



Hogarth Properties S.A.R.L

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## Project 3: Norfolk House

Holborn Links Estate





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## **PROJECT 3: NORFOLK HOUSE**

Holborn Links Estate

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WSP

Aldermay House  
10-15 Queen Street  
London

WSP.com

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# QUALITY CONTROL

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Project number	70081565
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Prepared by	Ross Williamson
Authorised by	Nick Belsten

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PRE-APPLICATION FEEDBACK

# EXECUTIVE SUMMARY

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*“Full planning and listed building consent application for internal and external refurbishment works, together with the erection of external plant and flue.”*

The proposal is for the refurbishment of Norfolk House, 13 Southampton Place, Holborn, London, WC1A 2AL, as part of the wider regeneration of the Holborn Links Estate.



The Holborn Links Estate is approximately 2.5 acres of contiguous land bounded by High Holborn, Southampton Row and Bloomsbury Square and comprises 32 freehold controlled properties made up of office, retail and residential uses. The Estate is located within the Central Activities Zone (CAZ) and the Bloomsbury Conservation Area and the majority of its buildings, 26 in total, are statutory listed.

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

The proposed scheme at Norfolk House has been informed by extensive pre-application engagement with the London Borough of Camden (LB Camden), local stakeholders and members of the public. Officers at LB Camden have expressed support for the scheme.

The proposal to Norfolk House seeks to secure the sustainable long term viable future of the site and will deliver a high quality development that will restore and enhance the Grade II listed Norfolk House and the site's contribution to the character of the surrounding Bloomsbury Conservation Area.

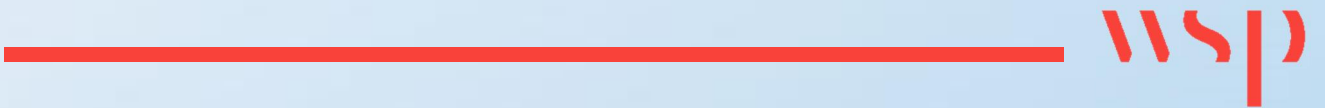
The development proposals will bring forward a number of significant public benefits. These include, but are not limited to:

- i Restoration and revitalisation of a Grade II listed heritage asset within the Bloomsbury Conservation Area;
- i Safeguarding the longevity of Norfolk House as a commercial site; and
- i Improve the sustainability and energy credentials at the site.

When assessed against the policies in the Development Plan taken as a whole and other material considerations including the NPPF, the proposed scheme constitutes sustainable development and should be approved without delay.

# 1

## INTRODUCTION



# 1 INTRODUCTION

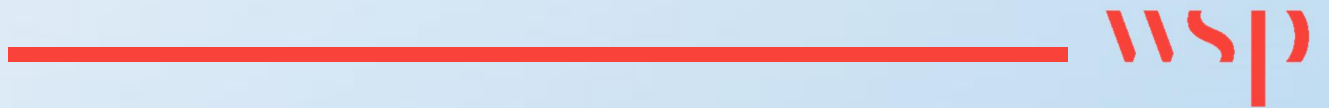
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- 1.1.1. This Planning Statement has been prepared by WSP on behalf of Hogarth Properties S.A.R.L in support of the proposed refurbishments at Norfolk House, 13 Southampton Place, Holborn, London, WC1A 2AL.
- 1.1.2. It is submitted to the London Borough of Camden (the LPA) as part of the application submission for the following:
- “Full planning and listed building consent application for internal and external refurbishment works, together with the erection of external plant and flue.”*
- 1.1.3. The Planning Statement assesses the proposed scheme against the adopted development plan and other material planning considerations.
- 1.1.4. This Planning Statement should be read in conjunction with the other supporting information submitted, which comprises:
- ┆ Application forms, including ownership certificates;
  - ┆ Community Infrastructure Levy Additional Information Forms;
  - ┆ Construction Management Plan Pro Forma;
  - ┆ Design & Access Statement;
  - ┆ Energy Technical Note;
  - ┆ Fire Strategy Report;
  - ┆ Full set of architectural drawings, including:
    - Existing and proposed elevations;
    - Existing and proposed floor plans;
    - Existing and proposed roof plans; and
    - Existing and proposed sections.
  - ┆ Heritage Statement;
  - ┆ Plant Noise Assessment;
  - ┆ Schedule of Works;
  - ┆ Site Location Plan;
  - ┆ Site Photographs; and
  - ┆ Structural Report.
- 1.1.5. The remainder of the Planning Statement is set out as follows:
- ┆ **Section 2** describes the development site, site designations and planning history;
  - ┆ **Section 3** describes the proposed development;
  - ┆ **Section 4** sets out the scope of the application submitted in context of the wider Holborn Links Estate regeneration;
  - ┆ **Section 5** sets out the relevant planning policy framework and guidance;
  - ┆ **Section 6** assesses the proposed development against relevant planning policies having regard to other material considerations; and
  - ┆ **Section 7** sets out our summary and conclusions.



