

Planning Statement
Vernon & Sicilian House and 21
Southampton Row

Relating to a site at Holborn Links Estate

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Contents

1. Introduction	5
2. Site Background	7
Vernon & Sicilian House and 21 Southampton Row	7
Historical Significance.....	8
Planning History.....	9
Planning Designations	13
3. Pre-Application	14
4. Proposed Development and Works	18
5. Planning Policy and Guidance.....	19
Listed Building Consent	19
Determination of the Planning Application and Listed Building Consent	20
London Plan (2021)	20
Camden Local Plan (2017)	20
Other Material Planning Considerations	21
6. Planning Considerations	23
Principle of Development.....	23
Heritage and Design	24
Noise and Vibration	25
Energy and Sustainability	25
7. Summary and Conclusions	26
Presumption in Favour of Sustainable Development.....	26
Public Benefits	26

Executive Summary

The proposal is for the refurbishment of Vernon & Sicilian House and 21 Southampton Row, Holborn, London, as part of a wider regeneration of the Holborn Links Estate.

The Holborn Links Estate is approximately 2.5 acres of contiguous land bounded by High Holborn, Southampton Row and Bloomsbury Square and comprises 32 freehold controlled properties made up of office, retail, and residential uses. Much 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 Vernon & Sicilian House and 21 Southampton Row has been informed by extensive pre-application engagement with the London Borough of Camden (LB Camden). Officers at LB Camden have expressed support for the scheme.

The proposal 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 internal office and spaces and the site's contribution to the character of the surrounding Bloomsbury Conservation Area. It will also significantly enhance the environmental credentials of the buildings and improve their energy efficiency.

It will secure the long-term viability of this part of Holborn Links as an office location, a use that is strongly encouraged within the Central Activities Zone (CAZ). The development proposals will also 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
- Safeguarding the longevity of Vernon & Sicilian House and 21 Southampton Row as a commercial site
- Securing the long-term viability of office uses on the site and in the CAZ
- Provide re-configured retail units capable of better use in a modern retail world
- The construction phase will facilitate opportunities for skills development, training and apprenticeships
- 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

1.1. This Planning Statement has been prepared by hgh Consulting on behalf of Hogarth Properties S.A.R.L (“Hogarth”) in support of the proposed works at Vernon & Sicilian House and 21 Southampton Row.

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 for internal refurbishments and external alterations, including a minor extension to Vernon House, new plant equipment, creation of cycle parking, shower and changing facilities, a new multi-function space and other associated works”.

1.3. The Planning Statement assesses the proposed scheme against the adopted development plan and other material planning considerations.

1.4. This Planning Statement should be read in conjunction with the other supporting information submitted, which comprises:

- Application Form, including Certificate of Ownership
- Community Infrastructure Levy Additional Information Form
- Planning Covering Letter
- Schedule of Works
- Site Location Plan
- Full architectural drawing pack, including:
 - Demolition, Existing and Proposed Site Plans
 - Demolition, Existing and Proposed Floor Plans
 - Demolition, Existing and Proposed Sections
 - Demolition, Existing and Proposed Elevations
 - Detailed Drawings
- Heritage Statement
- Design and Access Statement
- Verified Views
- Structural Report
- Air Quality Report, including Proforma
- Acoustic Report

- Plant Specification
- Fire Statement
- Draft Construction Management Plan Proforma
- Sustainability Statement
- BREEAM Pre-Assessment Report
- Energy Statement

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** details the pre-application feedback
- **Section 4** describes the proposed development
- **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
- **Section 7** sets out our summary and conclusions

2. Site Background

- 2.1. The Holborn Links Estate is approximately 2.5 acres of continuous 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 most of its buildings, 26 in total, are statutory listed.
- 2.2. The Estate is located close to two Crossrail stations on the Elizabeth line, Tottenham Court Road and Farringdon and is a short walk from Holborn Underground Station.
- 2.3. Holborn Links was acquired by CCP 5 Long Life (CCP 5 LL) in March 2020 and is managed by Alchemy Asset Management and Knight Frank. 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.
- 2.4. Our client's vision is to provide for a reimagined Holborn Links – a revitalised, modern estate that is fit for purpose and able to meet the needs of both 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.
- 2.5. Development to date across the Estate has been carried out in piecemeal fashion that has failed to realise the true potential of the destination through the capitalisation that can be achieved through the creation of an integrated, connected place. The listed buildings have also been somewhat neglected and have not been treated sympathetically.
- 2.6. 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 regarding 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.
- 2.7. 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.

