

**133-136 High Holborn**  
**14, 15 & 22 Southampton Place**  
London WC1

**Heritage Statement**

March 2017

Consultancy for the  
Historic Built Environment

**KMH**Heritage

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## **1 Introduction**

- 1.1 This report has been prepared to support the application for planning and listed building consent at 133-136 High Holborn and 14, 15 & 22 Southampton Place, London, WC1.

### **Purpose**

- 1.2 The purpose of the report is to set out the history and heritage significance of the area and listed buildings and their context, and to comment on the emerging proposals for its alteration.
- 1.3 This report should be read in conjunction with the documentation prepared by Oktra, architects.

### **Organisation**

- 1.4 This introduction is followed by a description of the history of 14, 15 & 22 Southampton Place and the conservation area. Section 3 analyses the heritage significance of the sites and their context. Section 4 sets out the national and local policy and guidance relating to the historic built environment that is relevant to this matter. An outline is provided in Section 4 of the merits of the scheme in heritage terms. Appendices include the list description and sources of information.

### **Author**

- 1.5 The author of this report is Nick Collins BSc (Hons) MSc MRICS IHBC. Nick has over twenty years' experience in the property sector, including most recently as a Director of the Conservation Team at integrated design consultants, Alan Baxter & Associates. Nick spent nine years at English Heritage as Principal Inspector of Historic Buildings & Areas where he led a specialist team of historic building inspectors, architects, and archaeologists

on a wide range of heritage projects in East & South London. Previously Conservation Officer at the London Borough of Bromley, Nick began his career at international real estate consultancy Jones Lang LaSalle as a Chartered Surveyor. This experience has given Nick an in-depth understanding of the property industry, listed building and planning process, heritage policy and guidance and funding bodies.

## **2 The history and background of the sites and their context**

- 2.1 This section provides a brief overview of the historic development of Southampton Place and its immediate surroundings.

### **The growth of the Bloomsbury Area**

- 2.2 Development of the Bloomsbury area first began in earnest during the 1660s when the Earl of Southampton built Southampton House on what is now the north side of Bloomsbury Square. High Holborn was already part of a key route linking the City with Westminster and onward routes to the west and development had already begun to line its edges by this time.
- 2.3 After the Restoration, widespread development of the area began. Landowners, following the example of the Duke of Bedford who had built Covent Garden with his architect Inigo Jones, saw an opportunity to develop similar fashionable areas based on similar formally planned principles. The first landowner to seize the initiative was the Earl of Southampton who was granted a building licence for the construction of Bloomsbury Square in 1661. William Morgan's *Map of London* of 1682 shows how developed the area around Bloomsbury Square was at this time (figure 1).



Figure 1: Morgan's Map of London of 1682. Here Southampton House is annotated 'Bedford House' a reflection of the fact that the Earl's property passed by marriage to the Earls of Bedford on his death in 1667.

- 2.4 Several recognisable streets and squares are depicted in this map extract such as Red Lion Square, Theobalds Road and Southampton Row. Southampton Place, or Southampton Street as it was known until the 1930s, has also been laid out with development either side. The area had a parish church, St George's Bloomsbury, and a small market in the vein of Covent Garden on Barter Street. Due to the area's mix of residential streets and shops and other social and religious amenities the area became known as 'the little town'.
- 2.5 Development beyond the Bloomsbury Square area gathered pace in the second half of the 18<sup>th</sup> century and ultimately stretched to Euston Road. For the area

immediately around Bloomsbury Square the pattern of development was set and, in terms of street pattern, would remain largely unaltered until the later 19<sup>th</sup> century. Figure 2 shows Bloomsbury Square in 1746 with open fields to the villages of Hampstead and Highgate beyond. The terraces around the square appear as impressively uniform elevations to the square, complementing the architecture of Southampton/Bedford House and the buildings of Great Russell Street. A number of original properties on Bloomsbury Square survive behind new fronts and stucco. These date to 1662-5. It is likely that the late 17<sup>th</sup> century buildings of Southampton Place were very similar.