# 2

## SITE BACKGROUND



## 2 SITE BACKGROUND

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- 2.1.1. The Holborn Links Estate is approximately 2.5 acres of contiguous land bounded by High Holborn, Southampton Row and Bloomsbury Square and comprises 32 freehold controlled properties made up of office, retail and residential uses. The Estate is located within the Central Activities Zone (CAZ) and the Bloomsbury Conservation Area and the majority of its buildings, 26 in total, are statutory listed.
- 2.1.1. The Estate is located close to two Crossrail stations on the Elizabeth line, Tottenham Court Road and Farringdon, both of which are due to open in 2022 and is a short walk from Holborn Underground Station.
- 2.1.2. Holborn Links was acquired by CCP 5 Long Life (CCP 5 LL), in March 2020 and is managed by Edmond de Rothschild. The Estate presents an opportunity to upgrade and revitalise the commercial and office accommodation; and enhance the appearance of the landmark Listed Buildings and public realm in accordance with local and regional objectives to create successful places.
- 2.1.3. Our client's vision is to provide for a reimagined Holborn Links – a revitalised, modern estate that is fit and prepared to meet the needs of its occupiers and the wider community. As a combined estate sharing mutual values it must be connected, integrated sympathetically and intellectually with the complexities of the conservation area and its listed buildings to maximise its true pedigree and potential.
- 2.1.4. Where development has taken place on the estate, it has been carried out in piecemeal fashion that has failed to realise the true potential of the destination as a whole through the capitalisation that can be achieved through the creation of an integrated, connected place.
- 2.1.5. In its current form, the office accommodation falls well short of meeting modern business requirements in that it fails to provide inclusive, efficient flexible floor space that is market desirable, energy efficient and sustainable. Furthermore, it delivers nothing in regard to those elements modern employers crave to aid them in the war on talent and staff retention – notably enhanced amenity and enriched smart places in which teams can meet and collaborate.
- 2.1.6. The architectural and cultural heritage of the estate is a major aspect to be celebrated and is something which, through a programmed approach to conserving where appropriate its significance; will add a rich texture and character to the future destination.

### NORFOLK HOUSE

- 2.1.7. Norfolk House is situated at 13 Southampton Place, Holborn, London, WC1A 2AL. The site is in a commanding position on the corner of Southampton Place and High Holborn with a direct line of sight to Holborn Underground Station.
- 2.1.8. It is an early example of the work of Charles Holden and is Grade II Listed. The interiors offer generous floor to ceiling heights and large windows, which provide good natural light with the potential to create well lit, open plan spaces.

2.1.9. The entirety of the building is in Class E use. The part basement and part-ground floors were previously occupied by the Royal Bank of Scotland (RBS) with this unit accessed from the main entrance at the corner of High Holborn and Southampton Place. The remainder of the basement and ground floors together with the first, second, third and fourth (attic) floors were previously used as offices and are accessed from a separate entrance at ground floor level from Southampton Place. These floors have been combined to create one single office unit.

## PLANNING DESIGNATIONS

2.1.10. The key planning designations affecting the site are the following:

- i Grade II Listed;
- i Bloomsbury Conservation Area;
- i Central Activities Zone (CAZ);
- i Central London Frontage;
- i Primary Frontage; and
- i PTAL Rating of 6b (Best).

