

LONDON



TUNNELS

The London Tunnels

Design and Access Statement

November 30 2023

WilkinsonEyre

HERITAGE STATEMENT

THE LONDON TUNNELS

NOVEMBER 2023



Written by: XXXX

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1.0 INTRODUCTION

THE LONDON TUNNELS

INTRODUCTION

1.1 Montagu Evans LLP have been instructed by The London Tunnels (the 'Applicant'), to prepare this heritage statement in support of an application for change of use to existing deep level tunnels of the Kingsway Exchange and redevelopment of above ground structures at No. 31-33 High Holborn (LB Camden) and No. 39-40 Furnival Street (City of London) ('the Site'). The Site extends between the Corporation of the City of London and the London Borough of Camden (the Local Planning Authorities).

THE SITE

1.2 The Site is located in the City of London ('the City'). The Site comprises a triangular urban block, bounded by Holborn Viaduct, Charterhouse Street and Shoe Lane, and located to the immediate east of Holborn Circus. It is occupied by a single nine-storey commercial office building, erected in 2005-2008, and an adjacent area of public realm referred to as the 'Pocket Park'.

1.3 The Site is described in more detail within the Design and Access Statement prepared by Eric Parry Architects. **Figure 1.1** outlines the boundary of the Site.

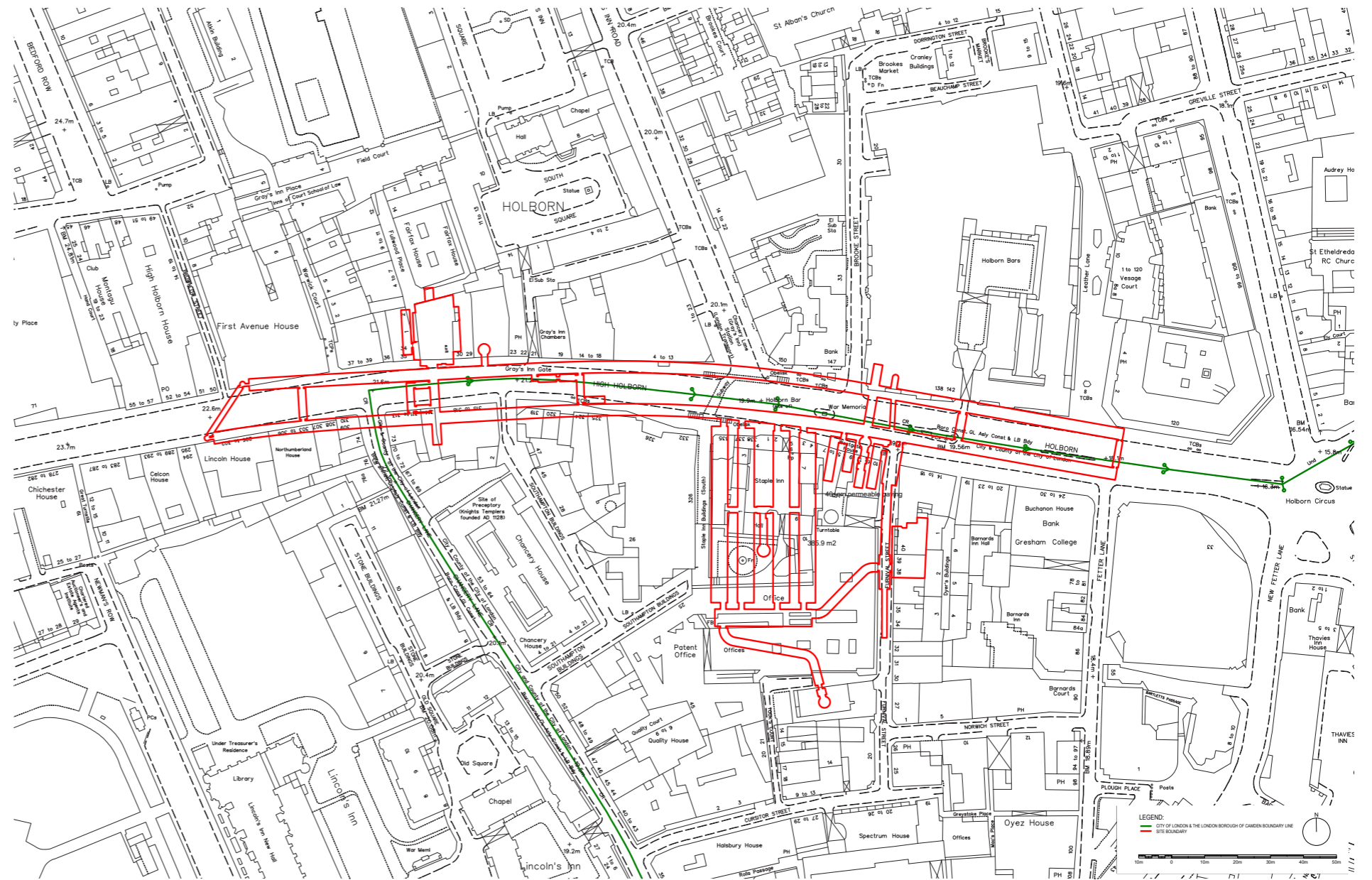


Figure 1.1 Site Plan

THE PROPOSED DEVELOPMENT

- 1.4 A description of the proposals (the 'Proposed Development') may be summarised as:

"Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1); demolition and reconstruction of existing building at 39 Furnival Street; redevelopment of 40 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at Fulwood Place, to provide secondary visitor attraction entrance (including principle bar entrance) with retail at ground floor level; provision of ancillary cycle parking, substation, servicing and plant, and other associated works."

PRE-APPLICATION CONSULTATION

- 1.5 The NPPF recognises at Paragraph 39 that:
- 'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre application discussion enables better coordination between public and private resources and improved outcomes for the community.'*
- 1.6 The proposals are the result of close consultation during design development between the Applicant's design team, the
- 1.7 City of London, London Borough of Camden, and Historic England.
- 1.8 In essence, the Proposed Development has sought to respond to the feedback received throughout the design development process. This has included refinements to the articulation, scale, and massing of the new build elements, to be more sensitive to the local townscape and heritage assets, and a well-considered, holistic approach to the refurbishment of the tunnels, factoring in heritage, accessibility, and sustainability.

PURPOSE AND STRUCTURE OF REPORT

- 1.9 The purpose of this Heritage Statement is to assist the decision maker by describing the significance of relevant heritage assets and assessing the impact of the Proposed Development upon that significance.
- 1.10 Paragraph 194 of the National Planning Policy Framework requires applicants to describe the significance of the identified assets so that the impact of the proposals may be understood.
- 1.11 The Site comprises non-designated heritage assets and is located across two conservation areas. The Site is within the setting of several other listed buildings and so the potential impacts of the Proposed Development on their setting is also assessed.
- 1.12 The assessment is informed by a zone of theoretical visibility (ZTV), historic research, an appraisal of the existing Site and surroundings, and relevant national, regional and local policies.
- 1.13 The report is structured as follows:
- **Section 2.0** of this report provides a summary of statutory provision and applicable planning policies.
 - **Section 3.0** provides a history of deep level air raid shelters and the Site.
 - **Section 4.0** provides an assessment of designated and non-designated heritage assets within the Site.
 - **Section 5.0** – provides an assessment of relevant designated assets within the vicinity of the Site.
 - **Section 6.0** provides an assessment of the Proposals' direct and indirect impacts on identified heritage assets;
 - **Section 7.0** provides a conclusion and summary of compliance with relevant policies.

2.0

PLANNING AND LEGISLATIVE FRAMEWORK

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PLANNING AND LEGISLATIVE FRAMEWORK

2.1 This section sets out the planning policy context for the redevelopment of the Site in relation to heritage considerations, including national and local guidance.

LEGISLATION

2.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 (hereafter “the 1990 Act”) sets out the legislative duties of the decision maker.

2.3 The Site does not contain any statutorily listed buildings; however, it is located across both the Bloomsbury Conservation Area (LB Camden) and Chancery Lane Conservation Area (City of London).

2.4 With respect to this Site, the applicable statutory provisions are therefore:

- **Section 66(1):** *In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features or special architectural or historic interest which it possesses.*
- **Section 72(1):** *With respect to any buildings or other land in a conservation area... special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.*

DEVELOPMENT PLAN

2.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that where in making any determination under the Planning Acts, regard is to be had to the development plan, and the determination must be made in accordance with that plan unless material considerations indicate otherwise.

2.6 As the Site extends between two local authority boundaries there are two relevant development plans, each comprising the London Plan (2021) and a corresponding Local Plan. The relevant development plan policies are outlined in the table below.

DEVELOPMENT PLAN POLICY	KEY PROVISIONS
London Plan (2021)	Policy D3: Optimising site capacity through the design-led approach Policy HC1: Heritage Conservation and Growth Policy HC3: Strategic and Local Views
City of London Local Plan (2015)	Policy CS10: Design Policy DM 10.1: New development Policy CS11: Visitors, Arts and Culture Policy CS12: Historic Environment Policy DM12.1: Managing change affecting all heritage assets and spaces Policy DM 12.2: Development in conservation areas
Camden Local Plan (2017)	Policy D1 Design Policy D2 Heritage Policy D3 Shopfronts

Table 2.1 Relevant Development Plan Policy

NATIONAL POLICY

NATIONAL POLICY	KEY PROVISIONS
National Planning Policy Framework (NPPF) 2023	Chapter 12 (Achieving well-designed places) Paragraph 127 Paragraph 128 Paragraph 129 Paragraph 130 Paragraph 132 Paragraph 134 Chapter 16 (Conserving and enhancing the historic environment) Paragraph 194 Paragraph 199 Paragraph 200 Paragraph 201 Paragraph 202 Paragraph 203 Paragraph 204 Paragraph 205 Paragraph 206 Paragraph 207

Table 2.2 Relevant National Planning Policy

MATERIAL CONSIDERATION

- 2.7 In addition to legislation and policy, the following assessment will take into consideration relevant planning guidance and any material considerations, including:
- National Planning Practice Guidance (online)
 - National Design Guide (2019)
 - Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)
 - Historic England Advice Note 12: Statements of Heritage Significance, Analysing Significance in Heritage Assets (2019)
 - Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017);
 - City of London’s Chancery Lane Conservation Area Character Summary and Management Strategy SPD (2016);
 - LB Camden’s Bloomsbury Conservation Area Appraisal and Management Strategy (2011);
 - Historic England, Military Structures Listing Selection Guide (2017);
 - Historic England, Infrastructure: Utilities and Communication Listing Selection Guide (2017).

POLICY DISCUSSION

ASSESSING SIGNIFICANCE OF HERITAGE ASSETS

- 2.8 Paragraph 194 of the NPPF states that the significance of a heritage asset affected by development proposals should be understood, and that this understanding should be proportionate and no more than is necessary to understand the impact of a development proposal on that significance.
- 2.9 Significance is defined as: *“the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance”*.
- 2.10 The 2015 Historic England document titled ‘Managing Significance in Decision-Taking in the Historic Environment’ provides guidance on how to assess the significance of heritage assets.

- 2.11 The description of significance should include the contribution that setting makes to the significance of the heritage asset, if relevant. Setting is defined in the NPPF as:
“the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”
- 2.12 In preparing our setting assessment we have had regard to best practice guidance. For setting, this is Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets (Historic England, December 2017).

IMPACT ON HERITAGE ASSETS

- 2.13 In preparing our analysis we are mindful of the considerable weight attached to the preservation or enhancement of heritage assets and their settings.
- 2.14 The London Plan Policy HC1(C) states that ‘development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.’
- 2.15 City of London Core Strategic Policy CS12 states that new development is required to ‘respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings’.
- 2.16 Paragraph 199 of the NPPF (2023) sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, ‘great weight should be given to its conservation.’ It goes on to state that ‘the more important the asset, the greater the weight should be’. There is potential for significance to be harmed or lost not only through alteration or destruction of a heritage asset but also through development in its setting.
- 2.17 Paragraphs 201 and 202 of the NPPF have regard to harm, which can either be considered substantial harm (total loss of significance) (Paragraph 201) or less than substantial harm (Paragraph 202).
- 2.18 In the case of less than substantial harm, Paragraph 202 states that this must be weighed against the planning benefits of a proposal. In other words, if there is harm to the significance of a heritage asset, a balanced

judgement is required as to whether that harm is outweighed by the benefits which are offered by the development proposal as a whole. Planning benefits include heritage benefits.

- 2.19 The ramifications of Paragraph 199 also extend to encompass any beneficial works, and this is confirmed by the High Court in *Rottingdean*¹. Given the considerable planning weight that attaches to any harm to a designated heritage asset, it follows that equal weight should be accorded to beneficial works.
- 2.20 NPPF policies together with the guidance on their implementation in the Planning Practice Guidance, form the framework for the consideration of change affecting designated heritage assets.

