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**Application references: 2022/3301/P & 2022/3985/L**

23 December 2022

Dear Elaine,

**Re: Vernon & Sicilian House and 21 Southampton Row, Holborn, WC1A**

This addendum note has been prepared to supplement Hale Brown's Response Document (Submitted in November 2022) and in response to subsequent discussions. Accordingly, this note provides a consolidated review of the following:

- How the proposals have evolved, and the concessions made in response to officers' feedback
- Assessment of the proposals
- The package of public benefits that would arise from the development

The proposals have been developed to meet the needs of modern occupiers and to deliver viable and sustainable property assets. They have been informed by commercial and retail experts who have extensive knowledge of the local Holborn market and who have provided valuable market intelligence to inform a commercial product that is financially viable, and which will support bringing tired and under-utilised buildings back into beneficial use.

The proposals seek to provide the optimum balance between the sensitive refurbishment, enhancement and restoration of the designated heritage asset whilst responding to modern occupier requirements (including enhancements to accessibility, sustainability, quality of floorspace and provision of amenity facilities) and, importantly, achieving compliance with both Building and Fire Regulations.

***How the proposals have evolved, and the concessions made in response to officers' feedback***

The proposals have been the subject of extensive pre-application discussions over the course of the last 12-18 months. In response to these discussions several key design concessions have been made by the application, comprising:

1. Removal of any proposed roof terrace
2. Retention of the three individual retail units between 21 Southampton Row and Sicilian Avenue
3. Reduced size of openings within ground floor of 21 Southampton Row
4. Reduced size of openings within the retail units along Sicilian Avenue
5. Retention of heritage features, wherever feasible

The concessions made to date have meant that the quality of product and its ability to meet the needs of potential occupiers has been diluted within an increasingly challenging and competitive market brought about post pandemic changes in working practices and wider economic challenges. For example, removal of the proposed roof terrace has a direct impact on both rental tone and letting prospects, thus removing development value, meaning there is less money available to pay for much needed repairs to the buildings.

It is therefore crucial that the amended proposals are not further diluted, which could seriously impact upon the long-term viability of the buildings.

### Assessment of Works

The table below provides a summary of the comments received, with a detailed response of what can, and cannot, be accepted, with reference to pre-application feedback received and the public benefits each proposed works would bring.

This should be read in conjunction with the detailed updated response pack prepared by Hale Brown Architects, which is enclosed with this letter, and which includes one extra slide in relation to the core of 21 Southampton Row

Relevant Proposed Work(s)	Assessment of Work(s)
Reconfiguration of core in 21 Southampton Row	<p><b>Pre-Application Feedback:</b></p> <p><i>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 organized around the stairs or elsewhere.</i></p> <p><b>Assessment:</b></p> <p>The existing staircase is modern. It is not comprised of historic fabric, so its removal would not amount to the loss or demolition of historic fabric.</p> <p>It is, however, in its historic location, which is afforded weight in heritage terms.</p> <p>Whilst the retention of the existing stair and lift arrangement was extensively explored by the design team, all options resulted in either compromised access routes into the offices or significant loss of office floor area, which impacted the viability of the refurbishment. The current arrangement is very inefficient and does need to be modernised.</p> <p>It is also in disrepair and needs to be replaced as it is unsafe for use.</p> <p>The proposed arrangement maintains the location of the primary vertical circulation route just in an amended configuration, improves fire safety and</p>

	<p>DDA compliance. The further supplementary information provided by Hale Brown explains and justifies the need for the revised core configuration.</p> <p>The contribution the existing stair core has to the significance of the heritage asset is limited to its appreciation in the plan form. As accepted, the stair is of no historic or architectural interest as it is a later addition. Furthermore, the core has been extended and altered through the introduction of lifts. Whilst the appreciation of the location of the vertical circulation within the historic floor plan does have merit, it is accepted that the plan form has been compromised and as such how the core would have been seen has been eroded. The significance of the core is therefore limited to its location, with the overall contribution to the special interest of the listed building being low.</p> <p>The proposal seeks to maintain the location of the core and consequently maintains the historic location of vertical circulation. Recognising the need for equal access for all and the change in user habits, lifts are proposed as the primary method of accessing the floor levels, with the stair being secondary. This is reflected in the arrangement of the core. In the sense, by reconfiguring the core (i.e., by swapping the staircase and lifts round), the proposal maintains the location of the primary access core by incorporating lifts. It is considered the historic position of the core will still be appreciated and therefore the contribution of the core to the significance of the listed building maintained.</p> <p>It can be seen from the Hale Brown pack that the core will still be in the same location, albeit enlarged.</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Allowing the historic location of the core to be better appreciated and actually used for its main function</li> <li>• Improving fire safety</li> <li>• Allowing DDA compliance</li> <li>• Securing the Optimum Viable Use and long-term future of the building by improving floorplates and WC provision in a coherent and logical layout</li> </ul>
<p>New full height glazing in rear windows at ground floor and basement of 21 Southampton Row</p>	<p><b>Pre-Application Feedback:</b></p> <p><i>To the rear of no.21 it is proposed to replace the existing windows with doors to improve links to a rear outdoor amenity space. The current fenestration is historic and has value within the context of the building as a whole. Drastic changes to the windows would therefore not be supported. There is currently</i></p>

