area is situated midway between the earlier settlements of the City of London and the City of Westminster, and to the north of the older areas of Soho and

Covent Garden, which had been developed during the 17th century. High Holborn, to the south, marks the route of the old Roman Road heading west out from London.

The development of Bloomsbury started with the completion of the development of Southampton House in 1660 and the subsequent laying out of a residential square by the 4th Earl of Southampton, to the south of his house. Originally known as Southampton Square it later became known as Bloomsbury Square. To the west was Montagu House, which was erected for the Duke of Montagu in 1675-9, on the site later to be occupied by the British Museum (see figure 1).



Figure 1: Extract from a map of the parish of St. Giles's in the Fields from the 1720 edition of Stow's Survey of the Cities of London and Westminster (Source: British Library)

By the late 17th century the Southampton Estate had passed by marriage to the Russells, Earls of Bedford, with Southampton House renamed Bedford House. At this time Southampton Place was known as Southampton Street, and remained as thus until it was changed to Southampton Place in the mid-20th century.

At the beginning of the 18th century, Bedford House was no longer desirable as a Duke's residence and an estate plan was conceived which proposed the development of previously undeveloped fields to the north. Bedford House was later demolished in 1800 to make way for the extensive development of the estate to the north. The builder, James Burton, laid out Russel Square and this was connected to Bloomsbury Square by Bedford Place, which was laid out on the site of the former Bedford House. The planned extension to the estate largely remains in the street pattern that exists today.

Southampton Place was re-developed in the mid-18th century, prior to the planned extension of the Bedford Estate to the north. No. 22 Southampton Place is understood to have been originally designed as part of a terrace by the eminent 18th century architect Henry Flitcroft. Cherry and Pevsner (1998) note that,

“Southampton Place runs south, with an ensemble of neat Palladian houses on both sides, 1757-63 by Henry Flitcroft; door cases with attached columns and pediments, some Doric, some Ionic.”

The list description for No. 22 Southampton Place notes that the front elevation is of multi-coloured stock brick and stucco ground floor with banding above. It is of three bays with recessed sash windows that have gauged brick flat arches and the centre window at first floor is within an arched recess. The list description notes that the property was altered in the 19th century, this may have been in connection with the conversion of the property to a non-residential use.

Bloomsbury remained a select residential area throughout the 19th century until it fell into relative decline with non-residential uses taking over formerly residential dwellings and artists and intellectuals moving into make the most of the affordable accommodation available. The decline in the desirability of Bloomsbury as a residential area for the wealthy was due in part to the construction of fashionable suburban villa developments to the north and west, such as Belsize Park and St John's Wood. The Bloomsbury Conservation Area appraisal notes this shift in uses and character of the area as follows,

“offices and hotels came to occupy former family dwelling houses as families moved out of central London to the suburbs during the later 19th and 20th centuries.” (paragraph 1.2)

Recent Planning History

The recent planning history indicates that No. 22 Southampton Place has been predominantly in office use since at least the 1970s, with alterations undertaken overtime to accommodate various occupiers.



Figure 2: Photograph of Southampton Place looking south toward Bloomsbury Square taken in 1963 (Source: Collage, City of London)

Notable changes in the vicinity include the complete rebuilding of the neighbouring No.23 Southampton Place, which was approved in October 1974 (ref. N14/23/E/HB.812). Figure 2 shows Southampton Place in 1963 prior to the rebuilding of No. 23 Southampton Place (two storey property adjacent to No. 22 Southampton Place).

Alterations of note to No. 22 Southampton Place have included a large scale refurbishment, which was carried out in the 1970s and included the introduction of a new lift core and the modernisation of existing offices. Further refurbishments and servicing works were also undertaken during the 1980s and 90s.

An overview of the recent planning history for the property is outlined in the table below and provides an indication of the recent alterations that have been made to No. 22 Southampton Place since the 1970s.

Ref.	Proposals	Decision
N14/23/E/235	Restoration of existing Georgian building to original state and addition of internal lift at 22 Southampton Place.	Granted - 29/03/1971
N14/23/E/10175	Modernisation of existing offices including the addition of internal lift and alterations at roof level to form lift motor, tank and boiler rooms at 22 Southampton Place.	Granted - 29/03/1971
N14/23/E/18935	Details of dormers required by conditional permission dated 22nd April 1974 for alterations and extensions to Nos. 20-22 Southampton Place.	Granted - 25/10/1974
N14/23/E/1048	The provision of internal partitions in the rear room of the basement and in the front room of the second floor.	Granted - 17/09/1975
8700489	Installation of air cooled condenser at roof level as shown on drawing numbers AHP/800/3 & 4 and 3 x A4 sheets showing manufacturers specifications.	Granted - 02/11/1987
8770158	General external restoration work and replacement of existing air conditioning plant on roof with new fan coil system as shown on drawing numbers AHP/800/3 & 4 and 3 x A4 sheets showing manufacturer's specifications.	Granted - 02/11/1987
9100980	The retention of air cooling condenser at roof level.	Granted - 17/10/1991

Assessment of Heritage Significance

By virtue of paragraph 128 of the NPPF, applicants for development proposals which have an effect upon the historic environment are required to describe the significance of the identified assets so that the impact of the proposals may be understood. This statement fulfils this requirement in setting out a Statement of Significance for the listed building and Bloomsbury Conservation Area. In forming a judgement on the heritage significance of the properties due regard has been paid to the relevant Historic England guidance, in particular, the guidance provided in Conservation Principles (2008).

