

150 Holborn

London EC1

Townscape, Conservation and
Visual Impact Assessment
August 2011





Figure 7: WWII Bomb Damage Map (1939-45)

WWII Bomb Damage Map Key

Black	Total destruction
Purple	Damaged beyond repair
Dark Red	Seriously damaged; doubtful if repairable
Light Red	Seriously damaged; repairable at cost
Orange	General blast damage, not structural
Yellow	Blast damage, minor in nature
Green	Clearance Area
Small Circle	V2 Bomb
Large Circle	V1 Bomb

**150 HOLBORN
TOWNSCAPE, CONSERVATION AND VISUAL IMPACT ASSESSMENT**

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1.0 INTRODUCTION

1.1 This document has been prepared in support of a full planning application for 150 Holborn on behalf of Laffly LLP. It provides an assessment of the likely visual impact that the Proposed Development will have on the Site, surrounding townscape and built heritage in the area. The assessment is based on architectural drawings prepared by the design team, which are being submitted as part of the planning application, and Accurate Visual Representations of the scheme produced by The Neighbourhood, which are included within this document.

1.2 This document should be read in conjunction with the Design and Access Statement prepared by MAKE and the full planning application documentation.

2.0 METHODOLOGY

2.1 This assessment takes into account the history and character of the physical fabric of the area, the significance of designated heritage assets, the appropriateness of the Site for the Proposed Development and the character of the proposed design. The planning policy context for this assessment is described in Chapter 3.0.

2.2 In landscape and visual assessments, a distinction is normally drawn between landscape effects (effects on the character or quality of the landscape, irrespective of whether there are any views of the landscape or viewers to see them) and visual effects (effects on people's views of the landscape). In urban areas, rather than assessing landscape, it is more appropriate to consider the impacts on the townscape.

2.3 The available guidance for assessing townscape and visual effects of a development is as follows:

- Guidelines for Landscape and Visual Impact Assessment (2002) (Ref. 1-1), produced jointly by the Institute of Environmental Assessment (now IEMA) and the Landscape Institute; and
- The London View Management Framework SPG (LVMF SPG) (July 2010) (Ref. 1-2), which refers to and occasionally differs from the IEMA guidelines.

2.4 The first of these publications was developed for rural sites, and is applicable to all assessments submitted under the Environmental Impact Assessment (EIA) Regulations. The latter was created specifically in relation to sites within London and also provides guidelines for assessing the potential qualitative visual impact of proposed developments.

2.5 Visual impacts have been assessed in terms of the magnitude of the impact or change and also the sensitivity of the resource affected. The assessment of the proposals is based on national, regional and local planning policies and guidance. Where present, Listed Buildings and Conservation Areas are taken to be of high sensitivity in townscape terms, and termed 'designated heritage assets' in Planning Policy Statement 5 (PPS5) (Ref. 1-3). The Site is not located within a Conservation Area and there are no Listed structures on Site. However the Site is situated between three Conservation Areas and there are Listed Buildings in its close vicinity. Potential impacts of the Proposed Development on the setting of these designated heritage assets are considered in accordance with PPS5 (Ref. 1-3) within the Views Assessment (Chapter 6.0) and Conclusions (Chapter 7.0).

2.6 Nine viewpoints were agreed in consultation with the London Borough of Camden. In order to assess the visual impact of the Proposed Development, two separate images have been prepared from each viewing location selected:

1. Existing – the view as it exists today; and
2. Proposed – with the Proposed Development inserted (in either rendered or wireline form).

2.7 Impacts have been categorised as neutral, negligible, beneficial or adverse. Where neutral or negligible in effect, the Proposed Development is deemed likely to cause little or no change to the townscape. For impacts judged to be either beneficial or adverse, the degree of that potential beneficial or adverse impact is further categorised in the following table:

Table 1-1: Table Significance evaluation methodology

Effect	Magnitude
Severe adverse	Where the existing site and the proposed changes would form the dominant feature, to which other elements become subordinate, markedly adversely affecting and substantially changing the overall character of the scene in valued views.
Major adverse	Where the existing site and the proposed changes would form a major and immediately apparent part of the scene that adversely effects and changes its overall character.
Moderate adverse	Where the existing site and the proposed changes to views would form a visible and recognisable new element within the scene and may be readily noticed by the viewer as adverse.
Minor adverse	Where the existing site and proposed changes to the views would be a minor component of the wider view and may be missed by the casual observer.
Negligible	Where the existing site and the proposed change would be imperceptible or would be in keeping with and would maintain the existing views. The balance of the proposals with proposed mitigation would maintain the quality of the views.
Neutral	Where none of the proposed changes would be discernible.
Minor beneficial	Where the existing site and the proposed changes to the existing view would not only be in keeping with, but would slightly improve the quality of the existing view.
Moderate beneficial	Where the existing site and the proposed changes to the existing views would be in keeping with, and would improve, the quality of the existing view.
Major beneficial	Where the existing site and the proposed changes to the existing views would be in keeping with, and would greatly improve the quality of the scene through the removal of visually distracting features.

Source: Modification of criteria contained in the Guidelines for Landscape and Visual Impact Assessment (2002) (Ref. 1-1)

2.8 Consideration should be made for the potential of different lighting conditions to alter the appearance and visual impacts of the Proposed Development. The time of day of the photography is indicated on the Table on Page 19.

2.9 The assessment would usually include both winter and summer photography in order to take into account the different effects of summer and winter foliage. The photography was retaken in June 2011 following the removal of scaffolding from the facades of the neighbouring Grade II* Listed Prudential Assurance Building. Consequently, the trees are in leaf and the impacts in winter are not visually represented in the views in section 6. However, view studies and photography taken during the design process, in the winter and spring, have enabled the assessment to take full account of potential impacts in all seasons. A representative version of view 5 with the foreground trees removed is included at the back of this report at Appendix A.