## PLANNING HISTORY

2.1.11. There is a limited planning history associated with the site. Full details are provided in the table below:

**Table 2-1 – Norfolk House – Planning History**

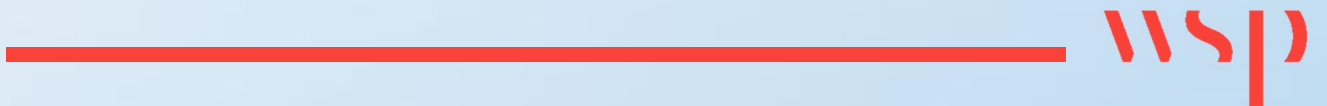
Application Reference	Description of Proposal	Status
2010/4809/L	Minor works to front entrance involving replacement of steel handrail, planters, corporate signage, paint to existing entrance door and installation of grip floor tactile	Granted 24-11-2010
2009/1156/P	Details of railings on the Southampton Place elevation (stone plinth) pursuant to condition 8 attached to planning permission granted subject to a section 106 agreement dated 05 August 2005 (2005/1082/P).	Granted 27-03-2009
2008/5131/P	Minor amendments to the facade to Southampton Place of approved scheme granted planning permission on 05/08/2005 (ref: 2005/1082/P) for demolition and redevelopment of 9-10 Southampton Place and 3 - 9 Southampton Row and demolition and redevelopment behind the retained facade at 121 - 126 High Holborn, 1 & 11 - 13 Southampton Row to provide new office and retail accommodation together with associated plant serving and parking.	Granted 10-11-2008
2008/2028/P	Details of revised lighting systems pursuant to condition 2 of appeal decision (ref. APP/X5210/H/07/1202222) dated 4th February 2008 (for the display of externally illuminated upright shroud advertisements on scaffolding in front of High Holborn and Southampton Row elevations)	Granted 08-05-2008
2007/1572/A	The display of externally illuminated upright shroud advertisements on scaffolding in front of High Holborn and Southampton Row elevations	Refused



		04-04-2007
2007/3895/A	Display of externally illuminated uplight shroud advertisements on scaffolding in front of High Holborn and Southampton Row elevations	Refused 16-08-2007
8970064	Alterations to entrance lobby as shown on drawing numbered 8814/01 02 and Axonometric projection.	Granted Listed Building / Conservation Area Consent 22-06-1989
HB3262(R1) / 36494(R1)	The refurbishment of the existing office accommodation at Norwich House, 13 Southampton Place, WC1, together with the infilling of the rear lightwell and external alterations at roof level, and the construction of new lift housing, tank room and boiler room and the replacement of and alteration of windows.	Granted 21-09-1983

# 3

## PRE-APPLICATION



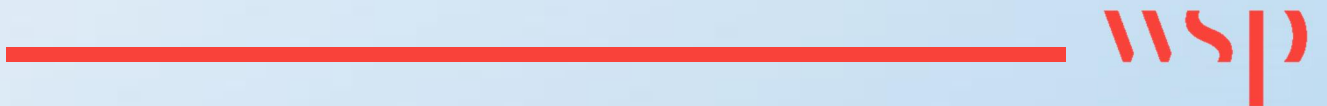
### 3 PRE-APPLICATION

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- 3.1.1. The scope of this application has been agreed following a comprehensive programme of engagement with the local authority and key stakeholders. A summary of which, has been provided at **Appendix A**.
- 3.1.2. Overall, LB Camden were supportive of the proposals presented at pre-application stage.
- 3.1.3. Nevertheless, proposed works that were considered to detrimentally harm the significance of the historic fabric have been omitted from the scope of the application following pre-application discussions.

# 4

## PROPOSED DEVELOPMENT AND WORKS



## 4 PROPOSED DEVELOPMENT AND WORKS

4.1.1. The proposed description of development is as follows:

*“Full planning and listed building consent application for internal and external refurbishment works, together with the erection of external plant and flue.”*

4.1.2. The majority of these works affect only the interior of the building. They are not, therefore “development” requiring planning permission under sections 56 and 57 of the Town and Country Planning Act 1990. However, as the site comprises a Grade II listed building, all the works are considered to affect the character of the listed building and would therefore require Listed Building Consent under sections 7 and 8 of the Planning (Listed Buildings and Conservation Areas) Act 1990. As the external works would require planning permission, this submission wraps both the Listed Building Consent and Planning Permission elements into one application.