DEVELOPMENT IN CONSERVATION AREAS

Paragraph 206 of the NPPF states that local planning authorities should look for opportunities for new development within Conservation Areas, that will enhance or better reveal their significance.

- 2.21 Regarding development in a conservation area, City of London Policy DM 12.2 states that:
‘Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building and ensuring that the developer has secured the implementation of the construction of the replacement building.’
- 2.22 LB Camden Policy D2: Heritage states that the council will ‘require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area’ and ‘resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area’.

¹ *Safe Rottingdean Ltd v Brighton and Hove City Council EWHC 2632[86]*.

2.23 This policy position is also supported by paragraph 197 of the NPPF, which states that when determining applications planning authorities should consider:

the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

the desirability of new development making a positive contribution to local character and distinctiveness.

2.24 Paragraph 207 of the NPPF states that not all elements of a Conservation Area will contribute to the significance of the area. Where a proposal will involve the loss of a building that contributes positively to the significance of the conservation area, this should be treated 'either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate'. The level of harm determined here should consider the relative significance of the building and its contribution to the significance of the conservation area as a whole.

NON-DESIGNATED HERITAGE ASSETS

2.25 Non-designated heritage assets are not protected by statutory provisions; however, they are given consideration in planning decisions through the NPPF.

2.26 Paragraph 203 of the NPPF states that:

The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application... Applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

BALANCING HARM

2.27 If development proposals have no harmful effect on the significance of any identified designated asset, then 'conservation' (as defined in the Glossary to the NPPF) is achieved. If the proposals enhance or benefit that significance, or enhance our ability to appreciate that, then these benefits attract significant weight as a matter of policy.

2.28 If, on the other hand, the proposed development is held to cause harm to the significance of a designated heritage asset, such harm should be categorised as either less than substantial or substantial (NPPF paragraphs 202 and 201 respectively), and within each category the extent of harm should be clearly articulated (Planning Practice Guidance or 'PPG' paragraph 18).

2.29 The nature and extent of harm is important to ascertain because that analysis informs the balancing out of any harm under the terms of paragraph 202. Underpinning this approach is the principle of proportionality. Whilst any harm to a designated asset is 'weighted harm', it is important for the decision maker to assess the extent, nature or degree of harm through the exercise of planning judgement. This principle is articulated in the Mordue² judgment, and its application is demonstrated in the Citroen decision³.

2.30 In either case, if a proposal would result in harm to the significance of a designated heritage asset, great weight should be given to the asset's conservation (NPPF paragraph 199), meaning the avoidance of harm and the delivery of enhancement where appropriate. Notwithstanding the 'great weight' provision, it would be unreasonable for an impact that is minor in nature or limited to lead to a refusal of permission. What matters, then, is the nature and extent of any harmful impact.

2.31 Any harm to the significance of a designated heritage asset should require 'clear and convincing justification', as per NPPF paragraph 200. A clear and convincing justification does not create a freestanding test requiring the demonstration of less damaging alternatives. To the extent that there is a test it is to be found in NPPF paragraphs 201 (in the case of substantial harm) and 202 (in the case of less than substantial harm).

2.32 In either case, and particularly looking at less than substantial harm, the clear and convincing justification the Framework requires is thus made out through no more than the countervailing public benefits delivered by a proposal. Public benefits can include heritage benefits and can also include benefits to the way an area appears or functions or land use planning benefits.

² Mordue v SSCLG [2015] Civ 1243.

³ APP/G6100/V/19/3226914

3.0 HISTORIC DEVELOPMENT

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HISTORIC DEVELOPMENT

BRIEF HISTORY OF HOLBORN AND CHANCERY LANE

- 3.1 The medieval settlement of Holborn grew up around the Roman road running west from the City and comprised ribbon development, large manors and semi-rural open land until the end of the 17th century. Initial growth in the area was stimulated partly by the Inns of Court, which were founded in existing manor houses to the north and south of High Holborn, and were interspersed with smaller houses and tenements.
- 3.2 By the mid-17th century, as the area grew in wealth, the larger institutions were increasingly being hemmed in by tradesmen's houses, tenements, shops, and markets. This pattern of development created the dense network of alley ways and courts which still characterise the area. Despite the increased density of development, the large houses and institutions in the Chancery Lane area were not affected by the Great Fire of 1666.
- 3.3 From the early 18th century, Holborn and the environs of Chancery Lane became increasingly urbanised through a mix of commercial and residential development to accommodate for a rapidly expanding population.
- 3.4 The 19th century did not bring to the area the civic improvements and significant changes to street patterns that evolved in much of the rest of the City. Instead, development was driven by the demise of the Inns of Chancery and the rise of the West End, the latter presaging the relocation of fashionable society away from Holborn. After this time, Holborn came to be increasingly defined by its mixed commercial and institutional character, with residential properties either taken over by institutions or used for slum housing.

- 3.5 In the late 19th and early 20th century, extensive redevelopment on High Holborn introduced buildings of a more commercial character and greater scale. The Prudential Assurance Building (Grade II*) constructed between 1885 and 1901, the Patent Office and Library (Grade II*) constructed between 1890 and 1912, and No. 31-33 High Holborn (within the Site), completed in 1900, are examples of this period of Edwardian commercial development.
- 3.6 During the Second World War, Holborn lost one seventh of its building stock to bomb damage and the fine grain of historic development was eroded by larger scale redevelopment in the post-war period. This remains particularly evident today in the swathe of post-war development between Fetter Lane and Farringdon Street, to the east of the Site.

DEEP LEVEL AIR RAID SHELTERS

- 3.7 The Kingsway Exchange Tunnels originated as one of eight deep-level air raid shelters constructed during the Second World War to provide shelter to Londoners during aerial bombing attacks. Ten of these shelters were planned, at Belsize Park, Camden Town, Chancery Lane, Goodge Street, Stockwell, Clapham North, Clapham Common, Clapham South, Oval and St Paul's. The ten deep-level air raid shelters were intended to house a total of 100,000 civilians; however, the shelters at Oval and St Paul's were not completed and the capacity of the others were reduced to 8,000 each to improve the conditions of the tunnels. The Oval site was prone to flooding and the St Paul's tunnels came too close to the foundations of the cathedral.

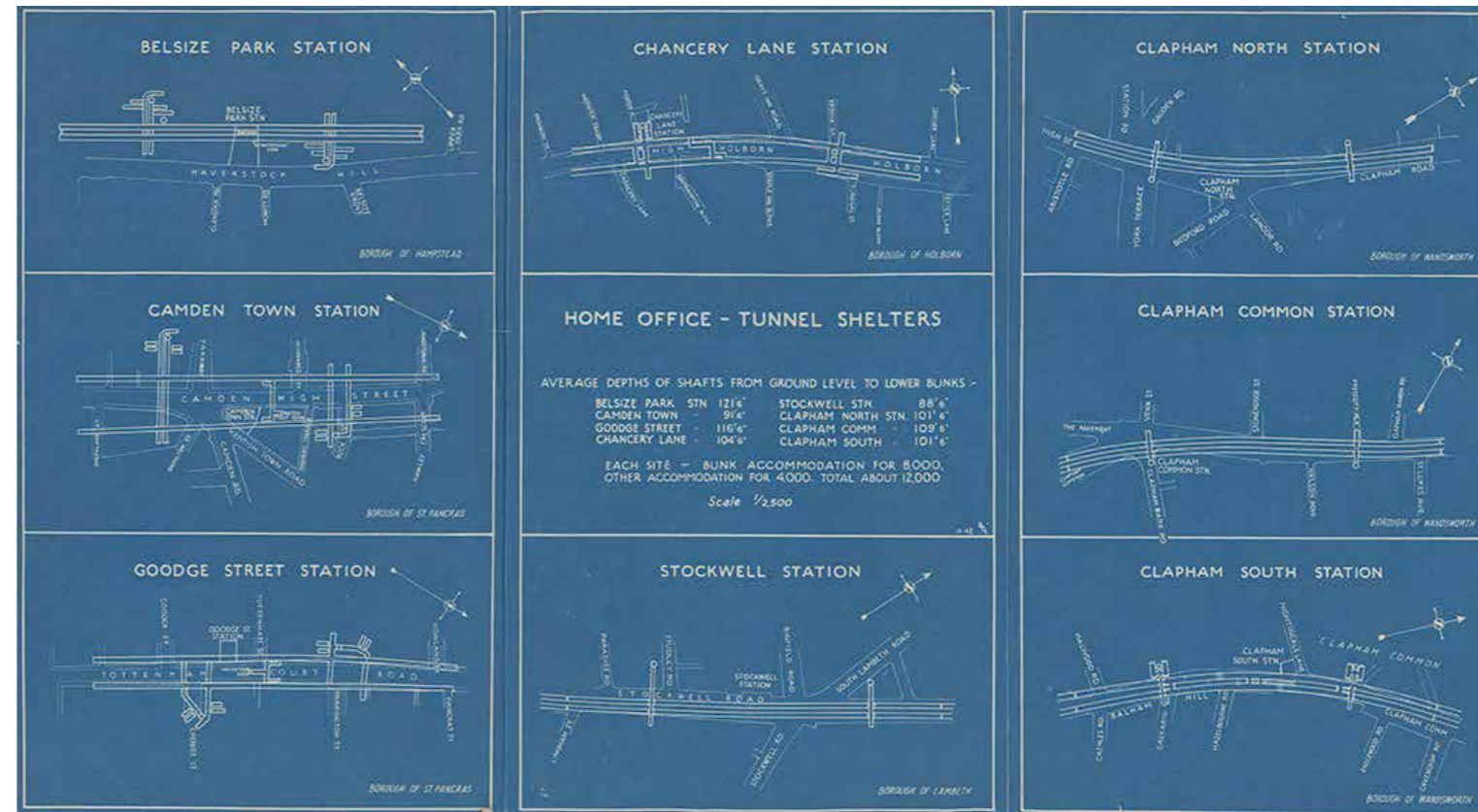


Figure 3.1 Blueprint drawing of eight deep level shelters constructed in London during the War (source: London Transport Museum)

3.8 The location of the deep level shelters coordinated with underground stations on the Northern and Central lines. The reason for this was means of access in densely developed residential and commercial areas and the planned future use of the tunnels as bypass routes for fast trains. This planned use was never fulfilled but was the reason for the diameter of the tunnels as built. As extensions to existing tube stations, it was hoped that deep level shelters would alleviate pressure on tube stations already used as air raid shelters. The location of the shelters was intended to cover a large area of London, north and south of the River Thames. The majority of the tunnels are located in predominantly residential areas, with the exception of Chancery Lane and Goodge Street which are located in predominantly commercial and institutional areas of central London.

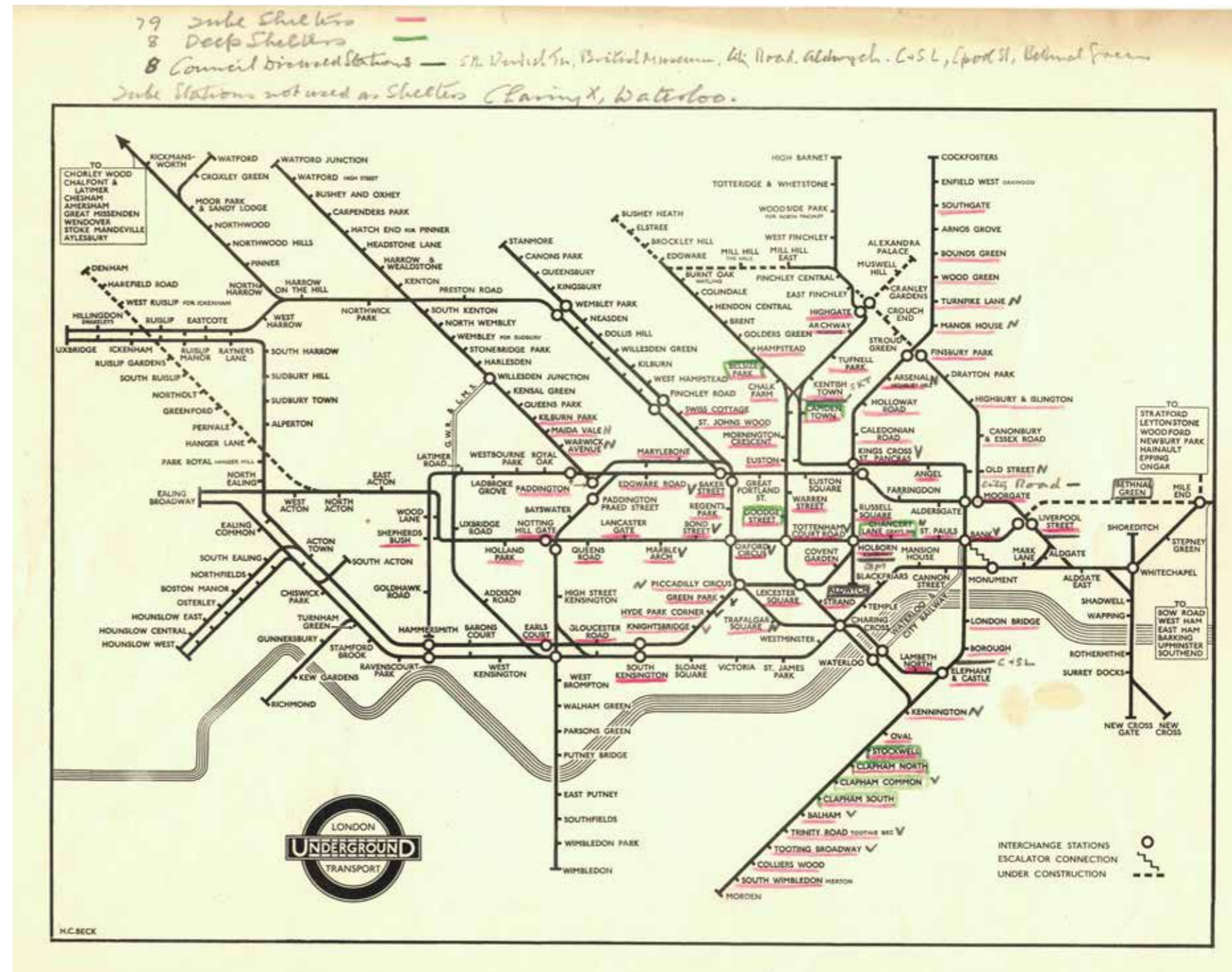


Figure 3.2 Map of London Underground marked up with location of station shelters and deep level shelters, 1942. Station shelters are highlighted in pink and deep level shelters highlighted in green (source: London Transport Museum)