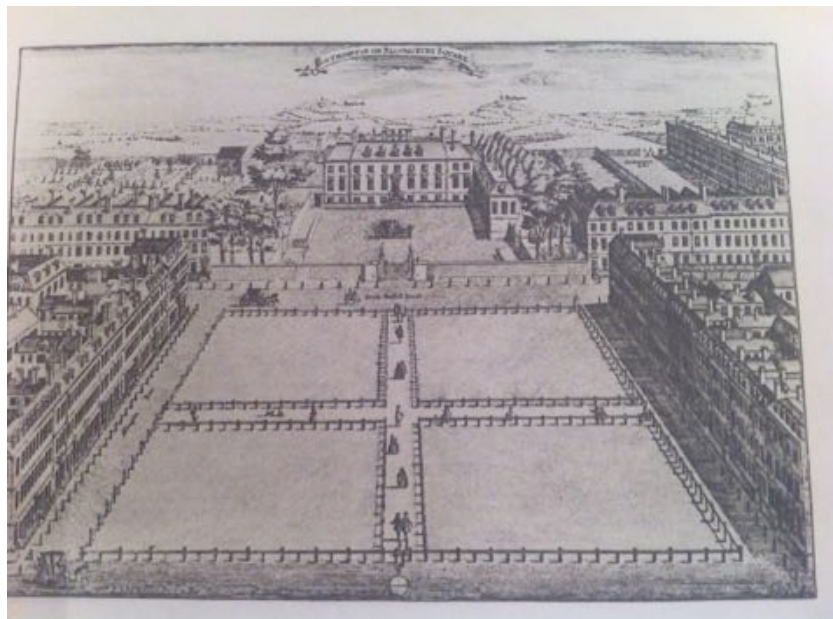


Figure 2: Birdseye view of Bloomsbury Square, 1746 (The Squares of London)

- 2.6 As ever, while the street pattern was well established by the late 17<sup>th</sup> century, the built fabric of the area evolved according to taste, design and will. The Russell, or Bedford family, who had acquired the Earl of Southampton's Bloomsbury holdings through marriage, undertook development around Bloomsbury Square and in other areas and demolition and reconstruction of buildings was inevitable.

- 2.7 One of the more significant changes was the demolition of Bedford/Southampton House in the early 19<sup>th</sup> century. In its place was constructed Bedford Place, leading north to Russell Square. Southampton Street formed part of a notional visual axis, if not an actual one, leading from High Holborn to Russell Square and beyond. Another change that would have undoubtedly added to the area's cachet was the opening of the British Museum on Great Russell Street in 1759, in the former Montagu House. This was rebuilt in the late 1820s.
- 2.8 From the early to mid-19<sup>th</sup> century, while streets and squares of terraced houses were being built in other areas of Bloomsbury, the proximity of the Bloomsbury Square area to the commercial areas of Holborn and to the various Inns of Court saw many houses around Bloomsbury Square and to the east and west become used for offices. Many were used by solicitors and other such professions. Many legal firms and chambers still have offices throughout this area.
- 2.9 By 1896, the OS Map published in that year (figure 3) indicated that the area essentially still had a predominantly Georgian townscape. Buildings of a larger footprint, mid-terrace, indicate where later development has broken this pattern such as at the corner of Holborn and Southampton Street and in Hart Street, later Bloomsbury Way. By 1916 (figure 4), Sicilian Avenue had been built to the north-east of Southampton Place and the Kingsway had been completed, running south from the Bloomsbury Way/Southampton Row junction, taking out and remodelling the southern section of Southampton Row. In addition, an office block was built on the corner of High Holborn and Southampton Place in 1904.





Figure 3: OS map of 1896



Figure 4: OS map of 1916

- 2.10 The OS Map of 1952 (figure 5) shows some of the damage caused by World War II bombings in the local area. The buildings of Red Lion Square and around Theobalds Road to the north are largely ruinous. Victoria House has also been built on the east side of Bloomsbury Square. The war and early 20<sup>th</sup> century development clearly had a significant and lasting impact on the local area. The area around Southampton Place does clearly preserve some of its planned Georgian integrity. Silver Street, which ran from Southampton Place to Bury Place has been renamed Barter Street.



Figure 5: OS map of 1952

### **The development of Southampton Place**

- 2.11 As set out above, Southampton Place was first laid out in the late 17<sup>th</sup> century as Southampton Street, probably during the late 1660s or early 1670s. The form of the buildings is unknown but it is likely that they took the form of terraced buildings in and around Bloomsbury

Square (figure 4). These were three-storey buildings with attics expressed as dormers in mansard roofs. The buildings appear as three bays wide. They are not entirely dissimilar to the buildings on Southampton Place as they are today, at least in the most basic form. Southampton Place was linked to Bloomsbury Market, the miniature Covent Garden, by Silver Street.

- 2.12 By the late 1750s/early 1760s the buildings of Southampton Place were almost a hundred years old. This presumably led to an 'upgrade' planned by the Bedford Estate and most likely undertaken or directed by the eminent 18<sup>th</sup> century architect Henry Flitcroft. Flitcroft began his working life as a carpenter but through the patronage of Lord Burlington and other, he eventually became the Comptroller of the Office in Works in 1758, a position he held until his death in 1769. Flitcroft was a proponent of the Palladian style and ideals. The terraces of Southampton Place were formed with this in mind from the alignment of each building's elevation, through to their window proportions and in the planning and volume and dimensions of the buildings' interior spaces. Collectively, the individual elements of the terraces on either side of the street form an aesthetically pleasing composition.
- 2.13 Flitcroft was an 18<sup>th</sup> century architect of considerable note and had an impressive body of work. This included the church of St Giles in the Fields, Wimpole Hall and parts of Woburn Abbey, the seat of the Dukes of Bedford and Russell family.



Figure 6: Horwood's Map of 1819.

