

10 May 2022

London Borough of Camden
Planning Department
Camden Town Hall
London
WC1H 8ND

Dear Sir/Madam

**PROPOSAL FOR CHANGE OF USE TO HOTEL AND CREATION OF OPENINGS
INTO NEIGHBOURING HOTEL
AT: 118-120 HIGH HOLBORN LONDON WC1V 6RD
DESIGN AND ACCESS/PLANNING STATEMENT
Planning Portal ref: PP- 12121043**

On behalf of our clients, L'Oscar London, I hereby submit applications for Planning Permission and Listed Building Consent for the following development:

Change of use of basement, ground floor and mezzanine to hotel use in association with adjoining hotel, relocation of existing clock to high level, and creation of openings at basement and ground floor to link new accommodation with existing hotel at 2-6 Southampton Row.

The LBC application relates only to the creation of openings to provide a link between the new and existing hotel accommodation; 2-6 Southampton Row is Grade 2* listed. A similar proposal – with the proposed GF opening in a different position – was approved on 1 February 2023 (LBC refs: 2022/1386/P and 2022/1915/L).

The application is submitted online and is accompanied by the following documents:

- Heritage Statement (Donald Insall Associates)
- Drawings (listed on separate drawing schedule):
 - Site location plan
 - Existing floor plans and elevations
 - Proposed floors plans and elevations
 - Existing and proposed openings (basement and GF)
 - Demolition plans (basement and GF)

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- Extant floor plans and elevations (LBC ref: 2007/5024/P) (for information only) – including section AA (drawing 467GS01 rev B) showing proposed lift overrun/plant room

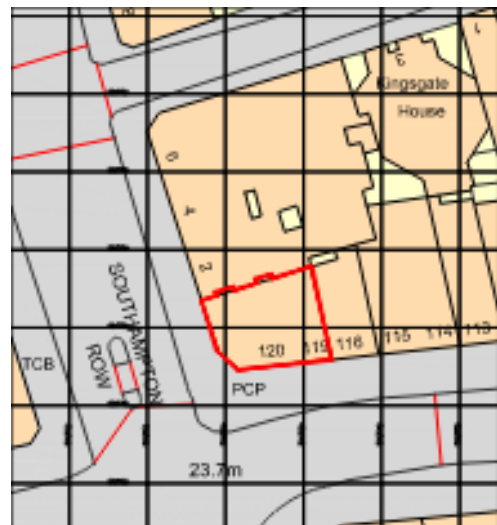
This covering letter serves as both as a Planning Statement, and as a Design and Access Statement required for the listed building consent application. It updates a similar document that supported the recently approved applications, providing additional heritage analysis and responding specifically to concerns voiced by the conservation officer.

The Site and Surroundings

118-120 High Holborn is located on the corner of High Holborn and Southampton Row at the junction with Kingsway. It comprises basement, ground, mezzanine and first to fourth floors. The fourth floor is located within the steeply-sloping roof behind a parapet and with a prominent cupola feature on the bevelled corner.

It adjoins 122 High Holborn to the east, a G+4-storey building in office use with ground floor café/restaurant at ground floor (Wasabi). On its return/northern frontage the building adjoins 2-6 Southampton Row, a G+6-storey building in hotel use (L'Oscar London) which is Grade 2* listed.

Opposite, to the south, is Holborn underground station. The area is characterised by retail activity, dominated by takeaways, cafés and restaurants. There is a large supermarket on the southwest side of the High Holborn/Southampton Row/Kingsway junction.



Site viewed from the SW/site plan

The proposal

The proposal involves the change of use of the basement, ground floor and mezzanine of the former bank building to hotel use, specifically a spa/wellness facility ancillary to the hotel use. The existing partial mezzanine would be filled in.

As noted in the planning history below, planning permission was granted in 2008 (amended in 2012) for conversion of the 1F-4F of this building to hotel bedroom accommodation, together with an additional 5F within the roof space. This permission is extant given the implementation of the conversion within the rest of the building at 2-6 Southampton Row (L'Oscar London).