2.10 The views assessment should also consider the future baseline context of the Proposed Development. There are no consented schemes in the area that would be visible in the views. Consequently, a cumulative impact assessment has not been provided.

3.0 PLANNING POLICY CONTEXT

National Planning Policy and Guidance

Planning Policy Statement 1 (PPS1) Delivering Sustainable Development (2005) (Ref. 1-4)

3.1 PPS1 sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system.

3.2 PPS1 states that planning has a key role to play in the creation of sustainable communities: communities that will stand the test of time, where people want to live, and which will enable people to meet their aspirations and potential. A spatial planning approach should be at the heart of planning for sustainable development. Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but also over the lifetime of the development.

Planning Policy Statement 5 (PPS5) - Planning and the Historic Environment (March 2010) (Ref. 1-3)

3.3 PPS5 sets out the Government's overarching planning policies put in place to conserve the historic environment and its heritage assets so that they may be enjoyed by future generations. PPS5 provides a full statement of Government policies for the identification and protection of heritage assets, listed buildings, conservation areas, World Heritage Sites and other valued elements of the historic environment. An Historic Environment Planning Practice Guide (Ref. 1-3a) was issued by English Heritage to accompany PPS5.

3.4 The Site, situated in the London Borough of Camden (LBC), is situated close to three Conservation Areas: Bloomsbury (to the west), Hatton Garden (to the east) and Chancery Lane (to the south) (see the Conservation Area and Listed Buildings Map, Figure 8). There are no historic structures on the Site. There are Conservation Areas and Listed Buildings close to the Site, most notably the Grade II* Listed Prudential Assurance Building to the east of the Site. Relevant Conservation Areas and Listed Buildings in the wider area are described in Chapter 4.0.

3.5 Policy HE6.1 of PPS5 requires the applicant *"to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance. [...] As a minimum the relevant historic environment record should have been consulted and the heritage assets themselves should have been assessed using appropriate expertise where necessary given the application's impact."* Further, at HE6.2, that *"This information together with an assessment of the impact of the proposal should be set out in the application (within the design and access statement when this is required) as part of the explanation of the design concept. It should detail the sources that have been considered and the expertise that has been consulted."* The relevant records have been consulted as part of the design process and the significance of the potentially affected heritage assets, and the nature and extent of the potential impacts, are assessed in this report.

3.6 Policy HE7 relates to development which affects all heritage assets, whether designated or not. It expresses *"the desirability of sustaining and enhancing the significance of heritage assets"* (HE7.4) and *"the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use."* The Practice Guide (Ref. 1-3a) encourages Local Planning Authorities *"to seek well-conceived and inspirational design that is founded on a full understanding of local context"* (para. 44).

3.7 The setting of designated heritages in the surrounding area would be affected by the proposals. In relation to the setting of designated heritage assets, PPS5 Policy HE10 encourages the preservation of those parts of the setting which contribute positively to the significance of the designated heritage asset and the weighing of harm against the wider benefits of the application (HE10.1). Paragraph HE10.2 requires local planning authorities to *"identify opportunities for changes in the setting to enhance or better reveal the significance of a heritage asset. Taking such opportunities should be seen as a public benefit and part of the process of place-shaping."*

3.8 The Practice Guide notes (Ref. 1-3a) that the legal provisions of Sections 16(2), 66(1) and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 remain in place. They require the Local Planning Authority to have special regard to *"the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses"* and, in relation to development within a Conservation Area, *"the desirability of preserving or enhancing the character or appearance of that area"* (para. 111).

By Design. Urban design in the planning system: towards better practice (2000) (Ref. 1-5)

3.9 Although not official planning policy, *By Design. Urban design in the planning system: towards better practice* (2000) was published by the Department for Transport, Local Government and the Regions (DTLR – now DEFRA) and the Commission for Architecture and the Built Environment (CABE) to provide an objective framework by which to assess urban design proposals. Consequently it has become a national measure by which proposals are determined. *By Design* (2000) lists seven criteria against which urban design proposals should be judged. They are as follows:

- i) Character;
- ii) Continuity and Enclosure;
- iii) Quality of the public realm;
- iv) Ease of movement;
- v) Legibility;
- vi) Adaptability; and
- vii) Diversity.

By Design (2000) is endorsed by PPS1 (2005).

Regional Planning Policy
The London Plan (July 2011) (Ref. 1-6)

3.10 Policy 7.11 of The London Plan introduces the London View Management Framework and defines the protected views it sets out as such:
“These views are seen from places that are publicly accessible and well used. They include significant buildings or urban landscapes that help to define London at a strategic level. These views represent at least one of the following categories: panoramas across substantial parts of London; views from an urban space of a building or group of buildings within a townscape setting (including narrow, linear views to a defined object); or broad prospects along the river Thames. Development will be assessed for its impact on the designated view if it falls within the foreground, middle ground or background of that view” (p.223).

3.11 Table 7.1 of The London Plan lists a number of strategically important views for which management plans are published in the LVMF SPG. It classifies these into ‘London Panoramas’, ‘Linear Views’, ‘River Prospects’ and ‘Townscape Views’. The Site is situated within the viewing corridor of the LVMF Protected Vista from Assessment Point 4A.1 on Primrose Hill. However, the proposal will not exceed the threshold plane of 52.1m and will not be discernible, and the view has not therefore been assessed in section 6 below. The Site is also located within the Background Assessment Area of the Protected Vista of St Paul’s Cathedral from Greenwich Park (Assessment Point 5A.2); the Proposed Development will not be visible within this view and has not been assessed in section 6.

3.12 Other policies of The London Plan (Ref 1-6) relevant to the design of the proposals include: 7.1, building London’s neighbourhoods and communities; 7.2, an inclusive environment; 7.4, local character; 7.5, public realm; 7.6, architecture 7.7, location and design of tall and large buildings; 7.8, heritage assets and archaeology; 7.9, heritage-led regeneration; and 7.10, World heritage Sites.