4.1.3. The full scope of proposed works is set out within the supporting Schedule of Works. This has been summarised in the table below:

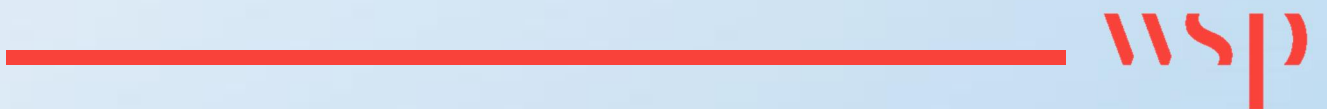
**Table 4-1 – HLE Project 3 – Schedule of Proposed Works**

<b>Proposed Work(s)</b>	
External Alterations	<p>Minimal alterations are proposed at the principal High Holborn (southern) and Southampton Place (eastern) elevations.</p> <p>Refurbishment works to roof.</p> <p>An external flue and louvres would be installed.</p>
Alterations to the Ground Floor Entrance Lobby and Basement	<p>Works would include, but limited to:</p> <ul style="list-style-type: none"> <li>i New timber door to basement stair;</li> <li>i New partition between lift lobby and basement stair;</li> <li>i New feature wall;</li> <li>i A new and refurbished lift would be provided serving the basement and all upper floors; and</li> <li>i New showers and changing facilities would be incorporated at basement level.</li> </ul> <p>The existing marble steps, pilasters, vaulted ceiling and timber panelling would otherwise all be retained.</p>
Alterations to Upper Floors (Typical Office Floor)	<p>It is proposed to remove the existing masonry partitions, ceilings and floor finishes at 1st, 2nd, 3rd and 4th floors to provide flexible open-plan office accommodation.</p> <p>New self-contained ‘superloo’ WC’s would be installed adjacent to the core at each of the upper floors.</p>



# 5

## PLANNING POLICY AND GUIDANCE



## 5 PLANNING POLICY AND GUIDANCE

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

### LISTED BUILDING CONSENT

- 5.1.2. Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (‘the Act’) impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas. Section 16 of the Act states that:

*“[...]In considering whether to grant listed building consent for any works the local planning authority all the Secretary of State show had special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”.*

- 5.1.3. 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.”*

- 5.1.4. 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:

*“[...]With respect to any buildings or other land in a conservation area, special attention should be paid to the desirability of preserving or enhancing the character or appearance of a conservation area”.*

- 5.1.1. Paragraph 199 of the National Planning Policy Framework (July 2021) (NPPF) states that, in terms of assessing the impact of a proposed development on the significance of a heritage asset:

*“...great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

- 5.1.2. Where a development would lead to “less than substantial” harm, paragraph 202 of the NPPF advises that:

*“...this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

### DETERMINATION OF THE PLANNING APPLICATION AND LISTED BUILDING CONSENT

- 5.1.3. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.

5.1.4. The Development Plan for the purpose of the determination of this planning application comprises:

- § The London Plan (2021); and
- § Camden Local Plan (2017)

5.1.5. A summary of the key policies from these documents are identified below.

### **LONDON PLAN (2021)**

5.1.6. In March 2021 the Mayor adopted the London plan. This is operative as the mayor's special development strategy and forms part of the development plan for Greater London. The policy pertaining to heritage includes HC1 Heritage conservation and growth:

*“(C) development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets significance and appreciation within their surroundings. The commutative impacts of incremental change from development on heritage asset and the setting should also be actively managed. Development proposal should avoid harm and identify enhancement opportunities by integrating heritage considerations earlier on in the design process. A summary of the key policies from these documents are identified below”.*

5.1.7. Other relevant policies include:

- § Policies GG2, GG5 and GG6 set out London's “Good Growth” strategy – that which is socially and economically inclusive and environmentally sustainable;
- § Policies D4 and D14 provide guidance on the approach to delivering good design;
- § Policies E1 – E3 sets out London's economic strategy for growth and development;
- § Policy HC1 provides guidance on heritage conservation and growth;
- § Policy SD5 gives strong support to office development in the CAZ; and
- § Policies T1 – T6 sets out the strategy for transport.