This current application relates only to the change of use at lower levels, but it involves changes to the configuration of the hotel accommodation, notably with the inclusion of a lift. Proposed plans for these upper levels are provided with the application alongside the extant scheme drawings (the latter for information only). A revised roof plan and elevations show the proposed lift overrun. No additional hotel floorspace is created other than by the change of use and there is no additional bedroom accommodation other than that at 5F as a result of the extant permission.

As noted during the consideration of the previous application, the extant 6F/roof drawing (467GA06 rev F) is confusingly annotated: the area indicated as being at 147.91m FFL is actually a taller enclosed space for plant and the original lift overrun. This extends up to 149.01m and therefore the amended lift overrun that forms part of this current proposal sits within it (see extant section drawing 467GS0 rev B1).

The Listed Building Consent application relates only to the creation of an opening at basement level and an amended position of the extant opening at GF level to provide links between the existing hotel and new accommodation.

Planning history

The following schedule sets out details of the two sites' planning history. In summary:

- As noted above, planning permission and listed building consent were granted in 2008 for conversion of the former Baptist Church HQ (Grade 2* listed) and the upper floors of 118-120 High Holborn to hotel use, the latter including a new 5F of hotel accommodation
- These were amended in 2012 to reduce the number of bedrooms permitted from 85 to 41 suites (including 1F-5F in 118-120 High Holborn)
- Both the original and amended schemes included creation of an opening at GF between the hotel and 118-120 High Holborn to provide access for guests to the stair and lift core serving the accommodation in the adjoining building
- All relevant conditions were discharged and the permission implemented, other than 1F-5F in 118-120 High Holborn and the GF opening; the permission is extant
- The previous occupier of 118-120 High Holborn (TSB bank) received permission for removal of the stepped entrance on the High Holborn/Southampton Row corner, but this was not implemented
- Earlier this year, planning permission was granted for change of use of the remaining parts of 118-120 High Holborn to hotel use, with related minor design changes, alongside listed building consent to create openings at basement and GF providing direct access from the hotel at 2-6 Southampton Row. The GF opening consented was in virtually the same position as that in the extant scheme, to the rear of the large lounge and reception on the Southampton Row frontage

| Reference | Description | Decision/ date |
|--|---|---------------------------|
| 2-6 Southampton Row and 118-120 High Holborn WC1B 4AA | | |
| 2007/5024/P | Conversion and alterations of the former Baptist Church Headquarters to create 84 bedroom hotel (Class C1) with restaurant, conference room, meeting/banqueting room, bar, spa and gym. | Permission 30 May 2008 |
| 2007/5206/L | External and internal alterations including conversion of the former Baptist Church Headquarters to create 84 bedroom hotel [Class C1] | Consent 10 April 2008 |

| | | |
|---------------|---|---------------------------------|
| 2008/2514/P | Variation of conditions 3, 4, 7, 8, 9, 10, 12, 13, 14 and 15 of listed building consent dated 10/04/2008 (ref. 2007/5206/L) for the external and internal alterations including conversion of the former Baptist Church Headquarters to create 84 bedroom hotel with restaurant, conference room, meeting/banqueting room, bar, spa and gym. {NB Proposed variation is to require the submission of details prior to the commencement of the relevant works rather than prior to commencement of works} | Permission 18 June 2008 |
| 2008/3257/P | External alterations to Catton Street frontage as an amendment to planning permission granted 30/05/2008 ref:2007/5204/P for Conversion and alterations of the former Baptist Church Headquarters to create 84 bedroom hotel (Class C1) with restaurant, conference room, meeting/banqueting room, bar, spa and gym. | Permission 19 September 2008 |
| 2012/5591/LBC | Alterations in connection with the reduction in hotel room numbers and alterations to design of chapel, ground floor entrance, hotel bedrooms, circulation and lifts, and internal fixtures, fittings and servicing, as an amendment to listed building consent 2007/5206/L dated 10/04/2008 for external and internal alterations including conversion of the former Baptist Church Headquarters to create 84 bedroom hotel [Class C1]. | Consent 26 November 2012 |
| 2012/5592/P | Reduction in the number of hotel rooms and various external alterations to the building, as amendments to planning permission ref 2007/5204/P dated 30/05/2008 for conversion and alterations of the former Baptist Church Headquarters to create 84 bedroom hotel (Class C1). | Granted 26 November 2012 |
| 2013/3105/P | Extension of existing first floor storage room into lightwell to create extended service area. | Permission 18 July 2013 |
| 2013/3717/L | Extension of existing first floor storage room into lightwell to create extended service area. | Consent 18 July 2013 |
| 2013/5020/LBC | Reinstatement of historic mezzanine at the eastern end of room 1.03/4 at first floor, and alterations to room layout at sixth and seventh floors as an amendment to listed building consent (ref:2012/5591/L) dated 14/12/2012 | Consent 20 September 2013 |