- 2.14 There is a narrower passage through to Silver Street, or Barter Street as it is now known. Buildings of a slightly larger footprint occupied sites at the southern end of Southampton Place. The individual properties on the street are numbered and behind each is indicated an area of garden. These garden areas are shown in later OS maps (figures 3-5) and are increasingly encroached upon as time moves on.
- 2.15 This mapping also shows changes such as the construction of the office block on the corner of High Holborn and Southampton Place in 1903 and new post-18<sup>th</sup> century development on the opposite corner. Today, there is a new, sensitively designed infill development facing nos. 15 Southampton Place which leads through into Southampton Row.
- 2.16 Southampton Place also survived unscathed from wartime bomb damage as indicated in figure 7. As set out above, large areas to the north and east of Southampton Place were quite heavily bombed and as a result there are many



streets and squares in Bloomsbury that were rebuilt during the post-war period.

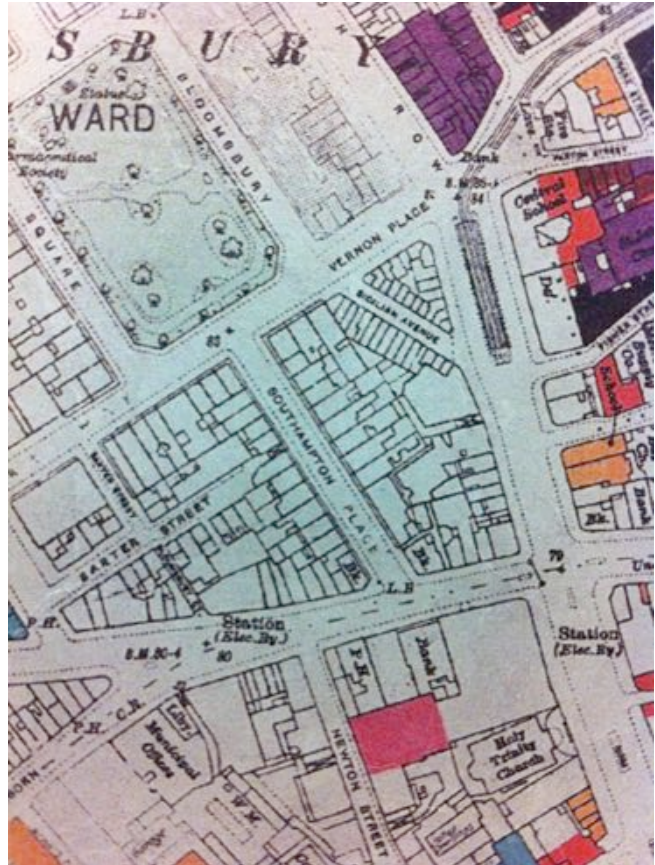


Figure 7: London County Council Bomb Damage Map, 1945

### 14, 15 & 22 Southampton Place

- 2.17 14, 15 & 22 Southampton Place were originally built in the late 1750s/early 1760s. The houses of the street were intended for the wealthier classes and their quality and status is reflected in their height, layout, internal rooms and external appearance. The listing description reports that although the interiors were not inspected it was 'noted [that the terrace] retain good staircases, fireplaces and panelling. Those of nos. 14, 15 and 17 are especially fine'.
- 2.18 No.22 rises to three storeys with the fourth floor within a mansard roof. The exterior was altered in the 19<sup>th</sup> century, with a stucco'd ground floor and an arched

recess to the central window on the first floor. It has a wooden doorcase with enriched pilasters carrying mutule cornice with panelled reveals, a fanlight and panelled door.

- 2.19 Internally the historic elements of the buildings all broadly retain their original floor plans although all have been modernised and 'institutionalised' for modern commercial use including addition of new lifts and bathroom facilities.
- 2.20 As early as 1828, the buildings of Southampton Place were perhaps no longer in solely residential use. By 1900, both nos. 14 and 15 Southampton Place were occupied by Routh, Stacey and Castle solicitors and the buildings were in use by the expanded practice until 1981 at the latest when it is indicated that another firm of solicitors.
- 2.21 By 1948, an amendment to the Goad Map (figure 8) indicates that No.15 was three storeys with two attics, an indication that in the intervening years, the mansard roof was adapted to provide an additional storey. Other buildings on the street have this arrangement but not all and this highlights that the double-height mansard was not an original feature (figure 11). No.22 retains its single mansard, but was historically one storey higher than Nos. 14 & 15.