- 3.9 London Transport were instructed to start construction on the tunnels in response to the start of the Blitz in 1940. The provision of manual labour and construction materials was constrained during the War and the eight deep-level shelters were not completed until 1942, when aerial bombing was not such a prevalent threat. The deep-level shelters were instead converted to other uses, with only five eventually opening to the public in 1944 when the Blitz intensified. While the deep-level shelters were under construction, tube stations continued to be used as air raid shelters by thousands of Londoners.
- 3.10 The deep-level shelters were planned to be linked with existing tube stations and of the eight constructed, seven were on the Northern Line, and just one, Chancery Lane, was constructed on the Central Line. Four were completed to the north of the River Thames, and four to the south.
- 3.11 The tunnels are classified as deep-level at a depth of around 30m and were designed with the intention of converting them to transport use after the war. Each shelter comprises two principal tunnels which run in parallel and have a length of 1400ft, connected by cross passages. The diameter of these tunnels is 16ft 6 inches, and each was intended to be split into two floors of accommodation. In those used as civilian shelters, the upper and lower floors were further divided into sub-shelters. Each sub-shelter was lined with metal bunk beds and the deep-level shelters were equipped with medical centres, canteens, toilet blocks, wardens' posts, control rooms and staff accommodation. Each shelter had eight canteens located at cross passages and the toilet blocks were located in smaller diameter tunnels at right angles to the principal tunnels.
- 3.12 The deep-level shelters were typically designed with three sets of entrances. Each end had an entrance shaft, covered by pill boxes (many of which remain as surface structures today). The tunnels were accessed via these pillboxes at street level and spiral staircases descending vertically through the shaft. Toilets and other services were located at the base of these shafts. Each shelter also had a central access staircase that connected to the corresponding tube station.

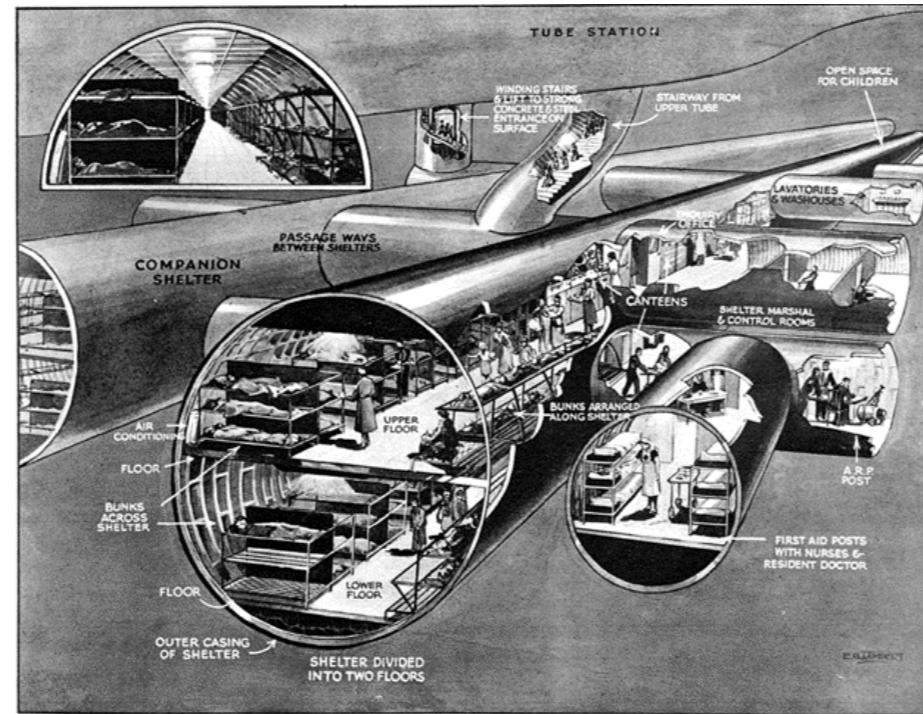


Figure 3.3 Cross section of deep level shelter arrangement and entry points.

CHANCERY LANE DEEP LEVEL SHELTER

- 3.13 The Kingsway Tunnel originated as the Chancery Lane deep-level shelter; one of the eight deep-level air raid shelters constructed by the British Government during the Second World War to provide protection to Londoners during the Blitz. These deep-level shelters were all linked with existing tube stations to make use of existing surface access.

- 3.14 As the name suggests, the Chancery Lane deep-level shelter was planned to connect to Chancery Lane station, which was the only Central Line station to benefit from a deep level shelter. Surface access was by staircase shafts emerging within the former Chancery Lane tube station at 31-33 High Holborn (the main entrance), which had been built in 1900 for the original section of the Central London Railway, and at No. 39 Furnival Street where bomb-damaged premises were demolished to make way. The Furnival Street entrance was covered by a circular concrete pill box, which was the standard entrance design for the other seven deep level shelters. A temporary construction shaft had also been opened in the roadway at the corner of High Holborn and Furnival Street. The third entrance, a staircase leading down to the centre of the tunnel system from Chancery Lane underground station, was constructed but never used by civilians.
- 3.15 The structure and arrangement of the Chancery Lane deep-level shelter was standard compared to the other seven constructed. It comprises two principal tunnels, which run in parallel and are connected by cross passages. The tunnels would have originally been split into two levels of accommodation. As the threat of aerial bombing had largely subsided by 1942, the Chancery Lane deep level shelter was never used for civilian shelter and was instead converted to 'Citadel' accommodation in 1944. At this time the tunnels were adapted to accommodate a reserve government headquarters in case of invasion or equivalent emergency.
- 3.16 The National Archives holds correspondence and plans dating from 1943-45, which provide some indication of how the Chancery Lane deep-level shelter was converted to Citadel accommodation and occupied during the final years of the war. As early as January 1943 it appears that both the Inter Services Research Bureau (Special Operations Executive) and Combined Operations had an interest in using the Chancery Lane shelter, part of which had already been allocated to the operational staff of the London Civil Defense Region and the Ministry of Works.

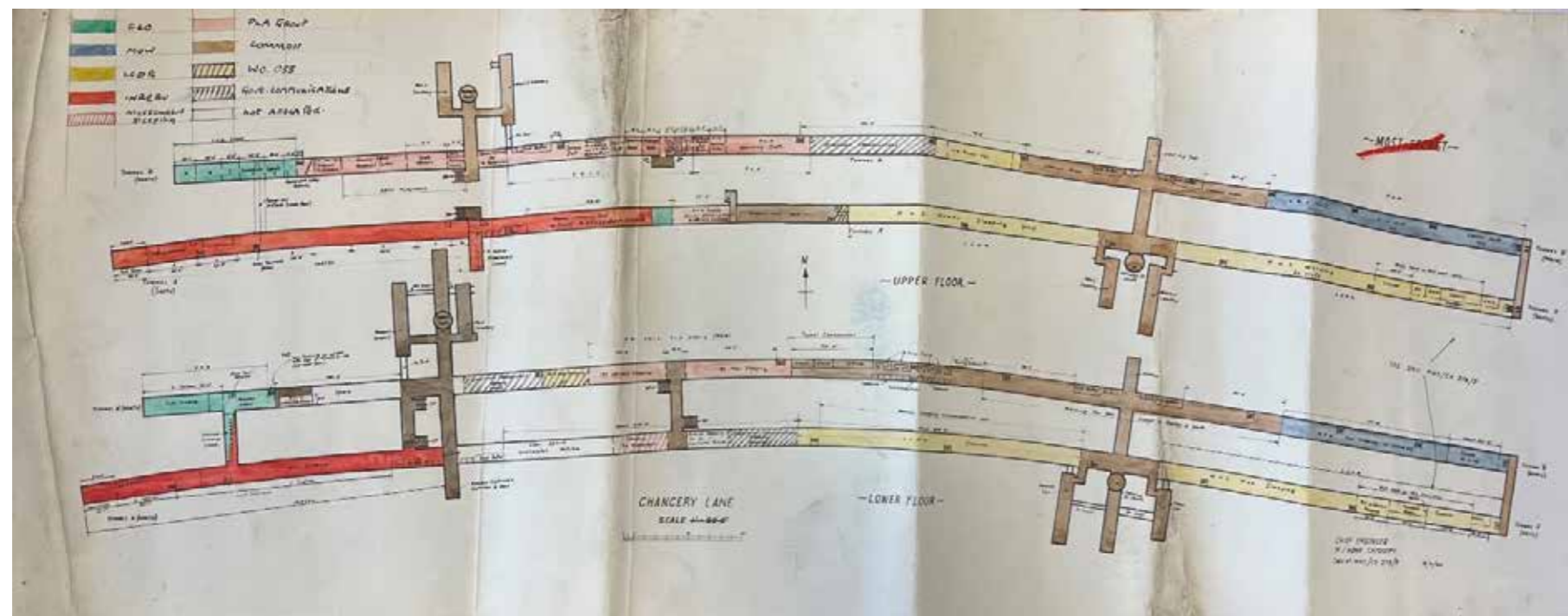


Figure 3.4 Proposed plan of the 'citadel' accommodation at Chancery Lane Deep Level Shelter, 1944 (source: National Archive)

- 3.17 A plan of the shelter from 1944 provides some indication of how these departments were arranged throughout the tunnel system. The available correspondence details the various requirements of individual departments ranging from personnel numbers and access protocols through to telecommunication requirements and subdivision of office accommodation. The 1944 plans suggest that at this time, the tunnels remained split into upper and lower floors and large sections of the tunnels were still dedicated to sleeping quarters, and retained the bunks installed for civilian shelter. In other areas, bunks were seemingly removed, and partitions inserted to create separate and private spaces associated with the operation of these government and military bodies.
- 3.18 The Inter Services Research Bureau and Combined Operations were both critical to the success of the British war effort and so their association with the tunnels is of some historic interest. Due to the clandestine nature of their operations, it is difficult to ascertain the extent of their activities in the shelter; beyond its stated use as a permanent reserve station intended for critical operational staff. However, it is clear from the available correspondence that both departments made sufficient arrangements to accommodate a relatively large number of personnel within the shelter.

- 3.19 In terms of surviving physical material, beyond the form and materiality of the original deep-level shelter, the tunnels no longer contain any features dating from the Second World War.

PUBLIC RECORD OFFICE USE

- 3.20 Immediately after the war, the east-west tunnels were briefly used for storage by the Public Records Office (now the National Archives). A report in the Evening Standard on Thursday 10th January 1946 indicated that the first books deposited within the tunnels were official books and documents evacuated from London during the war. The former bunks that lined the corridors of the tunnels were converted to create 80,000ft of shelving. The Public Records Office vacated the tunnels in 1951.

