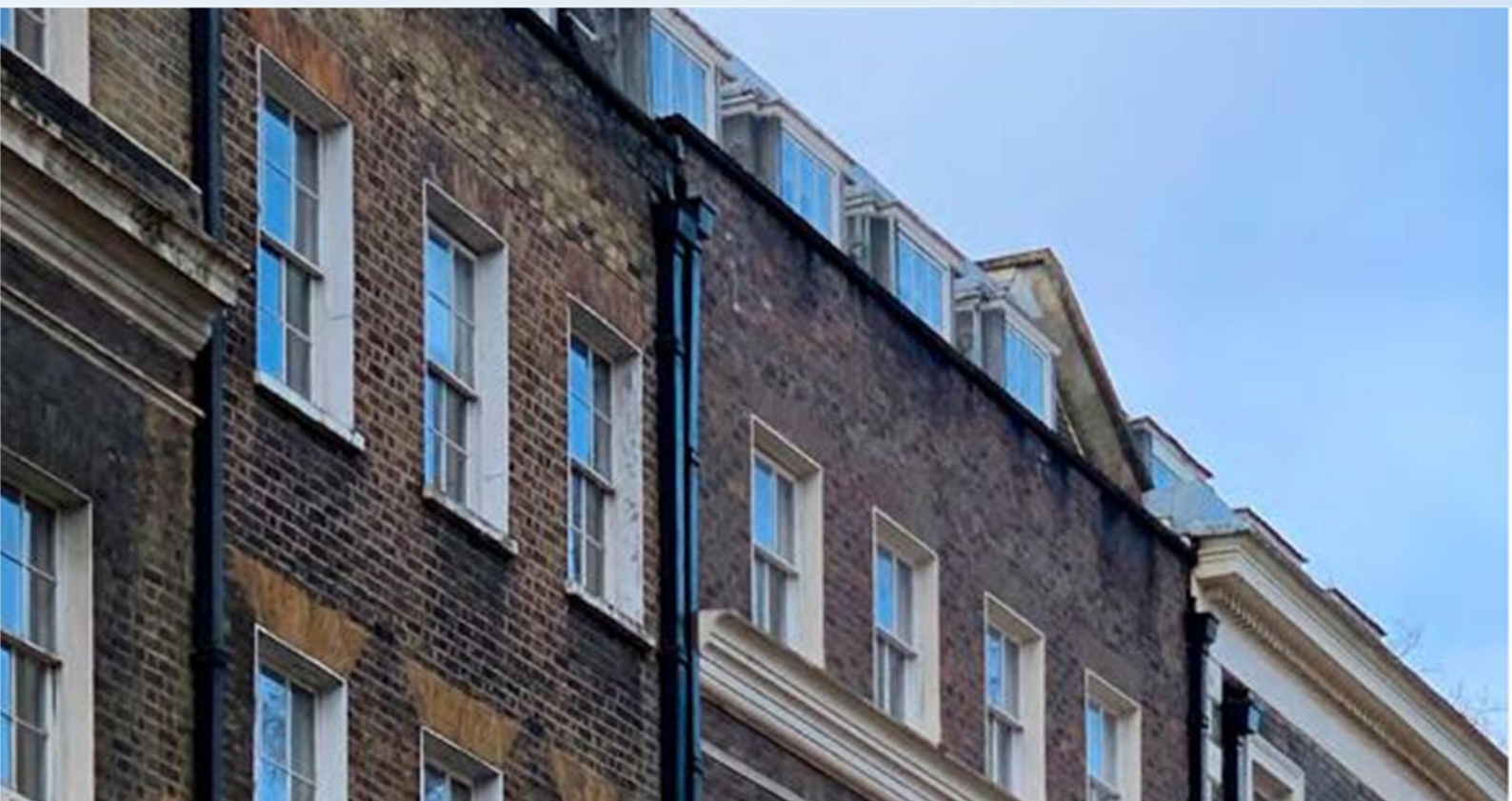




Hogarth Properties S.A.R.L

Project 5: 20-22 Southampton Place & 46-47 Bloomsbury Square

Holborn Links Estate





Hogarth Properties S.A.R.L

PROJECT 5: 20-22 SOUTHAMPTON PLACE & 46-47 BLOOMSBURY SQUARE

Holborn Links Estate

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Hogarth Properties S.A.R.L

PROJECT 5: 20-22 SOUTHAMPTON PLACE & 46-47 BLOOMSBURY SQUARE

Holborn Links Estate

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QUALITY CONTROL

Issue/revision	Final issue
Project number	70081565
Date	November 2021
Prepared by	Ross Williamson
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APPENDIX A

PRE-APPLICATION FEEDBACK

EXECUTIVE SUMMARY

“Full planning and listed building consent application for change of use of Nos. 20-22 Southampton Place and 46-47 Bloomsbury Square from Class F1 (learning and non-residential institution) to Class E (commercial, business and service), together with internal and external refurbishment works and the erection of replacement external plant”.

The proposal is for the refurbishment of 20-22 Southampton Place and 46-47 Bloomsbury Square, Holborn, London, as part of a wider regeneration of the Holborn Links Estate. The scheme also proposes to change the use of 20-21 Southampton Place and 46-47 Bloomsbury Square to deliver uniform Class E office accommodation across these properties.



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 majority of the estate, 26 buildings in total, are Listed and is located within the Bloomsbury Conservation Area.

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 20-22 Southampton Place & 46-47 Bloomsbury Square 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 20-22 Southampton Place & 46-47 Bloomsbury Square 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 and Grade II* listed buildings 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:

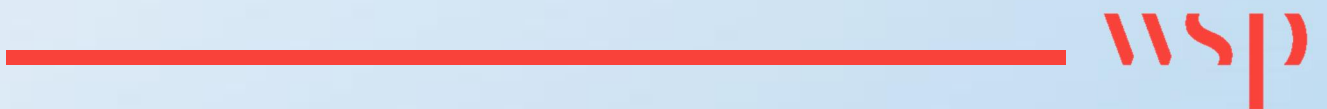
- § Restoration and revitalisation of a Grade II* and Grade II listed heritage asset within the Bloomsbury Conservation Area;
- § Safeguarding the longevity of 20-22 Southampton Place & 46-47 Bloomsbury Square as a commercial site;
- § Securing the long-term viability of office uses on the site and in the CAZ; and
- § Improving 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 development constitutes sustainable development and should be approved without delay.