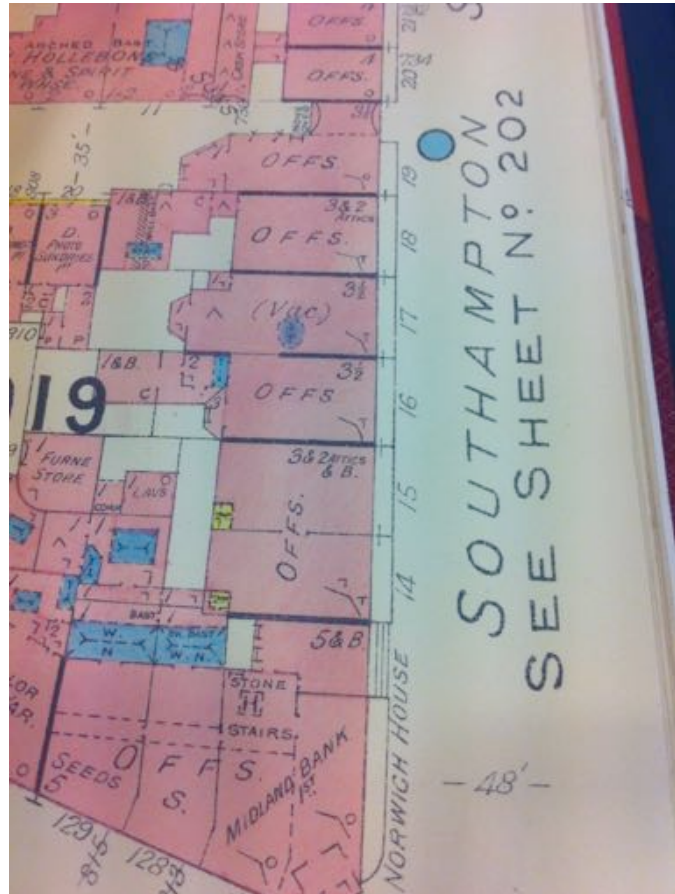


Figure 8: Extract from Goad's Insurance Map of London (1948)

- 2.22 The Goad extract also shows that nos. 14 and 15 were interconnected. It is also evident that the rear yard was partially open with some outbuildings constructed to the rear of the property by this time.
- 2.23 Therefore, either in the late 19<sup>th</sup> or early 20<sup>th</sup> century, no. 15 Southampton Place was altered to provide additional accommodation with lateral access to no. 14. It is likely that the interior of the buildings may have been redecorated and modified also at this time and that the windows were replaced throughout. A photograph of the 1940s (Figure 12) shows that all the windows to the main elevation were 1x1 sashes at this time. The dormers have 6x6 sashes. Interestingly, it also appears to show that the front door has been partially blocked and made to appear as a window complete with cill. The main door to the connected premises must have been at no. 14

Southampton Place. All the windows in this section of the terrace are shown as identical which may reflect a collective enhancement by a freeholder.



Figure 11: Varying roof designs on the eastern side of Southampton Place.





Figure 12: No. 15 Southampton Place, 1940s.

- 2.24 In the 1972 TP Bennett's were granted consent to add two lift towers including toilets and ground floor extensions to No.14 & 15 Southampton Place. Works to add a similar lift and toilets were also carried out at No.22 at this time too.
- 2.25 The proposals effectively involved the 'modernisation' of the office accommodation.
- 2.26 New partitions were added at the upper floors and at Nos 14 & 15 all fireplaces were removed from the second and third floors.

- 2.27 It is probable that all the windows at this time were altered from 1x1 sashes to the 6x6 and 6x9 sash windows that now form part of the building.
- 2.28 Notable changes in the vicinity include the complete rebuilding of (unlisted) No.23 Southampton Place which was approved in 1974.
- 2.29 As a result of its development history and use, the three buildings now have a rather careworn and approximate feel and character. Their principle elevations, although modified, do have a later 18<sup>th</sup> century architectural integrity but the interiors only show fragments of this. The original layout of the buildings is still legible and there is a some surviving 18<sup>th</sup> century cornice to ground, first and second floors. The buildings have retained their chimney breasts and also some 18<sup>th</sup> century joinery.
- 2.30 Elsewhere there are signs of a late 19<sup>th</sup> or early 20<sup>th</sup> century redecoration of the properties.
- 2.31 The works of the early 1970s had a dramatic impact on the building by extending them and adding a lift tower to their rear. Clearly the conservation philosophy applied at the time - though it would not perhaps now - was that this was on balance acceptable when weighed against changes to the windows and the returning or continuation of the principle rooms on the ground, first and second floors to a later 18<sup>th</sup> century character and appearance.

### **133-136 High Holborn**

- 2.32 133-136 High Holborn is a modern building in the post-modern classical style that sits on the corner of High Holborn and Bloomsbury Court. It has giant oversailing cornices on its corners above third floor and around the entire of its street frontages above 4<sup>th</sup> floor with rusticated stone cladding and bronzed windows.
- 2.33 This part of Bloomsbury, along High Holborn, is characterised by areas of large-scale, late 19<sup>th</sup> and early 20<sup>th</sup> century blocks fronting the busy thoroughfare.

Development followed the construction of new routes combined with the widening of earlier streets, thereby cutting through the earlier 17<sup>th</sup> and 18<sup>th</sup> century street pattern. The predominant use is commercial, with a range of shops, banks, offices, hotels and theatres. Residential accommodation generally takes the form of mansion blocks.

### 3 The heritage significance of the site and its context

- 3.1 This section of the report describes the heritage significance of 133-136 High Holborn and 14, 15 & 22 Southampton Place and their surroundings.