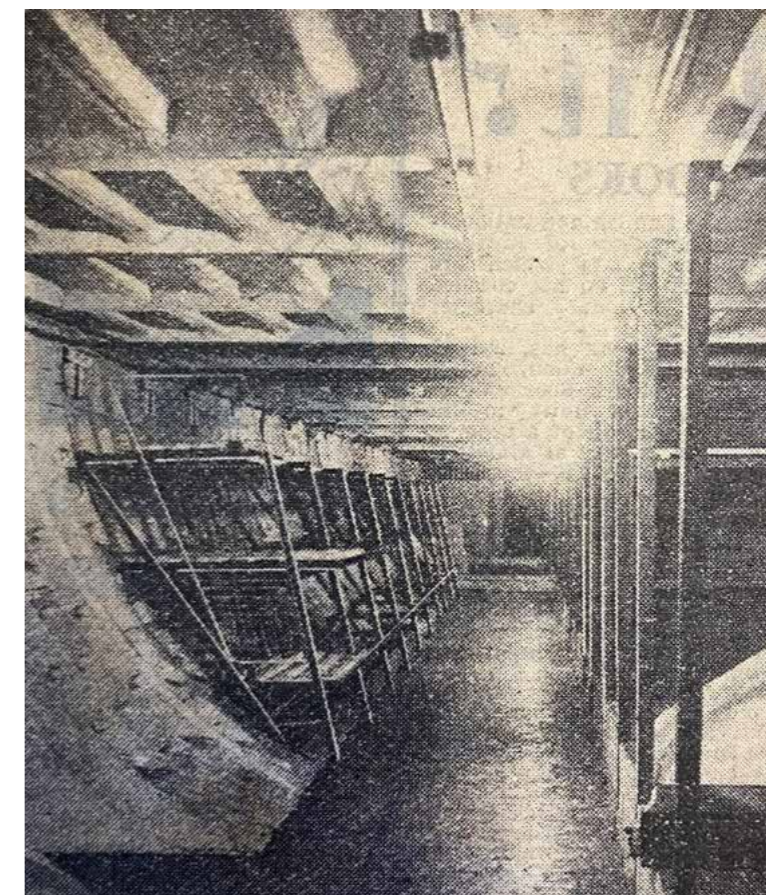


Figure 3.5 Interior of the Chancery Lane deep level shelter, 1946.

KINGSWAY EXCHANGE

- 3.21 In 1949 the Chancery Lane shelter was given over by the General Post Office to be converted for use as an underground telephone trunk exchange. It formed part of a larger communications project being planned by the Post Office that also included the construction of two more underground trunk exchanges: Birmingham Anchor and Manchester Guardian. According to the investigative journalist, Duncan Campbell, this combined network was an important facet of Britain’s Cold War defences as a strategic reserve communications system.
- 3.22 Planning for the installation operations began in early 1950, with construction work starting a year later following the departure of the PRO. The works were carried out in complete secrecy under Emergency Powers. The tunnel system was extended through the construction of four large-diameter north-south tunnels (referred to in contemporary and modern documentation as avenues) under Staple Inn to accommodate the automatic switching equipment. It was at this time that the most southerly shaft was constructed, using a bombed site at Tooks Court. This shaft was used for the construction of the avenues and then sealed.
- 3.23 The Post Office was also responsible for the construction of a goods lift in Furnival Street around this time, allowing delivery of large items of apparatus by road, and the building which currently stands at No. 39 Furnival Street. The equipment contractor was Siemens Brothers Ltd, which began its own planning and manufacture ready for the time when the full access to the new accommodation was to be ready, on 1st July 1952. This period of works to the Chancery Lane shelter is extensively documented through photographs held by the BT Archive. The interior of the tunnels was stripped of 1940s fabric, including bunks, at this time and the concrete partition floor removed throughout the east-west tunnels to accommodate large machinery and plant associated with telecommunications.
- 3.24 Along with the extensive telecommunications equipment, Kingsway also benefitted from an artesian well for water, emergency rations and accommodation in the event of a nuclear attack, and staff facilities including a restaurant, tearoom, licensed bar and billiard room. Artificial windows and scenery were painted onto rest-room walls (see Figure 6 and 7).

- 3.25 The new exchange was called Kingsway but known to Post Office staff more generally as TZK (Trunk Zone Exchange Kingsway) or LTK (London Trunk Kingsway). The exchange was not particularly close to the road named Kingsway but this conformed to an established Post Office procedure of giving important facilities names that had a geographical meaning but a deliberately inaccurate guide to their location.
- 3.26 Following installation and commissioning, the exchange opened to traffic on 30th October 1954, marking a significant milestone in the progress of inland trunk switching mechanisation in Britain. It is described by Duncan Campbell as follows:
‘With a permanent staff of one hundred and fifty, it connected over thirteen thousand long-distance lines. It had its own 1.5mw generator, and oil supplies for six weeks’ operation stored in the tunnels. All lined to and from the exchange ran via the deep-level tunnels, and through them to the underground or Post Office railways.... By the time Kingsway was in full operation, it was the major long-distance exchange in the British telephone system.’
- 3.27 In 1956, Kingsway became the UK termination point for TAT-1, the first transatlantic telephone cable which was used as a hotline to the USA.
- 3.28 In the 1980s, the reorganization and expansion of the London telephone system diminished the need for central London tunnels and exchanges. From c.1980 Kingsway ceased to be used as a trunk exchange and the complex was used for other purposes by British Telecom. However, in the early 1980s the tunnels were subject to a phased closure after blue asbestos was found. By 1995 only the main distribution frame was still in service. In October 2008, BT announced that the tunnels were for sale.
- 3.29 Some physical fabric remains from the Kingsway Exchange, surviving elements largely comprises telecommunication machinery and plant and fragments of the staff facilities such as restaurant interiors.



Figure 3.6 Dining room, 1957 (source: BT Archive)



Figure 3.7 Dining room, 2023 (source: Hallgrave Ltd)



Figure 3.8 Main Distribution Frame, 1957 (source: BT Archive)

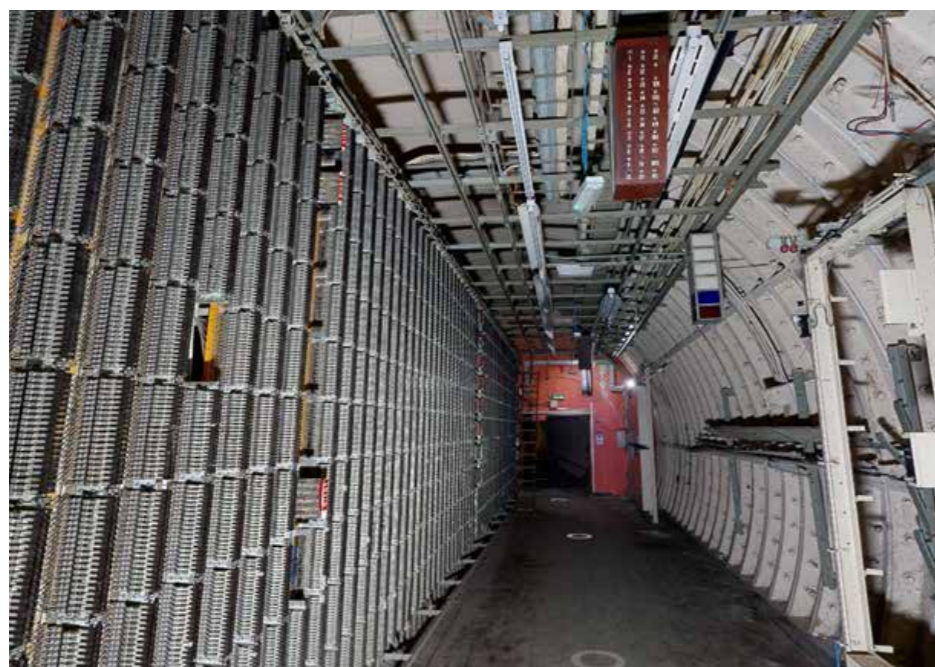


Figure 3.9 Main Distribution Frame, 2023 (source: Hallgrave Ltd)

4.0

HERITAGE ASSETS WITHIN THE SITE

THE LONDON TUNNELS

HERITAGE ASSETS WITHIN THE SITE

- 4.1 Below, we provide an appraisal of the heritage assets (designated and non-designated) within the Site. An Assessment of the significance of buildings in the wider vicinity is set out at **Section 5.o**.
- 4.2 The Glossary of the NPPF provides a definition of significance. Here, the 'heritage interest' of an asset may be archaeological, architectural, artistic or historic. Significance is derived not only from the physical presence of the building, but also from its setting.
- 4.3 The NPPF (2023) defines significance as:
'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'
- 4.4 The NPPF underpins our assessment of the significance of each building. We have also had regard to Historic England's Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015) ("GPA 2") and Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) ("GPA3").
- 4.5 The Site is located across the Chancery Lane and Bloomsbury Conservation Areas, and the impact of the Proposed Development on their respective character and appearance is the principal heritage consideration.
- 4.6 The Site also contains three built components that are of some historic and architectural interest: 39 Furnival Street (City of London); and No. 31-33 High Holborn (LB Camden). Each of these built elements is considered to be a non-designated heritage asset both in their own right and, in the case of above-ground structures, on account of their positive contribution to the respective CAs. They are, therefore, included within this assessment in accordance with paragraphs 203 and 207 of the NPPF.

DESIGNATED HERITAGE ASSETS

BLOOMSBURY CONSERVATION AREA

- 4.7 The Bloomsbury Conservation Area was first designated in 1968 and its boundary has since undergone several extensions. The Bloomsbury Square Conservation Area Appraisal and Management Strategy was adopted by the Council in April 2011.
- 4.8 The conservation area covers an area of approximately 160 hectares and is delineated by Euston Road to the north, Tottenham Court Road to the west, Lincoln's Inn Fields to the south and Grays Inn Road to the east.
- 4.9 Bloomsbury is a product of London's early expansion northwards, which began in the 1660s and continued through the Georgian and Regency periods to around 1840. This period is of major historical importance in the context of London's development and is manifest in the consistency of the street pattern, spatial character, and predominant building forms that make up the conservation area.
- 4.10 The character of the conservation area resides principally in:
- The planned 18th century residential street layout, comprising formal landscaped squares and an interrelated grid of streets;
 - Terraces of classically derived townhouses, many with mews; and
 - Major institutional buildings and uses associated with hospitals, universities and legal practice, as well as cultural institutions including museums, and offices.
- 4.11 The conservation area derives further significance from its size and complexity, which is emphasised by the subtle variations of the different character areas within it (14 in total). These character sub-areas generally share common characteristics to assist in defining those features that contribute to the CA's wider special interest.

- 4.12 The Site is located within 'Sub Area 9: Lincoln's Inn Fields/Inns of Court/High Holborn', in the south-east corner of the Bloomsbury Conservation Area. Sub Area 9 comprises a section of High Holborn, Lincoln Inn to the south of High Holborn and Gray's Inn to the north. This area is characterised by the large-scale institutional buildings, interconnected squares, gardens, courtyards and narrow passages of the Inns of Court. High Holborn is historically important commercial centre characterised by four to nine storey buildings of varying architectural style from the 19th to 21st centuries. The architectural and historic interest of the area is illustrated by the high number of listed buildings. In addition to these listed buildings, several "Positive Buildings" are identified within the conservation area appraisal, including No. 31-33 High Holborn.
- 4.13 There are other, more recognisable, remnants of the deep-level shelter programme elsewhere within the Bloomsbury Conservation Area. In Sub Area 4, which is located on the western boundary of the Conservation Area, the Eisenhower Centre is identified as a positive contributor to the character and appearance of the conservation area. The Eisenhower Centre is one of two entrances to the Goodge Street deep level shelter, which was reportedly converted to a Headquarters for the Allied armed forces after 1942. The appraisal identifies social and historic interest in the utilitarian "pill-box" structure covering the entrance to the deep level shelter, in its association with the Second World War.
- ### CONTRIBUTION OF SETTING TO CHARACTER AND APPEARANCE OF THE CONSERVATION AREA
- 4.14 Sub Area 9 of the conservation area is bound to the east by the City of London borough boundary and the Chancery Lane Conservation Area. The setting of this sub area contributes to its character and appearance in the continued pattern of narrow streets and large institutional complexes associated with the law professional, notably Barnard's Inn and Staple Inn, commercial premises, and public buildings.
- 4.15 Owing to the narrow street pattern and consistent building height, views out of the conservation area are limited, except for east-west views on High Holborn, and the character and appearance of the area is best experienced from within.

- 4.16 The conservation area is bound to the south by the Camden Borough boundary on the south side of Lincoln's Inn Fields. To the south of the conservation area is the Strand Conservation Area within the City of Westminster. The buildings within the Strand Conservation Area contribute to the character and appearance of the Bloomsbury Conservation Area as large institutional and commercial buildings, particularly the Royal College of Surgeons (Grade II*) and Her Majesty's Land Registry Building (Grade II) on the south side of Lincoln's Fields.

CONTRIBUTION OF SITE TO CONSERVATION AREA

- 4.17 The west end of the tunnels, including the Fulwood Place pedestrian entrance shaft are within the boundary of Sub Area 9 of the Bloomsbury Square Conservation Area.
- 4.18 The entrance to the tunnels from the north side of High Holborn is located within a covered walkway at ground floor level of 31–33 High Holborn. No. 31–33 High Holborn is identified in the conservation area appraisal as a positive contributor to the character and appearance of the conservation area. The building represents a period of commercial development in the Edwardian era and its positive contribution to the conservation area derives principally from its façade treatment and scale, as well as its original function as a station entrance. Its later use as an entrance to the Chancery Lane deep-level shelter is of some local historic interest, but this is not readily apparent from the street.
- 4.19 At present, the existence of the tunnels running beneath the conservation area is unknown to the public and they make no material contribution to the character and appearance of the conservation area.