1

INTRODUCTION



1 INTRODUCTION

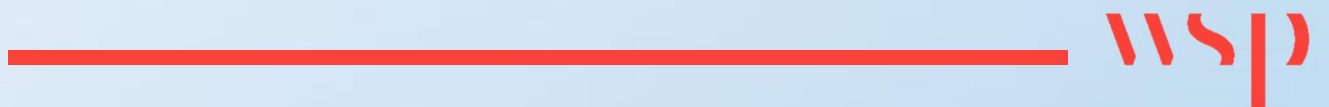
- 1.1.1. This Planning Statement has been prepared by WSP on behalf of Hogarth Properties S.A.R.L in support of the proposed refurbishment and delivery of modern office accommodation at 20-22 Southampton Place & 46-47 Bloomsbury Square, Holborn, London, WC1A 2BP.
- 1.1.2. It is submitted to the London Borough of Camden (the LPA) as part of the application submission for the following:
- “Full planning and listed building consent application for change of use of Nos. 20-22 Southampton Place and 46-47 Bloomsbury Square from Class F1 (learning and non-residential institution) to Class E (commercial, business and service), together with internal and external refurbishment works and the erection of replacement external plant”*
- 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;
 - § Block plan;
 - § BREEAM Assessment;
 - § Community Infrastructure Levy Additional Information Forms;
 - § Construction Management Plan Pro Forma;
 - § Design & Access Statement;
 - § Energy Statement;
 - § 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

- 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 a 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.

20-22 SOUTHAMPTON PLACE & 46-47 BLOOMSBURY SQUARE

- 2.1.7. Nos. 20-22 Southampton Place and 46-47 Bloomsbury Square form part of the Holborn Links Estate. The buildings included in this application submission are grouped into three planning units, following past works to link some of the buildings. The configuration comprises:
 - § 20-21 Southampton Place, which are Grade II* listed;
 - § 22 Southampton Place, which is Grade II* listed; and
 - § 46-47 Bloomsbury Square, which are Grade II listed.

- 2.1.8. Each of the buildings have been heavily altered over the years and have largely been in office use for a number of decades.
- 2.1.9. These proposals aim to provide significant investment in the buildings to create high quality, desirable office accommodation whilst retaining and restoring the historic fabric.

HISTORICAL ALTERATIONS

- 2.1.10. 20-21 Southampton Place were linked through previous alterations and refurbishments. Each building retains its own staircase between basement and third floor, however only the staircase in No. 21 extends to fourth floor within the mansard roofspace.
- 2.1.11. Extensive refurbishments were carried out in the 1970s when the mansard roofs were added. These mansards roofs and the interiors at fourth floor are of modern construction, as are the roof coverings and gutter linings.
- 2.1.12. Internally opening up has been undertaken for asbestos investigations and in all of these locations the walls and ceilings have been revealed to be of modern construction with gypsum based plaster or boards. There was no original lathe and plaster visible within partitions during the inspection.
- 2.1.13. A single lift serves basement to third floor and the lift sits at half landing level on the stairs within a modern rear extension. There is one WC per floor on the No. 21 side with the exception of the basement where an additional WC is location on the No. 20 side and the fourth floor where there is no WC provision.
- 2.1.14. Floors are generally arranged with a single room fronting the street and another facing the rear of the building. The fourth floor is more heavily partitioned from its previous residential use.
- 2.1.15. No. 22 Southampton Place is arranged with front and rear rooms either side of a central staircase. The front elevation consists of 3 window bays whilst the rear elevation contains a curved brick bay with central windows.
- 2.1.16. A small passenger lift sits at half landing level between floors adjacent to a single WC at each level.
- 2.1.17. Similarly to 20-21 Southampton Place, the fourth floor mansard level was a later addition in the 1970s and was used as a residential flat. There was also a more recent application for works in 2016 that were subsequently carried out, including the addition of plant to the roof.
- 2.1.18. At fourth floor level there is a narrow, steep stair providing rooftop access via a sliding hatch. At roof level there is a walkway linking this to a similar stair and hatch accessing the fourth floor of No. 20. This is assumed to have been part of the fire escape strategy.
- 2.1.19. There were fewer opening up works with No. 22 however it was clear from inspection that ceilings and a number of cornices, architraves and skirtings were new. All the existing fireplaces have also been removed and replaced with modern surrounds.
- 2.1.20. 46-47 Bloomsbury Square sit on the corner of Bloomsbury Square and Southampton Place. Each building has its own front door, No. 46 accessed from Southampton Place and No. 47 from Bloomsbury Square.
- 2.1.21. Internally, much like 20-21 Southampton Place, the buildings have been linked at every level, however each has its own staircase between basement and third floor, with the staircase in No. 47

extending to fourth floor. A steep stair provides roof access via an escape hatch which in turn leads to No. 1 Bloomsbury Square via a rooftop walkway.

- 2.1.22. The fourth floor mansard level was added to the building in the 1970s, at the same time as the rear lift and WC extension was added.
- 2.1.23. There are 4no. pavement vaults at basement level to the north and a rear courtyard to the south.
- 2.1.24. The internal partitions and joinery appear to be gypsum based board and modern softwood studs/architraves and skirtings. On the upper floors, openings have been created between rooms and then in some places infilled with recessed plasterboard. Additionally, the staircase stringers have been overboarded and enclosed. The fourth floor is more heavily subdivided and was previously in residential use.