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| | | |
|-------------|---|-----------------------------|
| | for external and internal alterations including conversion of the former Baptist Church Headquarters to create 84 bedroom hotel. | |
| 2015/6887/P | Erection of entrance canopies and lanterns at main entrance on Southampton Row and 2 secondary entrances on Catton Street | Permission 20 May 2016 |
| 2015/7194/L | Alterations in connection with the erection of entrance canopies and lanterns at main entrance on Southampton Row and 2 secondary entrances on Catton Street | Consent 22 December 2015 |
| 2016/0487/P | Installation of external lights for illumination of building facades on both elevations. | Consent 20 May 2016 |
| 2016/1133/L | Installation of external lights for illumination of building facades on both elevations. | Granted 2 March 2016 |
| 2016/1282/P | Installation of two new maintenance access ladders, associated platforms and mansafe cable system to the chapel roof and approved roof extension in the lightwell. | Permission 14 July 2016 |
| 2016/2141/L | Installation of two new maintenance access ladders, associated platforms and mansafe cable system to the chapel roof and approved roof extension in the lightwell. | Consent 14 July 2016 |
| 2016/1828/L | Installation of ventilation equipment for kitchen, involving one air-handling unit on rear internal lightwell roof. | Consent 14 July 2016 |
| 2016/4793/L | Installation of a new floor with integrated acoustic matting and service boxes in function rooms, retaining historic boards. | Consent 19 December 2016 |
| 2018/4159/A | Display of a non-illuminated sign on stonework at ground floor corner. | Consent 25 October 2018 |
| 2018/4191/L | Display of a non-illuminated sign on stonework at ground floor corner. | Consent 25 October 2018 |
| 2018/4193/A | Display of an illuminated sign above canopy on the main hotel entrance on Southampton Row and display of a non-illuminated sign above canopy on the restaurant/bar entrance on Catton Street. | Consent 25 October 2018 |
| 2018/4195/L | Display of an illuminated sign above canopy on the main hotel entrance on Southampton Row and display of a non-illuminated sign above canopy on the restaurant/bar entrance on Catton Street. | Consent 25 October 2018 |
| 2022/1915/L | Internal alterations (formation of openings at basement and ground floor to link | Consent 1 February 2023 |

