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Planning Services
London Borough of Camden
5 Pancras Square
London
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Via Planning Portal

June 2022

Dear Sir / Madam,

Re: Full planning and listed building consent for external roof plant and sedum roof at 6-8 Southampton Place, Holborn, WC1A

On behalf of our client, Hogarth Properties S.A.R.L (“Hogarth”), please find enclosed an application for full planning and listed building consent for external roof plant and sedum roof at 6-8 Southampton Place, Holborn, WC1A.

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

- Application form signed and dated
- Site location plan
- Existing and proposed elevations;
- Existing and proposed sections;
- Existing and proposed roof plans;
- Demolition plans (showing the location and extent of any demolition work cross hatched in red on relevant plans);
- Design and Access Statement;
- Heritage Statement;
- Schedule of Works; and
- Acoustic Report.

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

Site Context

The Site comprises of numbers 6, 7 and 8 Southampton Place, which are a group of three terraced townhouses that date from circa 1758-1763. It is understood that 6 & 7 Southampton Place are linked via a series of openings between the buildings, whilst 8 Southampton Place is a standalone unit.

Planning history records suggest that 6 & 7 Southampton Place was historically a residential institution (Class F1) (latest application dated 2004), whilst 8 Southampton Place has consistently been an office (Class E) (latest application dated 2010). It is understood, however, that each property has been in constant use as office space (Class E) for well over 10 years.

Full details of the planning history are appended to this letter.

The key planning designations relevant to the site are as follows:

- Grade II* Listed
- Bloomsbury Conservation Area
- Central Activities Zone (CAZ)
- PTAL Rating of 6b (Best)

The Proposal

The scope of this application is limited to the following:

- 1) Installation of external plant enclosures on the rear first floor roofs for No.6 & 7 and on the upper roof for No.8; and
- 2) Installation of new planted sedum roof to the non-original ground floor extensions in No.6 and 7.

Full details of the proposed works are provided within the supporting Design & Access Statement, Schedule of Works, and architectural drawing pack.

Pre-Application

The scope of this full application has been agreed following a comprehensive programme of engagement with the local authority and key stakeholders.

A pre-application site visit was held with LB Camden in June 2021, and a follow-up pre-application meeting was held with LB Camden in July 2021 to discuss the proposals for the site.

The pre-application discussions and feedback were generally positive, with overall support for the proposed works.

Planning Policy and Guidance

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”.

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 SD5 gives strong support to office development in the CAZ.

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 A4 resists unacceptable noise and vibration impacts.

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 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.

Planning Considerations

The proposed external plant enclosures, which will be consolidated on the roofs of the properties, are necessary for the day-to-day operations of the commercial units and is appropriate within these locations. The principle of the proposed plant units is therefore supported by policies G1 and E1 of Camden's Local Plan.

An Acoustic Report has also been submitted in support of the proposal, which demonstrates there is no detrimental harm to existing amenities, thereby accordingly with Policy A4 of Camden's Local Plan.

The existing non-original roofs to the rear of No.6 and 7 are in poor condition and in need of replacement. The proposals therefore seek to remove the existing roof covering and replace this with a new highly insulated roof with sedum finish, which will improve the thermal performance of the building and provide visual amenity for the surrounding properties.

Heritage and Design

It is acknowledged that the properties, which form part of this application, are 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 plant enclosures and sedum roof.

These external works would enhance the character and appearance of the 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 support of this application, a Heritage Statement has been completed, which concludes that the special interest of the buildings will be preserved, with a number of works resulting in an enhancement. The intrinsic architectural and historic values associated within the building being maintained.

Overall, therefore, the proposals are considered to be in alignment with the London Borough of Camden's policies on listed buildings and in alignment with the requirements of the NPPF Chapter 16.

Conclusions

In keeping with national and local policy and guidance, the proposed plant enclosures and sedum roofs 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.