#### The heritage context of the site

- 3.2 14, 15 & 22 Southampton Place were listed Grade II\* in October 1951 as part of a group listing of 14-22 (inclusive) Southampton Place, and their respective railings. The buildings are located in the Bloomsbury Conservation Area, within Sub Area 6: Bloomsbury Square/Russell Square.
- 3.3 The Bloomsbury Conservation Area was first designated in 1984 and the Conservation Area Appraisal and Management Strategy was adopted in April 2011. The extent of the southern part of the conservation area is shown in Figure 1. The present conservation area appraisal was adopted in 2002.

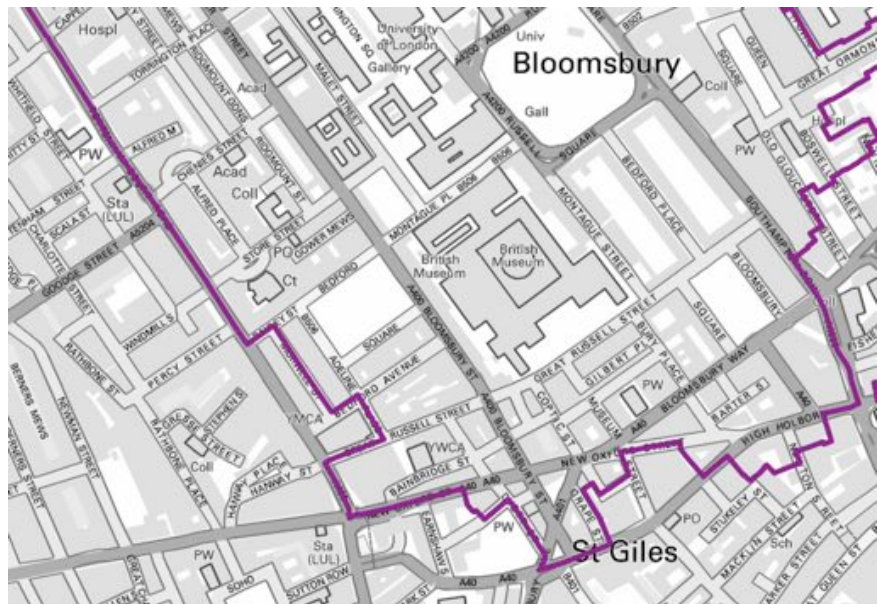


Figure : Map showing Bloomsbury Square within the Conservation Area  
(© LB Camden)

- 3.4 133-136 High Holborn lies within Sub-Area 8 of the Bloomsbury Conservation Area: New Oxford Street, High Holborn, Southampton Row, and is not identified in the conservation area appraisal specifically nor identified as a building that makes a positive contribution to its character or appearance.
- 3.5 In the vicinity of 14, 15 & 22 Southampton Place, 1-8 Southampton Place are listed Grade II\*, 127 & 129 High Holborn are listed Grade II and 46 & 47 Bloomsbury Square are listed Grade II – amongst others. Bloomsbury Square Gardens is a designated London Square on the Register of Parks and Gardens.

### **The heritage significance of the site and its context**

The relevant heritage assets

- 3.6 In terms of the assessment of the proposals, the heritage assets within Camden most relevant to considering the effect of the scheme are 14, 15 & 22 Southampton Place - the listed buildings themselves, nearby listed buildings, and the Bloomsbury Conservation Area.
- 3.7 The effect of the proposed scheme on these assets will be first and foremost on the special architectural and historic interest of 14, 15 & 22 Southampton Place and the character and appearance of the conservation area.

Assessing heritage significance

- 3.8 14, 15 & 22 Southampton Place, the listed buildings in the vicinity and the Bloomsbury Conservation Area and are 'designated heritage assets', as defined by the National Planning Policy Framework (the NPPF). Other buildings and structures that make a positive contribution to the conservation area - such as unlisted buildings of merit - can be considered as 'non-designated heritage assets'.
- 3.9 'Significance' is defined in the NPPF as 'the value of a heritage asset to this and future generations because of its

heritage interest. That interest may be archaeological, architectural, artistic or historic'. The Historic England 'Planning for the Historic Environment Practice Guide' puts it slightly differently – as 'the sum of its architectural, historic, artistic or archaeological interest'.

- 3.10 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (Historic England, April 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.

'Historic interest', 'Historical value' and 'Evidential value'

- 3.11 14, 15 & 22 Southampton Place, the listed and unlisted buildings nearby, and their relationship to one another and the Bloomsbury Conservation Area collectively illustrate the development of this part of London. They tell us about the nature of the expansion of London in the 18<sup>th</sup> century, the suburbanisation of previously open land by means of estate development to the east of the late 17<sup>th</sup> century development around Covent Garden, the nature of society at the time and the market for such residential development, and about how the housing built in the 18<sup>th</sup> century was adapted and changed to suit occupation in the Victorian and Edwardian periods. It tells us also about social and commercial transformations during the late 19<sup>th</sup> and 20<sup>th</sup> century, and about the dynamics of post-war change and its effect on older buildings. The area and its buildings are a record of social and economic change and lifestyles in various periods, and illustrate the effect these things had on the historic building stock and urban grain. 133-136 is an example of late 20<sup>th</sup> century regeneration of the area.