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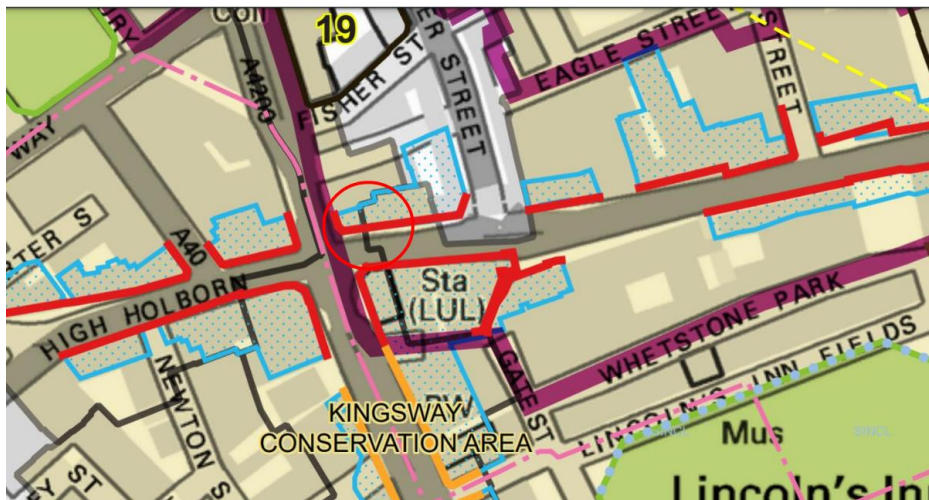
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| | to neighbouring 2-6 Southampton Row) in association with the change the use of the lower levels of 118-120 High Holborn to hotel use associated with the existing hotel at 2-6 Southampton Row. | |
| 118-120 High Holborn WC1V 6RD | | |
| 2012/6134/A | Installation of two internally illuminated signs at ground and third floor level. | Consent 29 November 2012 |
| 2015/4391/P | Alterations to shopfront including the removal of stepped entrance to provide level access (not implemented) | Granted 3 November 2015 |
| 2016/4239/NEW | Display of 5 x internally illuminated logo signs at fascia level. | Withdrawn |
| 2022/1386/P | Change of use of basement, ground floor and mezzanine to hotel use in association with adjoining hotel at 2-6 Southampton Row, relocation of existing clock to 3rd floor level, new window at 1st floor level fronting High Holborn, installation of 6 new windows at roof level and installation of skylight and lift over-run on roof. | Granted 1 February 2023 |
| 2022/1915/L | Internal alterations (formation of openings at basement and ground floor to link to neighbouring 2-6 Southampton Row) in association with the change the use of the lower levels of 118-120 High Holborn to hotel use associated with the existing hotel at 2-6 Southampton Row. | Consent 1 February 2023 |

Planning policies

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan comprises The Camden Local Plan (adopted 2017) [CLP] and the London Plan (March 2021) [LP].

An extract from the CLP Policies Map is shown below. The Site falls within the following designations:

- Central London
- Central London frontage
- Archaeological Priority Area
- Holborn Growth Area
- Kingsway Conservation Area



Extract from Camden Local Plan Policies Map

LP Policy SD4 The Central Activities Zone (CAZ) states that:

E The unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions should be promoted and enhanced.

LP para 2.4.4 notes that "the strategic functions of the CAZ include, but are not necessarily limited to: j. tourism facilities including hotels and conference centres...".

Similarly, LP Policy SD6 Town centres and high streets states:

G Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted

And LP Policy E10 Visitor infrastructure promotes enhancement and extension of tourism including:

C A sufficient supply and range of serviced accommodation should be maintained....

F Within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas ...

CLP Policy G1 directs growth, inter alia, to Holborn. The supporting text to this policy includes reference to "supporting businesses and job provision by providing or retaining suitable premises to support businesses staying or expanding within Camden" (para 2.6).

CLP Policy E3 Tourism states:

The Council recognises the importance of the visitor economy in Camden and will support tourism development and visitor accommodation. We will:

a. expect new, large-scale tourism development and visitor accommodation to be located in Central London, particularly the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn;...

CLP policy on town centres and shopping is relevant here given the proposed change of use from the lawful bank (formerly Class A2 use) at basement, GF and mezzanine.

CLP Policy TC2 promotes successful and vibrant town centres. This involves protecting and enhancing the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located (para a). It also means making "sure that food, drink, entertainment and other town centre uses do not have a harmful impact on residents and the local area and focusing such uses in King's Cross and Euston Growth areas, Central London Frontages, and Town Centres" (para c).