3.13 Of particular relevance to this assessment, the strategic aim of Policy 7.4 (local character) is that *“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area”* (p.214).

3.14 The strategic aim of Policy 7.6 (architecture) is that *“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context”* (p.216).

3.15 The strategic aim of Policy 7.8, heritage assets and archaeology, is that *“London’s heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account”* (p.219).

London View Management Framework SPG (July 2010) (Ref 1-2)

3.16 The London View Management Framework SPG (LVMF SPG) was updated and published in July 2010.

3.17 The LVMF SPG was created to provide additional clarity and detail to the sections of *The London Plan* (Ref 1-6) that deals with the management of important London views. The LVMF SPG includes thirteen Protected Vistas - of St Paul’s Cathedral, the Palace of Westminster and the Tower of London - which replace the ten Strategic Views of RPG3A (1991). The Protected Vistas are included within the total twenty-six designated views identified in the LVMF SPG under the categories ‘London Panoramas’, ‘River Prospects’, ‘Townscape Views’ and ‘Linear Views’.

3.18 All of the designated views are subject to Qualitative Visual Assessment, as outlined in the Management Plan for each designated view provided in the LVMF SPG. There is one LVMF SPG relevant to the Site: the Protected Vista from Assessment Point 4A.1 on Primrose Hill. The Site is located within the viewing corridor of this Protected Vista, however the proposal will not exceed the threshold plane of 52.1m and will not be discernible, and the view has not therefore been assessed below. The Site is also located within the Background Assessment Area of the Protected Vista of St Paul’s Cathedral from Greenwich Park (Assessment Point 5A.2); the proposed Development will not be visible within this view and has not been assessed in section 6. The Proposed Development will not harm views designated in the LVMF SPG.

Local Planning Policy
London Borough of Camden Unitary Development Plan (June 2006) (Ref .1-7)

3.19 The London Borough of Camden Unitary Development Plan was replaced by the Local Development Framework in November 2010. The only part of the UDP that was not carried forward into the Core Strategy and Development Policies are land use proposals sites detailed in LU1. Policy LU1 is not relevant to the application scheme.

London Borough of Camden Local Development Framework Core Strategy
(adopted 8 November 2010) (Ref. 1-8)

3.20 The London Borough of Camden’s Core Strategy sets out the key elements of the Council’s planning vision and strategy for the borough and forms the central part of the Local Development Framework (LDF).

3.21 Holborn is identified as a growth area in the Core Strategy and the London Plan. Details of the Council’s approach to growth areas are set out in CS1 - Distribution of growth - and CS2 - Growth Areas. Policy CS2 states that *“The Council will expect development in the growth areas to: d) maximise site opportunities; e) provide appropriate links to, and benefits for, surrounding areas and communities; and f) be in accordance with the Council’s aspirations and objectives for that area”* (p.20).

3.22 The Core Strategy describes Holborn as *“largely characterised by offices, and large office entrances often break up the frontage”* (p.78). The Council seeks to increase retail provision at street level to create more active public space, manage the night time economy, improve pedestrian links to the West End, improve the gyratory system and incorporate crime prevention measures in new development.

3.23 Policy CS14 of the Core Strategy relates to the promotion of high quality places and conservation of heritage. It states that:
“The Council will ensure that Camden’s places and buildings are attractive, safe and easy to use by:
a) requiring development of the highest standard of design that respects local context and character;
b) preserving and enhancing Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens;
c) promoting high quality landscaping and works to streets and public spaces;
d) seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible;
e) protecting important views of St Paul’s Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views.”

3.24 In relation to excellence in design, the supporting text states that *“High quality design also takes account of its surroundings and what is distinctive and valued about the local area. Camden is made up of a diversity of areas, each with their own distinctive character, created by many elements such as architectural style and layout, social and economic history, landscaping and mix of uses – as summarised in the description of Camden’s character below. As Camden is a densely built-up borough where most development involves the replacement, extension or conversion of existing buildings, taking account of context and local character is particularly important. The Council will therefore expect the design of buildings and places to respond to the local area and its defining characteristics and reinforce or, if appropriate, create local distinctiveness”* (para. 14.7).

3.25 In relation to views, Camden will protect the strategic views set out in the GLA’s LVMF SPG and a number of local views identified at paragraph 14.24, of which “views into and from conservation areas” is relevant to the Proposed Development.

London Borough of Camden Local Development Framework Development Policies (8 November 2010) (Ref 1-9)

3.26 The London Borough of Camden's Development Policies form part of the Local Development Framework (LDF). It sets out detailed planning policy that will be used by the Council in the determination of planning applications in line with the objectives set out in the Core Strategy.

3.27 Policy DP25 of Camden Development Policies provides more detailed guidance on the Council's approach to built heritage. Of relevance to the Proposed Development, is the requirement that *"In order to maintain the character of Camden's conservation areas, the Council will [...] d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area"* (p.117). *The Council will also "g) not permit development that it considers would cause harm to the setting of a listed building"* (p.117).

3.28 In relation to Conservation Areas, it states at paragraph 25.2 that *"In order to preserve and enhance important elements of local character, we need to recognise and understand the factors that create this character. The Council has prepared a series of conservation area statements, appraisals and management plans that assess and analyse the character and appearance of each of our conservation areas and set out how we consider they can be preserved and enhanced. We will take these into account when assessing planning applications for development in conservation areas. We will seek to manage change in a way that retains the distinctive characters of our conservation areas and will expect new development to contribute positively to this"* (p.118).

3.29 In relation to development within the setting of Conservation Areas, the document states at paragraph 25.9 that *"Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area"* (p.119).