PLANNING DESIGNATIONS

- 2.1.25. The key planning designations affecting the site are the following:
 - § Grade II and II* Listed (*46-47 Bloomsbury Square and 20-22 Southampton Place, respectively*);
 - § Bloomsbury Conservation Area;
 - § Central Activities Zone (CAZ); and
 - § PTAL Rating of 6b (Best).

PLANNING HISTORY

- 2.1.26. There is a limited planning history associated with the three sites. Relevant details are provided in the table below:

Table 2-1 – 20-22 Southampton Place & 46-47 Bloomsbury Square – Planning History

Application Reference	Description of Proposal	Status
20 & 21 Southampton Place		
2005/4268/P	Change of use from B1 (office) to D1 (non-residential institutions) on lower ground, ground, first, second and third floors.	Granted 2005
22 Southampton Place		
2016/6842/L	Internal refurbishment works, including the replacement of the existing lift, removal of modern partition walls at basement, ground and fourth floor levels, installation of new partitions at basement level, removal of plasterboard suspended ceilings at basement level, renewal of modern internal wall, ceiling and floor finishes, and re-routing and installation of new services.	Granted 2016

LSX0104181	Enlargement of opening in internal wall at ground floor level, as shown on drawing numbers: 8938-SK13 and 8938-SK14	Grant L B Consent with Conditions 2001
9100980	The retention of air cooling condenser at roof level.	Grant Full or Outline Perm. with Conditions 1991
8770158	General external restoration work and replacement of existing air conditioning plant on roof with new fan coil system as shown on drawing numbers AHP/800/3 & 4 and 3 x A4 sheets showing manufacturer's specifications.	Grant List.Build. or Cons. Area Consent 1987
8700489	Installation of air cooled condenser at roof level as shown on drawing numbers AHP/800/3 & 4 and 3 x A4 sheets showing manufacturers specifications.	Grant Full or Outline Perm. with Conditions 1987
46 & 47 Bloomsbury Square		
8970045	Alterations at third floor level involving construction of new partitions and small windows as shown on drawing numbered 615/2.	Grant List.Build. or Cons. Area Consent 1989
8970029	Retention of new window in the rear elevation at third floor level as shown on drawings numbered 615/1 and 2.	Grant List.Build. or Cons. Area Consent 1989
8900061	Retention of new window in the rear elevation at third floor level as shown on drawings numbered 615/1 and 2.	Grant Full or Outline Planning Permission 1989
8770253	Opening in the party wall at second and third floor level to form new doorways as shown on one unnumbered drawing.	Grant List.Build. or Cons. Area Consent 1987

8570267	Formation of an opening in the party wall with 23 Southampton Place at ground and basement levels in order to satisfy the means of escape requirements.	Grant List.Build. or Cons. Area Consent 1985
N14/23/E/1143	Internal alterations involving the erection of partitions at the ground floor of 46,Bloomsbury Square and in the first floor of 47,Bloomsbury Square.	Granted 1975
N14/23/E/1061	The construction of internal partitions on the basement, second and third floors of 46/47 Bloomsbury Square, WC1	Listed permission 1975
N14/23/E/20972	Erection of new mansard roof storeys, a lift/toilet tower at the rear uniting both buildings, and the formation of internal links.	Listed permission 1974
N14/23/E/18180/R	Restoration, and the addition of mansard roof storeys and a lift/toilet tower at the rear uniting both buildings, and the formation of internal links; the use of the basement, ground 1st, 2nd & 3rd floors of both buildings as offices and the use of the 4th floors of both buildings for residential purposes.	Conditional 1974
N14/23/E/582	Demolition of 1, 46, 47 Bloomsbury Square, W.C.1	Listed permission 1973

LAWFUL EXISTING USE AND AREA SCHEDULE

- 2.1.27. In 2005, a change of use was permitted from office use to a flexible office/education provision. This application is considered to have established the lawful use of the premises for language schools, which became the dominant use of the site following that permission.
- 2.1.28. Details of the existing lawful use and area schedule is provided in the table below. It should be noted that ancillary caretaker flats are located at the fourth floor in each of the properties, as demonstrated within the Design and Access Statement.

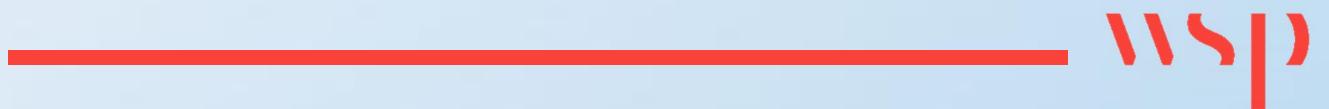
Table 2-2 – Lawful Existing Use and Area Schedule

Property	Lawful Existing Use	Area (sqm) (GIA)
20-21 Southampton Place	Class F1 (learning and non-residential institution)	676

22 Southampton Place	Class E (commercial, business and service)	475
46-47 Bloomsbury Square	Class F1 (learning and non-residential institution)	651
TOTAL	-	1,802

3

PRE-APPLICATION

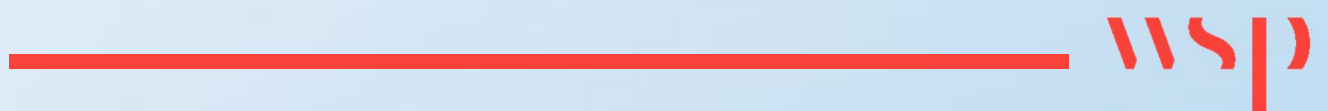


3 PRE-APPLICATION

- 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 change of use of Nos. 20-22 Southampton Place and 46-47 Bloomsbury Square from Class F1 (learning and non-residential institution) to Class E (commercial, business and service), together with internal and external refurbishment works and the erection of replacement external plant”

4.1.1. 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 Grade II* and Grade II listed buildings, 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 material change of use and external works would require planning permission, this submission wraps both the Listed Building Consent and Planning Permission elements into one application.

