



45 Welbeck Street  
London W1G 8DZ  
020 3409 7755  
info@hghconsulting.com  
[hghconsulting.com](http://hghconsulting.com)

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

## **Via Planning Portal**

27 April 2022

Dear Sir / Madam,

### **Re: Listed building consent for external repair works at 1 Southampton Place, 18-23 Southampton Place, and 46-47 Bloomsbury Square, Holborn, WC1A**

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

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

- Application form signed and dated
- Location plan
- Relevant existing and proposed elevations, floor plans, and roof plans
- Schedule of Works
- Planning covering letter, including Heritage Assessment

## **Background**

The Holborn Links Estate is approximately 2.5 acres of contiguous land bounded by High Holborn, Southampton Row and Bloomsbury Square and comprises 32 freehold controlled properties made up of office, retail, and residential uses. Much of the estate, 26 buildings in total, are Listed and are located within the Bloomsbury Conservation Area.

Our client’s vision is to provide for a reimagined Holborn Links – a revitalised, modern estate that is fit and prepared to meet the needs of its occupiers and the wider community. As a combined estate sharing mutual values, it must be connected, integrated sympathetically and intellectually with the complexities of the conservation area and its listed buildings to maximise its true pedigree and potential.

This application for external repair works to 1 Southampton Place, 18-23 Southampton Place, and 46-47 Bloomsbury Square, is submitted in support of the wider refurbishment works that have been secured through separate planning applications – LPA refs. 2021/6113/L, 2021/6112/L, 2021/5686/P, 2021/5685/P.

## **The Proposal**

Hogarth are now seeking to secure listed building consent to enable external repair works to 1 Southampton Place, 18-23 Southampton Place, and 46-47 Bloomsbury Square.

Full details of the proposed works have been provided in the supporting drawing pack included within this application; however, details of the proposal can be summarised as follows:

- Cleaning and repairing masonry work
- Repair works to existing timber
- Various spot repairs
- Repair works to roofing
- Repair works to surface finishes
- Repair works to metal railings and drainage
- Repaint window security bars and replace glazing where glass is broken

## **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”.*

### Camden Local Plan (2017)

Policy E1 sets out to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses.

Policy D1 sets out the design requirements to secure high quality design in development. The Council will expect excellence in architecture and design and resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Policy D2 will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

## **Heritage Assessment**

The proposed works amount to sensitive remedial work to the Grade II and Grade II\* listed buildings. They seek effective repair the existing fabric where damaged and reinstatement of traditional materials where they have been lost. As such, in keeping with London Plan Policy HC1 and Local Plan Policy D1 and D2, the proposals aim to protect and preserve the elements of historic significance.

Whilst minor in nature, the works are necessary to increase the buildings' attractiveness to the market and actively contribute towards securing their viable long-term future, which in turn enables the heritage significance of the properties to be preserved. All repairs, follow good conservation practices and principles, use traditional materials and are compatible with the traditional construction of the designated heritage assets.

In sum, and as described above, the proposed external repair works will ensure the properties continue to contribute positively to the historic character of the site and the surrounding conservation area. The proposals are therefore considered to adhere to the legislative requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990.

## **Conclusions**

In keeping with national and local policy and guidance, the proposed external repair works respect the form, fabric, design, and scale of the Grade II and Grade II\* properties and their surrounds.

hgh

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

Yours faithfully

A handwritten signature in black ink that reads "R. Williamson". The signature is written in a cursive style with a large, stylized initial "R".

Ross Williamson

*Enc: As listed above*