Figure 4.1 Present contribution of Site to CA

CHANCERY LANE CONSERVATION AREA

- 4.20 The Chancery Lane Conservation Area was first designated in 1994 and extended in 2007. The Chancery Lane Conservation Area Character Summary and Management Strategy SPD was adopted in February 2016.
- 4.21 The conservation area is bound approximately by High Holborn to the north, Fleet Street to the south and Chancery Lane to the west, and Fetter Street to the east.
- 4.22 The conservation area boundary incorporates Chancery Lane, which formed in the 12th century. From this period until the 17th century, the area was characterised large institutional buildings associated with religious groups and the law professional, and open land. In the 17th and 18th centuries, the area grew in prosperity and large institutional buildings became surrounded by residential and commercial development. This "hemming in" of the institutional buildings created the networks of narrow roads, alley ways and courts that are distinctive to the conservation area today.
- 4.23 The conservation area appraisal defines the character of the conservation area as follows:
- An exceptional span of building ages and styles, resulting in a townscape of arresting contrasts;
 - Significant historic associations with the legal profession, with origins as a centre for medieval legal administration;
 - The collegiate surroundings of Staple Inn and Barnard's Inn, which incorporate rare secular medieval survivals;
 - A historic association with educational establishments that has persisted to the present time (e.g. the Inns of Court, Birkbeck College, King's College London);
 - The site of the Knights Templars' first precinct and church in London (at Southampton Buildings);
 - A well-preserved and easily legible historic street network;
 - Monumental 19th century Victorian public buildings in a range of styles;
 - One important early act of conservation (Staple Inn north range) and several buildings of varying periods associated with a single company's patronage (Prudential Assurance Co.);
 - Well-considered 21st century insertions into a historic context.

4.24 The urban grain of the conservation area comprises a relatively tight network of streets, extending south from High Holborn towards Fleet Street, and a regularity of built form. Chancery Lane is a historic north-south route which dates to the 12th century and forms the spine of the conservation area. The north of the conservation area is defined by its relationship to High Holborn, a historic thoroughfare leading west from the City that has been extensively modernised by 19th and 20th century redevelopment. The busy character and extent of modern infill development detracts from the varied historic frontages which line the road. The southern part of the conservation area is characterised by larger buildings and open spaces.

VIEWS AND VISTAS

4.25 The Conservation Area Appraisal identifies 22 views and vistas within the conservation area, comprising a combination of intimate local views within the surviving historic lanes, alleys and courts, as well as longer views via Holborn and Chancery Lane.

4.26 The part of the Site within this CA (39 and 40 Furnival Street) does not feature prominently in any of the specific views identified within the Appraisal. The location of these buildings at the north end of Furnival Street means they would appear in the midground of View 13, which looks north along Furnival Street from Cursitor Street towards High Holborn. However, owing to the narrow viewing corridor and interposing development only the principal elevations of 39 and 40 Furnival Street are visible.

4.27 Nevertheless, both buildings contribute to the overall impression of continuous frontages which line both sides of the narrow street and, therefore, help to create a sense of enclosure that is typical of the lanes and alleys which characterise much of the CA.

CONTRIBUTION OF SETTING TO CHARACTER AND APPEARANCE OF THE CONSERVATION AREA

4.28 Owing to the enclosed nature of the street grid and relative heights of the buildings within it, the conservation area is mainly experienced from within its boundary. The Conservation Area Appraisal identifies that broad, open views are limited in the conservation area to the buildings along Holborn and the open space around the former Public Records office.

4.29 The conservation areas setting is defined by its location on the western edge of the City of London, and its northern and eastern boundaries correspond with the City’s boundaries. Two-thirds of the western boundary is shared with the London Borough of Camden, which also borders to the north; the remainder of the western boundary is with the City of Westminster. In both cases, the non-City townscape provides an important setting for the buildings within the conservation area, and vice-versa.

4.30 The eastern boundary of the conservation area is set against a large area of large-scale 20th and 21st century redevelopment, which is indicative of the extensive bomb damage sustained here during the Second World War. This area of development separates the conservation area from the City’s historic core. Here the setting of the conservation area comprises a stretch of large-scale contemporary development, comprising a high proportion of glazing and other modern materials, which extends from Holborn Circus and continues along New Fetter Lane, and makes a neutral contribution to the setting of the conservation area.

CONTRIBUTION OF SITE TO CONSERVATION AREA

4.31 The east end of the Kingsway Exchange Tunnels, including the Furnival Street goods entrance (No.39) and the adjoining building at No. 40 Furnival Street, are located on the north side of the Chancery Lane Conservation Area, close to High Holborn.

4.32 The only element of the historic tunnel complex that is visible within the conservation area is the goods entrance at No. 39 Furnival Street. This two-storey building was constructed in 1952 and contains a lift shaft leading to the east end of the tunnels. The façade of the building is utilitarian in style, with concrete tiles to the ground floor and brick to the upper storey. There is a large concrete ventilation grille to the upper storey and the brackets of an iron hoist, which was removed in 2018-9. No. 39 is of a different architectural style and height to the other buildings on Furnival Street, notably the former Patent Office by architect Sir John Taylor at No. 10, which is an Edwardian building of fine architectural detail and high fenestration.

4.33 As a piece of infrastructure, the building at No. 39 differs from the predominantly commercial character of Furnival Street, this is highlighted in the conservation area appraisal which states that No. 39 contributes a ‘strikingly industrial aesthetic to the street’. This contribution is considered to be positive to the character and appearance of the conservation area and is manifest through the building’s functional appearance, scale and materiality.

4.34 The adjoining building at No. 40 Furnival Street is a six-storey commercial building, constructed in the late- 20th century, and is unrelated to the tunnels. The principal façade comprises pale brick cladding to the ground floor and red brick upper storeys. The façade is dominated by a three-storey glazed bow which protrudes from the established building line of Furnival Street. No. 40 makes a neutral contribution to the character and appearance of the conservation area on account of its modern construction and limited architectural quality.



Figure 4.2 Present contribution of Site to CA

NON-DESIGNATED HERITAGE ASSETS

NO. 39 FURNIVAL STREET

- 4.35 The building that currently stands at No. 39 Furnival Street was constructed in the early 1950s, during the conversion of the deep-level shelter to a telephone trunk exchange under the General Post Office. As described, the façade of the building is utilitarian in style, with concrete tiles to the ground floor and brick to the upper storey. There is a large concrete ventilation grille to the upper storey and the brackets of an iron hoist, which was removed in 2018–9.
- 4.36 In 1940, bomb damage was sustained to the buildings that previously occupied the Site and No. 39 and the neighbouring properties were demolished. Between 1940 and 1942 an air raid shelter was constructed under High Holborn, with a primary entrance at No.31–33 High Holborn and within the subsurface Chancery Lane tube station. The third civilian entrance was constructed on the cleared site at No. 39. Like the other seven deep level shelters constructed, this entrance was covered by a circular “pill box” with square brick ventilation shaft. This shaft was never used by civilians for the intended purpose.



Figure 4.3 Photo of No. 39 Furnival Street



Figure 4.4 Aerial photograph of the civilian pillbox entrance to the Chancery Lane deep level shelter on Furnival Street, September 1945 (source: Historic England)



Figure 4.5 OS Map, 1951 (source: National Library of Scotland)



Figure 4.6 Construction of the goods shaft and No. 39 Furnival Street, 1952 (source: BT Archive)

4.37 In 1952, the pill box was demolished and the shaft was widened to accommodate a goods lift and a new frontage was constructed to infill the plot. This shaft was used as a goods entrance, allowing delivery of large items of apparatus by road. The 1951 OS Map at Figure 14 shows the Site as a vacant plot, during the construction of the goods lift and new façade. The photograph at Figure 15 shows the shaft and rear of the façade of No. 39 Furnival Street under construction in 1952.

4.38 The building is of some historic interest as a functional element of the Kingsway telephone trunk exchange, which formed part of a national communication system during the post-war period. This interest is manifest principally in the street-facing façade, which alludes to the historic function of the building while maintaining an unobtrusive presence on Furnival Street. The design of the building differs from earlier shaft entrances associated with the other deep level air raid shelters in London. This difference signifies its later construction date and a desire to maintain the secrecy of the tunnels. The utilitarian façade of the building is indicative of its function as a piece of infrastructure, but its architectural treatment serves to contextualise it in the surrounding streetscape. The façade and form of the building is intentionally unobtrusive, respecting the historically narrow building plots and materiality of Furnival Street, particularly at the time of construction. However, it is precisely because of this unobtrusive character that the historic interest described above is not readily apparent.

NO. 31-33 HIGH HOLBORN

4.39 No. 31-33 High Holborn is identified as a “Positive Building” in Sub Area 9 of the Bloomsbury Conservation Area.

4.40 The six-storey commercial building was constructed in 1900, to the designs of Delissa Joseph, a well-known architect in London at the time. It has some architectural interest for its redbrick elevations which feature terracotta window surrounds. The principal façade is asymmetrical, comprising five bays, a gabled roofline and two four storey bay windows. The left side bay forms a covered archway to Fulwood Place. The ground floor has a different materiality, featuring pilasters, arched windows and a decorative frieze. There are modern shopfronts of poor quality to the ground floor façade, which detract from the architectural quality of the Edwardian office building.

4.41 The ground floor of No. 31-33 originally served as the ticket hall and entrance to the Central London Railway underground station at Chancery Lane, which opened in July 1900. The station building was designed by Harry Bell Measures and featured an entrance archway with decorative metal work and a glazed entrance canopy. The platform was originally served by lifts from the entrance at No. 31-33 High Holborn; however, this entrance became redundant in 1934 when a new entrance opened close to the junction of High Holborn and Gray’s Inn Road.

4.42 The former tube station was presumably chosen as an entrance to the deep level air raid shelter owing to its existing lift shafts. It is unclear when access to the lift shafts was moved from the ticket hall to the side entrance on Fulwood Place. The later wartime and post-war function of No. 31-33 High Holborn is less clear in the architectural expression of the building, owing perhaps to the clandestine nature of its operation. The entrance to the tunnels is located within the covered passage of Fulwood Place and the doorways have no architectural treatment.



Figure 4.7 Chancery Lane Station entrance at No. 31-33 High Holborn, 1914 (source: London Transport Museum)



Figure 4.8 Interior of Chancery Lane ticket hall at No. 31-33 High Holborn, 1928 (source: London Transport Museum)



Figure 4.9 New entrance to Chancery Lane tube station, 1934 (source: London Transport Museum)

4.43 The building, therefore, has some historic interest for its association with the development of London's underground railway network and latterly the Chancery Lane deep level air raid shelter, citadel accommodation and Kingsway Telephone Exchange. Despite the alteration and refurbishment of the ground floor façade after 1934, No. 31-33 High Holborn today retains much of the original character associated with the underground station, with the exception of modern plate glass and the loss of some architectural detailing. The Edwardian office building contributes positively to the commercial streetscape of High Holborn, and the character and appearance of the Bloomsbury Conservation Area more broadly as an early 20th century commercial building with attractive architectural detailing. There is, however, opportunity to improve the quality of the shopfronts and enhance the contribution of the building to the character and appearance of the conservation area.



Figure 4.10 Photo of No. 31-33 High Holborn today

KINGSWAY EXCHANGE TUNNELS

- 4.44 The historic development and structure of the tunnel system is outlined in Paragraphs 3.14 to 3.30.
- 4.45 The historic interest of the tunnel system is principally derived from its origins during the Second World War. The east-west tunnels were one of eight deep level shelters constructed to provide safe shelter to civilians in London during aerial bombing campaigns on the home front. Owing to delay in construction the tunnels were never used for their intended purpose and instead converted to house 'Citadel' accommodation in 1944, for use in the event of invasion or emergency. Alterations were made to prepare the tunnels for use by different government and military bodies; however, there is no longer any material evidence alluding to this use. Apart from the superstructure of the tunnels, no interior fabric remains from the Second World War and therefore there is no longer a tangible link to this historic interest.
- 4.46 In the early 1950s the tunnels were converted into a telephone exchange, for use on a national scale. This formed part of the wider expansion of Britain's domestic telecommunications network. The tunnels were adapted and extended under this use, with several tunnels constructed on a north-south axis, to the south of the 1940s tunnels. Remnants of the 1950s phase of use remain in the tunnels, largely comprising plant and machinery associated with the function and running of the Kingsway Exchange tunnels. The machinery installed here is understood to be standard for telephone exchanges of this kind. While the tunnels were one of three underground telephone exchanges used in Britain during the Cold War and at one point housed the first Transatlantic Cable which connected to the USA, there are no known features of note relating to this particular function. The surviving dining room interiors are of some historic and architectural interest in their application of mid-century style and the use of decorative design elements and murals, presumably intended to raise the spirits of those working underground at the telephone exchange. However, this area forms just a small part of a much larger now-vacant tunnel system.