In this regard, para f of the policy seeks to protect the designated primary frontage in Holborn to maintain its retail function, setting out its expected mix of uses (Appendix 4) as a minimum 50% A1 and a maximum 25% A3-A5 uses. This policy is somewhat superseded by the 2020 changes to the use class order which subsume retail (A1), financial and professional services (A2) and restaurants and cafés (A3)

into a new Class E commercial, business and service use; drinking establishments (A4) and hot food takeaways (A5) are now both *sui generis*.

CLP Policy D2 Heritage sets out the Council's requirements in relation to heritage assets, including the following for listed buildings:

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

- i. resist the total or substantial demolition of a listed building;*
- j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and*
- k. resist development that would cause harm to significance of a listed building through an effect on its setting.*

Planning merits

Land use

The extant hotel permission on the upper floors was always compromised by the lack of physical connection with the rest of the hotel. This proposal enables successful completion and enhancement of that permission.

In land use terms the proposal aligns with the thrust of policy that recognises this general location in Central London and the Holborn Growth Area as one where additional hotel accommodation is acceptable. It accords with LP Policies SD4E, SD6G and E10C and F, and with LP para 2.4.4. Similarly, CLP policies G1 and E3 promote additional growth and hotel accommodation in this part of the Borough.

In terms of the impact on the primary retail frontage, the proposal would involve the loss of the current lawful A2 use; CLP Policy TC2 is not explicit on such uses. Para b, however, does promote an appropriate range of service uses "to provide variety, vibrancy and choice."

The following table summarises the mix of uses in the four immediate sections of primary frontage immediately around the Southampton Row/High Holborn/Kingsway junction.

| Frontage | No of units | | | | |
|--|--------------------------------|--|--|--|---|
| | Retail A1 (Class E) | Financial services A2 (Class E) | Restuarant/ café A3 (Class E) | Drinking establishment A4 (sui generis) | Hot food takeaway A5 (sui generis) |
| High Holborn E (north side) | 1 | (1 vacant) | 3 | 0 | 2 |
| High Holborn E (south side)/ Kingsway | 6 | 0 | 5 | 0 | 0 |
| High Holborn W (north side)/ Southampton Row | 0 | 1 | 2 | 0 | 0 |
| High Holborn W (south side)/ Kingsway | 3 | 1 (1 vacant) | 0 | 1 | 0 |
| Total | 10 | 3 (2 vacant) | 10 | 1 | 2 |
| % of total 26 units | 38% | 12% | 38% | 4% | 8% |

While the total A1 and A2 units (including 2 vacant units) meets the 50% minimum policy requirement (principally around the underground station entrance), the remaining 50% are all restaurant/café or takeaway uses, and one public house. The

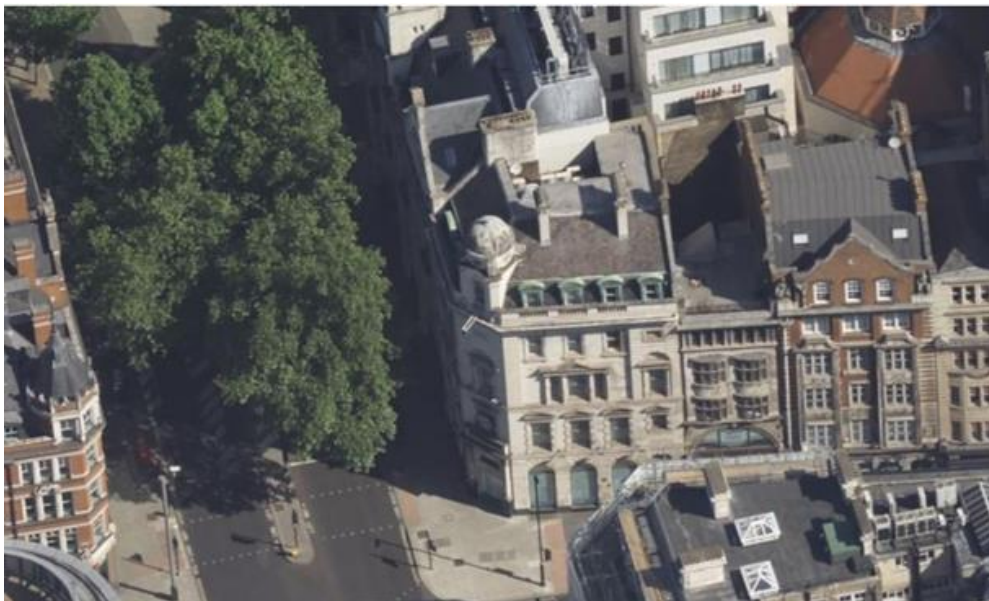
policy position of a maximum 25% A3-A5 uses is now firmly breached, even without the Use Class Order changes.