3.30 In relation to the setting of Listed Buildings it states that, *"The setting of a listed building is of great importance and should not be harmed by unsympathetic neighbouring development. While the setting of a listed building may be limited to its immediate surroundings, it often can extend some distance from it. The value of a listed building can be greatly diminished if unsympathetic development elsewhere harms its appearance or its harmonious relationship with its surroundings. Applicants will be expected to provide sufficient information about the proposed development and its relationship with its immediate setting, in the form of a design statement"* (para 25.15, p.121).

4.0 BASELINE CONDITIONS

The history and character of the Site and locality

Introduction

4.1 The urban development of London is not the result of a comprehensive unified vision but it is a City of many distinctive parts. Correspondingly, Camden cannot be defined by any single overriding architectural idea or stylistic era. This is key to appreciating the qualities of the borough's broader urban character, and herein lies its potential for developmental flexibility and continued economic success into the future. Generally, Camden comprises a visibly mixed building stock accrued from successive eras – Georgian, Victorian, Edwardian and Modern – and the part of this borough centred on Holborn and High Holborn includes a range of buildings from different periods, with different architectural styles and social characters.

The Holborn area

4.2 Holborn (from Holborn Circus in the east to Gray's Inn Road to the west) and High Holborn (leading westwards from Gray's Inn Road) follow the path of the Roman Road which led westwards from the City across the Holbourne, part of the River Fleet, now culverted, which ran along the route now followed by Farringdon Street. Large suburban houses were built within estates along Holborn and High Holborn in the Middle Ages, some of which became lawyers' colleges. Two of these survive: Gray's Inn, to the west of Gray's Inn Road, and Lincoln's Inn, just to the south of High Holborn towards Kingsway.

4.3 In the 17th century, residential streets and squares were laid out on the open spaces off the main thoroughfares to accommodate a growing residential population. By the mid 18th century much of the land north of Holborn was developed and the secluded terrace-fronted squares of Bloomsbury followed to the northwest in the late 18th century. As west London became a more fashionable address, the outskirts of the City lost their status and by the 19th century dense populations created slums in areas such as Saffron Hill, just to the north of Holborn.

4.4 Victorian road widening schemes and new roads transformed the area in the mid-late 19th century. Overcrowded backstreets were demolished and road connections between the City and west London greatly improved. Holborn Circus was created at this time, connecting to the new east-west routes of Holborn Viaduct and Charterhouse Street. To the north of High Holborn, Theobald's Road was widened and led eastwards into the new Clerkenwell Road. Housing blocks were erected to accommodate the displaced population, particularly south of Clerkenwell Road, near the Church of St Alban's the Martyr.

4.5 The turn of the 20th century brought Kingsway, which cut north-south through the terraced slums between Covent Garden and Lincoln's Inn, connecting the Strand to High Holborn. The grand tree-lined avenue was fronted by large commercial buildings in the Beaux Arts style. On Holborn, Alfred Waterhouse's palatial Prudential Assurance Building and Staple Inn Buildings were built at this time. As businesses moved into the area and slums were cleared, the residential population began to decline. This social shift was compounded by WWII during which Holborn suffered significant bomb damage, particularly near Gray's Inn.

4.6 Post war development brought large office buildings with little character to the frontage of Holborn. The narrow Citty of York public house, adjacent to the southern gatehouse to Gray's Inn, is one of few surviving reminders of the historically more varied character of the street. Even the attractive Art Nouveau Buchanan Distillery by Treadwell & Martin, erected opposite the Prudential at the turn of the 20th century, was replaced in the 1950s with the sombre, stone faced Buchanan House.

4.7 Today, Holborn and High Holborn are busy traffic-filled commercial thoroughfares. As Pevsner states in *The Buildings of England* series, except at the west end, almost all the buildings on High Holborn between Gray's Inn Road and Kingsway were built after 1945 (p. 303, Ref 1-14), and they have different plot sizes, frontages, heights and character. At the east end, on Holborn, are the massive, fiery red brick and terracotta Gothic Prudential Assurance building and Foster and Partner's high-tech smooth glass Sainsbury's building at Fetter Lane and Holborn Circus. The historic buildings which survive close to the Site - from the medieval Staple's Inn to the terracotta Waterhouse buildings and to Butterfield's polychrome Gothic Church of St Alban's the Martyr - are important visual reminders of the area's long and varied history. All are Listed and described more fully below. There is much mediocrity – the general commercial stuff that makes up most cities – in between.

The existing building on Site

4.8 The existing building on Site was designed by Gordon Collis for the Prudential in the 1970s-80s and was first occupied in 1984. It is ground plus six storeys fronting Holborn and Gray's Inn Road, with a plant enclosure stepping away from the street at level 07, and stepping down to ground plus two storeys on Brooke Street, with a plant enclosure at level 03. All elevations are characterised by a series of projecting bays which fold back to a metal clad mansard roof. A plant level is set back from the parapet. Stone lintels frame the entrances and windows at street level and are cantilevered on the projecting bays. Above, the main body of the building is red brick set in stretcher bond. The windows are almost square and are paired, with simple brick sills beneath and deep reveals on the recessed bays.

4.9 There are retail units at part basement, ground and part first floors which would remain in operation during the construction phase of the Proposed Development. A service yard is located at the rear (north) side of the site. Vehicle access is through a brick gateway on Brooke Street, on the east side of the Site.