Vernon & Sicilian House and 21 Southampton Row

- 2.8. The site subject to this planning application and listed building consent consists of the following:
 - Vernon & Sicilian House, Sicilian Avenue

- 21 Southampton Row

- 2.9. Sicilian Avenue is a shop lined pedestrian thoroughfare that links Southampton Row and Vernon Place. It consists of two large blocks of Edwardian buildings that line each side of Sicilian Avenue and then the southern block returns southwards along 15-23 Southampton Row and includes Vernon & Sicilian House.
- 2.10. The group of buildings, which is the subject of this planning application, is known as 21 Southampton Row incorporating Vernon and Sicilian House.
- 2.11. This group of buildings has been subdivided into retail units on the ground and basement floors and the upper floors have been fitted out for office use. The subdivision between office and retail dates from the original construction of the building as can be seen from the historic drawings. However, the upper-level offices were originally designed and constructed as private residential flats rather than offices.
- 2.12. 21 Southampton Row is 6 storeys tall with basement plant and storage, ground floor reception and retail and then 6 upper floors as offices.
- 2.13. Vernon and Sicilian House are 5 storeys tall with basement plant, ground floor reception, ground, and basement, retail, and 5 upper floors.
- 2.14. To the rear of the properties is a private gated service yard with a vehicular access to the southern boundary of 21 Southampton Row.

Historical Significance

- 2.15. Vernon House, Sicilian House and 21 Southampton Row are part of a shopping parade that runs along, in part, Sicilian Avenue. Built in the early-20th century and designed by RJ Worley, the exteriors are of a high historical significance.
- 2.16. The ground floor shop fronts are lined with Corinthian columns on low plinths, and the impressive terracotta work throughout is a very good example of its type, as well as being highly decorative, despite several unfortunate and unsympathetic cement repairs. The facade also hosts several bay and oriel windows, as well as turreted oriel windows. These are all fitted with leaded light windows. Each building has a basement level which is hidden at street level. The facades of these buildings are of very high significance.
- 2.17. These buildings have seen significant reconstruction over their lifespan, with 21 Southampton Row having two additional floors (including the Mansard) added, and an additional floor (via a new Mansard) onto both Vernon and Sicilian House. These large-scale reconstructions have followed through to the interiors of the buildings where refurbishment for office usage throughout the last century has seen much of the internal historical significance removed.
- 2.18. Despite this, architecturally the plan form does remain in part, including the original locations for stair and lift access in all 3 buildings. In Vernon and Sicilian House, although

one spine wall of the original plan has been replaced with columns to create an open plan working area, one side remains, along with its cellular offices. This is of some significance.

- 2.19. Internally, most of the historical features have been removed or covered up. 21 Southampton Row retains a fragment of a cornice to its basement stair, along with several of its historic windows. These however have been severely overhauled and at present have stainless steel ironmongery.
- 2.20. Similarly, in Vernon and Sicilian House it is the windows that survive mostly intact, on the 1st -3rd floor (some even with ironmongery), as does part of the cornice to these areas, though it is heavily damaged. This however is still of significance. Many of these historic elements disappear from the 4th floor, as invasive works were carried out here to support the new floor above.
- 2.21. The exterior has unfortunately been poorly restored with repairs to the terracotta being carried out in cement rather than purpose made terracotta replacements.