While the lawful use of the site is A2 (now Class E), the unit is vacant (as is another former A2 unit nearby). It has little activation on the street frontage. The proposal will see the unit reused and with a degree of activation on the High Holborn and Southampton Row frontages. There would be no adverse impact on the vitality of the town centre; rather the completion of the hotel use will remove an unsightly vacant unit from a prominent location.

Design

The rationale for the design interventions in the former Baptist Church HQ building and the modest changes to 118-120 High Holborn with the additional level of hotel accommodation at 5F within the tall mansard roof were set out in detail at the time of the 2007 applications.

The approved floor plans and section for 118-120 High Holborn are provided with this application by way of background. The current proposal involves a reconfiguration of the new hotel accommodation, alongside the new extended mezzanine, including a new lift core and the links to main hotel at GF and basement levels. There are no other significant changes, other than the modest lift overrun which will not be in any public views, being set back from the main frontages behind the steep roof, and only just visible in elevation.



Aerial view from the S

The following external changes are also proposed:

- Relocation of the prominent clock. As shown in the photographs below, this is currently positioned in front of a window; its new position would be on a blank part of the corner façade previously used for TSB signage. While there is no direct relationship between the clock and the blue plaque commemorating Thomas Earnshaw (18th century watch and chronometer maker) whose business premises were on this site, the continued presence of the clock will provide a visual link with that history.
- Substitution of the two main doors (one on the prominent corner, the other adjoining 122 High Holborn) with hardwood replacements that resemble (but do not slavishly copy) the Edwardian originals.
- Removal of ugly light fittings (their replacement with fittings to match those on the main hotel frontage will be the subject of a separate application in due course)



Existing clock – external and internal views



Blue plaque on High Holborn frontage

The existing access on corner will continue to be used, though the main access to the extended hotel premises will continue to be from Southampton Row. A previous permission to remove the stepped entrance on the corner was not implemented.

Heritage

The proposal involves the creation of an opening at basement level and an amended position of the extant opening at GF level to provide links between the existing hotel and new accommodation. The 2007 and 2023 consents both included a GF opening that would involve guests entering a "back of house" area in order to access guest bedrooms above or the spa area. Alternative options have been considered to create effective circulation and access but the proposed opening is the only one that has any spatial logic.

Ground floor

At the time of the 2007 applications, the submitted Historic Building Architect's Report (Donald Insall Associates Ltd, October 2007) noted the following description of the GF lounge space (room G3) as it then was in the former Church HQ building:

This was a room created when the insurance company/bank took over the building following Keen's occupation. The fabric and finishes largely date to the early 20th century, however, and include: beamed plaster ceiling with coved cornices; handsome polished mahogany chimney piece with mirrors; window joinery to the rear area; basement staircase with tiled finishes – but this has modern re-modelling.

The sub-divisions and partitions all date to the later 20th century when the use was changed to offices. (para 3.2.7)

At that time, the proposed works to this room were as follows:

Removal of the basement service staircase and modern sub-divisions in G3 and infilling of the stair well to form part of a restaurant.

Formation of an opening between G3 and the neighbouring building (118-120 High Holborn) to the south. (para 4.2.1)

And the report noted the following in terms of heritage impact:

The alterations in G3 would be to modern fabric and a staircase with modern re-modelling, except where they affect the original light well.