### **CAMDEN LOCAL PLAN (2017)**

- § Policy G1 states that the Council will create the conditions for growth to deliver facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings.
- § Policy E1 sets out to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.
- § Policy E2 encourages the provision of employment premises and sites in the borough.
- § Policy A4 will seek to ensure that noise and vibration is controlled and managed. Development should have regard to Camden's Noise and Vibration Thresholds. Planning permission will not be granted if development is likely to generate unacceptable noise and

vibration impacts or, if development sensitive to noise is proposed in locations which experience high levels of noise, unless appropriate attenuation measures can be provided.

- § Policy D1 sets out the design requirements to secure high quality design in development. The Council will expect excellence in architecture and design and resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- § Policy D2 states that that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings. This policy reiterates the requirements of the NPPF.
- § Policy CC1 requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy sets out several requirements including the promotion of zero carbon development and the encouragement of sensitive energy efficiency improvements.

## **OTHER MATERIAL PLANNING CONSIDERATIONS**

### **National Planning Policy Framework**

- 5.1.8. The revised National Planning Policy Framework (NPPF) was published in July 2018 and was updated in 2019 and 2021. This sets out the Government's planning policies for England and how these are expected to be applied. The National Planning Practice Guidance (NPPG) which is regularly updated sits alongside the NPPF and provides guidance on how the policies should be applied.
- 5.1.9. Both the NPPF and NPPG are important material considerations in the determination of planning applications. Central to the NPPF is the presumption in favour of sustainable development in paragraph 11. It advises that, for decision-taking, this means approving development proposals that accord with the development plan without delay.
- 5.1.10. With reference to the proposed development, key chapters from the NPPF include:
  - § Chapter 2 – achieving sustainable development;
  - § Chapter 6 – delivering a strong, competitive economy;
  - § Chapter 8 – promoting healthy and safe communities;
  - § Chapter 11 – making effective use of land;
  - § Chapter 12 – achieving well-designed places; and
  - § Chapter 16 – conserving and enhancing the historic environment.
- 5.1.11. The National Design Guide (2019) also provides guidance outlines and illustrates the government's priorities for well-designed places by focussing on good design, helping to inform development proposals and their assessment by local planning authorities.
- 5.1.12. With regard to conserving and enhancing the historic environment, the NPPF requires proposals relating to heritage assets to be justified and explain explanation of their effect on the heritage asset significance provided.

5.1.13. Paragraph 7 of the framework states that the purpose of the planning system is to contribute to the achievement of sustainable development and that, at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At paragraph 8, the document expands on this as follows:

*“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and needs to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:*

*‘a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) A social objective-to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural well-being; and*

*c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of the land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.*

5.1.14. And notes at paragraph 10:

*‘So that sustainable development is pursued in a positive way, at the heart of the framework is a presumption in favour of sustainable development (paragraph 11).*

5.1.15. With regards to the significance of a heritage asset, the framework contains the following policies:

*195. Local planning authorities should 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 into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.*

5.1.16. In determining applications local authorities are required to take into account the significance, viability, sustainability and local character and distinctiveness. Paragraph 197 of The NPPF identifies the following criteria in relation to this:

*“a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*

*b) The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

*c) The desirability of new development making a positive contribution to local character and distinctiveness”.*

5.1.17. With regard to potential harm to the significance of designated heritage assets, in paragraph 199 the Framework states the following:

*“... Great weight should be given to the asset’s conservation (And the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total Loss or less than substantial harm to its significance”.*

5.1.18. The framework goes on to state at paragraph 200 that:

*“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction or from development within the setting), should require a clear and convincing justification”.*

5.1.19. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset paragraph 201 of the NPPF states that:

*“.... local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

*a) The nature of the heritage asset prevents all reasonable uses of the site; and*

*b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

*c) conservation by grant funding or some form of not-for-profit, charitable or public ownership is demonstrably not possible; and*

*d) The harm or loss is outweighed by the benefit of bringing the site back into use”.*

5.1.20. With regard to less than substantial harm to the significance of a designated heritage asset, of the NPPF states the following:

*“202. 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, where appropriate, securing it optimum viable use”.*

5.1.21. In terms of non-designated heritage assets, the NPPF states:

*“203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect 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”.*

5.1.22. The framework requires 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. Paragraph 206 states that:

*“... Proposals that preserve those elements of the setting that make a positive contribution to the outset (or which better reveal its significance) should be treated favourably.”*