5.0

HERITAGE ASSETS IN THE SETTING OF THE SITE

THE LONDON TUNNELS

HERITAGE ASSETS IN THE SETTING OF THE SITE

- 5.1 This section assesses the significance of heritage assets within the vicinity of the Site. Another salient heritage consideration is the indirect impact of the proposals on the setting of nearby listed buildings, neighbouring conservation areas, and non-designated heritage assets. Due to the location of the Site close to the boundary with London Borough of Islington, the study area is likely to encompass heritage assets located within both Camden and Islington.
- 5.2 The NPPF (which describes setting as the ‘surroundings in which a heritage asset is experienced’), defines the setting of heritage assets in very broad terms. Such a broad scope means that many development proposals may be held to come within the setting of a heritage asset. Most would agree however that aside from some generic inter-visibility, a great number of such proposals could not reasonably be held to engage with or alter the setting of heritage assets in a material way.
- 5.3 Owing to the nature and the height of the Proposed Development, the prevailing height of other buildings in the surrounding area, and the screening provided by the existing urban form, the viewing envelope for the Site is relatively restricted. There, the effect on the setting of surrounding built heritage assets is limited.

DESIGNATED HERITAGE ASSETS

10 FURNIVAL STREET AND ATTACHED RAILINGS, AND 25 SOUTHAMPTON BUILDINGS AND ATTACHED RAILINGS (GRADE II*)

- 5.4 The former Patent Office Library at 25 Southampton Buildings was listed in 1989, and 10 Furnival Street added to the listing in 1999.

- 5.5 The office occupies a large site comprising several distinct phases of construction. The building incorporated and replaced older buildings on Tooks’ Court, Staple Inn Buildings and Southampton Buildings. The programme of work to create the present building started in 1890, to designs by Sir John Taylor when he was the Office of Works’ principal architect. Construction continued after Taylor’s retirement in 1898 and thereafter it was supervised by Sir Henry Tanner and H. N. Weekes until it was completed in 1912. The block that is of primary concern here is Block 5, which has its principal façade on Furnival Street. This 18-bay block was constructed between 1902 and 1912. The five storey over basement building was constructed in yellow brick with stone quoins, pilasters, string courses and window surrounds. There are dutch gables to the roofline and a central porch with swan neck pediment and fanlight. Original decorative iron work railings run the full length of the Furnival Street façade.
- 5.6 The Furnival Street façade corresponds to the Southampton Buildings façade, known in the List Entry as Block 5, which was designed with the same architectural treatment by Sir John Taylor and completed by 1903.
- 5.7 The historic interest of the former Patent Office and Library is in its association with architect Sir John Taylor, known during his time at the Office of Works for several well-known buildings including works to Marlborough House, the War Office and the British Museum. Further historic interest derives from its function as the reading room and offices for the Patent Office, a government body established in 1852 to grant patents, trademarks and design rights.
- 5.8 The architectural interest lies in the phased development of the building which incorporates older fabric. The principal architectural interest of the building lies in the surviving interior spaces, such as the atrium Reading Room with two gallery floors with decorative iron work and Corinthian columns. Further interest is derived from the building facades which display handsome Victorian and Edwardian architectural detailing. The Furnival Street and Southampton Buildings façades are particularly elaborate in their architectural detailing and make a positive contribution to the historic commercial character of Holborn.



Figure 5.1 Former Patent Office Library

CONTRIBUTION OF SETTING TO SIGNIFICANCE

- 5.9 The setting of the former Patent Office Library comprises narrow streets and squares which are built up with large institutional and commercial premises. The setting contributes to an understanding of its interest in illustrating the historic development of the area. Historically, Holborn was characterised by large institutional buildings, notably the Inns of Court, and the network of narrow streets, squares and alleys that connected them. In the 19th century the commercial character of the area developed with the construction of large-scale office buildings with impressive street frontages. This is illustrated by the former Patent Office, the Public Record Office to the south on Chancery Lane (also by Sir Henry Tanner) and the Prudential Assurance offices to the north on High Holborn. There has been piecemeal redevelopment throughout Furnival Street and the surrounding area that has eroded the historic character of the area; however, these are generally respectful in scale and function.
- 5.10 The Site, specifically No. 39 and 40 Furnival Street are located to the west of the former Patent Office on the opposing side of Furnival Street. The buildings within the Site make a neutral contribution to the interest of the building, in that they are a later date of construction, a different materiality and scale to the listed building but overall sympathetic to the character of the wider area.

PRUDENTIAL ASSURANCE BUILDING (GRADE II*)

- 5.11 The Prudential Assurance Building was listed in 1972.
- 5.12 The office building was constructed between 1885 and 1901 to designs by Alfred Waterhouse. In 1930–32, the building was altered and extended by EM Joseph. The building is Gothic Revival in style and constructed in a distinct combination of granite, red brick and red terracotta. The building occupies an entire urban block within Waterhouse Square, with its principal façade to High Holborn. The building has a complex floor plan with an interconnected series of courtyards within the block. The Prudential offices occupy the former site of Furnival’s Inn, one of Holborn’s Inns of Court, demolished in 1897.
- 5.13 The principal elevation is four storeys over basement and symmetrical, with a central entrance bay defined by a square plan tower with corner turrets. The building is heavily ornamented with Gothic motifs including pointed arches, spires, oriel bay windows, tracery windows, turrets and niches. Above the pointed arch entrance way is a niche of Prudence, represented by a female holding a serpent and a mirror, the emblem for Prudential from 1848. There is a frieze running the length of the principal façade depicting a coat of arms for each of their offices.
- 5.14 The office building has historic interest as the headquarters of the Prudential Assurance, Investment and Loan Association, founded in 1848. The building was extended over several years and designed to reflect the prestige of the company. The building has further associations with architect Alfred Waterhouse, a prolific Victorian architect specialising in large institutional buildings and Gothic Revival architecture. Waterhouse was responsible for well-known works such as the Natural History Museum and Eaton Hall. The architectural interest of the building derives from its imposing street presence on High Holborn and high level of Gothic detailing. The building is a fine example of purpose-built commercial office architecture, designed to reflect the values of the company it housed. The building has strong national associations with other Prudential Assurance offices, demonstrating a national company identity.



Figure 5.2 Former Prudential Assurance office

CONTRIBUTION OF SETTING TO SIGNIFICANCE

- 5.15 The setting of the Prudential Office building contributes positively to its significance in its visual and spatial relationship with other large commercial and institutional sites on and around High Holborn. There are fragments of the historic streetscape that once characterised this commercial centre on the south side of High Holborn, which contribute to an understanding of the development of Holborn in the late 19th century. To the east and west of the listed building there is modern commercial development of a contrasting style and materiality, which detract from the architectural and historic interest of the building.
- 5.16 There is no meaningful visual or spatial relationship between the Site, No. 39 and 40 Furnival Street, or the listed building. The Victorian office building is best appreciated when looking north at the principal façade. The Site is a peripheral element in the wider setting of the building.

32-33 FURNIVAL STREET (GRADE II)

- 5.17 No. 32–33 Furnival Street was listed in 1974.
- 5.18 This is a pair of early 18th century townhouses of three to four storeys over basement. The buildings are typically Georgian in style and proportion, with architrave windows, string courses, parapet roofline and door-hoods.
- 5.19 The buildings have architectural interest as a rare example of 18th century domestic development in central London. The buildings have historic interest as an illustration of the history of Holborn which developed as a residential suburb to the city before it declined in popularity in the 19th century and became predominantly institutional and commercial in character. The townhouses derive group value from one another through their historic and visual association.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

- 5.20 The setting of the townhouses contributes positively to their interest only in the identifiable historic street pattern of Furnival Street and the surrounding area, and the visual relationship with No. 10 on the opposing side of Furnival Street. Furnival Street has undergone piecemeal redevelopment, meaning that the neighbouring buildings to the listed townhouses are modern constructions. These vary in architectural quality but overall respect the narrow plot size of the historic development.
- 5.21 The Site, specifically No. 39 and 40 Furnival Street are separated from the listed buildings by intervening development; however, they share a wider visual relationship in views looking north or south on Furnival Street. The Site contributes neutrally to the interest of the listed buildings in being of a later date of construction, style and materiality, but overall sympathetic to the character of these listed buildings.

6.0 ASSESSMENT OF PROPOSALS

THE LONDON TUNNELS

ASSESSMENT OF PROPOSALS

6.1 This section assesses the impact of the Proposed Development on the built heritage receptors identified in **Sections 4.0** and **5.0**. The assessment is informed by the ZTV, reproduced at **Figure 6.1**, which gives an indication of the potential visibility of the Proposed Development within the surrounding area.

DESCRIPTION OF PROPOSALS

6.2 The proposals represent the culmination of a detailed design process, including engagement with City of London, LB Camden, and Historic England. The Design and Access Statement prepared by Wilkinson Eyre Architects sets out the design rationale and should be read alongside this assessment.

6.3 A full description of the proposals is set out in the Design and Access Statement prepared by Wilkinson Eyre architects.

6.4 In summary, the Proposals are for:

- the refurbishment and re-activation of the Kingsway Exchange tunnel system as an underground cultural destination and event space;
- the redevelopment of buildings at 39 and 40 Furnival Street to provide a visitor entrance, circulation, and plant storage for the tunnels;
- the refurbishment of the shopfrontage to 31–33 High Holborn and provision of secondary access to the tunnels from Fulwood Place.

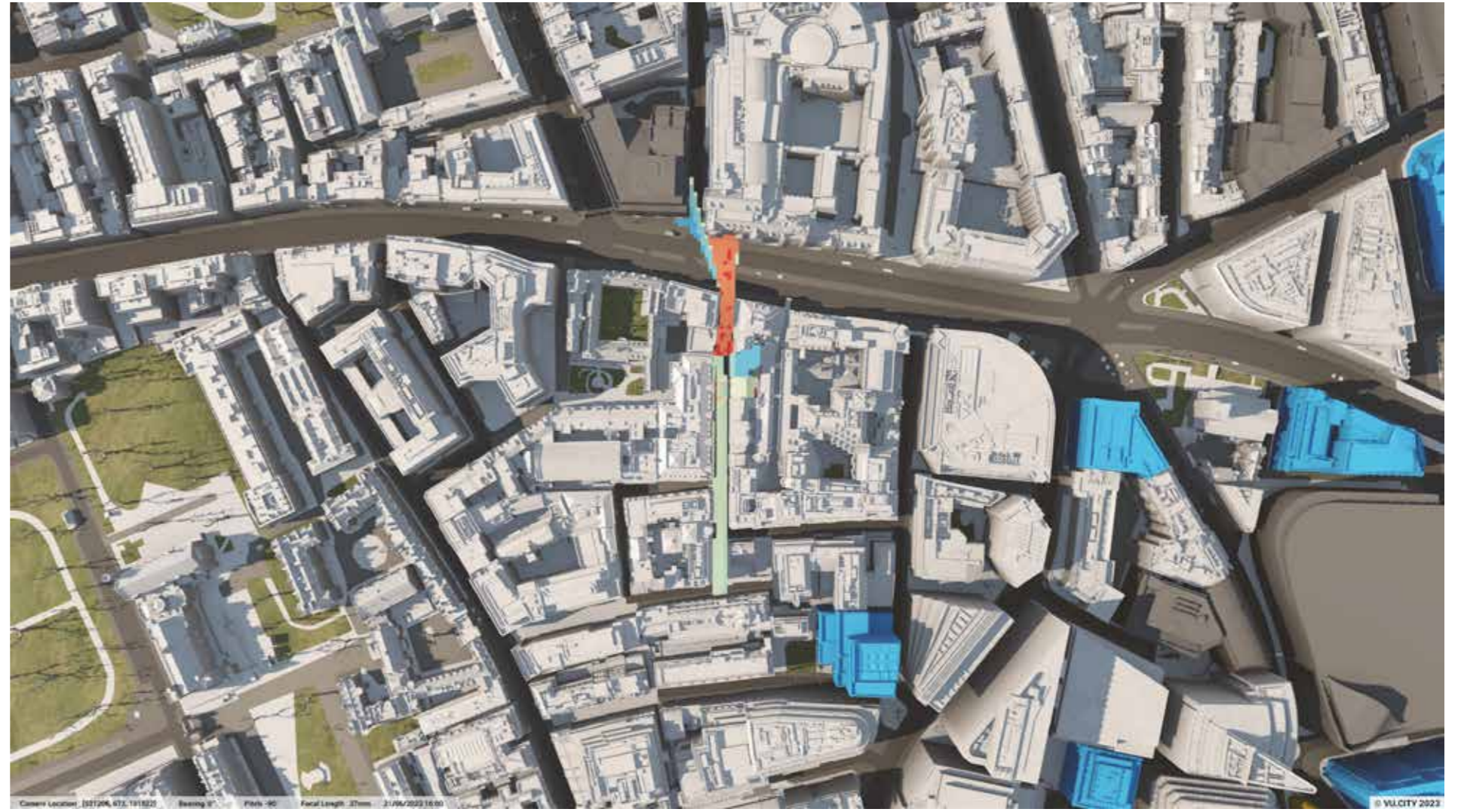


Figure 6.1 ZTV of the Proposed Development prepared by Montagu Evans.