Planning History

- 2.22. The Site has been subject to numerous planning applications. Full details of the Planning History are set out below:

Table 1: Relevant Planning History

Application Reference	Address	Description of Development	Date Granted
2010/1000/L	21 Southampton Row London WC1B 5HA	Installation of secondary glazing to front elevation at 1st, 3rd, 4th, and 5th floor levels, to office building (Class B1).	22/04/2010
2008/4834/L	21 & 31 Southampton Row London WC1B 5HA	Internal and external alterations to Sicilian Avenue, including new paving scheme, replacement drainage, installation of umbrella anchors, installation of new external lighting scheme and new signage.	10/11/2008
2008/4735/P	21 & 31 Southampton Row London WC1B 5HA	Alterations to Sicilian Avenue footway including new paving scheme, replacement drainage, installation of umbrella anchors, and installation of new external lighting scheme.	10/11/2008
2007/1201/L	2-6 Sicilian Avenue & 27	Alterations involving the erection of a new staircase at basement level and demolition	14/03/2007

	Southampton Row London WC1A 2QD	of existing, works to merge unit 2-4 with unit 6, internal strip out of shopfitting's, removal of security grills, repair and cleaning of shopfront.	
2005/2088/L	21 Southampton Row London WC1B 5HA	Installation of a new electricity sub-station and relocation of a chiller unit at rear yard.	12/10/2005
2005/2085/P	21 Southampton Row London WC1B 5HA	Installation of a new electricity sub-station and relocation of a chiller unit in rear yard.	12/10/2005
2004/1249/L	21 Southampton Row London WC1B 5HA	Internal alterations and works to internal surfaces to offices at sixth floor level.	15/04/2004
9170215	17-23 Southampton Row WC1	Internal alterations as shown on drawings nos. SI/9137/ 1O 2I 3F 4H 5G 7D and 6G.	13/11/1991
9170035	17-23 Southampton Row WC1	Construction of fire escape at rear of building as shown on drawing number 641/271	04/02/1991
9100144	17-23 Southampton Row WC1	Construction of fire escape at rear of building as shown on drawing number 641/127.	04/02/1991
9000556	17-23 Southampton Row WC1	Approval of details pursuant to condition 03 of planning permission granted 04.04.90 (ref.8900506) relating to dormer windows main entrance doors and brickwork *(plans submitted)	26/11/1990
9070206	17-23 Southampton Row WC1	Approval of details pursuant to condition 03 of planning permission granted 04.04.90 (ref.8900506) relating to dormer windows main entrance doors and brickwork *(plans submitted)	26/11/1990
8970200	17-23 Southampton Row WC1	New entrance at ground floor level as shown on drawing numbers 641/13A 14C 21J & SK8 revised by letter dated 24th April 1990.	11/12/1989

8900613	17-23 Southampton Row WC1	Alterations to ground floor entrance together with the change of use of part of the ground floor and basement into retail shop offices and some ancillary uses as shown on drawing numbers 641/13A 14C 21J & SK8 revised by letter dated 24th April 1990.	28/11/1989
8970159	17-23 Southampton Row WC1 ^ (Duplicate application)	Extension of the fifth floor and construction of a new sixth floor to be used for offices. Installation of an additional 8 person lift to accommodate persons with disabilities. Construction of a new lift motor room at roof level as shown on drawing numbers 641/21G 27E 28C 30C 32D 34E 35B 37A 38B & 39 revised by letters dated 29th November 1989 20th December 1989 26th January 1990 and 12th February 1990.	13/10/1989
8970158	17-23 Southampton Row WC1	Extension of the fifth floor and construction of a new sixth floor to be used for offices. Installation of an additional 8 person lift to accommodate persons with disabilities. Construction of a new lift motor room at roof level as shown on drawing numbers 641/21G 27E 28C 30C 32D 34E 35B 37A 38B & 39 revised by letters dated 29th November 1989 20th December 1989 26th January 1990 and 12th February 1990.	13/10/1989
8900507	17-23 Southampton Row WC1 ^ (Duplicate application)	Extension to the fifth floor and construction of a new sixth floor to be used for offices installation of an additional 8 person lift to accommodate persons with disabilities and construction of a new lift motor room at roof level as shown on drawing numbers 641/21G 27E 28C 30C 32D 34E 35B 37A 38B & 39 revised by letters dated 29th November 1989 20th December 1989 26th January 1990 and 12th February 1990.	13/10/1989
8900506	17-23 Southampton Row WC1	Extension to fifth floor and construction of a new sixth floor to be used for offices installation of an additional 8 person lift to accommodate persons with disabilities and construction of a new lift motor room at roof level as shown on drawing numbers	13/10/1989