The new opening in the party wall to the building to the south discretely links the two buildings, to allow the south building to be used as part of the hotel without compromising other floors. (para 4.5.2)

The proposed opening in the party wall was clearly considered acceptable at the time that listed building consent was granted (LBC ref: 2007/5206/L, 10 April 2008), though this element of the scheme was not shown on the application drawings. The February 2023 listed building consent included an opening in the same position.

The location of the proposed new opening is indicated in the photograph below, to the left of the fireplace. DIA now consider the chimney piece to be of Edwardian origins but refurbished and finished to match the colour of the modern joinery (para 3.4.2 of 2023 statement – see below).



Refurbished fireplace and modern décor on party wall (hotel lounge/room G3)

Basement

The Historic Building Report refers to the basement space (room B3) as follows:

This is a mixture of robust original spaces, including below pavement vaults contiguous with the remaining space, and modern sub-divisions. (para 3.2.8)

The then proposed alterations are summarised simply as:

Re-modelling B3 ... to form new kitchens and staff facilities. (para 4.2.7)

The report is silent on any impacts on heritage value in relation to B3.

As indicated in the photograph below, this space has no particular features of note. The intervention is simply to provide staff access between the main hotel building and 118-120 High Holborn.



Basement hotel storage

Updated heritage assessment

Donald Insall Associates, given their long association with the buildings, have revisited their previous research in relation to the current proposals, and the application is now supported by their 2023 Heritage Statement. Their involvement is also a response to the stance taken by the conservation officer in negotiating the February consent – summarised in the decision notice as follows:

The proposed ground floor opening was previously consented as part of approved scheme 2007/5206/L which has been partially implemented. Although the approved openings have not been carried out to date they remain extant because the rest of the proposals have been implemented, and as such, the previous permission forms a strong material consideration. The opening at basement level is within a part of the building with lesser significance and sensitivity and is considered acceptable.

It was initially proposed to form an opening at the front of the ground floor lounge in 2-6 Southampton Row. This was removed from the proposals at the request of the Council's Conservation Officer due to the impact the lateral opening would have had on the plan form of a principal room of the building and also the main envelope of the listed building. This would have caused harm to the significance of the building due to the impact on the main envelope of the building, confusing the understanding of the original architecture, circulation and plan form. Following the removal of these elements, the Council's Conservation Officer has confirmed the proposals are acceptable, and would preserve the significance of the listed building.

[source: 2022/1915/L decision notice 1 February 2023, Informative 1: reasons for granting listed building consent]

The Heritage Statement considers principally the heritage value of 2-6 Southampton Row. Importantly, it also assesses the improvements to 118-120 High Holborn (which is not listed) in coming to a view on the planning balance here in terms of the test set out in NPPF para 202.

The Statement provides a thorough exposition of the area's development and the history of the former Baptist Church House. It references some of the terracotta panel decorations and their associations, in particular one in the council chamber depicting the liberation of enslaved Jamaicans in 1834 (see plate 3.5).

It also includes evidence suggesting, following bomb damage during the 2WW, consequential repairs and subsequent decline in use by the Church, that there were links with 118-120 High Holborn at basement (plate 2.10), ground (pl13), and first floor levels (plate 2.9).

The Heritage Statement concludes that:

...the former Baptist Church House is of high significance not only for its flamboyant Edwardian architecture and sculptural programme but as an historical symbol of the Baptist Church's contribution to improving the lives of the poor and dispossessed both in the former imperial capital and the colonies. In terms of built fabric of the highest significance are:

- *The flamboyantly-composed street facing facades including the statue of John Bunyan, author of the seminal moral text Pilgrim's Progress.*
- *The remaining historic plan form, including the octagonal chapel.*
- *The carefully restored former meeting rooms at first and second floor level including the sculptural 1902 reliefs by George Tinworth, commemorating the Baptist's contribution to the passing of the Slavery Abolition Act 1833.*

Modern joinery – as exists in the GF reception space – is considered to be of neutral significance, being of an appropriate period style (p26).

