

| Application No: | Consultees Name:                          | Consultees Addr:                                | Received:           | Comment: | Response:   |
|-----------------|---|---|---------------------|----------|---|
| 2015/4407/P     | Mr Paul Sugden<br>and Mrs Carol<br>Sugden | Flat 2<br>80 High Holborn<br>London<br>WC1V 6LS | 17/04/2016 18:15:40 | COMMNT   | <p>Objection to Application</p> <p>As occupiers of Flat 2, 80 High Holborn my wife and I object to this Application, both in its original and amended form.</p> <p>Relevant Background</p> <p>Flat 2, 80 High Holborn is part of a residential development of 6 Flats in the property adjoining and situated immediately to the east of Templar House.</p> <p>Flat 2 is identified by the Applicant as a “neighbour” to the proposed development.</p> <p>In or around 2008/2009 a substantial refurbishment behind its original façade was undertaken to 79 to 80 High Holborn pursuant to an application originally made in 2006 (2006/3615/P) as part of an associated re-development of the office and retail space in the adjoining “Hanover House” at 75 to 79 High Holborn.</p> <p>Although it is assumed to be entirely coincidental, it is noted in in the context of the treatment of 79 to 80 High Holborn in the Application that DP9, the Applicant’s planning consultant, also acted for the developer of 79 to 80 High Holborn.</p> <p>Impact on local community and townscape</p> <p>It is noteworthy that, when addressing the existing townscape and the façade which runs east from 80 High Holborn to the Red Lion public House, the Applicant (in its Townscape, Visual Impact and Heritage Assessment” at paragraph 3.26) appraises the immediately adjoining properties to the east of the development site this way:</p> <p>“The Old Red Lion Public House, no 72 High Holborn, on the western corner of the junction with Red Lion Street, is built of red brick with stone dressings, in an Edwardian style. It has a narrow elevation to High Holborn with a long frontage to Red Lion Street. The council’s Appraisal, at page 72, notes the “pub front is a particularly well preserved example, adorned with black granite Ionic pilasters, an inverted shell entrance canopy and stained timber window frames”. West of the pub, towards the Site is a large 1950 red brick clad commercial buildings, with some stone dressings, which like Templar House is of a polite design but adds little to the local townscape. “ (emphasis added)</p> <p>Attention is, for completeness, drawn to the depiction of the façade referred to in the Applicant’s Design Statement of March 2016 at page 3 (title “The Office Building”).</p> <p>To describe the site at 75 to 79 High Holborn as a “large” development is curious in the context of the scale of the proposed development; and to condescend that its architecture is “polite” begs what, in 66 years’ time, might aptly be recorded as to the Applicant’s proposed architecture.</p> <p>The impact on 80 High Holborn and the basis for objection</p> <p>In its “Townscape, Visual Impact and Heritage Assessment” of July 2015 the Applicant characterised 80 High Holborn in the following way (at paragraph 3.9)</p> <p>“Adjoining the Site to the east, and projecting forward of the building line, is a 4 storeys high commercial building from the turn of the last century, with a double height mansard roof. It is faced in red brick and has stone detailing. The flank wall adjoining the Site is rendered and painted white, with a door with a deep arched hood and windows above. “ (emphasis added)</p> <p>The description wrongly characterises the property as “commercial” and makes no reference to the residential accommodation.</p> <p>The flank wall which incorporates the entrance to 80 High Holborn is depicted in the Design Statement of March 2016 at page 11 as view 5.</p> <p>As recorded by the Applicant, the entrance to the residential accommodation at 80 High Holborn is the</p> |

**Application No:**    **Consultees Name:**    **Consultees Addr:**    **Received:**

**Comment:**    **Response:**

single door set into the flank wall which runs at a right angle and adjacent to the existing High Holborn façade of Templar House.

Flats 1 to 6 at 80 High Holborn are arranged over the upper five floors of 80 High Holborn. The windows recorded as set in to the flank wall "...projecting forward of the building line..." are bedroom windows of four of the six flats. These, including that for Flat 2 (on the first floor level) are located no more than 3 meters from the building line of the Applicant's proposed development.

As residents of Flat 2 80 High Holborn, we object to the proposed development as identified in the original and revised Application for the following reasons:

1. Despite suggestions by the Applicant to the contrary, and despite Flat 2, 80 High Holborn being identified as a "neighbour", we were not provided with any invitation to attend or take part in the initial consultation referred to by the Applicant as part of its "Statement of Community Involvement", or otherwise provided, by the Applicant, with notice of the Application, or the amendment to it. In consequence we invite the conclusion that the Application is flawed as predicated on inadequate consultation.

2. The historic scale of the building that is now 80 High Holborn will, architecturally and by the increased scale of the site's height and usage, be overborne by the development as proposed. Although there is, at present, a difference in scale between the Templar House site and that of 80 High Holborn that difference must be judged by reference to the relationship with other sites and facades fronting on to this part of High Holborn. The proposed development of Templar House would produce an adjoining building which not only dwarfs 80 High Holborn, but which would manifestly be disproportionate in scale to all other buildings in the immediate vicinity, including, not least, the historic Pearl Assurance Building, now the Rosewood Hotel. This disproportionate increase in visual and actual scale is proposed by the Applicant without any attempt to identify a benefit to the area and its community which might possibly provide justification for it being permitted. It must, reasonably, be inferred that the principal reason for the significant change in scale of the site is commercial benefit accruing, in the main if not uniquely, to the Applicant. In the absence of tangible benefit identified as accruing to other than the Applicant, and in particular accruing to the area and its community, we invite the conclusion that the unjustified increase in scale (including but not limited to the height of the proposed development) represents manifest "overdevelopment" of the site. The disproportionate scale of the proposed development when viewed (as it must be) in the context of 80 High Holborn as the property adjoining to the east, detrimentally overbears 80 High Holborn.

3. The Application (even as amended) wrongly characterises 80 High Holborn as having "commercial" use. In likely consequence, but in any case, the Application completely fails to address the impact, both immediate (and during the development/demolition) and in the medium and long term, on the entirely residential use of 80 High Holborn. In particular, while the Application recognises (and provides pictorial evidence of the proximity of the sole entrance door to 80 High Holborn in the adjoining flanking wall) it fails to address the impact of the development on the access to 80 High Holborn both during and after completion of the proposed development (and in particular demolition) and manifestly and materially fails to address at all (let alone satisfactorily) the impact of the development on the proximity of residential accommodation, including bedrooms. In the absence of any recognition by the Application of these matters, we invite the necessary conclusion that such impact is materially detrimental to our residential amenity and privacy.

4. The process of development, including complete demolition of the existing site cannot be

**Application No:**    **Consultees Name:**    **Consultees Addr:**    **Received:**    **Comment:**    **Response:**

undertaken without what must inevitably be significant and detrimental impact on safe access to 80 High Holborn and its residential use. In circumstances where there has been inadequate consultation, a failure to recognise the residential usage of 80 High Holborn and a complete failure to address the impact of the proposed development on such usage, we invite the necessary conclusion that the Application is, as is stands, fundamentally flawed and that the Application should, for all of the reasons we have identified be refused.

Mr Paul B Sugden  
Mrs Carol A M Sugden  
17 April 2016

---