- 3.12 In terms of Historic England's 'Conservation Principles' the listed buildings and conservation area provide us with 'evidence about past human activity' and, by means of their fabric, design and appearance, communicate information about its past. Subsequent alteration,

demolition and redevelopment has not entirely removed the ability of the older townscape and intact historic buildings to do this; the Bloomsbury Conservation Area and its listed buildings clearly retains sufficient historic character and appearance to convey the area's historical ethos. Despite the many changes that are described earlier in this report, 14, 15 & 22 Southampton Place, externally and internally, retain their ability to convey this historical value. In fact, the presence of different phases of work in each building is part of their special historic interest, providing evidence about the historical changes that occurred to it over time.

'Architectural interest', 'artistic interest' or 'aesthetic value'

- 3.13 It is clear that the Bloomsbury Conservation Area and 14, 15 & 22 Southampton Place referred to above have 'architectural' and 'artistic interest' (NPPF) or 'aesthetic value' ('Conservation Principles'). In respect of design, 'Conservation Principles' says that 'design value... embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship'.
- 3.14 The part of the Bloomsbury Conservation Area possesses these heritage values to a considerable degree. The contributing elements of the aesthetic significance of the area as a piece of historic townscape are the nature of older (listed and unlisted) structures and their contribution to the historic streetscape, including Bloomsbury Square Gardens, and that streetscape itself.
- 3.15 The special architectural and historic interest of 14, 15 & 22 Southampton Place as listed buildings lies principally in their Georgian architectural style as altered, changed and then restored in later phases of intervention – there are few internal features remaining in the buildings, although those that do form a part of this typology.
- 3.16 All three buildings have been heavily altered over the years in a way that has very little to do with the special

architectural and historic interest of the listed building. Recent alterations have more or less preserved the main plan form but most internal features have been lost and the new lift shafts and toilets have altered the rear elevations and configuration. Modern services have been installed, replacement floor coverings and internal partitions at the upper floors.

- 3.17 The 1970s single storey extensions to Nos. 14 & 15 are not of any interest, being flat roofed additions that attach through the new lift/toilet extensions to the rear of the historic buildings.
- 3.18 In recent years poor quality patch repairs have failed and led to damage, and aborted strip-out works and incompleting previous refurbishment schemes have diminished the existing quality of the buildings.
- 3.19 133-136 High Holborn is an interesting exercise in post-modern classicism, however it is not recognized as making a positive contribution to the conservation area.



## **4 The policy context**

- 4.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.

### **Legislation**

- 4.2 The legislation governing listed buildings and conservation areas is the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 (1) of the Act requires decision makers to ‘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’ when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay ‘special attention...to the desirability of preserving or enhancing the character or appearance of that area’.

### **The National Planning Policy Framework**

- 4.3 In March 2012, the Government published the new National Planning Policy Framework (NPPF), which replaced Planning Policy Statement 5: ‘Planning for the Historic Environment’ (PPS5) with immediate effect.
- 4.4 The NPPF says at Paragraph 128 that:
- In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 4.5 A description and analysis of the heritage significance of 14, 15 & 22 Southampton Place and their context is provided earlier in this report.

- 4.6 The NPPF also requires local planning authorities to ‘identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal’.
- 4.7 At Paragraph 131, the NPPF says that:
- In determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.8 Paragraph 132 advises local planning authorities that ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting’.
- 4.9 The NPPF says at Paragraph 133 ‘Good design ensures attractive, usable, durable and adaptable places and is a key element in achieving sustainable development. Good design is indivisible from good planning.’ Paragraph 133 says:
- Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse

consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

4.10 Paragraph 134 says that ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

4.11 Further advice within Section 12 of the NPPF urges local planning authorities to take into account the effect of an application on the significance of a non-designated heritage asset when determining the application. It says that ‘In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.

4.12 Paragraph 137 of the NPPF advises local planning authorities to ‘look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably’.

4.13 Paragraph 138 says that:

Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

### **Planning Practice Guidance**

4.14 In 2014 the government published new streamlined planning practice guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled ‘Conserving and Enhancing the Historic Environment’. It is subdivided into sections giving specific advice in the following areas:

- Historic Environment Policy and Legislation
- Heritage in Local Plans
- Decision-taking: Historic Environment
- Designated Heritage Assets
- Non-Designated Assets
- Heritage Consent Processes and
- Consultation Requirements

### **Historic England’s Good Practice Advice in Planning Notes**

4.15 The NPPF incorporates many of the essential concepts in Planning Policy Statement 5 ‘Planning for the Historic Environment’. PPS5 was accompanied by a ‘Planning for the Historic Environment Practice Guide’, published by English Heritage ‘to help practitioners implement the

policy, including the legislative requirements that underpin it'. In the light of the introduction of the NPPF, Good Practice Advice notes 1, 2 and 3 supersede the PPS 5 Practice Guide, which was withdrawn on 27 March 2015. These notes are:

- Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans
- Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets

#### **Camden Council's Local Development Framework**

4.16 Camden Council adopted its Core Strategy and Development Policies on 8 November 2010. Core Strategy Policy CS14 deals with 'Promoting high quality places and conserving our heritage' and says:

'The Council will ensure that Camden's places and buildings are attractive, safe and easy to use by:

- a) requiring development of the highest standard of design that respects local context and character;
- b) preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
- c) promoting high quality landscaping and works to streets and public spaces;
- d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
- e) protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and

outside the Borough and protecting important local views’.