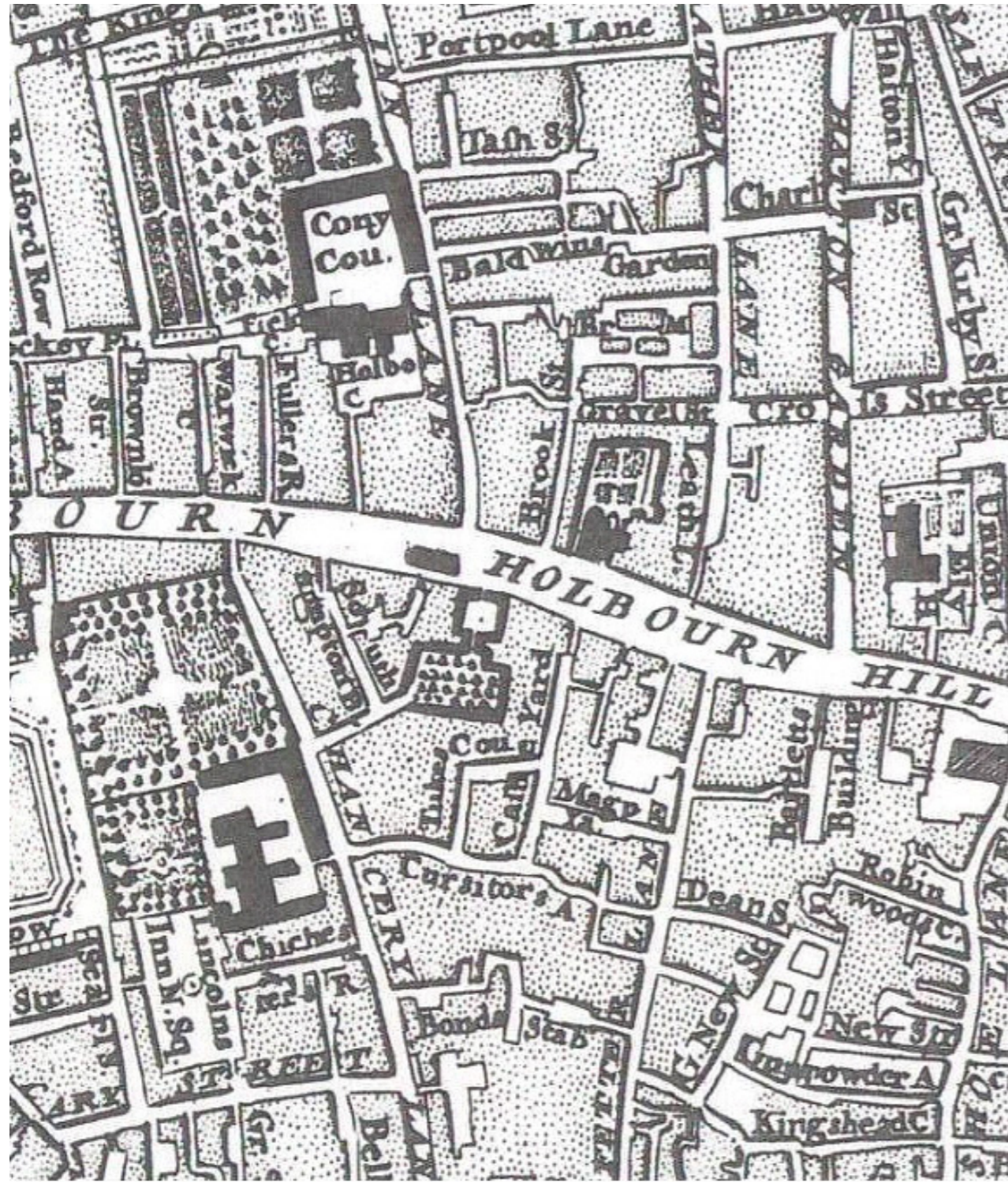


Figure 1: Rocque 1741

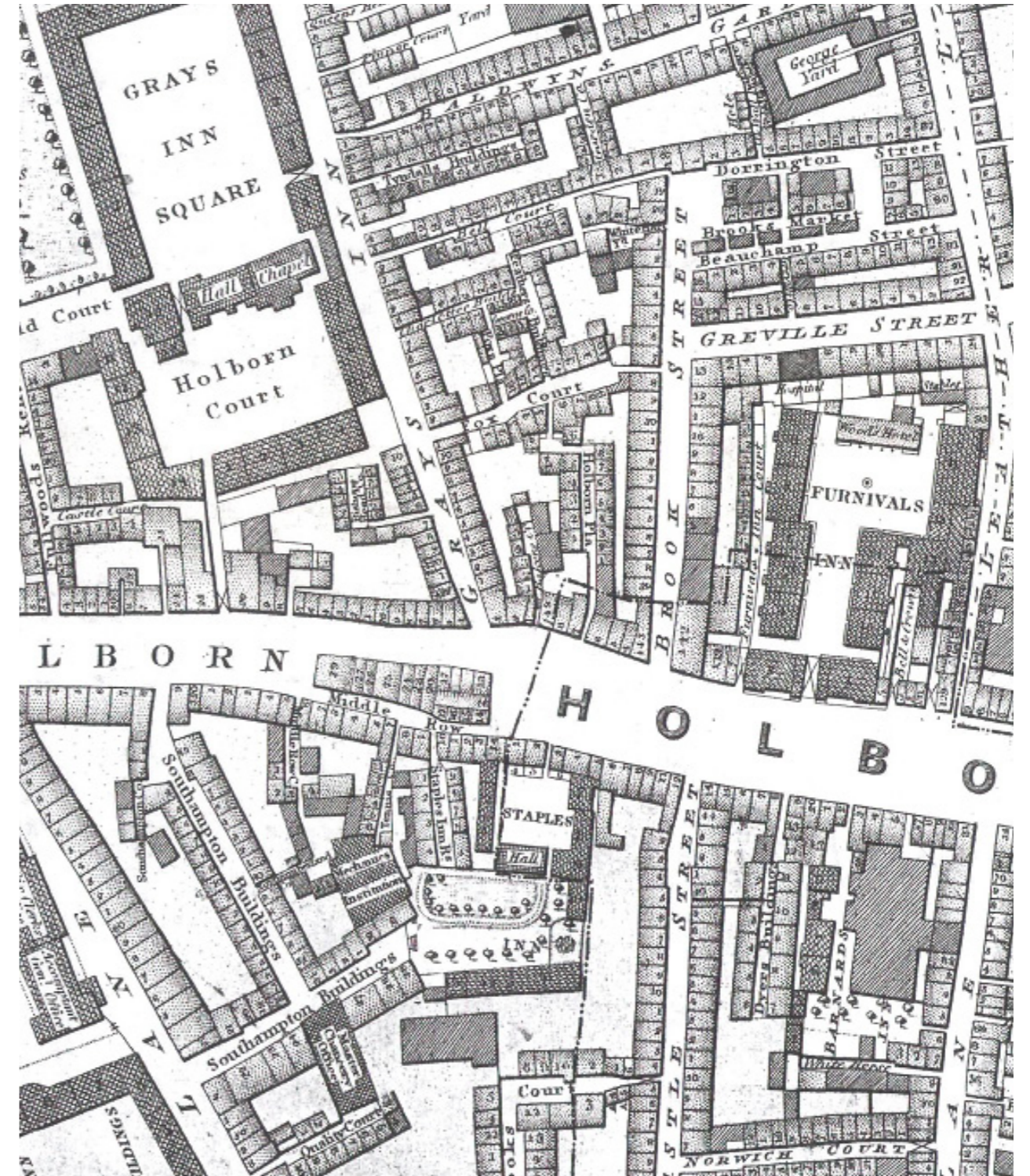