		641/21G 27E 28C 30C 32D 34E 35B 37A 38B & 39 revised by letters dated 29th November 1989 20th December 1989 26th January 1990 and 12th February 1990.	
8880104	17-23 Southampton Row WC1	Display of: (1) Externally illuminated hanging plate sign 950mm high x 750mm wide mounted 2500mm above the footway on a bracket which projects 1000mm from the building face. (2) 2 x 600mm high x 400mm wide internally illuminated logo signs mounted 2700mm above ground level on the sloping side soffit to the suspended ceiling 200mm inside the window glass as shown on drawing numbers M539/001 002A 003 & 004 revised by letter dated 1st November 1988.	12/10/1988
8870190	17-23 Southampton Row WC1	Alterations to include restoration of shopfront both internally and externally and the fixing of a bracketed hanging sign over the entrance door as shown on drawing numbers M539/001 002A 003 & 004 revised by letter dated 1st November 1988.	12/10/1988
35299	Part Ground Floor - 17/23 Southampton Row, WC1	Continued Use of the northern part of the ground floor of 17/23 Southampton Row as an Estate Agency.	19/11/1982
32098	17-23 Southampton Row, WC1	The change of use of part of the ground floor (most recently used as an employment agency) from shop to form an extension to the restaurant/snack bar adjacent at 1 Sicilian Avenue.	10/03/1981
CA1562/A	17-23 Southampton Row, W.C.1	Erection at 17-23 Southampton Row, W.C.1 of an internally illuminated double-sided projecting box sign measuring 3'0" x 2'0" (0.91m x 0.61m) affixed at a height of 9'0" (2.75m) above ground level to read "Albany Accountants" in opal-coloured letters on a brown background.	13/02/1974

13026	17-23 Southampton Row, W.C.2	Erection of an extension for office use at 5th floor level at 17-23 Southampton Row, W.C.2	28/02/1972
CA1562	17-23 Southampton Row, Camden	17-23 Southampton Row, Camden 1. An internally illuminated single sided fascia sign having violet letters to read CONDUIT, and white letters to read BUREAU, with a violet bend, all on an orange panel. Overall length 5'10" (1.77m), depth 4'3" (1.31m) overall height 11'9" (3.58m) 2. An internally illuminated double sided projecting box sign having violet letters to read CONDUIT and white letters to read BUREAU with a violet bend all on an orange panel. Overall projection 3'3" (1m), depth 2'0" (0.61m), overall height 11'0" (3.35m)	16/06/1970
4394	Nos. 17-23 Southampton Row, Camden.	The installation of a new shop front at Nos. 17-23 Southampton Row, Camden.	17/10/1967
N14/24/A/4195	17-23 Southampton Row, Camden.	The use of the ground floor shop for as employment agency and the construction of a new entrance at 17-23 Southampton Row, Camden.	19/08/1967
N14/24/A/18656	No. 17-25 Southampton Row, Holborn.	The installation and retention for a limited period, of an extract ventilation dust at the rear of No. 17-25 Southampton Row, Holborn.	14/11/1960

Planning Designations

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

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

3. Pre-Application

- 3.1. The scope of this application has been agreed following a comprehensive programme of engagement with the local authority and key stakeholders, with feedback provided in August 2021.
- 3.2. The pre-application discussions and feedback were generally positive, with overall support for the proposed works. Albeit some of our proposals were clearly rejected, so we have listened to this feedback and adjusted the scheme accordingly.
- 3.3. A full summary of feedback is set out below:

Table 2: LB Camden Pre-Application Feedback

Relevant Proposed Work(s)	LB Camden Pre-Application Feedback
Refurbishing stair cores at Vernon / Sicilian House	<p>Creation of links between 21 Southampton Row and Sicilian House via the staircases would not be supported – this does not seem necessary and would harm the plan form and legibility of the building.</p> <p>Vertical circulation at No. 21 Southampton Row – the current staircase, although modern, is in the historic position. Two lifts have been inserted in voids around the staircase to provide access to the upper levels of the building. The historic positioning of the staircase should remain, and if new lifts are required, they should be organised around the stairs or elsewhere.</p>
Removing spine walls at Vernon / Sicilian House, creating large, modern, office space	<p>The removal of the historic partitions would usually be resisted as the walls are the last remaining historic element and provide some evidence of how the building was once used and circulated. It is difficult to see the loss of the spine walls, but accepts the position set by the extant consents.</p> <p>Infilling of the lightwells – this would not be supported as these are architectural features that allow light and create spaces around the building. It might be possible to use the lightwells for servicing, but this should be carefully considered and carried out without entirely filling the void.</p>
New raised data floor at Vernon / Sicilian House	The raising of the floor is acceptable as long as existing joinery is unharmed.

