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**THE VICTORIAN SOCIETY**  
The champion for Victorian and Edwardian architecture

David Fowler  
Development Control  
Planning Services  
London Borough of Camden  
Town Hall  
Argyle Street  
WC1H 8ND

Your reference: 2015/2704/P  
Our reference: 2016/04/019

20 April 2016

[David.Fowler@camden.gov.uk](mailto:David.Fowler@camden.gov.uk)

Dear Mr Fowler

**RE: Central Somers Town covering land at Polygon Road Open Space;  
demolition of existing buildings and construction of 7 new buildings ranging  
from 3 to 25 storeys in height**

Thank you for consulting the Victorian Society on this application. We **object** to the proposals which will harm the setting of numerous Grade I listed buildings. Of particular concern is St Pancras Station, a building that the Society successfully campaigned to save from demolition in the 1967.

It is noted that Historic England have now recommended that this application is withdrawn, if not refused, on the basis that it will cause 'significant and serious' harm to 'heritage assets of the highest designation' (the Grade I listed Regents Park and Chester Terrace).

We suggest that St Pancras also falls into this bracket, which as a heritage asset, is no less significant. The new 25 storey tower will be visible over certain points of William Henry Barlow's train shed (1865-8), once the widest clear span structure in the world. It is widely considered to be one of the most important pieces of engineering of the nineteenth century, embodying the pioneering spirit of the Victorian age. Whilst the impact the proposed tower will have on the station does not perhaps present such a high level of harm as that to Regents Park, not being an intrusion into what is a well preserved and carefully designed rural landscape, it is nevertheless an unwelcome competitor to the monumental architecture of St Pancras, to which the roofscape is so important. Currently, the 25 bays of the train shed are framed against the sky without interruption and this contributes to the sense of its vastness and achievement as an unprecedented feat of engineering.

As shown by recent High Court decisions ruling against developments, such as that of Forge Field, Penshurst in 2014, the setting of listed buildings is incredibly important. Paragraph 48 of this judgement states:

*'the duties in sections 66 and 72 of the Listed Buildings Act do not allow a local planning authority to treat the desirability of preserving the settings of listed buildings*

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*and the character and appearance of conservations areas as mere material considerations'*

The following paragraph continues *'that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted.'*

This presumption can be outweighed by public benefits, but when there are other shorter options to explore, the current scheme is unjustifiable. It is clear that proposals negatively affect some of London's most important architecture and we therefore recommend that the scheme in its current iteration is **refused**.

Yours sincerely

Alex Bowring  
**Conservation Adviser**