Figure 2: Horwood 1794-99

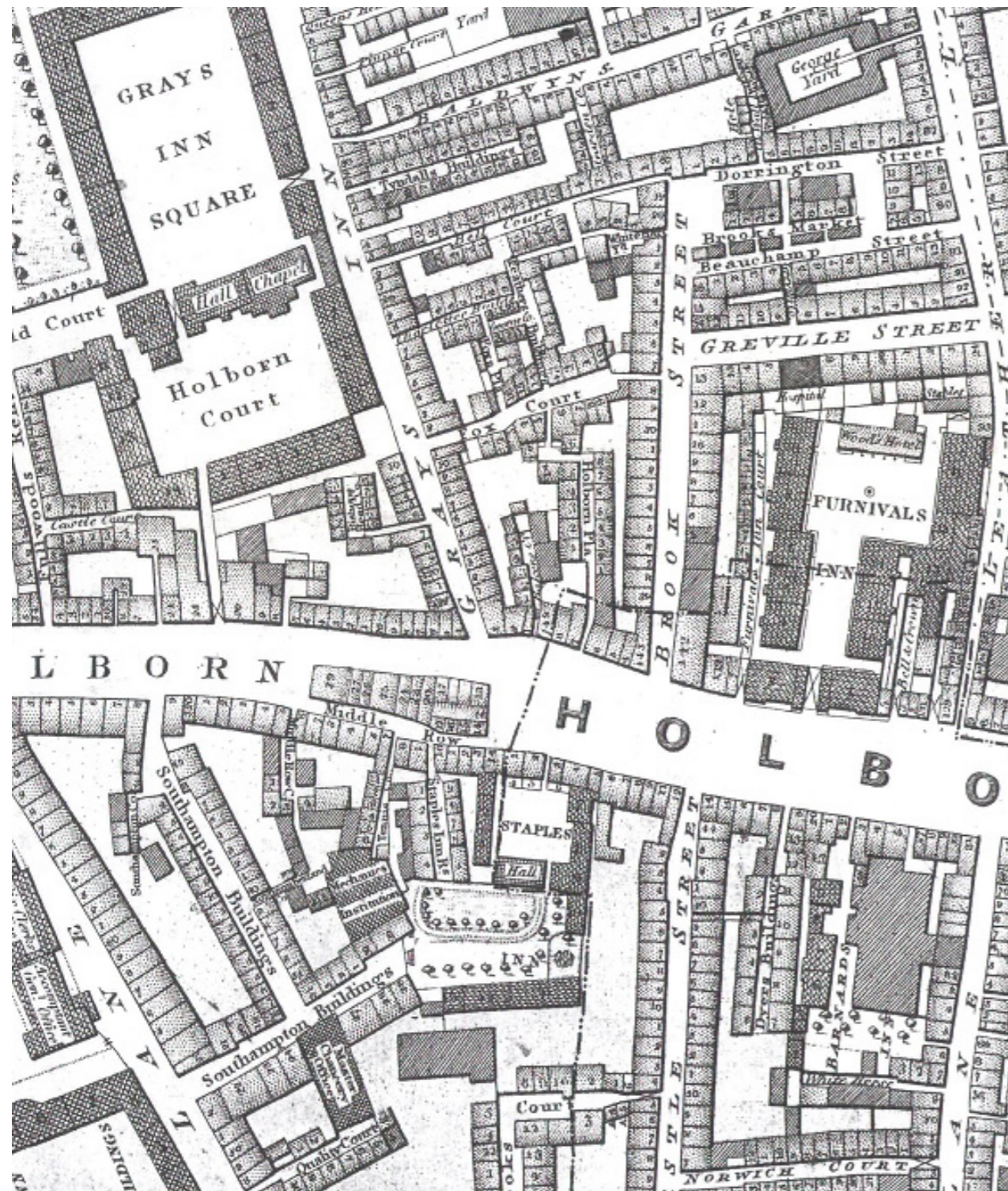


Figure 3: Horwood 1819/1842 revision