Creating improved office reception facilities at 21 Southampton Row	Many of the historic partitions are still intact creating long narrow space. LB Camden has not seen an historic plan so is unable to establish the significance of the current partitions and the harm that might be caused by removing them and creating links. However, there could be some flexibility at this level (accepts it is “perfectly reasonable” to open this space up), but this should be established after careful consideration of the historic plan. Would encourage something to allow the former language of the space (plan form) to be read/ perceived.
Improving the basement and creating shared amenity space	<p>The basement plans are ambitious and imaginative and make good use of the space. The cycle storage and auditorium are welcome. It could be worth considering how the historic columns situated within the auditorium seating might affect views.</p> <p>However, the basements of the shop units in Sicilian House are historically and architecturally significant and should not be included in the basement plan.</p> <p>In addition, access to the basement will need to be reconsidered because of the concerns around the position of the stair core and lift shafts.</p>
Improving the attractiveness of the rear service yard, including the installation of new windows and fenestration	<p>Proposal to replace existing windows with doors to a rear outdoor amenity space – the current fenestration is historic and has value within the context of the building. Drastic changes to the windows would therefore not be supported. There is currently one door leading to the rear external space, this should continue to be used as access.</p> <p>The landscaping strategy will improve the outdoor areas, making them more attractive. It would be helpful to better understand the reorientation of the fire escape and how it relates to surrounding buildings.</p>
Creating a new entrance door for Vernon House / Sicilian House with brass signage	<p>Addition of brass banding to the existing column, which will house some lighting – this is already a decorative feature, the brass banding will detract from the column and add unnecessary clutter. If additional lighting is required, would suggest an alternative method of fixing is sought.</p> <p>Proposals to pin the historic doors open and move the lobby doors closer to the entrance – the design of the new timber surround between the two sets of doors</p>

	<p>should be carefully considered so that the historic arrangement remains clearly understood. Overall, there is no objection to these proposals in principle.</p>
<p>Implementing a radical retail strategy behind a retained façade, including the combining of units between 21 Southampton Row and the entrance to Sicilian House to create a larger unit</p>	<p>Small shop units of Sicilian House have special interest and high significance within the complex of buildings. Some of the units retain the original staircases that lead to the basement which adds to the historic and architectural value. The units have architectural and historic interest due to their scale and historic fabric – the aim is to keep these units intact.</p> <p>The Council has mostly resisted amalgamation of the units; however, some have been laterally converted, but have retained down stands and large portions of the separating wall. The proposals suggest that units are currently unlettable due to their size, however, there appears to be little evidence to support this statement. It is also unclear if retaining the units as they have been explored. Without sufficient evidence and justification, this part of the proposal would be resisted.</p>
<p>Potential reconfiguration of other ground floor space into more modern, lettable space</p>	<p>Switching the entrance to the upper floors of 31 Southampton Row to Sicilian Avenue – although appreciates the logic to replicate Vernon/ Sicilian House, the architecture does not lend itself to that. Creation of the entrance would see the amalgamation of two units and the loss of a staircase, which is likely to be historic. There is also a series of awkward partitions inserted into the current Southampton Row entrance. As a result, this element is unlikely to be supported.</p>
<p>Creating a new curved entrance door at 21 Southampton Row</p>	<p>Existing entrance and shop fronts are later additions; replacement of these elements is therefore acceptable.</p> <p>Proposed entrance and shopfronts are in keeping with the overall aesthetic of the site. Curved entrance relates to the curved glass of the shopfronts on Sicilian Avenue.</p> <p>Not sure about the metal canopy – it's unclear where inspiration for this has come from. Could be that the canopy is acceptable in principle, but it would need to relate better to the existing architecture.</p>
<p>A new accessible roof terrace to Vernon House / Sicilian House</p>	<p>Creation of a small roof terrace at 21 Southampton Row – it is appreciated that outdoor amenity space for offices is becoming increasingly popular, however the roof of</p>

