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Planning Services
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Via Planning Portal

May 2022

Dear Sir / Madam,

Re: Full planning, listed building consent, and advertisement consent for external lighting and signage at 1 Southampton Place, 18-23 Southampton Place, and 46-47 Bloomsbury Square, Holborn, WC1A

On behalf of our client, Hogarth Properties S.A.R.L (“Hogarth”), please find enclosed an application for full planning, listed building consent, and consent to display signage at 1 Southampton Place, 18-23 Southampton Place, and 46-47 Bloomsbury Square, Holborn, WC1A.

In addition to this covering letter, the submission comprises the following documents:

- Application form signed and dated
- Site location plan
- Block plan
- Existing site plan
- Existing front elevations
- Proposed site plan, including Schedule of Works
- Proposed front elevations, including advertisement dimensions
- Proposed lighting specifications
- Lighting and Controls document, prepared by Kazzar
- Planning covering letter, including Heritage Assessment and Lighting Assessment

The planning application fee has been paid directly to the London Borough of Camden via the Planning Portal.

Background

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. Much of the estate, 26 buildings in total, are Listed and are 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.



This application for external lighting and signage at 1 Southampton Place, 18-23 Southampton Place, and 46-47 Bloomsbury Square, is submitted in support of the wider refurbishment works that have been secured through separate planning applications.

The Proposal

Hogarth are now seeking to secure nine new external lighting fixtures as well as advertisement consent for the installation and display of seven polished brass signage plates at each of the entrances to 1 Southampton Place, 18-23 Southampton Place, and 46-47 Bloomsbury Square.

Full details of the proposed lighting and adverts, including dimensions, has been provided in the supporting drawing pack included within this application; however, details of the proposed external lighting fixtures and brass signage plates can be summarised as follows:

- Seven polished brass plates (text/ logos etc. varies) mechanically fixed to brickwork (335mmW x 255mmH (x nom. 2mmD)); and
- Nine LED surface mounted wall luminaires, downlight only (110mmW x 190mmH x max. 110mmD BEGA product ref. 33814 K3 (colour 'Graphite') or similar).

Planning Policy and Guidance

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

Regulation 3 of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 requires that local planning authorities control the display of advertisements in the interests of amenity and public safety, taking into account the provisions of the development plan, in so far as they are material, and any other relevant factors.

The National Planning Policy Framework (NPPF) sets out at Paragraph 136 that advertisements should be subject to control only in the interests of amenity and public safety, considering cumulative impacts.

Under Paragraph: 026 Reference ID: 18b-026-20140306 of the Planning Practice Guidance (PPG), this is recognised to mean that unless the nature of the advertisement is harmful to amenity or public safety, consent cannot be refused because the local planning authority considers the advertisement to be misleading (in so far as it makes misleading claims for products), unnecessary or offensive to public morals.

Planning (Listed Buildings and Conservation Areas) Act 1990

Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 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”.

In considering whether to grant listed building consent the decision maker shall:

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

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

“[...]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”.

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.”

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.”

London Plan (2021)

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 asset’s 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”.

Policy D8 (Public realm) states that lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.

Camden Local Plan (2017)

Policy A1 seeks to protect the quality of life of occupiers and neighbours, including from artificial lighting levels.

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 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 will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Policy D4 requires advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail.

Planning Considerations

The proposed lighting and brass signage plates are necessary for the day-to-day operations of the commercial units by advertising its presence to its occupiers, their visitors, and deliveries and servicing.

In accordance with Policy D2 and D4 of Camden's Local Plan, the adverts are of high-quality subtle design, which contributes positively to the historic character of the site and the surrounding conservation area. The proposals are modest and of an appropriate scale, which reflects the proportions of the site.

The brass signage plates themselves are not illuminated, however will be lit by the proposed LED surface mounted wall luminaires, which will shine down on to the brass signage plates during sundown hours.

Amenity and Public Safety

The materials, detailing and colours of the advertisements and external luminaires have been carefully selected to respect the character and appearance of the local residential area.

Illumination from the proposed external lighting would not be excessively bright or have any impact on highway safety. As such, the proposal would have a limited impact on the amenity of neighbouring occupiers.

Heritage Assessment

It is acknowledged that the properties, which form part of this application, are a mix of Grade II and Grade II* Listed buildings. As such, in keeping with London Plan Policy HC1 and Local Plan Policy D1 and D2, the proposals aim to protect and preserve the elements of historic significance, and where necessary, sensitively install new brass signage plates and external lighting fixtures into external historic brickwork.

These external works would enhance the character and appearance of these Grade II and Grade II* heritage assets, whilst in turn, increasing the buildings' attractiveness to the market and actively contribute towards securing their viable long-term future that would also enable their heritage significance to be preserved.

In sum, and as described above, the proposed external brass signage plates and luminaires are of a high-quality subtle design, which contributes positively to the historic character of the site and the surrounding conservation area. The proposals are therefore considered to adhere to the legislative requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990.



Lighting Assessment

As described above, the proposed lighting consists of nine LED surface mounted wall luminaires, which provide downlight only. Full specification details of the proposed lighting, including light spillage calculations, are attached to this submission; however, a summary of key details is provided below:

- The luminaire itself is made from aluminium alloy, aluminium and stainless steel and will be “Graphite” in colour
- Maximum dimensions of the luminaires measure 110mmW x 190mmH x 110mmD (width x height x depth)
- The luminaires will operate via a daylight sensor and a time clock, which will turn the lights off in the late evening
- As detailed on the attached proposed site plan, the maximum light spillage in metres is calculated at 2m from the luminaires themselves
- The luminaire luminous flux is calculated as 787 lm

As noted above, the illumination from the proposed luminaires would be limited, minimal and tasteful, and when considered as a whole, would not be excessively bright. Indeed, Item 2.2.1 in Kazzar Lighting & Controls’ document dated 14.04.2022 confirms compliance with Institute of Lighting Professionals Guidance Note 01/21 Table 3.

As such, the proposal would have a limited impact on highway safety and the amenity of neighbouring occupiers.

Conclusions

In keeping with national and local policy and guidance, the proposed external lighting and brass signage plates respect the local context and character, whilst integrating well with the surrounding street scene. The proposal respects the form, fabric, design, and scale of their setting, as well as providing high-quality design.

It is clear the proposed advertisements adhere to national policy and guidance, as set out in the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, the NPPF, and the PPG, which states that unless the nature of the advertisement is in itself harmful to amenity or public safety, consent cannot be refused.

We conclude that the proposals do not result in harm to the character and appearance of the area and are acceptable on amenity grounds, as set out in Paragraph 136 of the NPPF.

We trust you have everything required to validate and determine this application within the statutory time frame. Should you wish to discuss any aspect of this application, please do not hesitate to contact my colleague Mel Mantell or me.

Yours faithfully

A handwritten signature in black ink that reads 'R. Williamson'.

Ross Williamson

Enc: As listed above