5.1.23. Concerning conservation areas in world heritage sites it states, in paragraph 207, that:

*“Not all elements of a conservation area or world heritage site 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*



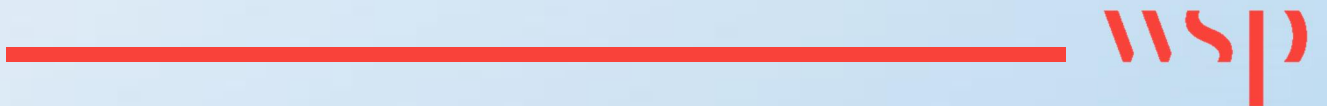
*harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the conservation area or world heritage site as a whole”.*

### **Camden Planning Guidance (CPG)**

- § Amenity CPG (January 2021);
- § Design CPG (January 2021);
- § Employment Sites and Business Premises (January 2021); and
- § Town Centres and Retail (January 2021).

# 6

## PLANNING ASSESSMENT





## 6 PLANNING ASSESSMENT

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- 6.1.1. Having set out the relevant planning policy considerations, the Planning Statement now considers the merits of each of the elements of the proposed development in light of planning policy and material considerations. This Statement also considers the proposals in light of the Pre-Application advice received from LB Camden.
- 6.1.2. The works at each level are as set out in the submitted Schedule of Works.

### PRINCIPLE OF DEVELOPMENT

- 6.1.3. The principle of refurbishing existing commercial buildings is strongly supported within regional and local planning policy.
- 6.1.4. At Policy G1 of Camden's Local Plan, the Council set out that they will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 6.1.5. In relation to economic development, London Plan Policy E1 supports improvements to the quality, flexibility and adaptability of office space. Local Plan Policy E1 writes that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. Local Plan Policy E2, meanwhile, writes that the Council will seek to protect and enhance existing employment premises and sites.
- 6.1.6. The sensitive cleaning of the principal facades will enhance the character and appearance of this Grade II listed building, which is noted for its highly significant historic and architectural public-facing facades.
- 6.1.7. The proposals seek to create single open and flexible floorplates for use by a range of office occupiers to maximise the building's attractiveness to the market. This accords with Local Plan Policy E1.
- 6.1.8. GQA has confirmed that all previous historic features have regrettably been removed meaning there would be no harm to the building's significance with reference to paragraphs 193-196 of the NPPF.
- 6.1.9. The proposals seek to upgrade the servicing strategy of the buildings through the installation of air source heat pump technology at roof level. The VRF heating/ cooling units serving historic spaces would be concealed within sympathetic casing to preserve their special interest. The upgrade and renewal of services would vastly improve the energy and sustainability performance of the buildings in accordance with the Council's declared climate emergency, and the relevant policies applicable to building refurbishment as set out within Chapter 8 of the Local Plan.
- 6.1.10. It is considered that this energy strategy, including the erection of sympathetically located new plant, would lead to less than substantial harm to the significance of the buildings whilst contributing tangible public benefits (i.e. para 196 of NPPF).
- 6.1.11. Camden LBC, in pre-application discussions, considered there to be nothing controversial regarding the proposals.

- 6.1.12. The proposals would also deliver revitalised office accommodation to meet the demands of modern commercial occupiers. This would increase the buildings' attractiveness to the market and actively contribute towards securing their viable long term future, which would enable their heritage significance to be preserved (i.e. para 196 of NPPF).

## **HERITAGE AND DESIGN**

- 6.1.13. London Plan Policy HC1 requires development proposals, which affect heritage assets, to conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 6.1.14. Local Policy D1 requires that development preserve and enhances the historic environment and heritage assets. In keeping with Local Policy D2, the Council will not permit the loss of or substantial harm to a designated heritage asset, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 6.1.15. The proposals aim to protect and preserve the elements of historic significance and, where necessary, sensitively remove and replace tired and unsympathetic modern construction elements.
- 6.1.16. This programme of external and internal refurbishment and restoration would significantly enhance the character and appearance of this Grade II heritage asset. These proposals would therefore accord with Local Plan Policy D2.
- 6.1.17. Given the improvements being made to the quality and appearance of the principal elevation, it is considered that there is no harm to the buildings' significance with reference to paragraphs 193-196 of the NPPF. The architectural and historic special interest of the principal elevation is actually enhanced through the programme of sensitive refurbishment and restoration.
- 6.1.18. This would increase the buildings' attractiveness to the market and actively contribute towards securing their viable long term future, which would enable their heritage significance to be preserved.
- 6.1.19. In support of this submission, a Heritage Impact Assessment has been provided. This concludes that the proposals will have a neutral impact on the listed building.