	<p><i>one door leading to the rear external space, this should continue to be used as access.</i></p> <p><b>Assessment:</b></p> <p>Historic floorplans demonstrate that the rear windows at ground floor level have previously been altered, with some converted from windows to doors (and vice versa). The existing windows are not therefore original and there would not be a heritage benefit in retaining them.</p> <p>As part of the works, the existing plant and service runs along the external elevation would be removed, which is considered as a positive change to the building.</p> <p>Further, the revised windows futureproof the building and enable it to comply with EPC regulations – particularly future regulations for 2027 and 2030. The revised windows would assist in regulating the temperature in the building and reducing heat loss.</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Sustainability and energy enhancements, including upgrading of EPC rating to EPC B, as required by emerging Government legislation</li> <li>• Revitalisation of Grade II listed heritage assets by removing cluttered plant and service runs from rear elevation</li> </ul>
Existing masonry walls removed internally in 21 Southampton Row	<p><b>Pre-Application Feedback:</b></p> <p><i>Various links are created, and partitions are demolished at no.21 creating an open plan office space. I have not seen an historic plan and so I haven't been able to establish the significance of the current layout and the harm that might be caused as a result of changing it. However, there could be some flexibility at this level, but this should be established after careful consideration of the historic plan.</i></p> <p><b>Assessment:</b></p> <p>Comments from LB Camden confirm they are comfortable with the openings created in 21 Southampton Row, in principle; however, they asked for the openings to be reduced and a legible down stand introduced to define the opening.</p> <p>This point has been accepted with openings reduced, which correspond with historic floorplans, and a legible down stand to define the opening.</p>

	<p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Securing the Optimum Viable Use and long-term viable future of the building by improving floorplates</li> <li>• Revitalisation of Grade II listed heritage assets by reducing openings to align with historic floorplans</li> </ul>
<p>Bicycle access to rear of 21 Southampton Row to incorporate lift and stair access.</p>	<p><b>Pre-Application Feedback:</b></p> <p><i>The basement plans are ambitious but are imaginative and make good use of the space. The cycle storage and auditorium are welcome.</i></p> <p><b>Assessment:</b></p> <p>Recent comments from LB Camden have asked to limit bicycle access to a lift only in the rear of 21 Southampton Row.</p> <p>Both a staircase and lift are required to support access to the cycle store. A lift is required for DDA compliance, meanwhile the staircase is required in case the lift needs maintenance at any point. From a purely practical point of view no modern office building would have just a lift without stairs as well.</p> <p>Also, and as per the Camden's Planning Guidance on Transport, cycle parking must be accessible via a ramp or lift. Where many users are likely to arrive at a similar time, lifts alone are not an acceptable open, as convenient access would be compromised (paragraph 8.16).</p> <p>The cycle store will be supporting the whole of the Holborn Links estate and will therefore be used by many occupiers. It is necessary to have both access arrangements in place to ensure efficiency of space, sufficient capacity at busy times and, should the lift ever require maintenance, continued access.</p> <p>The proposal promotes sustainable travel by enabling people to cycle to the office space.</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Allowing DDA compliance</li> <li>• Supporting sustainable and active travel initiatives required by Camden's Planning Guidance on Transport</li> </ul>

	<ul style="list-style-type: none"> <li>The facilities proposed go beyond the requirements of BREEAM in order to provide exemplary facilities that also support the letting prospects of the refurbished offices.</li> </ul>
Widened staircase in rear of 21 Southampton Row	<p><b>Pre-Application Feedback:</b></p> <p>N/A</p> <p><b>Assessment:</b></p> <p>Recent comments from LB Camden have asked for this element to be removed from the scope of works.</p> <p>Whilst seemingly a minor point, the staircase must be widened to maintain a consistent clear width of 1200mm along the escape route, which is a requirement of the fire strategy.</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>Improving fire safety</li> <li>Allowing DDA compliance</li> </ul>
Amalgamation of retail units along Sicilian Avenue to create two larger units.	<p><b>Pre-Application Feedback:</b></p> <p><i>The proposals are to amalgamate many of the units to create large commercial premises. The proposals suggest that the units are currently unlettable due to their size, however, there appears to be little evidence to support this statement. It's also unclear if retaining the units as they are, has been explored. Without sufficient evidence and justification, this part of the proposal would be resisted.</i></p> <p><b>Assessment:</b></p> <p>LB Camden have requested that, at ground floor level only, the proposed openings are reduced to ensure the small-scale plan form is legible of the historic retail units.</p> <p>This point has been accepted with openings reduced at the front and rear of the units, which enhance the reading of individual retail units from the public realm. It is also proposed to introduce deeper down stand beams to help define the historic separation walls. We are happy to provide updated drawings showing these changes.</p>