4.1.2. As confirmed within the planning history for 20-21 Southampton Place and 46-47 Bloomsbury Square, the lawful use of these properties is Class F1 (learning and non-residential institutions), which was formerly Class D1 of the previous Use Class Order.

4.1.3. The lawful use of 22 Southampton Place is already Class E, as it was previously occupied as B1 office accommodation. A change of use is therefore not required for this property.

4.1.4. This proposal seeks to change the lawful use of 20-21 Southampton Place and 46-47 Bloomsbury Square from Class F1 to Class E and to provide uniform office accommodation across the site, as well as external and internal refurbishments to facilitate the commercial operations within the properties.

4.1.5. The proposed refurbishment of 20-22 Southampton Place and 46-47 Bloomsbury Square, including the proposed change of use, would significantly enhance the quality of the office accommodation and would enable it to meet the expectations of modern commercial occupiers.

4.1.6. The full scope of proposed external and internal refurbishment works is set out within the table below:

Table 4-1 – HLE Project 5 – Schedule of Proposed Works

Proposed Work(s)	
20-21 Southampton Place	
Internal: Lower Ground Floor	<ol style="list-style-type: none"> 1. Refurbished lift 2. Existing WCs refurbished with new sanitary ware and finishes. 3. Existing WC refurbished in current position 4. All new period appropriate doors, skirtings, architraves and cornices throughout. 5. New floor mounted FCUs in built in joinery.

	<ol style="list-style-type: none"> 6. Existing lobby retained. 7. New service risers. 8. Courtyards refurbished with wall panelling and paving. 9. New kitchenette with high and low wall mounted units. 10. Wall clad in black vertical cladding. 11. New service cupboard in existing location.
Internal: Ground Floor	<ol style="list-style-type: none"> 1. Existing lift refurbished. 2. Existing WCs refurbished with new sanitary ware and finishes. 3. New condensate risers sized to allow retention of high and low level historic features. 4. All non-historic features replaced with more in keeping skirtings, architraves and cornices. 5. Existing windows refurbished and re decorated. 6. Existing fireplace surrounds repaired as required and new inserts installed 7. New capped services for future tea point. 8. New partition formed with double doors to reinstate entrance lobby. 9. New door and partition installed. 10. Existing opening infilled to reinstated separate reception room. 11. External store area. 12. New floor mounted FCUs within built in joinery.
Internal: Typical Upper Floor	<ol style="list-style-type: none"> 1. Existing lift refurbished. 2. Existing WCs refurbished with new sanitary ware and finishes. 3. All replaced features such as skirting, architraves and cornices replaced to match existing. 4. New doors into offices. 5. New floor mounted FCUs in built in joinery. 6. New service risers sized to allow retention of high and low level historic features. 7. Existing fireplace surrounds repaired and new inserts installed. 8. New openings formed in assumed modern partition. 9. New guarding to full height windows (first floor only). 10. Existing windows refurbished and redecorated. 11. New capped services for future tea points.
Internal: Fourth Floor	<ol style="list-style-type: none"> 1. New stair lobby formed. 2. Existing assumed 1970s partitions removed and new partitions installed to rationalise room layouts. 3. All new doors, skirtings, architraves and cornices throughout with period appropriate designs. 4. New capped services for future tea points. 5. New stair and access hatch to roof in existing access location. 6. New opening formed in modern partition. 7. New floor mounted FCUs in built in joinery 8. New risers. 9. Existing windows refurbished and redecorated. 10. New casement windows. 11. New sash window.

	<ol style="list-style-type: none"> Existing mansard roof upgraded with new insulation to improve thermal performance.
22 Southampton Place	
Internal: Lower Ground Floor	<ol style="list-style-type: none"> Existing lift refurbished. New floor mounted FCUs in built in joinery. Existing cupboard retained as comms room. All new period appropriate doors, skirtings, architraves and cornices throughout. New condensate risers Existing courtyard cleaned and surfaces made good. Existing door widened and re-handed. New kitchenette within lower ground front room in existing kitchenette location. Existing window sill lowered to create new access into rear courtyard for maintenance access. New ladder installed for maintenance access. New service cupboard in existing location.
Internal: Ground Floor	<ol style="list-style-type: none"> Existing 2016 lift refurbished. New capped services for future tea point installation. WC enlarged in line with 2016 consent and refurbished with new fittings and finishes. All non-historic features replaced with more in keeping skirtings, architraves and cornices. Existing windows refurbished and re decorated. Existing fireplace surrounds repaired as required and new inserts installed Existing opening widened to create more usable access to front room. New floor mounted FCUs within built in joinery. Riser rebuilt for new services.
Internal: Typical Upper Floor	<ol style="list-style-type: none"> Existing lift refurbished. New guarding to full height windows (first only). WC enlarged in line with 2016 consent and refurbished with new fittings and finishes. All replaced features such as skirting, architraves and cornices replaced to match existing. New floor mounted FCUs in built in joinery. New service riser. Existing fireplace surrounds repaired and new inserts installed. New capped services for tea points. Existing office doors retained. Existing windows refurbished and redecorated.
Internal: Fourth Floor	<ol style="list-style-type: none"> Existing lift overrun.