## **NOISE AND VIBRATION**

- 6.1.20. The proposed external flue is considered to be appropriate within this location. A Plant Noise Assessment has been submitted in support of the proposal, which demonstrates there is no detrimental harm to existing amenities.
- 6.1.21. Camden Council's policy documents express their requirement that the external Rating Level emitted from the building services plant to be lower than the Background sound level by 10dB (15dB if tonal components are present) at the nearest noise sensitive receptors.
- 6.1.22. Based on the manufacturer's sound pressure level data, it is predicted that noise emissions will be adequately controlled during the daytime and the night-time. The assessment indicates that the predicted rating noise level of the mechanical plant will be 10dB and 23dB below the typical background sound level at the nearest noise sensitive receiver during the day and night-time



respectively. This equates to a low impact in accordance with BS 4142 and complies with the Camden Council criteria.

- 6.1.23. The proposed development therefore accords with Policy A4 on this basis.

## **STRUCTURAL CHANGES**

- 6.1.24. In regard to structural changes, all works will be carried out sympathetically to the historic fabric of the building and in line with any guidance or requirements set out by the local Conservation Officer and English Heritage. The existing internal and external fabric shall be suitably protected throughout the entire duration of the works and the contractor undertaking the works shall have relevant listed building experience.
- 6.1.25. A summary of the proposed structural works is provided within the supporting Structural Statement.

## **ENERGY AND SUSTAINABILITY**

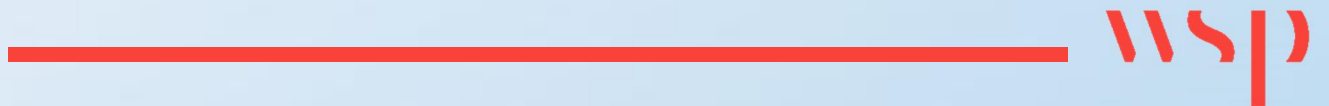
- 6.1.26. An Energy Technical Note has also been prepared in support of this application, which outlines that the existing building falls below an EPC rating of E – that being the minimum required for commercial rental properties. The Energy Technical Note demonstrates that the proposed refurbishments, meanwhile, will achieve a B EPC rating.

## **FIRE SAFETY**

- 6.1.27. As detailed within the support Fire Strategy Report, the proposals are considered to demonstrate a level of fire safety equal to or greater than the general standard implied by compliance with the recommendations in Approved Document B. This level of safety therefore satisfies the functional requirements of Part B of the Building Regulations.
- 6.1.28. The proposed development therefore complies with Policy D12 on this basis.

# 7

## SUMMARY AND CONCLUSIONS



## 7 SUMMARY AND CONCLUSIONS

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### COMPLIANCE WITH THE DEVELOPMENT PLAN

- 7.1.1. This Planning Statement has been prepared by WSP in connection with the proposed refurbishment of Norfolk House.
- 7.1.2. The reuse of previously developed land is supported by paragraph 117 and 118 of the NPPF which promote the effective use of land, in particular, making as much as possible use of brownfield sites.

### PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

- 7.1.3. Paragraph 7 of the NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Paragraph 8 identifies the three overarching and interdependent objectives:
  - a) *“economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
  - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;*
  - c) *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”*
- 7.1.4. As we have identified in this Statement, the proposed refurbishment of Norfolk House would significantly enhance the quality of the office accommodation and would enable it to meet the expectations of modern commercial occupiers. This aspiration is strongly supported by Local Plan Policy E1.
- 7.1.5. The refurbishments would increase the building’s attractiveness to the market and actively contribute towards securing its viable long-term use, enabling its heritage significance to be preserved, in keeping with paragraph 196 of the NPPF.