	<p>We have also accepted that the 3 small retail units adjacent to 21 Southampton Row reception should not be amalgamated even though we are concerned about the letting prospects of these very small, old-fashioned units.</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Securing the Optimum Viable Use and long-term viable future of the building by improving floorplates and creating modern, relevant retail units capable of being let</li> <li>• Revitalisation of Grade II listed heritage assets by reducing openings to align with historic floorplans</li> </ul>
Removal of some (not all) historic stairs in Sicilian Avenue retail units	<p><b>Pre-Application Feedback:</b></p> <p><i>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.</i></p> <p><b>Assessment:</b></p> <p>All historic staircases in the retained smaller retail units are to be retained; however, in the two larger amalgamated units, the existing staircases would compromise the layout of the retail units and be in illogical positions once the larger combined units are created</p> <p>We have looked again at whether these staircases can be retained but this simply does not work, and it is fundamental to leasing success and commercial viability that the amalgamated retail units do not have a compromised floorplate with staircases in the wrong positions.</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Securing the Optimum Viable Use and long-term viable future of the building by improving floorplates.</li> </ul>
Within Vernon and Sicilian House, the existing lightwells to be infilled for WCs, in line with 1970s permission	<p><b>Pre-Application Feedback:</b></p> <p><i>The infilling of the lightwells would not be supported, these are architectural features that allow light and create spaces around the building. It might be possible use on the lightwells for servicing, but this should be carefully considered and carried out without entirely filling the void.</i></p>

	<p><b>Assessment:</b></p> <p>The 1970s permission allowed these lightwells to be infilled and reconfigured with new stairs and lifts. Indeed, within Vernon House, the lightwell was to include new male and female WC's.</p> <p>It is now proposed to retain the stairs and lifts in Vernon and Sicilian House but infill the lightwells in keeping with the 1970s permission.</p> <p>Retaining the lightwells would also require the WCs to be moved internally, which would not only compromise internal commercial floorspace leading to a loss of net internal area and development value, but it would also require additional internal interventions to support servicing.</p> <p>It is a requirement to increase the WC provision to ensure we are in line with BCO standards.</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Ensuring the proposed offices adhere to modern standards and lettable floor area is maximised.</li> <li>• Securing the Optimum Viable Use and long-term viable future of the building by improving floorplates.</li> </ul>
<p>Remaining spine walls removed in Vernon and Sicilian House, in line with 1970s approved application</p>	<p><b>Pre-Application Feedback:</b></p> <p><i>The removal of the historic partitions would be resisted as the walls are the last remaining historic element and provide some evidence of how the building was once used and circulated.</i></p> <p><b>Assessment:</b></p> <p>The historic plans, permissions, and existing works, demonstrate that the historic plan form has already been significantly compromised and no longer reads as residential units.</p> <p>Notwithstanding this point, any retained walls would significantly decrease the lettable and usability of the floor. Modern office occupiers require open plan office space, not cellular floor plates where lines of sight are removed. The letting prospects of these offices would be significantly reduced if internal walls were to be left.</p>



	<p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Securing the Optimum Viable Use and long-term viable future of the building by improving floorplates.</li> </ul>
Mansard roof extension	<p><b>Pre-Application Feedback:</b></p> <p><i>It is also proposed to alter the roof of the mansard roof to ensure it meets modern standards. The roof height will increase by 400mm. The roof is not historic so there is no harm to significant fabric. The increase in height will not impact view or any other architectural elements of significance.</i></p> <p><i>To Vernon House the mansard roof is also extended towards Bloomsbury Square, this will have little impact as long as the extension is detailed correctly.</i></p> <p><b>Assessment:</b></p> <p>LB Camden have requested that the window in the mansard extension can be repositioned to respond to the fenestration below.</p> <p>Whilst the dormer window could be aligned, it would be necessary to increase the size of the extension and a reduction of the set back.</p> <p>In order to maintain the set back of the existing roof, the new mansard has a faceted corner. Due to this configuration, it is not feasible to position the proposed dormer window to align with the windows on the floors below when viewed squared on.</p> <p>Currently the dormer is positioned to sit centrally within the sloping roof.</p> <p>Therefore, whilst we have done our best to address this concern, we believe the window will need to remain as proposed, unless LB Camden would prefer to increase the size of the extension and reduce the set back.</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Revitalisation of Grade II listed heritage assets through sympathetic infill extension that improve the view from Bloomsbury Square</li> </ul>
Reinstatement of historic features	<p><b>Pre-Application Feedback:</b></p> <p><b>Assessment:</b></p> <p>LB Camden have requested that historic features can be reinstated.</p>