	<ol style="list-style-type: none"> 2. Existing assumed 1970s partitions removed and new partitions installed to rationalise room layouts. 3. All new doors, skirtings, architraves and cornices throughout with period appropriate designs. 4. New cleaners cupboard within existing plant room. 5. New stair and access hatch to roof within existing plant room to open up rear room - stair to match rise and going of existing. 6. New landing formed. 7. New floor mounted FCUs in built in joinery. 8. New service riser. 9. New capped services for tea point. 10. Existing windows refurbished and redecorated. 11. New sash window.
20-22 Southampton Place (inclusive)	
External: Roof Plan	<ol style="list-style-type: none"> 1. Existing roof overlain with new roofing membrane. 2. Existing plant removed and new plant consolidated to the back of the roof. 3. Existing guarding removed and new guarding installed to improve roof access. 4. New access hatch from relocated stairs below. 5. Existing roof overlain with new roofing insulation and membrane to improve thermal performance of building. 6. New access hatch from stairs below.
46-47 Bloomsbury Square	
Internal: Lower Ground Floor	<ol style="list-style-type: none"> 1. Existing lift refurbished. 2. Existing WC refurbished with new sanitary ware and finishes. 3. Existing vaults unaltered. 4. All new doors, skirtings, architraves and cornices throughout. 5. New M&E installed to courtyard recess 6. Courtyards refurbished with new decking 7. New comms cupboard. 8. New M&E cupboard in old location. 9. Existing pavement vault utilised for plant. 10. New floor mounted FCUs in built in joinery 11. New risers. 12. New external stairs.
Internal: Ground Floor	<ol style="list-style-type: none"> 1. Existing lift refurbished. 2. Existing WC refurbished with new sanitary ware and finishes. 3. Form new double door opening in existing wall. 4. New stair to lower ground for bike access. 5. Existing fireplace surrounds repaired and new inserts installed. 6. Existing fire escape arrangement retained. 7. New floor mounted FCUs in built in joinery.

	<ol style="list-style-type: none"> 8. New risers sized to allow retention of high and low level historic features. 9. All replaced features such as skirtings, architraves and cornices replaced to match existing. 10. New doors to offices. 11. Existing windows refurbished and redecorated. 12. New capped service provision for future tea points. 13. New casement window.
Internal: Typical Upper Floors	<ol style="list-style-type: none"> 1. Existing lift refurbished. 2. Existing WC refurbished with new sanitary ware and finishes. 3. Form new opening in existing wall within previous opening location. 4. All replaced features such as skirtings, architraves and cornices replaced to match existing. 5. Existing fireplace surrounds repaired and new inserts installed. 6. New panelled office doors. 7. New floor mounted FCUs in built in joinery. 8. New service risers sized to allow retention of high and low level historic features. 9. New guarding to full height windows (first floor only). 10. New free standing tea points within joinery. 11. Existing windows refurbished. 12. New casement window.
Internal: Fourth Floor	<ol style="list-style-type: none"> 1. New stair lobby formed. 2. Existing assumed 1970s partitions removed to rationalise room layouts. 3. All new doors, skirtings, architraves and cornices throughout with period appropriate designs. 4. New capped service provision for future tea point. 5. New roof access in existing location. 6. Existing windows refurbished and redecorated. 7. New floor mounted FCUs in built in joinery 8. New service risers.
External: Roof Plan	<ol style="list-style-type: none"> 1. Existing roof overlain with new roofing membrane. 2. Existing plant removed and new plant consolidated to the back of the roof. 3. Existing guarding removed and new guarding installed to improve roof access. 4. New access hatch to stairs below.

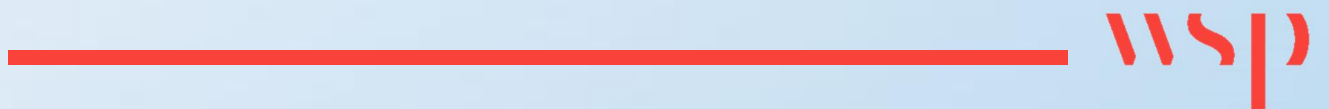
4.1.7. An area schedule of the proposed change of uses has been set out in the table below:

Table 4-2 – HLE Project 5 – Change of Use Area Schedule

Property	Lawful Existing Use	Proposed Use	Area (sqm) (GIA)
20-21 Southampton Place	Class F1	Class E	676
22 Southampton Place	Class E	Class E	475
46-47 Bloomsbury Square	Class F1	Class	651
TOTAL	-	-	1,802

5

PLANNING POLICY AND GUIDANCE



5 PLANNING POLICY AND GUIDANCE

- 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".*
- 5.1.5. 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."*
- 5.1.6. 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

- 5.1.7. 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.
- 5.1.8. The Development Plan for the purpose of the determination of this planning application comprises:

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

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

LONDON PLAN (2021)

5.1.10. 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”.

5.1.11. 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

- 5.1.12. 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.
- 5.1.13. 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.
- 5.1.14. 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.
- 5.1.15. 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.
- 5.1.16. 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.
- 5.1.17. 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”.

5.1.18. 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).

5.1.19. 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.

5.1.20. 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”.

5.1.21. 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”.

5.1.22. 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”.

5.1.23. 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”.

5.1.24. 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”.

5.1.25. 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”.

5.1.26. 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.”

5.1.27. 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,



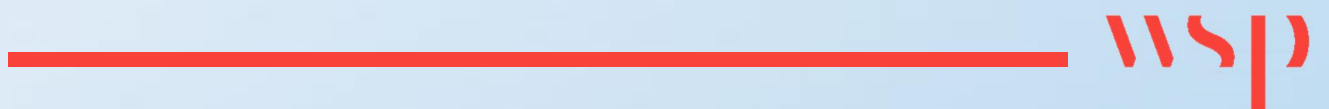
taking into account the relative significance of the element affected and its contribution to the significance of the conservation area or world heritage site as a whole”.

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 CONSIDERATIONS



6 PLANNING CONSIDERATIONS

- 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 the expansion of use to commercial office space, as well as refurbishing the existing buildings, is strongly supported within local and London plan 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. Camden's Local Plan gives both office uses and educational uses a level of protection. As London's economy is becoming increasingly service based, the London Plan seeks to ensure that there is enough office space of the right kind in the right location.
- 6.1.7. It had been recognised during pre-application discussions with LB Camden, however, that whilst being an educational use, the existing language schools are not considered in the same way as institutional educational uses, and they would support a change of use application for this site.
- 6.1.8. There is also an acknowledgement that whilst office employment may grow by 303,000 between 2011 and 2031, requiring an additional 3.9 million sqm (net), local plans and strategies should support the conversion of surplus offices to other uses and promote mixed use development, given the whole impact from COVID-19 pandemic.
- 6.1.9. The site is within the Central Activities Zone (CAZ) where office uses are strongly supported. The London Plan, at Policy SD5, strongly supports the provision of office space in the CAZ. Camden's Local Plan, at Policy E2, supports uses that support the functions of the CAZ.
- 6.1.10. The proposed refurbishment of 20-22 Southampton Place & 46-47 Bloomsbury Square, including proposed change of use, would significantly enhance the quality of the office accommodation and would enable it to meet the expectations of modern commercial occupiers.
- 6.1.11. This aspiration aligns clearly with London and local policy and is therefore considered acceptable in principle.