	<p>the building should remain uncluttered so that the form of the roof is clear and can easily be read.</p> <p>Creation of a roof terrace on top of the existing mansard roof – although the mansard roof is not historic, it provides a clear and traditional termination to the building/ Adding a roof terrace would compromise the form of the mansard roof, by adding handrails and access. The shape and silhouette of the building are important components of its architecture and should not be altered. From discussions elsewhere, terraces at flat roofs are more likely to be acceptable.</p> <p>Altering the mansard roof (increase in height of 400mm) – the roof is not historic so there is no harm to significant fabric. The increase in height will not impact views or any other architectural elements of significance.</p>
New and replacement plant and lift equipment to all roofs	<p>LB Camden has concerns regarding the amount of plant to be housed at roof level. This should be reduced, and the least harmful position sought. This might not be at roof level but could be inside the building (see lightwell infill suggestion above).</p>

4. Proposed Development and Works

4.1. The proposed description of development is as follows:

“Full planning and listed building consent for internal refurbishments and external alterations, including a minor extension to Vernon House, new plant equipment, creation of cycle parking, shower and changing facilities, a new multi-function space and other associated works”.

4.2. No change of use is proposed with this application.

4.3. Full details of the proposed works are set out in the accompanying Design and Access Statement, Schedule of Works, and architectural drawings.

4.4. As can be appreciated, many of the elements of these works affect only the interior of the buildings. They are not, therefore “development” requiring planning permission under sections 56 and 57 of the Town and Country Planning Act 1990.

4.5. However, as the site consists of statutorily Listed Buildings (Grade II), all the works are considered to affect the character of the Listed Buildings and would therefore require Listed Building Consent under sections 7 and 8 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

4.6. As the external works would require planning permission, this submission wraps both the Listed Building Consent (LBC) and Planning Permission (PP) elements into one application.

5. Planning Policy and Guidance

- 5.1. 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

- 5.2. Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment.
- 5.3. Primary legislation under Section 66 (1) of the Planning (Listed Buildings and Conservation Areas Act) 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or Secretary of State, as relevant, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses.
- 5.4. Section 72(1) of the Act, meanwhile, states that:
- “In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*
- 5.1. Paragraph 199 of the National Planning Policy Framework (July 2021) (NPPF) states that, in terms of assessing the impact of a proposed development on the significance of a heritage asset:
- “...great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.*
- 5.2. Where a development would lead to “less than substantial” harm, paragraph 202 of the NPPF advises that:
- “...this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”.*

Determination of the Planning Application and Listed Building Consent

- 5.3. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise.
- 5.4. The Development Plan for the purpose of the determination of this planning application comprises:
- The London Plan (2021)
 - Camden Local Plan (2017)
- 5.5. A summary of the key policies from these documents are identified below.

London Plan (2021)

- 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
- 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 C2 resists the loss of community facilities
- 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 residents and businesses
- Policy E2 encourages the provision of employment premises and sites in the borough
- 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 states 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

- 5.6. 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.
- 5.7. 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.
- 5.8. 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
 - Chapter 16 – conserving and enhancing the historic environment
- 5.9. 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

Camden Planning Guidance

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

5.10. Given the scope of works, the most relevant planning and heritage considerations are as follows:

- Principle of Development
- Heritage and Design
- Noise and Vibration
- Energy and Sustainability

5.11. The relevant policy and materials considerations within each of these topics are discussed in **Section 6** below.

6. Planning Considerations

- 6.1. Having set out the relevant planning policy considerations, this section 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.
- 6.2. The works at each level are as set out in the submitted Schedule of Works.

Principle of Development

- 6.3. The principle of both internal refurbishments, and external alterations, are strongly supported within Camden and London Plan policy.
- 6.4. 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, considering quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.
- 6.5. 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 residents and businesses. Local Plan Policy E2, meanwhile, writes that the Council will seek to protect and enhance existing employment premises and sites.
- 6.6. 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.
- 6.7. The proposed refurbishment of Vernon & Sicilian House and 21 Southampton Row would significantly enhance the quality of the office accommodation and would enable it to meet the expectations of modern commercial occupiers.
- 6.8. The aspiration aligns clearly with Camden and London policy and is therefore considered acceptable in principle.
- 6.9. Indeed, at pre-application discussions, LB Camden officers were very supportive of the scheme in principle.