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



Ross Williamson

Enc: As listed above

Appendix A – Planning History

Application Reference	Address	Description of Proposal	Status
2010/3465/L	No. 8	Erection of a rear extension at basement level and associated internal alterations to existing office building (Class B1).	Refused 02.09.2010
2010/3464/P	No. 8	Erection of a rear extension at basement level to existing office building (Class B1).	Refused 02.09.2010
2010/3364/L	No. 8	The creation of a new opening through the party wall between nos. 7 and 8 Southampton Place	Refused 16.08.2010
2010/0406/L	No. 8	The creation of a new opening through the party wall between nos. 7 and 8 Southampton Place.	Refused 12.05.2010
2010/0348/L	No. 8	Internal alterations including removal of existing timber partitions at fourth floor level and installation of new timber partition and doors, and creation of new opening in party wall at fourth floor level to link to No. 7.	Granted 17.03.2010
2009/5060/L	No. 8	Erection of two dormer windows in upper front slope of mansard roof, internal alterations including removal of existing timber partitions at fourth floor level and installation of new timber partition and doors, and creation of new opening in party wall at fourth floor level to link to No. 7.	Refused 13.11.2009
2009/5058/P	No. 8	Erection of two dormer windows in upper front slope of mansard roof at fourth floor level.	Refused 13.11.2009
2009/4809/L	No. 8	Refurbishment and repair of Grade II* listed building (dual use Class B1 and D1) and removal of partition at 1st floor level.	Granted 16.10.2009

2009/3016/P	No. 8	Change of use of basement, ground, first, second and third floors from office (Class B1) to dual use office (Class B1) and non-residential institution (Class D1).	Granted 14.08.2009
2008/2905/L	No. 8	Masonry infilling to 3 no. toilet windows and provision of mechanical ventilation system with low level weathered roof terminal. Installation of new ductwork with lined studwork to match the internal walls including new balanced boiler flue and roof vent through flat roof.	Granted 28.05.2009
2007/1443/L	No. 8	Insertion of structural ties to secure side wall.	Granted 01.02.2008
2007/4794/L	No. 8	Introduction of ties to repair fractures in side/party wall and construction of chimney.	Granted 09.10.2007
2007/2541/L	No. 8	Underpinning foundation to wall adjoining 9 Southampton place.	Granted 01.06.2007
2005/1041/L	Nos. 6-7	Formation of new internal opening at 3rd floor level to allow passage between numbers 6 and 7.	Granted 25.05.2005
2005/1039/L	Nos. 6-7	Formation of new internal opening at 4th floor level to allow passage between numbers 6 and 7.	Granted 25.05.2005
2004/1472/L	No. 6	Works associated with the installation of a basement kitchen and extract fan to no. 6, together with internal works at fourth floor level to link nos. 6 & 7 and the installation of a satellite dish on the main roof, in association with the existing non residential (Class D1) and ancillary residential (Class C3) use of the premises.	Part Granted, Part Refused 08.09.2004
2004/1471/L	Nos. 6-7	Internal and external alterations including erection of staircase enclosure at rear ground floor and associated railings to rear of no.7, creation of new link at 4th floor level between no.6 and no.7 and installation of a satellite dish at roof level of no. 6 all in connection with existing use as non residential institution (Class D1) and ancillary residential uses.	Refused 08.09.2004
2003/3347/L	Nos. 6-7	Internal alterations to create door openings in party wall at basement and ground floor levels.	Granted 08.01.2004
2003/2275/P	Nos. 6-7	Change of use of basement, ground, first, second and third floors from offices (B1) to education (D1).	Granted 30.09.2003

9200648	No. 6	Change of use of basement ground first second and third floors from uses within Class B1 (offices) to Class D1 (educational institution).	Granted 01.07.1992
HB3359	No. 6	The retention of an existing stud partition sub-dividing the ground floor rear room.	Refused 04.11.1983
HB3238	No. 6	Works of alteration in connection with fire protection.	Granted 14.06.1983