- 6.1.12. Indeed, at pre-application discussions, LB Camden officers were very supportive of the scheme in principle.

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 these Grade II and Grade II* heritage assets. 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 plant, which will be consolidated to the back of the roof, is considered to be appropriate within this location. An Acoustic / Noise Impact Assessment has been submitted in support of the proposal, which demonstrates there is no detrimental harm to existing amenities.
- 6.1.21. The assessment indicates that the predicted rating noise level of the mechanical plant will be 10dB and 8dB below the typical background sound level at the nearest noise sensitive receiver. This complies with the Camden council criteria during the day but exceeds the criteria by 2dB at night.
- 6.1.22. The calculation is, however, worst case and due to the directionality of the sound propagation from the units (which we were unable to account for in the model) it is likely that in practice the noise level will be marginally more than 10dB below the background during the night-time and comply with the Camden Council criteria.
- 6.1.23. Should further mitigation be required a further 2dBA attenuation may be achieved by use of acoustic screening or an alternative plant layout.



ENERGY AND SUSTAINABILITY

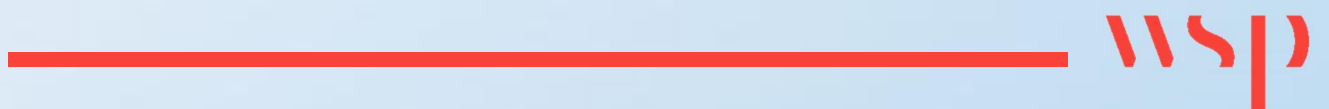
- 6.1.24. An Energy Technical Note has also been prepared in support of this application, which acknowledges that the existing buildings fall below the minimum requirement of an EPC rating of E for commercial rental properties. The proposed energy improvements at each building are anticipated to achieve a low C or high D EPC rating.

FIRE SAFETY

- 6.1.25. A Fire Strategy Report has also been provided for each property, which demonstrates that the proposals are considered to provide 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.

7

SUMMARY AND CONCLUSIONS



7 SUMMARY AND CONCLUSIONS

COMPLIANCE WITH THE DEVELOPMENT PLAN

- 7.1.1. This Planning Statement has been prepared by WSP in connection with the proposed refurbishment of 20-22 Southampton Place & 46-47 Bloomsbury Square, including proposed change of use.
- 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:
 - ha) “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 20-22 Southampton Place & 46-47 Bloomsbury Square, including proposed change of use, 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

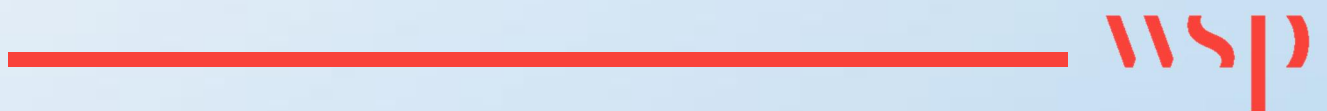
- 7.1.6. Overall, the development proposals will bring forward a number of significant public benefits. These include, but are not limited to:

- § Restoration and revitalisation of a Grade II listed heritage asset within the Bloomsbury Conservation Area;
- § Safeguarding the longevity of 20-22 Southampton Place & 46-47 Bloomsbury Square as a commercial site;
- § The construction phase will facilitate opportunities for skills development, training and apprenticeships; and
- § 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

Pre-application site visits were held with LB Camden on 5 May and 8 June, and a follow-up pre-application meeting was held with LB Camden on 14 July to discuss the proposals for the site.

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

Table – Pre-Application Feedback

Proposed Work(s)	Pre-Application Feedback
EXTERNAL ALTERATIONS TO ELEVATIONS – 20-22 SOUTHAMPTON PLACE	
<p>Works of repair and refurbishment to the front of nos. 20 to 22, including:</p> <ul style="list-style-type: none"> § Existing windows refurbished and re- decorated; § New metal balustrades to full height windows; § New entrance signage; and § New wall mounted lighting <p>Works of repair, refurbishment and alteration to the rear of nos. 20 to 22, including:</p> <ul style="list-style-type: none"> § Cycle parking to be located inside existing gate - new balustrade to walkway; § Courtyards to rear nos. 20 and 21 refurbished with wall panelling and lighting; § Existing 1970's lower ground extension at nos. 20 and 21 modified to form new pump and tank room. Wall clad in black wooden board on board vertical cladding; § Existing window cills at nos. 20 and 21 lowered to create access into courtyard from new kitchenettes; and § Existing windows refurbished and redecorated. <p>Works of general repair to be identified at application stage, including:</p> <ul style="list-style-type: none"> § Redecoration of facades, windows, doors and railings; § Render, stonework and brickwork repairs; § Rainwater goods replacement/repair; § Relining of fourth floor parapet gutters in lead; § Overlaying the existing modern asphalt roof with a liquid roofing membrane to repair existing leaks; and § Full refurbishment of the sash windows. 	<p>LB Camden 14.07.2021: Note there is nothing controversial with these proposals.</p>
INTERNAL ALTERATIONS AT LOWER GROUND FLOOR – 20-22 SOUTHAMPTON PLACE	
<p>Internal alterations across the Lower Ground Floor at nos. 20-21 include:</p>	<p>LB Camden 14.07.21 CH: not adverse to modern-looking doors but need to</p>