Heritage and Design

- 6.10. 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.
- 6.11. Local Policy D1 requires that development preserves 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.
- 6.12. 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.
- 6.13. This programme of external and internal refurbishment and restoration would significantly enhance the character and appearance of these Grade II heritage assets. These proposals would therefore accord with Local Plan Policy D2.
- 6.14. 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.
- 6.15. 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.
- 6.16. In support of this submission, a Heritage Impact Assessment has been provided. The assessment has considered the historic development of the Site and the surrounding area to demonstrate and inform an assessment of significance of the asset.
- 6.17. The assessment concludes that the proposals have built upon heritage specific guidance to ensure the significance of the heritage assets is preserved. As a result of the proposals, it is considered that the special interest of the buildings will be preserved, with several works resulting in an enhancement.
- 6.18. Furthermore, the buildings will continue to positively contribute to the character and appearance of the Bloomsbury Conservation Area.
- 6.19. Overall, therefore, the proposals are in alignment with the London Borough of Camden's policies on listed buildings and in alignment with the requirements of the NPPF Chapter 16.

Noise and Vibration

- 6.20. The proposed plant is appropriate within this location and is sympathetic to the historic fabric of the Site, which is demonstrated through the enclosed Verified Views.
- 6.21. An Acoustic / Noise Impact Assessment has been submitted in support of the proposal, which concludes that, with suitable noise mitigation measures in place to control the noise emissions of the proposed fixed mechanical plant items, the noise impacts of the development proposals would be negligible.

Energy and Sustainability

- 6.22. As demonstrated in the supporting reports, the Applicant is committed to delivering a sustainable development that aligns with Camden's Local Plan requirements. The proposed scope of works, including the incorporation of new solar panels, seeks to significantly improve the energy efficiency and sustainability credential of the Site, as far as is possible given the statutory listing.
- 6.23. The proposal will provide significant improvements in thermal performance, water, and energy consumption, whilst minimising construction and demolition waste through the reuse of existing materials, including significant efforts to preserve and minimise disruption to historical elements of the building during construction.
- 6.24. The refurbished office CO₂ emissions would be reduced by circa 31% in comparison to pre-refurbishment baseline emissions using SAP10 fuel factors. The scheme will also remove fossil fuels from site in favour of all electric heat pump technology.
- 6.25. Meanwhile, the BREEAM Pre-Assessment Report indicates that the proposals can meet all the mandatory level requirements for a targeted rating. A score of 71.78% is predicted, which is indicative of an **Excellent** rating.
- 6.26. The new end of journey facilities (bike storage, shower and changing areas) will encourage sustainable modes of travel and these facilities will meet both BREEAM and BCO stipulations.

7. Summary and Conclusions

Presumption in Favour of Sustainable Development

- 7.1. This Planning Statement has been prepared by hgh Consulting in connection with the proposed refurbishment of Vernon & Sicilian House and 21 Southampton Row.
- 7.2. Paragraph 7 of the NPPF identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Paragraph 8 identifies the three overarching and interdependent objectives:
- a) *“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 place and at the right time to support growth, innovation, and improved productivity; and be 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-deigned 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”*
- 7.3. As we have identified in this Statement, the proposed refurbishment of Vernon & Sicilian House and 21 Southampton Row would significantly enhance the quality of both the office and retail accommodation and would enable it to meet the expectations of modern commercial occupiers. This aspiration is strongly supported by Local Plan Policy E1.
- 7.4. The refurbishments would increase the building’s attractiveness to the market and actively contribute towards securing its viable long-term future, enabling its heritage significance to be preserved, in keeping with paragraph 196 of the NPPF.

Public Benefits

- 7.5. 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.
- Safeguarding the longevity of Vernon & Sicilian House and 21 Southampton Row as a commercial site.
- Bringing life back to Sicilian Avenue with newer, better retail tenants
- The construction phase will facilitate opportunities for skills development, training, and apprenticeships; and
- Improve the sustainability and energy credentials at the site, including installing new solar panels.

7.6. 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.

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



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