4.17 The commentary to the policy says:

‘Our overall strategy is to sustainably manage growth in Camden so it meets our needs for homes, jobs and services in a way that conserves and enhances the features that make the borough such an attractive place to live, work and visit. Policy CS14 plays a key part in achieving this by setting out our approach to conserving and, where possible, enhancing our heritage and valued places, and to ensuring that development is of the highest standard and reflects, and where possible improves, its local area’

4.18 It goes on to say:

‘Development schemes should improve the quality of buildings, landscaping and the street environment and, through this, improve the experience of the borough for residents and visitors’

4.19 Regarding Camden’s heritage, the Core Strategy refers to Policy DP25 in Camden Development Policies as providing more detailed guidance on the Council’s approach to protecting and enriching the range of features that make up the built heritage of the borough.

4.20 Policy DP25 is as follows:

#### Conservation Areas

In order to maintain the character of Camden’s conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;

- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

#### Listed Buildings

To preserve or enhance the borough's listed buildings, the Council will:

- e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- g) not permit development that it considers would cause harm to the setting of a listed building.

#### Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, including physical preservation, where appropriate.

#### Other heritage assets

The Council will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

## **5 The proposed scheme and its effect**

- 5.1 This section of the report briefly describes the proposed scheme and its effect on the heritage significance described earlier. The proposed scheme is illustrated in the drawings prepared by Oktra Architects and this section should be read in conjunction with the Design & Access Statement.

### **The proposed scheme and its effect on heritage significance**

#### **133-136 High Holborn**

- 5.2 In terms of the impact on the conservation area, the works are minimal and are focussed on the ground floor openings.
- 5.3 The proposal is to simplify the existing openings, removing the paraphernalia linked to the ground floor's previous use as a bank, but retaining the proportions of the openings and glazing bars.
- 5.4 The works will not have any impact on the proportions of the architectural composition of the building and will have the beneficial effect of opening up views into the ground floor – enlivening this part of the conservation area.
- 5.5 Likewise, the removal of the railings along the side elevation on Bloomsbury Court will lessen the sense of a 'subsidiary' elevation and enhance both the building and area.

#### **14, 15 & 22 Southampton Place**

- 5.6 The works proposed to 14, 15 & 22 Southampton Place are focussed entirely on internal spaces and again aim to be a light touch that reverses previous changes which have not contributed to the significance of the listed buildings, and to restore a quality and status befitting the buildings.



- 5.7 In all three buildings, all lifts and toilet facilities are to be refurbished and services updated using largely existing service ducts and points.
- 5.8 None of the existing floor coverings are original and all are of poor quality. They will be replaced with high quality wood effect vinyl or carpet sitting on top of any historic floor boards where they remain.
- 5.9 Roof repairs will be carried out to replace poor quality previous patch-repairing with high quality traditional (and long term) methods.
- 5.10 Doors will be decorated and modern ironmongery replaced with more appropriate historic replacements.

14&15 Southampton Place

- 5.11 It is proposed that at lower ground floor the existing modern ground floor ceilings will be removed throughout the rooms and replaced with new plasterboard ceilings. The modern cupboards in the front room at No.15 will also be removed, returning the room to its original proportions.
- 5.12 A wooden effect vinyl flooring will be carefully laid over the existing floor.
- 5.13 At ground floor change is focussed in the single storey rear extension. This was added in the 1970s and is of no significance with regard the special interest of the listed buildings.
- 5.14 Damaged balustrades to the staircase will be repaired like-for-like with the existing staircase.
- 5.15 The rear windows to the main building and the rear extension in No.15 are to be re-opened and repaired which can be regarded as a benefit in terms of the listed building. New sashes will match existing sashes on other floors.
- 5.16 Wood effect vinyl flooring will be laid over the existing floors to provide a high quality finish to the spaces.
- 5.17 From first to third floor the alterations are minimal – involving the removal of modern cupboards from the first

floor rear room and the 'tea point' from the third floor in No.15 Southampton Place. A missing window will be re-instated in the toilet on the third floor, however this is part of the 1970s extension to house the lift and is therefore not of historic significance.

- 5.18 At fourth floor, the existing modern ceiling and services will be stripped from No. 15, and the spaces made good.