	<p>Every effort will be made to reinstate historic features; however, detailed design work is still ongoing and is likely to be subject to occupier requirements.</p> <p>It is suggested we record all fabric at this stage to inform later design details / decisions.</p> <p>Can this be secured via condition?</p> <p><b>Public Benefits:</b></p> <ul style="list-style-type: none"> <li>• Revitalisation of Grade II listed heritage assets</li> </ul>
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## Public Benefits

Before assessing each of the relevant proposed works, it is important to understand that the project delivers numerous public benefits that should be weighed as part of decision making. This includes:

- Securing the **Optimum Viable Use** and long-term viable future of the buildings through the creation of high-quality commercial office and retail floorspace that will meet the future needs of modern occupiers and promote economic growth of the local economy on an estate where occupancy levels have been suffering for years and dated accommodation is dragging the estate down
- External and internal restoration works and **revitalisation of Grade II listed heritage assets** within the Bloomsbury Conservation Area including:
  - Elevations to be repaired and redecorated in keeping with existing
  - Existing windows to be retained, refurbished, and protected
  - Existing shopfronts to be retained, refurbished, and protected
  - Existing doors to be retained, refurbished, and protected
  - Existing gates to be retained and refurbished at 21 Southampton Row
  - Existing columns to be retained, refurbished, and protected
  - Existing terrazzo stair to be retained, refurbished, and protected
  - Existing timber stairs to be retained, refurbished, and protected in small retail units
  - Existing key clamp handrail to be retained, refurbished, and protected
  - Existing chimneys to be retained, refurbished, and protected
  - Removal of existing internal plant
  - Existing stair core retained, refurbished, and protected in Vernon / Sicilian House
  - Existing pavement light retained, refurbished, and protected
  - Existing flat roof refurbished with insulation and waterproofing
  - Existing dormers to be retained, refurbished, and protected
- Internal alterations to deliver achieve **DDA compliance**
- Enhanced fire safety throughout
- Significant **sustainability and energy enhancements**, which mean the CO2 emissions of the refurbished building are reduced by ~31%. Specific measures include:

- Provision of **Air Source Heat Pumps** and installation of **PVs** at roof level
- Achieving **BREEAM 'Excellent'** Rating
- Upgrading of EPC rating to **EPC B**, as required by emerging Government legislation
- Estate wide cycle centre to support up to **172 cycle spaces**, shower and changing facilities
- The construction phase will facilitate opportunities for **skills development, training, and apprenticeships**

### Summary of Planning Legislation and Guidance

The application scheme does not create substantial or complete demolition of the heritage asset. As such, the proposals will **not result in substantial harm**.

Consideration must therefore be given to whether the proposals result in less than substantial harm to the significance of the designated heritage asset, and if so, this **harm should be weighed against the public benefits of the proposal**, including securing its optimum viable use, incorporating energy and sustainability measures, improving accessibility, promoting active travel, revitalising heritage features, and facilitating opportunities for skills development, training, and apprenticeships.

As confirmed by London Borough of Camden's Conservation and Heritage team, this harm would fall within the category of lower level '**less than substantial**' and thus, in accordance with the National Planning Policy Framework, this harm should be weighed against the public benefits of the proposal.

### Summary

Overall, the scheme offers the potential to secure a long-term sustainable use for the building, alongside conserving its significance in heritage terms. The works are considered to follow good conservation principles and are appropriate for its Grade II listing designation, following the removal of unsympathetic and redundant features and the considered approach to retention and repair. Where possible we have agreed to and conceded on major areas of concern such as the proposed roof terrace and amalgamation of the three smaller retail units. No more concessions like this are possible without destroying value and endangering the financial viability of the whole scheme.

The proposals are in alignment with the London Borough of Camden's policies on listed buildings and in alignment with the requirements of the National Planning Policy Framework Chapter 16. In consenting this scheme, in our view, the local planning authority would be wholly performing their duties under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Yours sincerely



Nick Belsten  
**Executive Director**