<ul style="list-style-type: none"> § Existing lift refurbished; § Existing WCs refurbished with new sanitary wear and finishes; § Form new partitions for plant room and shower within 1970's lower ground extension; § All new period appropriate doors, skirtings, architraves and cornices throughout; § New floor mounted FCUs in built in joinery; § New shower installed within old WC; § New condensate risers; § New kitchenette with high and low wall mounted units; and § New kitchenette within lower ground linked to courtyard. <p>Internal alterations across the Lower Ground Floor at no.22 include:</p> <ul style="list-style-type: none"> § Existing lift refurbished; § New floor mounted FCUs in built in joinery; § Form new partitions for plant room in existing coms room location; § All new period appropriate doors, skirtings, architraves and cornices throughout; § New condensate risers; § New shower installed; § Existing door widen and handed; and § New kitchenette within lower ground front room in existing kitchenette location. 	<p>understand these in the context of the building.</p>
<p>INTERNAL ALTERATIONS AT GROUND FLOOR – 20-22 SOUTHAMPTON PLACE</p>	
<p>Internal alterations across the Ground Floor at nos. 20-21 include:</p> <ul style="list-style-type: none"> § Lifts refurbished; § Existing WCs refurbished with new sanitary wear and finishes; § New condensate risers sized to allow retention of high and low level historic features; § All non-historic features replaced with more in keeping skirtings, architraves and cornices; § Existing fireplaces surround repaired as required and new inserts installed; § New free standing tea points within joinery; § New partition formed with double doors to reinstate entrance lobby; § New open plan room formed and historic features retained at high level; § Existing opening infilled to reinstated separate reception room; and 	<p>LB Camden 14.07.21: Need to maintain the cellular approach at ground floor, which is a standard requirement for listed buildings in London. There is a general presumption in favour of retaining the plan-form as the cellular plan-form (particularly at 46-47) is a key intrinsic part of the buildings' special interest.</p> <p>LB Camden 14.07.21 CH: Any altering of the plan-form at ground floor would be a "cause for concern".</p> <p>LB Camden 14.07.21 CH: not adverse to modern-looking doors, but need to</p>

<p>§ New floor mounted FCUs within built in joinery.</p> <p>Internal alterations across the Ground Floor at no.22 include:</p> <ul style="list-style-type: none"> § Existing 2016 lift refurbished. § New free standing tea points within joinery; § WC enlarged in line with 2016 consent and refurbished with new fittings and finishes; § All non-historic features replaced with more in keeping skirtings, architraves and cornices; § Existing windows refurbished and re decorated; § Existing fireplaces surround repaired as required and new inserts installed § Existing opening widened to create more usable access to front room; § New floor mounted FCUs within built in joinery; and § New condensate risers sized to allow retention of high and low level historic features. 	<p>understand these in the context of the building.</p>
<p>INTERNAL ALTERATIONS AT FIRST, SECOND AND THIRD FLOORS – 20-22 SOUTHAMPTON PLACE</p>	
<p>Internal alterations across the First, Second and Third floors at nos. 20-21 include:</p> <ul style="list-style-type: none"> § Existing WCs refurbished with new sanitary wear and finishes; § All non-historic features replaced with more in keeping skirtings, architraves and cornices; § Existing four panel doors retained. All inappropriate doors replaced with new four panel doors; § New floor mounted FCUs in built in joinery; § New condensate risers sized to allow retention of high and low level historic features; § Existing fireplaces surround repaired and new inserts installed; § New openings formed in assumed modern partition; and § New free standing tea points within joinery. <p>Internal alterations across the First, Second and Third floors at no.22 include:</p> <ul style="list-style-type: none"> § Existing lift refurbished; § WC enlarged in line with 2016 consent and refurbished with new fittings and finishes; § All non-historic features replaced with more in keeping skirtings, architraves and cornices; § New floor mounted FCUs in built in joinery; § New condensate risers sized to allow retention of high and low level historic features; 	<p>LB Camden 14.07.21 CH: not adverse to modern-looking doors but need to understand these in the context of the building.</p>

<ul style="list-style-type: none"> § Existing fireplaces surround repaired, and new inserts installed; and § New free standing tea points within joinery. 	
INTERNAL ALTERATIONS AT FOURTH FLOOR – 20-22 SOUTHAMPTON PLACE	
<p>Internal alterations across the Fourth floor at nos. 20-21 include:</p> <ul style="list-style-type: none"> § New stair lobby formed; § Existing assumed 1970s partitions removed, and new partitions installed to rationalise room layouts; § All new doors, skirtings, architraves and cornices throughout with period appropriate designs; § New free standing tea points within joinery; § Existing roof access retained and refurbished; § New opening formed in modern partition; § New floor mounted FCUs in built in joinery; and § New condensate risers <p>Internal alterations across the Fourth floor at no.22 include:</p> <ul style="list-style-type: none"> § Existing assumed 1970s partitions removed, and new partitions installed to rationalise room layouts; § All new doors, skirtings, architraves and cornices throughout with period appropriate designs; § New cleaner's cupboard within existing plant room; § New stair and access hatch to roof within existing plant room to open up rear room - stair to match rise and going of existing; § New landing formed; § New floor mounted FCUs in built in joinery; § New condensate risers; § New free standing tea points within joinery; and § New free standing tea points within joinery. 	<p>LB Camden 14.07.21 CH: not adverse to modern-looking doors, but need to understand the context of the building.</p>
EXTERNAL ALTERATIONS TO ROOF – 20-22 SOUTHAMPTON PLACE	
<p>External alterations and refurbishment to roof to include:</p> <ul style="list-style-type: none"> § Existing roof overlain with new liquid roofing membrane; § Existing plant removed and new plant consolidated to the back of the roof; § Existing guarding removed and new guarding installed to improve roof access; § New access hatch from relocated stairs below; and § Existing roof access retained and refurbished. 	<p>LB Camden 14.07.2021: Note there is nothing controversial with these proposals.</p>

EXTERNAL ALTERATIONS TO ELEVATIONS – 46 & 47 BLOOMSBURY SQUARE

Works of repair and refurbishment to the front of nos. 46 and 47 Bloomsbury Square, including:

- § Existing windows refurbished and redecorated;
- § New metal balustrades to full height windows;
- § New roof access in existing location;
- § New entrance signage;
- § New wall mounted lighting; and
- § Existing external access stairs retained.