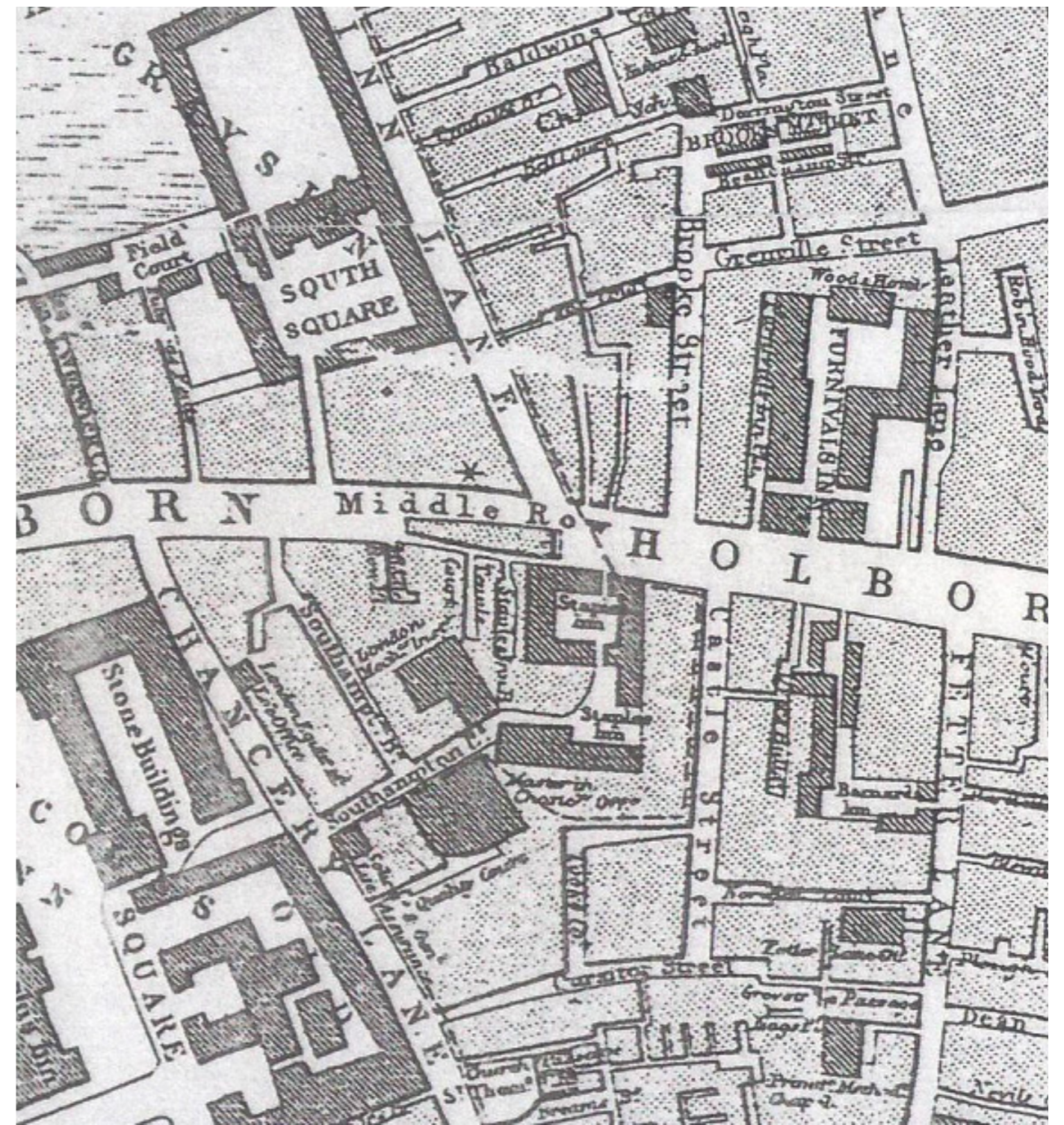


Figure 4: Weekly Despatch 1862

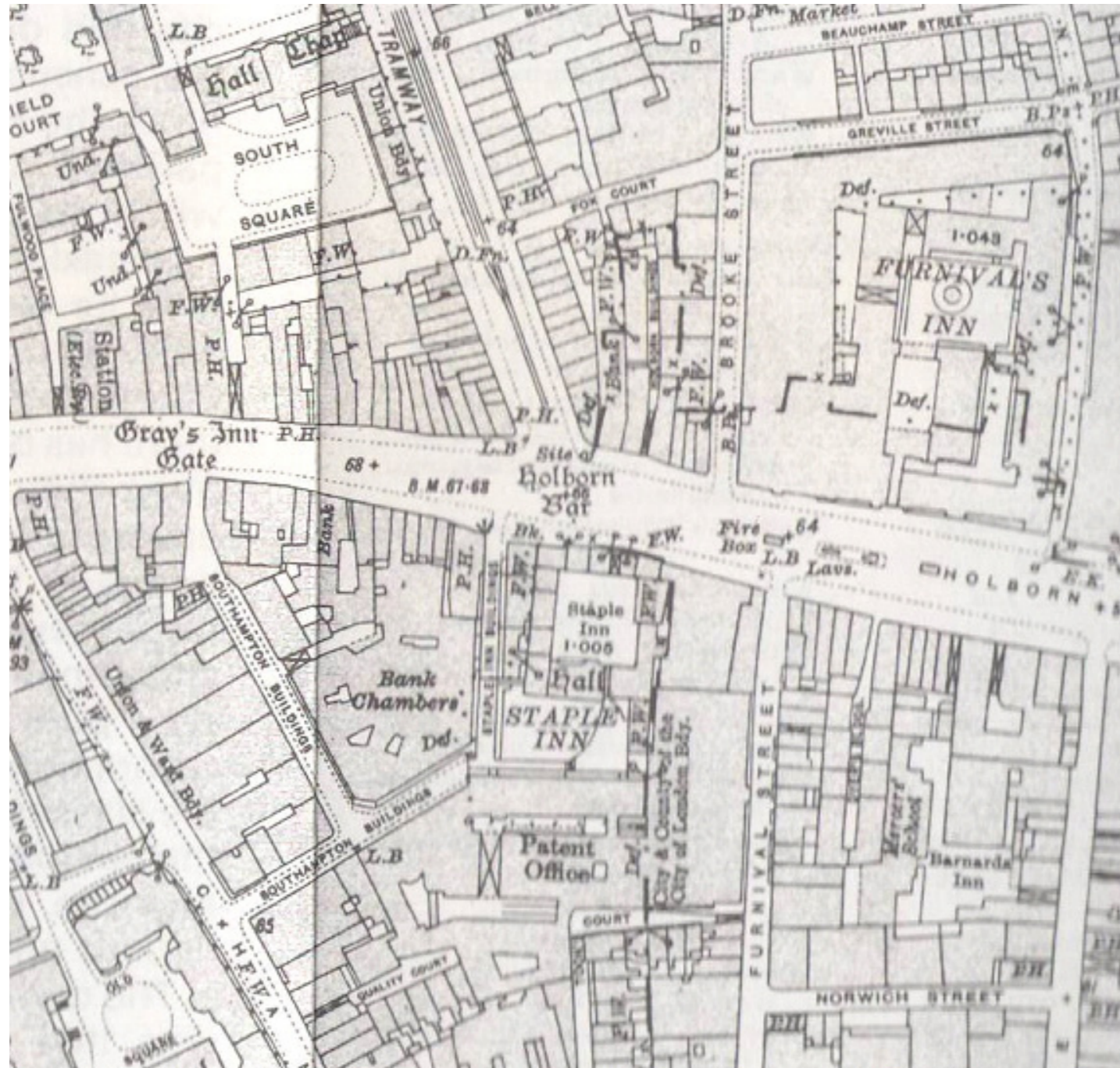


