

<b>Delegated Report</b>			<b>Expiry Date:</b>	14/10/2021
<b>Officer</b>		<b>Application Number</b>		
Nick Baxter		1) 2021/4044/L 2) 2021/4038/A		
<b>Application Address</b>		<b>Application Type:</b>		
Disraeli House, 6 Bloomsbury Square WC1A 2LP		1) Listed building consent 2) Advertisement Consent		
<b>1<sup>st</sup> Signature</b>	<b>2<sup>nd</sup> Signature (If refusal)</b>	<b>Conservation</b>	<b>Recommendation:</b>	
		n/a	1) Refuse listed building consent 2) Refuse advertisement consent	
<b>Proposal(s)</b>				
Installation of flagpole and associated flag. 45 degree angled flag pole with flag showing company name/emblem				
<b>Consultations</b>				
<b>Consultation method:</b>	Bloomsbury CAAC was consulted about both proposals			
<b>Summary of consultation responses:</b>	<p>Bloomsbury CAAC objected, saying:</p> <p>“It will create an unnecessary and inappropriate visual intrusion to the streetscape and therefore cause harm to the Conservation Area.</p> <p>“It is likely to impact on the original brickwork of the host building, which is Grade II* listed.</p> <p>“Not only will the flagpole impinge on the building’s architectural character and significance, but giving permission for an unnecessary accessory of this nature, could also encourage other applications for flags to “promote” their name or business, increasing the harm of visual clutter within the Bloomsbury Conservation Area.</p> <p>“There is also no drawing within the application documents to show what the proposed flag will look like. The image could be poorly designed and/or utterly inappropriate.”</p>			
<b>Site Description</b>				

The application site is located on the south-west corner of Bloomsbury Square.

It is one of a pair of houses of 1744 by Henry Flitcroft, and thought to have been built by Devall.

The pair are grade-II\* listed. They consist of three storeys, an attic and basement and are constructed of darkened multi-coloured stock brick. The application site was the childhood home of the father of Benjamin Disraeli, and a plaque notes this.



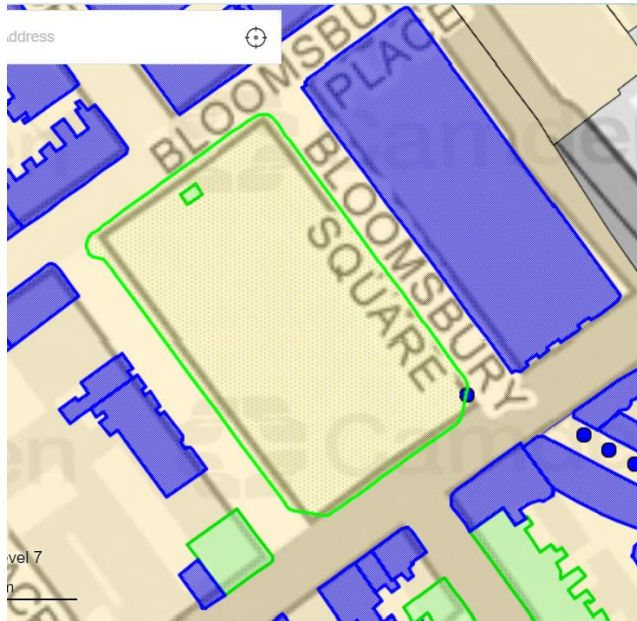
It is the house on the right of this pair. As can be seen, like many houses of the period, it is extremely austere in design, exhibiting a sobriety valued at the time and believed to be embodied in plainness and regularity of form.

The house stands within the Bloomsbury Conservation Area, to which it is a positive contributor.

The garden in the centre of Bloomsbury Square is a registered historic park/garden.

There are several listed grade-II-listed buildings surrounding the site, namely:

- (1) To the south lie 2-3 Bloomsbury Square, 1 Bloomsbury Square and 46-47 Bloomsbury Square
- (2) To the north lie the White Hall Hotel, number 14 Bloomsbury Square, the Royal Pharmaceutical Society, 18-22 Bloomsbury Square, 23-27 Bloomsbury Square and 1-5 Bloomsbury Square
- (3) To the north-east lies Victoria House.



The site is the green square on the bottom left. Blue-shaded shapes represent grade-II-listed buildings. Green-shaded ones, grade-II\*. Yellow shading indicates the conservation area.

### Relevant History

No relevant history.

