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

Via Planning Portal

January 2023

Dear Sir / Madam,

Re: Full planning application for change of use and external alterations at 46-47 Bloomsbury Square, Holborn, WC1A

On behalf of our client, Hogarth Properties S.A.R.L (“Hogarth”), please find enclosed a full planning application for a change of use and external alterations at 46-47 Bloomsbury Square, 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;
- Design and Access Statement;
- Acoustic Report;
- Air Quality Assessment; and
- Energy Statement (incl. BREEAM).

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

Background

The Site comprises of 46-47 Bloomsbury Square, Holborn, WC1A, which is understood to lawfully be Use Class F1. The full area of the Site is 651sqm (GIA).

This proposal seeks to change the use of the Site to an office (Use Class E).

Full details of the planning history are set out below:

Application Reference	Description of Proposal	Status
8970045	Alterations at third floor level involving construction of new partitions and small windows as shown on drawing numbered 615/2.	Grant List.Build. or Cons. Area Consent 1989
8970029	Retention of new window in the rear elevation at third floor level as shown on drawings numbered 615/1 and 2.	Grant List.Build. or Cons. Area Consent 1989
8900061	Retention of new window in the rear elevation at third floor level as shown on drawings numbered 615/1 and 2.	Grant Full or Outline Planning Permission 1989
8770253	Opening in the party wall at second and third floor level to form new doorways as shown on one unnumbered drawing.	Grant List.Build. or Cons. Area Consent 1987
8570267	Formation of an opening in the party wall with 23 Southampton Place at ground and basement levels in order to satisfy the means of escape requirements.	Grant List.Build. or Cons. Area Consent 1985
N14/23/E/1143	Internal alterations involving the erection of partitions at the ground floor of 46,Bloomsbury Square and in the first floor of 47,Bloomsbury Square.	Granted 1975
N14/23/E/1061	The construction of internal partitions on the basement, second and third floors of 46/47 Bloomsbury Square, WC1	Listed permission 1975
N14/23/E/20972	Erection of new mansard roof storeys, a lift/toilet tower at the rear uniting both buildings, and the formation of internal links.	Listed permission 1974
N14/23/E/18180/R	Restoration, and the addition of mansard roof storeys and a lift/toilet tower at the rear uniting both buildings, and the formation of internal links; the use of the basement, ground 1st, 2nd & 3rd floors of both	Conditional 1974



	buildings as offices and the use of the 4th floors of both buildings for residential purposes.	
N14/23/E/582	Demolition of 1, 46, 47 Bloomsbury Square, W.C.1	Listed permission 1973

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:

- Change of use from Class F1 to Class E; and
- External alterations, including new plant equipment.

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

Planning Policy and Guidance

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

Principle of Development

The principle of changing the use to office space (Use Class E) and carrying out minor external works is strongly supported within local and London plan policy.

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.

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.

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.

The proposed external works at the Site 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.



Noise Impacts

The proposed external plant is necessary for the day-to-day operations of the commercial units and is appropriate within these locations. The principle of the proposed plant units is therefore supported by policies G1 and E1 of Camden's Local Plan.

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

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 works would significantly enhance the character and appearance of this heritage asset. These proposals would therefore accord with Local Plan Policy D2.

It is considered that there is no harm to the buildings' significance with reference to paragraphs 193-196 of the NPPF. The external works 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.

Conclusions

In keeping with national and local policy and guidance, the proposed change of use and external alterations respect the local context and character, whilst integrating well with the surrounding street scene. The proposal respects the form, fabric, design, and scale of their setting, as well as providing high-quality design.

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

Yours faithfully

A handwritten signature in black ink that reads 'R. Williamson'.

Ross Williamson

Enc: As listed above