PRINCIPLE OF DEVELOPMENT

- 6.5 In preparing the Proposals, the desirability of conserving heritage assets, in this case the Chancery Lane Conservation Area, the Bloomsbury Conservation Area, and the setting of nearby listed buildings, has been afforded great weight (consistent with paragraph 199 of the NPPF and with the approach commended by the Court of Appeal in Barnwell).
- 6.6 The principal considerations therefore comprise:
- The effect of the Proposals on the character and appearance of the Chancery Lane Conservation Area and Bloomsbury Conservation Area;
 - The effect of the Proposals on the non-designated heritage assets within the Site; and
 - The effect of the Proposals on the setting of nearby listed buildings.
- 6.7 The Site is located on the boundary of the City of London and the London Borough of Camden. The City's Local Plan acknowledges the City of London's position as a historical and cultural centre. Its vision, as out in Strategic Objective 3, is to support the continued development of the City as a cultural destination. This will be achieved, in part, through promotion of high-quality architecture and street scene, complementing and integrating the City's heritage assets.
- Camden's Local Plan has similar strategic objectives relating to strengthening its economy through culture, entertainment, and tourism, and promoting high quality, safe and sustainably designed buildings that preserve and enhance the unique character of Camden.
- 6.8 The Kingsway Tunnel system is a large-scale subterranean structure with an interesting history dating back to the Second World War. The tunnels themselves are no longer in operational use and now sit vacant. The lack of a long-term viable use poses a challenge to its conservation; as stated in the PPG, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.⁴
- 6.9 The Site, therefore, presents an exciting opportunity: to take a relatively unknown and underutilised vestige of London's subterranean Second World War heritage and transform it into a cultural attraction capable of meeting strategic objectives identified by both the City of London and LB Camden in relation to the cultural economy and heritage.

- 6.10 In developing the Proposals, the design team has been informed by a detailed understanding of the history and significance of the Kingsway Tunnels, as set out in **Section 4.0** of this report, and also addressed in the DAS.
- 6.11 The Kingsway Tunnels and its associated above ground structures at 39 Furnival Street and 31-33 High Holborn are not designated heritage assets. However, in recognition of their historic interest, they have been treated as a non-designated heritage assets. Non-designated heritage assets do not enjoy statutory protection like listed buildings and conservation areas. They are a material consideration through policy and therefore less sensitive in heritage terms.
- 6.12 Nevertheless, the design team has sought to preserve the historic structure and character of the tunnel system where possible whilst undertaking the necessary works to adapt it into safe and commercially viable cultural attraction. This approach is consistent with paragraph 197 of the NPPF, which states heritage assets should be put to viable use consistent with their conservation, and has benefitted from consultation with Historic England.
- 6.13 The design of the new buildings at 39 and 40 Furnival Street and the refurbishment of the ground floor of 31-33 High Holborn have also sought to respond sensitively to the Chancery Lane Conservation Area and Bloomsbury Conservation Area respectively; preserving their overall character and appearance while introducing a new, beneficial use in the form of a managed cultural attraction to an area predominantly occupied by offices.
- 6.14 This work has benefitted from close consultation with the City of London and LB Camden and is supported by the NPPF which promotes sensitive design that delivers public benefits in a sustainable and appropriate way. In particular, paragraph 206 states that local planning authorities should look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance.
- 6.15 The provision of these objectives is considered necessary to secure the future use and management of the Kingsway Tunnels. However, in doing so, it has also been possible to sustain and enhance the character and appearance of parts of the Chancery Lane and Bloomsbury Conservation Areas. Based on our findings we see no objection in principle to these Proposals.

DIRECT IMPACTS ON HERITAGE ASSETS

CHANCERY LANE CONSERVATION AREA (CITY OF LONDON)

- 6.16 The Proposals include scope for the redevelopment of 39 and 40 Furnival Street, which are in the north part of the Chancery Lane Conservation Area. This aspect of the Proposals is, therefore, subject to the statutory duty set out in Section 72 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, the guidelines set out in the NPPF, as well as any relevant local plan policies.
- ### DEMOLITION OF EXISTING BUILDINGS
- 6.17 The Section 72 duty applies to the conservation area as whole. This bears emphasising as to avoid the risk of confusing harm to a building within the conservation area (by virtue of its demolition, say), with whether the demolition of that building causes harm to the conservation area as a whole.
- 6.18 Paragraph 207 of the NPPF is clear that *'not all elements of a Conservation Area... will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area... should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.'*
- 6.19 With regard to the City of London Local plan, Core Strategic Policy CS12 puts an emphasis on "Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them."
- 6.20 Policy DM12.2 is consistent with the NPPF in stating that proposals for the demolition of buildings in a conservation area (whether listed or not) "will only be permitted if it preserves and enhances the character or appearance of the conservation area." It goes on to state that "The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted."
- ### 39 FURNIVAL STREET
- 6.21 As described in **Section 4.0**, 39 Furnival Street is not listed but has been identified as a non-designated heritage asset on account of its historic associations and positive contribution to the CA through its "strikingly industrial aesthetic". Its demolition and reconstruction, therefore,

⁴ PPG, Paragraph: 015 Reference ID: 18a-015-20190723

would result in a direct impact to its significance, as well as the wider Conservation Area, and would also engage DM12.1 of the City of London Local Plan and paragraph 203 of the NPPF.

- 6.22 Policy DM12.1 of the City of London Local Plan emphasises the need for development proposals “To sustain and enhance heritage assets, their settings and significance.” The proposed demolition of No.39 would, inevitably, result in harm to its significance through potential loss of historic fabric. However, as it is a non-designated heritage asset, and in accordance with paragraph 203, this harm is a material consideration and not a weighted one.
- 6.23 The building at No.39 is currently in a dilapidated state and sits directly above the goods shaft of the Kingsway Tunnels, which is required to be enlarged in diameter to provide the access and evacuation required for its intended use by the public. To facilitate these works, it is necessary for the existing building at 39 Furnival Street to be demolished. It would then be rebuilt on a like-for-like basis once the works are completed (discussed below).
- 6.24 The demolition and reconstruction of 39 Furnival Street would also have a direct impact on the Chancery Lane Conservation Area, due to loss of significance of a positive contributor, which would result in a degree of harm as per paragraph 207 of the NPPF. This harm is considered to be ‘less than substantial’ and at the low end of the scale, owing to the modest intrinsic significance (see **Section 4.0**) of the building and its limited contribution to the significance of the CA as a whole.
- 6.25 Furthermore, as discussed below, the demolition of No.39 as proposed would enable the implementation of the wider scheme that is capable of delivering public and heritage benefits to enhance the Chancery Lane CA.
- 40 FURNIVAL STREET**
- 6.26 40 Furnival Street is an unlisted modern building and is not mentioned in the adopted CA appraisal. The building is typical of late-20th century commercial office development and is of no intrinsic historic or architectural interest. It is considered to make a neutral impact to the character and appearance of the CA. Therefore, its demolition would result in ‘no harm’ in principle, and the special interest of the CA would be preserved subject to the design of the replacement building.



Figure 6.2 CGI showing proposed redevelopment of 39–40 Furnival Street from the north (Source: Wilkinson Eyre Architects).

PROPOSED REDEVELOPMENT OF 39 AND 40 FURNIVAL STREET

- 6.27 It is important to note that the statutory duty set out in Section 72 is met where the development as a whole at least preserves the character or appearance of the CA. That is, if a replacement building is at least as good as the building that has been demolished, then the ‘preserve’ test has been met and the planning authority will have discharged its statutory duty in such a decision. This applies even in cases where the building proposed for demolition is considered to make a positive contribution to the CA.
- 6.28 This is a planning judgement, and one which requires a balancing of the level of harm and the level of benefit required to off-set it.
- 6.29 The Proposed Development would rebuild 39 Furnival Street, following the completion of the works to the goods shaft described above, and internally amalgamate it with a new building at 40 Furnival Street. A combined deep basement is also proposed beneath both buildings to reduce the need for additional height above ground.
- 6.30 The Proposals for rebuilding 39 Furnival Street seek to restore its historic external footprint and proportions to Furnival Street, while introducing some additional massing to the rear in the form of an extended volume accommodating plant and a lift overrun. The scope also includes the creation of an external landscaped staff terrace at roof level overlooking Furnival Street.

6.31 Importantly, the proportions of the principal elevation of 39 Furnival Street, including the industrial façade articulation and ground floor alignment, would be reinstated. It is also intended to retain the historic materiality, maximising re-use of original materials where possible.⁵ The additional massing to the rear would be set back from the main building line and enclosed by a lightweight louvered plant screen, which would be read as a modern addition and reduce the visual impact from street level. The landscaped roof terrace would contribute to the urban greening factor and would be consistent with similar rooftop terraces found within the CA and across the City.

6.32 The current undistinguished building at 40 Furnival Street would be replaced entirely with a modern, purpose-built structure of four principal storeys plus rooftop plant enclosure within the existing footprint, so as to maintain the established building line and rhythm of development.

6.33 The new development would be lower than the current building at No.40, resulting in an overall re-balancing of the massing to Furnival Street, and would employ high-quality contemporary design and lightweight materials to rationalise the principal elevation and mark the building as a new addition to the streetscape.

- In principle, the impact on the CA from the introduction of contemporary development on the Site is considered to be neutral. Furthermore, it would create an interesting visual contrast with 39 Furnival Street, which would be consistent with contrasting styles and scale of development found throughout the conservation area. The new building at 40 Furnival Street would also benefit from a recessed, activated frontage at ground floor level that would respond positively to the proportions of Furnival Street.

6.34 As proposed, the redevelopment of the dilapidated 39 Furnival Street would restore much of its external character and appearance and, by extension, its contribution to the Chancery Lane CA. Furthermore, its faithful reconstruction would provide variation and interest to the Proposed Development as a whole, which also includes the new contemporary building on the site of 40 Furnival Street. The activation at ground floor across both 39 and 40 Furnival Street would enhance the vitality of the streetscape. Overall, it is considered that the Proposed Development would be an improvement on the existing condition of this part of the Site and, by extension, would enhance the character and appearance of the Chancery Lane CA.



Figure 6.3 CGI showing proposed redevelopment of 39-40 Furnival Street from the south (Source: Wilkinson Eyre Architects).

⁵ A similar approach has been taken by Wilkinson Eyre at Battersea Power Station to great effect.

STREETSCAPE ENHANCEMENTS

- 6.35 The Proposals also include scope for refurbishing a portion of the roadway adjacent to the Site through an extension to the pavement to better serve pedestrian access to the Kingsway Tunnels. This would involve resurfacing the road and repaving the pavement.
- 6.36 Furnival Street retains its historic narrow character. The pavement consists predominantly of Yorkstone pavers, albeit with some areas tarmacked, and granite kerbs. The road itself is surfaced with modern tarmac. Yorkstone paving and granite kerbs are common features of the CA and contribute to its historic character and appearance.
- 6.37 There is already evidence of previous extensions to the pavement width and alterations to paving slabs along the street. In principle, the proposals for widening part of the pavement would retain the overall narrowness of the street whilst improving the pedestrian experience. Despite the loss of some potentially historic fabric, this aspect of the Proposals would have a neutral impact on the CA providing it is done sensitively and conforms to the traditional materiality of extant pavement.

PROPOSED USES

- 6.38 The Proposals would introduce a new cultural use to a part of the Conservation Area which is otherwise populated by institutional and office users. This cultural use would be rooted in the heritage of the Site and would open and interpret a largely unknown part of the Conservation Area for a wider public. The proposed new use for the Site will also attract tourists and amenity users to this part of the CA outside of normal office hours and at weekends, thus enhancing its vitality.
- 6.39 Other associated uses of the Proposed Development, including retail and event space, are consistent with the vibrant, mixed-use nature of the City and would support the project's ambition to regenerate the Site in a manner that protects the special character of the Chancery Lane CA.
- 6.40 Overall, we conclude there is no inherent conflict between the special interest of the Chancery Lane Conservation Area and the proposed use of the Site as a cultural attraction with associated commercial use. The Proposals will improve access to a heritage asset (Kingsway Tunnels) within the Conservation Area, while also contributing to its maintenance and upkeep in perpetuity.