## **Relevant policies**

**National Planning Policy Framework 2021**

**The London Plan 2021**

**London Borough of Camden Local Plan 2017**

D2 - Heritage

D4 - Advertisements

**Town and Country Planning (Control of Advertisements) (England) Regulations 2007**

**Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013**

**Bloomsbury Conservation Area Appraisal and Management Strategy 2011**

## **Assessment**

### **1. Proposal**

- 1.1 The applicant seeks advertisement consent and listed building consent to attach a flagpole to the façade of the grade-II\*-listed building for the purpose of displaying the resident firm's logo on a flag.
- 1.2 No design has been provided for the proposed flag. Nor could the design of any flag realistically be controlled, if consented.
- 1.3 The application drawings describe the flag as being aligned with "historic signage". This in fact refers to an historic masonry plaque commemorating the author Isaac Disraeli.
- 1.4 The applicant has found three examples of flags locally. The first is attached to 15 Bloomsbury Square. This is a modern, unlisted building and houses a cookery school.

- 1.5 The second, 48 Russell Square is in a completely different setting, on an exuberant, late-Victorian frontage of considerably less architectural formality.
- 1.6 The third is on Swedenborg House, a public educational facility on Bloomsbury Way, which is, again, a completely different setting. This building has been significantly altered by having its area filled in and a shopfront inserted. These three examples are not considered to support this application.
- 1.7 The applicant notes that the flagpole could be removed in the future. It is however difficult to envisage circumstances where a future occupant would choose to spend money removing the means of advertising his or her business from his or her frontage. It is also not considered wise practice to allow undesirable development on the grounds that it might be removed in future.
- 1.8 The Bloomsbury Conservation Area specifically cites flags as being a factor detrimental to the character of the area.
- 1.9 Paragraph 5.6 states: "Building frontages, roads, pavements and the squares are all important elements of the public realm and the cumulative impact of small scale additions can have an overall detrimental impact on the character of the area. Such additions can include: Visual clutter from excessive signage and flags"
- 1.10 There is no difference between a flag and any other piece of advertising material. A flag is, in essence, a flexible projecting sign. It is therefore not appropriate in a sensitive heritage context such as this.

#### **1.11 Listed building consent**

- 1.12 The historic use of the house is residential. Although its current use is commercial, it can still be clearly understood as a very grand house, as can its neighbours. Apart from a carved plaque commemorating Isaac Disraeli, its façade remains unaltered. The addition of a flagpole to such a house would disrupt this almost unaltered condition.
- 1.13 It would also be historically inaccurate, suggesting that a grand private family in the 18<sup>th</sup> century might fly a flag from the front of their house.
- 1.14 The physical installation of the flagpole would harm the fabric of the listed building.
- 1.15 The visual presence of a flagpole and its flag would harm the special interest of the listed building, contrary to policy D2 of the Camden Local Plan.
- 1.16 There is no public benefit.

#### **1.17 Advertising consent**

- 1.18 The historic character of the locality is residential. Although the current uses are commercial, the visual character of an 18<sup>th</sup>-century residential square is to a great extent retained. The addition, at high level, of commercial impedimenta, such as flags carrying logos would harm this character, as noted in the conservation area statement, above.
- 1.19 The installation of the flagpole and its flag would fail to preserve or enhance the character and appearance of the Bloomsbury Conservation area.
- 1.20 The proposed flag and pole would contribute to visual clutter, contrary to policy D4, which states that only adverts that "preserve or enhance heritage assets and conservation areas" will be supported. Those that "contribute to an unsightly proliferation of signage in the area"

and “contribute to street clutter in the public realm” will be resisted.

1.21 The policy goes on to state that: “Advertisements in conservation areas and on or near listed buildings require particularly detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance and must not obscure or damage specific architectural features of buildings.”

1.22 It is not considered that the proposed flagpole and flag achieve these requirements.

## **2. Recommendation**

2.1 It is therefore recommended that listed building consent be refused for the following reason:

2.2 The proposed flagpole and flag would be harmful to the special interest of the grade-II\*-listed house, by virtue of their historical inappropriateness, the physical damage to the fabric of the house entailed, and their adverse effects on the historic character of the house, contrary to policy D2 of the Camden Local Plan 2017.

2.3 It is recommended that advertisement consent be refused for the following reason:

2.4 The proposed advertisement by reason of its scale and location adding harmful visual clutter would be detrimental to the character and appearance of the host building which is listed, the wider terrace and the Bloomsbury Conservation Area, contrary to policies D2 and D4 of the Camden Local Plan 2017.