The property has evidential and historic value as a good surviving example of a mid-18th century building within the Bloomsbury Conservation Area. The list description is clear that the historic and architectural importance of the building resides principally in its external façade and front elevation to Southampton Place. The interior of the building is not noted in the list description and is considered to be of limited interest as it has been altered significantly over time to meet the varying needs and requirements of different occupiers over time. This has included the addition of a mansard roof, installation of a lift and associated plant and the installation and removal of partition walls, but remnants of some features of interest do remain including the central staircase (the bannisters and handrails are modern additions), cornicing in the first floor front room and internal timber panelling of window surrounds in the front rooms of the principal floors.

The Bloomsbury Conservation Area retains a high degree of uniformity in terms of architectural style, materials and scale. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area. The property is identified by the Bloomsbury Conservation Area Appraisal and Management Strategy as being located within sub area 6 'Bloomsbury Square/Russel Square/Tavistock Square', which is characterised as being,

“largely made up of three- and four-storey late 18th and 19th century terraces surrounding a sequence of linked formal spaces, namely Bloomsbury Square, Russell Square and Tavistock Square. A series of north-south vistas visually connect the three squares. Moving through the area, there is a transition between the enclosed, urban nature of the streets and the more open squares which are softened by trees and green landscape.” (paragraph 5.79)

The existing property reflects this prevailing character and its appearance generally reflects that of the terraces in sub area 6 of the Bloomsbury Conservation Area. It is of four storeys in height with a basement below street level with iron railings to the frontage and dormer windows set back in a mansard roof. In addition

it includes first floor stucco banding and occupies a standard plot width, which results in a three-bay width. The window openings have gauged brick arches, with window frames recessed behind deep reveals containing sliding sashes which have been sub-divided into small panes by slender glazing bars. The architectural and historical importance of the property is reflected by it being Grade II* listed.

The special interest of the listed building therefore predominantly lies in its external appearance to Southampton Place. The building at No. 22 Southampton Place positively contributes to the character and appearance of the Bloomsbury Conservation Area as part of the terrace group to which it belongs and in the detail of its principal front elevation.

Assessment of the Proposals

The proposals comprise minor internal alterations to No. 22 Southampton Place, pursuant to the ongoing use of the property for modern office purposes. A full schedule of proposed works is included in the Design and Access Statement submitted as part of this application.

It is acknowledged that the plan form of mid-18th Century London terraced houses, such as No. 22 Southampton Place, can form an important part of their character and special interest where they survive and are discernible. In general the character, proportion, and integrity of principal rooms (at ground and first floor level) should be preserved where they survive, with a greater degree of flexibility and ability to accommodate change afforded elsewhere. As set out above, the interior and plan form of the property has been significantly altered over an extended period, reducing the sensitivity of the interior of the building. The internal elements of the building make a limited contribution to the special interest of the listed building.

The proposed internal alterations consist mainly of minor layout changes to rationalise the building's plan form and do not involve any alterations to the principal staircase, first floor front room cornice and/or the internal timber panelling window surrounds in the front rooms of the principal floors. The proposed new lift would be installed within the existing lift shaft and new partition walls and doors would be of materials and design to match the existing. The general plan form and remnants of significant historic built fabric features would be retained.

Benefits of the proposals include the removal of air conditioning units from basement lightwells and ground floor rear yard, removal of plant from the fourth floor, like for like repair of the front and rear elevations, restoration of the original height of basement ceilings and removal of a plant louvre from a fourth floor rear dormer and replacement with a timber sash window to match existing dormer windows.

Given that the proposed internal alterations are minor, and the previous alterations that have taken place to the interior of the property, we conclude that the proposals are acceptable and would not be detrimental to the architectural or historic integrity of the property. In accordance with Policy DP25 and Policy CS14 the proposals would contribute to the ongoing maintenance of the listed building without adversely affecting the special architectural or historic interest of the building or its setting and include a number of enhancements.

On this basis we consider that overall the proposed alterations would therefore enhance the special interest of the listed building and character and appearance of the Bloomsbury Conservation Area and are in compliance with relevant statutory and planning policy provisions.

Summary

We have assessed the likely impact of the proposed development upon the listed building and Bloomsbury Conservation Area and consider that the alterations are fully compliant with the relevant statutory and planning policy provisions, and are commensurate with the preservation and enhancement of the listed building and wider Bloomsbury Conservation Area.

In summary, we consider that this application is consistent with both London Plan and Camden Planning Policies, which encourage the provision of office uses within the CAZ and seek to protect and retain the special interest of heritage assets. We therefore respectfully request that the Camden Council grants listed building consent for the proposals.

Application Procedure

The application has been submitted online via the planning portal under **Ref. PP-05668415**

We trust this information is sufficient for you to validate the application. However, if you do require any further information please do not hesitate to contact Gareth Fox or Anthony Brogan of this office.

Yours faithfully

MONTAGU EVANS LLP

Montagu Evans LLP

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