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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: Listed building consent for internal works and external remedial works 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 listed building consent for internal works and external remedial works 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; and
- Schedule of Works.

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:

Internal works

1. Historic rooms and features will be refurbished
2. The original plan form will be reinstated to No.6 and 7 on floors 1-3
3. New kitchenettes and WCs are proposed in either existing locations or within the later additions to the rear
4. New heating and cooling units will be floor mounted and housed within castings that reflect the mouldings of the historic rooms
5. Vertical service risers will be carefully integrated into the historic fabric
6. New lighting and power are proposed throughout

External works

7. The existing historic windows to the principal buildings are to be refurbished
8. The windows and roof lights to the later extensions are proposed to be replaced with higher performing double-glazed units
9. The finishes to the external courtyards are replaced and improved.

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 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. A full summary of feedback is summarised below:

Proposed Work(s)	Pre-Application Feedback
Ground Floor	<p>At ground floor level, the lateral conversion between no.6 and no.7 is removed and blocked up. This reinstates the historic plan form and therefore improves the understanding of the buildings.</p> <p>At no. 6 an additional door is created between the front and rear rooms. It would be helpful to understand why this is necessary and if this is the best way to create circulation between the two spaces.</p> <p>At no. 7 the opening between the front and rear room is reinstated, this is acceptable.</p> <p>The more recent lifts and WCs are removed within the proposals. This is acceptable in principle.</p> <p>Within the modern rear extensions, the WCs, doors, and window are removed. This change has no impact on historic significance; however, replacements should be appropriate.</p> <p>The lightwells and courtyards are restored within the scheme, this could improve the quality of the spaces and their amenity value. As a result, this is a welcome alteration subject to appropriate details.</p> <p>The floating timber floor is acceptable, if the floor beneath is protected and historic joinery is not affected.</p> <p>Where non-original panelling and joinery exists, it is acceptable to remove it, if appropriate panelling is reinstated. All historic joinery should remain in situ – this should be considered when assessing the necessity of the opening between the front and rear rooms of no. 6.</p> <p>Further details of the lighting should be submitted to show how it affects the panelling – there should be minimal intervention.</p> <p>The enlarged roof light to the modern extension at no.7 is acceptable.</p>
Basement	<p>The lateral conversion between no.6 and no.7 is removed and built back up. This improves the legibility of the plan form and is welcome.</p> <p>The removal of various modern internal walls is welcome.</p> <p>The removal of modern internal doors is welcome; however, the replacement doors should be carefully considered, a historic door would likely be most appropriate.</p> <p>The removal of the modern wall lining is welcome.</p> <p>The removal of modern doors and windows within the rear extensions, vaults and to the front elevation is welcome. However, if any of the doors and windows are historic, they should remain and be repaired where possible. Replacement doors should be given careful consideration.</p>

	The removal of the modern lifts and WCs is welcome.
First Floor	<p>The removal of the modern partitions is welcome.</p> <p>The creation of the opening between the front and rear room of no.6 should be carefully considered in terms of loss of fabric, particularly the panelling. The opening between the front and rear room of no.7 appears to be a reinstatement, however loss of fabric should be considered.</p> <p>The removal of the window to the closet wing of no.7 is not a huge cause for concern, however the replacement should be appropriate.</p> <p>The removal of the modern WCs, lifts and rooflights is acceptable.</p> <p>It would be helpful to fully understand the significance of the Edwardian panelling in No.6. I understand that it is part of a wider decorative intervention that took place in the early 20th century. Until the significance is understood, I'm unable to say if this part of the proposals would be supported.</p> <p>Where historic floors exist, they should be repaired rather than removed. If historic floors do not exist, appropriate floors can be re-laid. An appropriate floor would be historic in materiality and appearance.</p>
Second Floor	<p>The removal of the partitions is welcome.</p> <p>Any new opening between the front and rear rooms should consider the loss of historic fabric.</p> <p>The removal of the windows to the closet wing is acceptable if the replacement is historically appropriate.</p> <p>The removal of the modern WCs and lift is supported.</p> <p>The removal of modern joinery is supported.</p> <p>All new joinery, including doors and windows, should be historically appropriate.</p>
Third Floor	<p>The removal of the modern partitions is supported.</p> <p>The new door between the front and rear rooms is acceptable in terms of plan form, however consideration should be given to the loss of fabric.</p> <p>The removal and blocking up of the lateral conversion are welcome.</p> <p>The removal of the window to the closet wing is acceptable if the replacement window is appropriate.</p> <p>The removal of the modern WC and lift is supported.</p>
Fourth Floor	The removal of the partitions is supported.

	<p>The removal of the interconnecting door is welcome.</p> <p>The removal of the bathroom and plant is welcome.</p> <p>The replacement of the window to the closet wing is acceptable.</p>
Heating and Cooling	<p>The principal of the heating and colling system is acceptable. The units themselves will be no more harmful than the radiators that currently exist.</p> <p>LB Camden have some concerns regarding the cabling, and would like existing routes to be utilised, if new routes are required these will need to be thoroughly assessed in terms of impact on historic fabric and aesthetics.</p> <p>The installation of the associated plant on the roofs of the extensions to no.6 and 7 is acceptable in principal but will need to be properly assessed.</p> <p>The roof top plant at no. 8 could be problematic, ideally the roof would be kept clear.</p>
Power and Data	<p>The power and data cabling should be kept to a minimum as cutting into floorboards is harmful. The strategy should be well thought out and justified, clearly demonstrating that the proposed boxes are necessary, and that the least harmful solution has been sought.</p>
Lighting	<p>The lighting strategy is reasonable. However, there should be minimal intervention into historic fabric.</p> <p>Wall mounted lighting should be carefully considered as cutting into the panelling would be unfortunate.</p> <p>Using existing routes and fittings would be preferable.</p>
Staircases	<p>The staircases have high significance within the buildings, the removal of new fittings and their refurbishment is welcome.</p>
WCs and Tea Points	<p>The introduction of high-quality WCs and tea points within the closet wings is welcome.</p>
Courtyards and Lightwells	<p>The repair of the courtyards and lightwells is welcome. If the rear courtyards are to be repaved, this should be in a suitable material compatible with the historic character of the listed buildings. Adding planting and greenery would be welcome.</p>
Opening Works	<p>All opening up works should be kept to a minimum and carried out where there is least impact on historic fabric of significance. For example, decorative features should be avoided such as cornices or decorative elements of panelling.</p> <p>If possible, ceilings and floor joists should be inspected by lifted floorboards above rather than cutting into ceiling plaster.</p> <p>Paint removal should be considered carefully to avoid damaging the materials beneath.</p>

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 principle of refurbishing the existing buildings is strongly supported within local and London plan policy.

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, considering quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.

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 residents and businesses. Local Plan Policy E2, meanwhile, writes that the Council will seek to protect and enhance existing employment premises and sites.

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.

The proposed refurbishment of 6-8 Southampton Place would significantly enhance the quality of the office accommodation at the wider estate and enable it to meet the expectations of modern occupiers.

The aspirations clearly align with London and Local Plan policy and is therefore considered acceptable in principle. Indeed, at pre-application discussions, LB Camden officers were very supportive of the scheme in principle.



Heritage and Design

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.

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.

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.

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.

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 enhanced through the programme of sensitive refurbishment and restoration.

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.

In support of this submission, a Heritage Impact Assessment has been provided. This 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

Overall, the development proposals will bring forward several 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; and
- Safeguarding the longevity of 6-8 Southampton Place as a commercial site

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.

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

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