### PUBLIC BENEFITS

- 7.1.6. Overall, the development proposals will bring forward a number of significant public benefits. These include, but are not limited to:

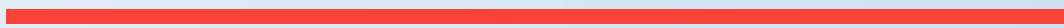
- i Restoration and revitalisation of a Grade II listed heritage asset within the Bloomsbury Conservation Area;
- i Safeguarding the longevity of Norfolk House as a commercial site;
- i The construction phase will facilitate opportunities for skills development, training and apprenticeships; and
- i Improve the sustainability and energy credentials at the site.

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

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

# Appendix A

PRE-APPLICATION FEEDBACK



## PRE-APPLICATION WITH LB CAMDEN

A pre-application site visit was held with LB Camden on 5 May, and a follow-up pre-application meeting was held with LB Camden on 30 June 2021 to discuss the proposals for Norfolk House.

A summary of feedback received is provided in the table below.

**Table – Pre-Application Feedback**

Proposed Work(s)	Pre-Application Feedback
EXTERNAL ALTERATIONS	
<p>Minimal alterations are proposed at the principal High Holborn (southern) and Southampton Place (eastern) elevations, with the opportunity of opening-up previously obscured areas of glazing at high level on some floors.</p> <p>The principal facades have already been cleaned.</p>	N/A
<p>Balconies to be installed across the rear (northern) elevation at the 1st, 2nd, 3rd and 4th floors. These would provide external amenity space for office occupiers and would face onto the adjacent courtyard.</p> <p>A new full-height glazed door would replace an existing, reduced width opening at each floor to enable access to the balconies.</p> <p>An external flue would be installed at the rear elevation, adjacent to the new external doors providing access to the balconies. This is indicatively proposed to serve a potential new food and beverage use within the adjacent retail unit (formerly occupied by RBS Bank).</p>	<p>No objection to the balconies in principle, as long as they do not overwhelm the elevation.</p> <p>Would also encourage exploring the opportunity to rationalise the rear plant equipment serving the neighbouring retail units (Chicken Hub/ My Old Dutch), which are also within the applicant's ownership.</p> <p>The proposed external flue is "not great", but officers would be led by the new adjacent retail use. Recognise that the impact of the flue would be mitigated by the new, darker colour to the rear elevation; which is positive as the existing cream colour is "odd".</p>
ALTERATIONS TO THE GROUND FLOOR ENTRANCE LOBBY	
<p>It is proposed to provide an enlarged reception lobby using part of the existing ground floor retail unit (formerly occupied by RBS Bank). This would provide an opportunity to accommodate a reception desk and seating areas suitable for occupation by a single commercial tenant.</p> <p>Works would include:</p> <p>Existing internal lobby doors would be removed; Installation of new automated, inward swinging glazed doors; Internal masonry partitions to be removed to open-up the space;</p>	<p>Queried whether the demolition drawing on page 8 shows the removal of a chimney breast? This would be concerning if so.</p> <p>Need to ascertain the degree and extent of harm by establishing what is historic and what is not original.</p> <p>Also need to understand how this space has evolved over time i.e. whether the form of the entrance lobby has been dictated by the works to the adjacent retail unit/ bank; and whether Southampton Place has always been the secondary entrance. Providing this further background information will allow officers to assess how much they can tolerate in terms of change.</p>



<p>Installation of a new fire and acoustic rated partition to separate the enlarged reception area from the adjacent retail unit;</p> <p>Installation of new terrazzo flooring;</p> <p>The area of slab adjacent to the lift would be lowered/ removed to ensure a single floor level;</p> <p>A new and refurbished lift would be provided serving the basement and all upper floors; and</p> <p>New showers and changing facilities would be incorporated at basement level.</p> <p>The existing marble steps, pilasters, vaulted ceiling and timber panelling would otherwise all be retained.</p>	
<p>ALTERATIONS TO UPPER FLOORS (TYPICAL OFFICE FLOOR)</p>	
<p>It is proposed to remove the existing masonry partitions, ceilings and floor finishes at 1st, 2nd, 3rd and 4th floors to provide flexible open-plan office accommodation.</p> <p>New self-contained 'superloo' WC's would be installed adjacent to the core at each of the upper floors.</p> <p>A new lift and steel structure would be built within the existing timber lift shaft, providing access to all floors.</p>	<p>Need to ascertain the degree and extent of harm by establishing what is historic and what is not original, which will allow officers to assess how much they can tolerate in terms of change.</p>



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