118-120 High Holborn was also heavily bomb-damaged and underwent extensive post-war repair. This included installation of signage – including the existing clock, likely installed by Zenith Watches. More recently the original stallrisers were removed and changes made to the main entrance.

The building is assessed as making a positive contribution to the character and appearance of the Kingsway Conservation Area (Kingsway Conservation Area Statement 2001, p14). The DIA Heritage Statement concludes that its heritage significance is principally "its contribution to the area's townscape" though modern interventions "detract from its ability to make a positive contribution to the character and appearance of the conservation area" (p27).

Impact on heritage assets

In relation to 2-6 Southampton Row, the Heritage Statement considers that the impact of the proposed GF opening "would cause no harm to the listed building's architectural significance overall" (p28). This area was once the Baptist Church House bookshop, subsequently altered for an independent bookseller and, while the current bookshelves mimic this history, the joinery is modern. Furthermore, there is documented history of openings between the buildings. The proposed job door would be an inventive solution that would have no impact on the reading of the GF space and would not create any feeling of "lateral conversion" that the conservation officer has suggested.

In relation to 118-120 High Holborn, the Heritage Statement considers the various external improvements would be beneficial for the building's townscape role. The internal opening would clearly have no impact on the exterior heritage value.

The proposal is therefore considered to have no impact on the significance of these heritage assets. The proposal meets the relevant test in CLP Policy D2j in that it would not cause harm to the special architectural and historic interest of the building. Nor would it have any impact on setting (k).

In coming to this conclusion, it is useful to note that Policy D2 of the CLP essentially repeats the advice and relevant tests set out in the NPPF (2021), the key aspects of which are quoted below (emphasis added):

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

199. When considering the impact of a proposed development on the significance of a designated 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.

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The Conservation Officer has previously stated that the proposal would result in "less than substantial harm" to the significance of the heritage interest. This was on the basis that this proposal would have a "bigger impact on plan form and the circulation of the buildings."

DIA are of the opinion that the proposals would result in “no harm” to the significance of the heritage assets. It is not clear what relevance the plan form or circulation of the buildings has to the significance of the heritage assets. Even if the LPA perceived some harm, it is clear, in any event, that this is at the very lowest level of “less than substantial” harm in terms of NPPF 202.

Furthermore, even if less than substantial harm arises (which is not accepted), in applying the NPPF 202 test, the public benefits of the proposal are as follows:

- the proposal will bring the vacant building at 118-120 High Holborn back into active use, including at basement level
- it will help to activate the publicly-accessible GF of the hotel and the corner
- the missing hardwood external doors will be replaced
- ugly façade light fittings will be removed
- re-positioning of the large clock to a more logical location

The external changes will enable the building properly to make a positive contribution to the character and appearance of the Kingsway Conservation Area and improve the setting of the adjacent listed building.

There are no ground works involved in the proposal that would impact on archaeology.

Conclusion

The planning application is for the change of use of basement, ground floor and mezzanine of 118-120 High Holborn to hotel use in association with adjoining hotel. It involves the extension of the existing mezzanine floor to create additional hotel space, relocation of the existing clock to high level and removal of ugly façade lighting. Listed building consent is sought for the creation of an opening at basement level and the repositioning of the extant opening at ground floor to link the new accommodation with the existing hotel (listed Grade 2*).

The proposals accord with relevant London Plan and Camden Local Plan policies as set out in detail above, and meet the relevant test set out in NPPF para 202 in that the low level of “less than substantial harm” to the significance of the heritage asset is outweighed by the public benefits of enabling a functional hotel proposal to be completed (and enlarged) and bringing a building that makes a positive contribution to the character of the Conservation Area back into active use alongside external improvements.

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The application fee has been paid online. I look forward to receiving confirmation of validation in due course.

Yours faithfully,

Mike Ibbott
Director
for **tp bennett**