Figure 5: Ordnance Survey 1914

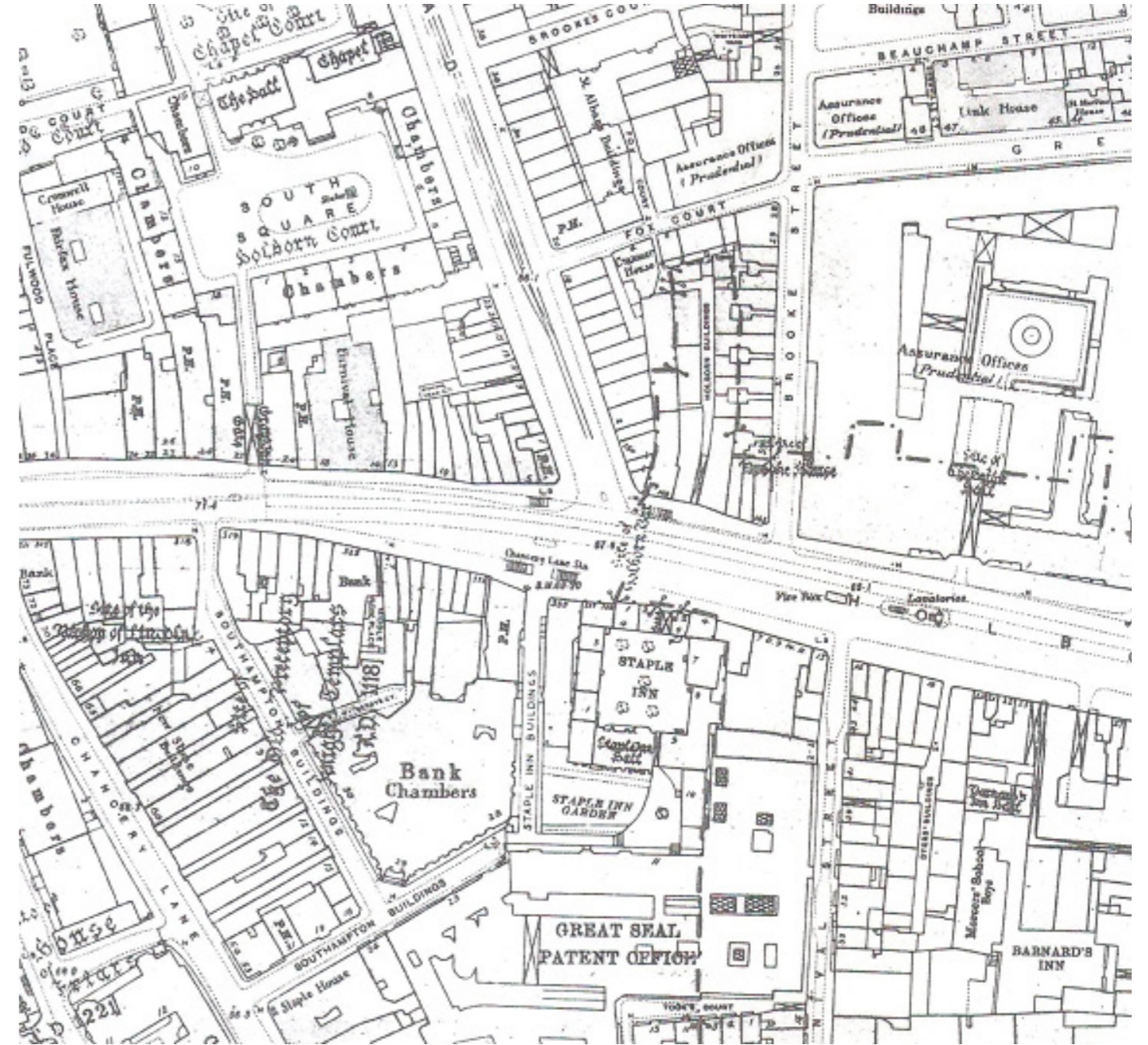


Figure 6: LCC Revision Map 1934-40