OVERALL IMPACT ON SIGNIFICANCE

- 6.41 When considering the impact of the Proposals on the character and appearance of the Chancery Lane Conservation Area, the first point to note is that the impact is localised to Furnival Street, and thus limited to one part of a larger asset. The visual impact of the Proposed Development would be well-contained owing to the reduction in overall massing, the narrowness of Furnival Street and the surrounding, fine-grain development.
- 6.42 It is considered that the Proposals would have a neutral visual impact on one's ability to appreciate the character and appearance of the CA as a whole, and would preserve the contribution of the Site to this character and appearance. This includes relevant views identified within the CA appraisal. In View 13 the redevelopment of 39 and 40 Furnival Street would retain the impression of continuous frontages, ranging in style, age and scale, extending north along Furnival Street, as well as the associated sense of enclosure, while enhancing the appearance and vitality of the Site within the immediate streetscape.
- 6.43 While the Proposals would require the demolition and reconstruction of a non-designated heritage asset and positive contributor to the CA in 39 Furnival Street, resulting a low degree of less than substantial harm, this is justified to deliver the substantial benefits associated with the redevelopment of the Site as part of a heritage-led cultural attraction. In particular, the high-quality architectural interventions to Furnival Street, activation of the ground floor frontages, enhancements to the streetscape, and proposed use as an entrance to the refurbished Kingsway Tunnels all constitute benefits to the character and appearance of this part of the CA.
- 6.44 These benefits are more than capable of outweighing the loss of significance to a non-designated heritage asset, and the low order of less than substantial harm to the Chancery Lane CA, caused by the demolition and reconstruction of 39 Furnival Street. Overall, it is considered that the Proposals would result in a net enhancement to the Chancery Lane Conservation Area.
- 6.45 The proposed development would, therefore, comply with aims of Policies CS12, DM12.1 and DM12.2 of the City of London Local Plan, and conform with paragraphs 202, 203 and 207 of the NPPF.

BLOOMSBURY CONSERVATION AREA (LB CAMDEN)

- 6.46 The Proposals also include scope for the refurbishment of Fulwood Place, to the rear of 31-33 High Holborn, to serve as a secondary entrance into the Kingsway Tunnels. This part of the Site is located on the south edge of the Bloomsbury Conservation Area (Sub Area 9). As a result, the same considerations apply with regard to statutory, regional and local policy obligations.

TREATMENT OF 31-33 HIGH HOLBORN

- 6.47 The refurbishment of Fulwood Place would have a direct impact on the function and appearance of 31-33 High Holborn, which is identified as a 'positive contributor' to the Bloomsbury Conservation Area in the CA Appraisal and is therefore considered to be a non-designated heritage asset.
- 6.48 Externally, the Proposals are principally focused on the alleyway and rear elevation at ground floor, which is accessed from the westernmost ground floor bay 31-33 High Holborn. This includes the creation of two additional doorway openings into the building at ground floor on the west elevation, along with the general restoration of paintwork and brickwork, and a larger opening to the north (rear) elevation for ventilation in the form of slender metal louvres and bronze cladding. This would result in the removal of fabric, but these elevations are not considered to be of significance. Owing to the enclosure formed by the alleyway and surrounding development, the visual impact would be limited and, therefore, would have a neutral impact on the character and appearance of the CA.
- 6.49 The Proposals also include scope for improvements to the principal elevation of 31-33 High Holborn in the form of replacing the low-quality modern shopfronts with a single, unified and traditionally-detailed shopfrontage. This would constitute an enhancement to the appearance of the building and, by extension, enhance its positive contribution to the character and appearance of the CA.



Figure 6.4 Improvements to ground floor frontage of 31–33 High Holborn (Source: Wilkinson Eyre Architects).

6.50 Internally, the Proposals are limited to the basement and ground floor levels of the building, as part of the retrofit and utilisation of the two existing shafts here. Alterations to the reinforced concrete structure include openings to be made through the concrete walls and replacement of the concrete floor slabs at a lower level. In addition, openings are required through perimeter load bearing masonry walls. The internal planform would also be reconfigured. These alterations are necessary to facilitate the installation of a new lift and stair landings, to allow visitor circulation to the tunnels, as well as the wider MEP strategy for the Site. These works would find a new use for the basement and ground floor levels of the building and reveal a lesser-known aspect of its historical association with the Kingsway Tunnels.

PROPOSED USES

- 6.51 The proposals for the refurbishment of 31–33 High Holborn would provide a secondary entrance to the Kingsway Tunnels, thereby extending the cultural use of the Site to a part of the Bloomsbury Conservation Area that is also dominated by commercial, institutional and office uses.
- 6.52 The Proposals would facilitate public and emergency access to Fullwood Place and the lower levels of 31–33 High Holborn and improve the ability to appreciate its local significance.
- 6.53 While this part of the Site would not experience the same level of footfall as 39–40 Furnival Street, the proposed uses at basement and ground floor would nonetheless improve access to a heritage asset (Kingsway Tunnels) within the Conservation Area, while also contributing to its maintenance and upkeep in perpetuity. Furthermore, the proposed uses at 31–33 High Holborn would contribute to the vitality along High Holborn and draw people towards this part of the Bloomsbury Conservation Area, which would constitute a heritage benefit.

OVERALL IMPACT ON SIGNIFICANCE

- 6.54 Overall, it is considered that the proposed treatment and use of 31–33 High Holborn would, on balance, enhance the appearance of the building and better reveal an aspect of its local historic interest. As a result, the significance of the non-designated heritage asset would be enhanced and its positive contribution to the CA enhanced. As a result, the Proposals would also constitute an enhancement to the character and appearance of the CA itself.

THE KINGSWAY TUNNELS (NDHA)

- 6.55 A large proportion of the Site comprises the underground tunnel system itself, which is currently vacant.
- 6.56 The Proposals seek to facilitate the change of use of the tunnels from a former telephone exchange to a multifaceted cultural attraction, and comprise:
- Retention and general refurbishment of existing tunnel structure to provide flexible temporary and permanent exhibition space, dedicated areas for circulation, and associated public facilities;
 - Refurbishment of historic bar and recreation rooms within the tunnels to accommodate a new bar area with dedicated back of house facilities;
 - Retrofit of the existing tunnel shafts beneath 39 Furnival Street and 31–33 High Holborn to provide vertical transportation to/from street level;
 - Installation of a new, integrated MEP and AV strategy and associated plant within the tunnels; and
 - Installation of necessary fire safety measures, including fire-rated compartmentation.
- 6.57 The building is not designated, so does not have the same statutory protection governing internal changes. Furthermore, it is not considered to make a material contribution to the character and appearance of a Conservation Area owing to its subterranean nature. Nevertheless, on account of the historic interest outlined in this report, the tunnel system is considered to be a non-designated heritage asset and thus paragraph 203 of the NPPF applies.

OVERALL IMPACT ON NDHA

- 6.58 The proposals to refurbish the Kingsway Tunnel system would retain its structural integrity and historic character while also securing its occupancy, maintenance, and upkeep in perpetuity through new uses. Beyond the functional zoning, the historic planform of the tunnels would remain legible and would benefit from enhanced interpretation through signage. This is considered to be a heritage benefit and would enhance the significance of the asset.
- 6.59 The restoration of the bar area, once known to be the deepest bar in the UK, would correspond with the historic use of this part of the tunnel system and reveal one of its quirkiest characteristics. This is considered to be a heritage benefit and would enhance the significance of the asset.
- 6.60 The proposed alterations to the vertical shafts, installation of new MEP and AV strategies, and modernization of fire safety measures are all necessary to ensure the safe and sustainable use of the tunnel system by the public. These interventions have all been designed to limit the amount of plant required and maximise the available flexible space within the tunnels. This is considered to have a neutral impact on significance of the asset.
- 6.61 At present, the tunnels are largely vacant apart from the remnants of plant associated with its former use. While some of the historic plant is intended to be retained to add character to the exhibition spaces, it is likely that much of this redundant plant would need to be removed, or at least relocated, to facilitate the proposed works and uses. In any case, much of this equipment is not considered to contribute to the significance of the NDHA and so its removal is justified. It would not cause harm to the significance of the asset.
- 6.62 Overall, we conclude that the Proposals would better reveal the historic interest of the Kingsway Tunnels, as a non-designated heritage asset, both through the sensitive refurbishment of existing fabric and its new cultural use drawing on the history of the Site.

INDIRECT IMPACT ON HERITAGE ASSETS – SETTING EFFECTS

- 6.63 The built environment within the vicinity of the Site has been defined by a succession of major interventions deriving from the Great Fire, Victorian road improvements, the Blitz, and intensive post-war building activity, which have all fundamentally altered the urban fabric in this part of the City. As a consequence, the listed buildings within the vicinity of the Site already have fragmented urban settings, comprising a mix of old and new development that provides an interesting context within which they are understood and appreciated.
- 6.64 The main impact of the Proposals on the setting of nearby listed buildings is derived from the redevelopment and use of 39–40 Furnival Street.
- 6.65 In the case of **10 Furnival Street and Attached Railings, And 25 Southampton Buildings and Attached Railings (Grade II*)** and **32–33 Furnival Street (Grade II)**, this part of the Site is understood within the context of Furnival Street, which is a narrow, secondary route lined with continuous frontages of differing styles, dating predominantly from the Victorian period to the present, and resulting in an overall varied architectural character. The form, scale and detailing of the Proposed Development would retain the varied character of the streetscape while improving the quality of the architecture on the Site. It is considered, therefore, that the Proposals would have a ‘neutral’ impact on the respective settings of these listed buildings.

- 6.66 The impact of the Proposals on the **Prudential Assurance Building (Grade II*)** would be negligible owing to the limited visual and spatial relationship with the Site. The setting of the Grade II* listed building is largely defined by its prominent relationship to High Holborn. While it does also terminate the view north along Furnival Street, this aspect of the setting makes no real contribution to its setting. In any case, as described above, where the Proposals are visible in the context of the listed building, it would maintain the existing varied character of Furnival Street. As a result, the Proposals would have a neutral impact on the setting of the listed building.
- 6.67 Overall, it is considered that the respective settings of the nearby listed buildings would be preserved in accordance with Section 66(1) of the Act.

7.0

CONCLUSION AND POLICY COMPLIANCE

THE LONDON TUNNELS

CONCLUSION AND POLICY COMPLIANCE

- 7.1 Montagu Evans have been instructed by The London Tunnels to prepare this heritage statement in support of an application for change of use to existing deep level tunnels of the Kingsway Exchange and redevelopment of above ground structures at No. 31–33 High Holborn (LB Camden) and No. 39–40 Furnival Street (City of London).
- 7.2 The proposals have been designed by Wilkinson Eyre Architects and comprise:
- “Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1); demolition and reconstruction of existing building at 39 Furnival Street; redevelopment of 40 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at Fulwood Place, to provide secondary visitor attraction entrance (including principle bar entrance) with retail at ground floor level; provision of ancillary cycle parking, substation, servicing and plant, and other associated works.”*
- 7.3 The scheme by Wilkinson Eyre has been developed in collaboration with a full, professional consultant team and the Applicant. It has been an iterative design process including close consultation with the City of London, the London Borough of Camden, and Historic England.

- 7.4 The purpose of this advice has been to ensure that the development: responds sensitively and in a complementary way to the character and appearance of the Chancery Lane Conservation Area and Bloomsbury Conservation Area; considers the significance of non-designated heritage assets within the Site; and enables the safe and sustainable reuse of the Kingsway Tunnels to better reveal its historic interest.
- 7.5 In our judgement, the proposals represent an opportunity to secure and refurbish take a relatively unknown and underutilised vestige of London’s subterranean Second World War heritage in a use that will secure its long-term conservation, occupation, and maintenance in line with the local plan policy aspirations.
- 7.6 The designs and broader concepts for the Site presented by Wilkinson Eyre demonstrate a design-led approach which respects the character and history of the Site, and seeks to protect its authenticity and reveal fabric of interest where possible.

POLICY COMPLIANCE

- 7.7 This assessment has followed the approaches set out in legislation, policy, and best practice guidance, namely the 1990 Act, the relevant Development Plans, the NPPF, and guidance published by Historic England. Furthermore, it is mindful of the great weight that should be given to the preservation of heritage assets which has been confirmed in Court judgements. To preserve the significance of a heritage asset has been defined as ‘to do no harm’.
- 7.8 In accordance with the statutory duties outlined in the Planning (Listed Buildings and Conservation Areas) Act 1990, we conclude that the Proposals would, on balance, deliver heritage benefits capable of enhancing the character and appearance of both the Chancery Lane CA and Bloomsbury CA, while the respective settings of nearby listed buildings would be preserved.

- 7.9 In accordance with the terminology of the NPPF (2023), the Proposed Development would also have a beneficial effect on the significance of non-designated heritage assets within the Site. The NPPF also requires high quality design (paragraphs 130–134) which this development would deliver. On this basis we consider that the Proposed Development complies with paragraphs 130–134, 194, 199, 202, 203, and 206 of the NPPF. It would also comply with Policy HC1 of the London Plan, Policies CS10, CS11, and CS12 of the City of London Local Plan, and Policy D2 of the Camden Local Plan.
- 7.10 The decision maker is, therefore, able to discharge their legal duties as set out in 66(1) and 72(1) of the 1990 Act, and in doing so, consider that the development is consistent with the NPPF and both applicable development plans.

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