Works of repair, refurbishment and alteration to the rear, including:

- § Courtyards refurbished with wall panelling and Lighting; and
- § Existing windows refurbished and redecorated.

Works of general repair to be identified at application stage, including:

- § Redecoration of facades, windows, doors and railings;
- § Render, stonework and brickwork repairs;
- § Rainwater goods replacement/repair;
- § Relining of fourth floor parapet gutters in lead;
- § Overlaying the existing modern asphalt roof with a liquid roofing membrane to repair existing leaks; and
- § Full refurbishment of the sash windows.

LB Camden 14.07.2021:
Note there is nothing controversial with these proposals.

INTERNAL ALTERATIONS AT LOWER GROUND FLOOR – 46 & 47 BLOOMSBURY SQUARE

Internal alterations across the Lower Ground Floor at nos. 46 and 47 Bloomsbury Square include:

- § Existing lift refurbished;
- § Existing WC refurbished with new sanitary wear and finishes;
- § New partitions installed;
- § All new doors, skirtings, architraves and cornices throughout;
- § New shower/locker area;
- § Courtyards refurbished with wall panelling and lighting;
- § New shower installed;
- § New M&E cupboard;
- § Existing pavement vaults utilised for plant;
- § New floor mounted FCUs in built in joinery; and
- § New condensate risers

LB Camden 14.07.21 CH:
not adverse to modern-looking doors but need to understand the context of the building.

INTERNAL ALTERATIONS AT GROUND FLOOR – 46 & 47 BLOOMSBURY SQUARE

Internal alterations across the Ground Floor at nos. 46 and 47 Bloomsbury Square include:

- § Existing lift refurbished;
- § Existing WC refurbished with new sanitary wear and finishes;
- § Form new double door opening in existing wall;
- § Existing fireplace surrounds repaired, and new inserts installed;
- § Open plan room created;
- § New floor mounted FCUs in built in joinery;
- § New condensate risers sized to allow retention of high and low level historic features;
- § All non-historic features replaced with more in keeping skirtings, architraves and cornices;
- § Existing four panel doors retained. All inappropriate doors replaced with new four panel doors; and
- § New free standing tea points within joinery

LB Camden 14.07.21: Need to maintain the cellular approach at ground floor, which is a standard requirement for listed buildings in London. There is a general presumption in favour of retaining the plan-form as the cellular plan-form (particularly at 46-47) is a key intrinsic part of the buildings' special interest.

LB Camden 14.07.21 CH: Any altering of the plan-form at ground floor would be a "cause for concern".

Removal of partition at 46 seems acceptable as there is no return nib.

LB Camden 14.07.21 CH: not adverse to modern-looking doors but need to understand these in the context of the building.

INTERNAL ALTERATIONS AT FIRST, SECOND AND THIRD FLOORS – 46 & 47 BLOOMSBURY SQUARE

Internal alterations across the First, Second and Third floors at nos. 46 and 47 Bloomsbury Square include:

- § Existing lift refurbished;
- § Existing WC refurbished with new sanitary wear and finishes;
- § Form new opening in existing wall within previous opening location;
- § All non-historic features replaced with more in keeping skirtings, architraves and cornices;
- § Existing fireplace surrounds repaired, and new inserts installed;
- § Existing four panel doors retained. All inappropriate doors replaced with new four panel doors;
- § New floor mounted FCUs in built in joinery;
- § New condensate risers sized to allow retention of high and low level historic features; and
- § New free standing tea points within joinery.

LB Camden 14.07.21 CH: not adverse to modern-looking doors but need to understand these in the context of the building.

INTERNAL ALTERATIONS AT FOURTH FLOOR – 46 & 47 BLOOMSBURY SQUARE

Internal alterations across the Fourth floor at nos. 46 and 47 Bloomsbury Square include:

- § New stair lobby formed;
- § Existing assumed 1970s partitions removed to rationalise room layouts;
- § All new doors, skirtings, architraves and cornices throughout with period appropriate designs;
- § New free standing tea points within joinery;
- § New floor mounted FCUs in built in joinery; and
- § New condensate risers.

LB Camden 14.07.21 CH:
Not adverse to modern-looking doors but need to understand these in the context of the building.

EXTERNAL ALTERATIONS TO ROOF – 46 & 47 BLOOMSBURY SQUARE

External alterations and refurbishment to roof to include:

- § Existing roof overlain with new liquid roofing membrane;
- § Existing plant removed and new plant consolidated to the back of the roof;
- § Existing guarding removed and balustrade installed to improve roof access and;
- § New glazed roof access from existing stair core.

LB Camden 14.07.2021:
Note there is nothing controversial with these proposals.

POTENTIAL ROOF TERRACE – 46 & 47 BLOOMSBURY SQUARE

The proposed roof terrace would be enclosed with balustrading set back from the roof edge and the main staircase within the building would be extended to roof level via a glass enclosure.

This staircase would be directly above the existing stair located on the south side of the building, so as to reduce the visual impact.

In addition, the existing louvred ventilation pop-up would be removed and new plant included behind a timber screen on the south west corner of the building, an approach which has previously been approved on 22 Southampton Place.

LB Camden 14.07.21: Roof terraces are a possibility on flat roofs but would be resisted on mansards. There is an appreciation that external amenity is high on the agendas of prospective office occupiers in terms of securing the long term viable future of the buildings.



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