#### 22 Southampton Place

- 5.19 As with Nos. 14&15, the proposals at No.22 are light touch and focus on the removal of modern insertions and an overall upgrade in the quality of the space. Toilet facilities will be upgraded throughout and new wood effect vinyl flooring and carpet laid over existing floors throughout – again to upgrade the appearance and quality of the space. Modern existing cupboards will be removed as part of the upgrade.
- 5.20 At lower ground floor level it is proposed to remove the existing modern kitchen and comms room.
- 5.21 On the lower ground and ground floor rear rooms it is proposed to insert a new light-weight partition to create a meeting room. This has been carefully designed to be fully glazed and able to sit around any existing cornices, and detailing. This light-weight and reversible insertion will enable the proportions of the existing room to be read and will have no impact on any historic fabric.
- 5.22 Similar partitions are proposed on the first, second and third floors. The light touch nature of the partitions will ensure that the original plan form of the building is still legible throughout the building.
- 5.23 Overall, the proposals seek to primarily return the buildings to their former quality with a comprehensive programme of restoration and sympathetic refurbishment which will positively enhance the special interest of the listed buildings and the conservation area. Clearly the buildings have been subject to much alteration and adaptation over the years, and particularly since the 1970s. The buildings are currently in a poor state of

repair and refurbishment and the works will be particularly beneficial to sustaining their remaining significance. The aim is to make minimum intervention to the existing building fabric while upgrading staff facilities and improving existing services. The proposals will return a high quality to relatively tired buildings and give them a sustainable future use more commensurate to their significance.

- 5.24 The effect on the character and appearance of the Bloomsbury Conservation Area and on the setting of other listed buildings will be negligible but positive.

## 6 Compliance with policy and guidance

- 6.1 This report has provided a detailed description and analysis of the significance of 133-136 High Holborn, 14, 15 & 22 Southampton Place and their heritage context, as required by Paragraph 128 of the National Planning Policy Framework. In addition, the report also describes how the proposed scheme will affect that heritage significance. The effect is positive, and for that reason, the scheme complies with policy and guidance.

### **The level of ‘harm’ caused by the proposed scheme**

- 6.2 As outlined in Section 4, the NPPF identifies two levels of potential ‘harm’ that might be caused to a heritage asset by a development: ‘substantial harm...or total loss of significance’ or ‘less than substantial’. Both levels of harm must be caused to a *designated* heritage asset – in this instance, 14, 15 & 22 Southampton Place, other listed buildings and the Bloomsbury Conservation Area and their settings.
- 6.3 The proposed scheme, in our considered view, preserves the special architectural and historic interest of the listed buildings and the character and appearance of the Bloomsbury Conservation Area, and thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It does not lead to ‘substantial’ harm or any meaningful level of ‘less than substantial’ harm to the listed buildings or any other heritage assets. The proposals provide a sensitive and considered approach to modernising and restoring the character of the listed buildings without harming any of their remaining significance and provides a unified and welcoming new fenestration to 133-136 High Holborn. The works to the listed buildings will reverse a period of steady decline in terms of repair and quality and will enhance their significance. The works will have no effect on the character and appearance of the conservation area or the setting of other listed buildings.

- 6.4 The core special architectural and historic interest of 14, 15 & 22 Southampton Place and other heritage assets remains intact in the proposal.

### **The National Planning Policy Framework**

- 6.5 In respect of Paragraph 131 of the NPPF, the proposed scheme can certainly be described as ‘sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation’. It secures the ‘positive contribution’ that the buildings make to the Bloomsbury Conservation Area, and the setting of other listed buildings, and it preserves the essential elements of its special architectural and historic interest as a listed building.
- 6.6 The proposed scheme complies with Paragraph 133 of the NPPF - it certainly does not lead to ‘substantial harm to or total loss of significance of a designated heritage asset’. It also complies with Paragraph 134 for the reasons given in detail earlier in this report – the scheme cannot be considered to harm the listed buildings or the conservation area, but rather alters them in a fashion that has a relatively small effect on overall heritage significance, reverses previous harm and protects surviving significance. In the case of 133-136 High Holborn it will provide a welcoming and high quality fenestration to the street. Even if it was regarded that some less than substantial harm was being caused by the proposals, this is more than outweighed by the beneficial overall quality of the proposals, repairs and re-instatement - removing out-dated and tired modern elements, re-instating missing sash windows, repairing the historic staircases and generally sympathetically restoring the buildings, giving them a sustainable future.
- 6.7 It is our view that none of the individual minor interventions that make up the overall set of proposals can reasonably be considered to cause harm to the listed buildings or conservation area when the cumulative extent of intervention involved is measured against the

overall heritage assets. The interventions - individually and taken as a whole – help secure the ‘optimum viable use’ of the buildings.

### **Camden’s Local Development Framework**

- 6.8 In positively addressing the requirements of the National Planning Policy Framework, the works also meet the policy requirements of the London Borough of Camden Local Development Framework relevant to the historic built environment.
- 6.9 In terms of Core Strategy Policy CS14 and its accompanying commentary, the proposals ‘would not cause harm to the special interest of the building’ or to ‘the setting of a listed building’.
- 6.10 Equally, the proposals will ‘preserve and enhance the character and appearance of the area’.

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