



Historic England

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Ms Elaine Quigley  
London Borough of Camden  
Development Control Planning Services  
Town Hall  
Argyle Street  
London  
WC1H 8ND

Direct Dial: 0207 973 3777

Our ref: P00517031

11 August 2016

Dear Ms Quigley

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015  
TEMPLAR HOUSE , 81 - 87 HIGH HOLBORN, LONDON, WC1V 6NU  
Application No 2015/4407/P**

Thank you for your letter of 30 June 2016 notifying us of the application for planning permission relating to the above site. We do not wish to comment in detail, but offer the following general observations.

**Historic England Advice**

We are aware that the applicants are preparing revisions to this scheme. We are therefore not commenting in any detail at this stage and will await notification that the revisions before making detailed comments.

At this stage, we wish to express our concerns regarding the loss of the existing building at 81-87 High Holborn. Whilst the existing building is not identified in the Bloomsbury Conservation Area Appraisal as making a positive contribution to the character of the area, the existing Portland stone classically detailed facade onto High Holborn is considered to be of high quality and to make a positive contribution to the local street scene. As such, we are likely to raise concerns about the replacement of this facade and consider its loss to cause some harm to the character and appearance of the conservation area. We also have serious concerns regarding the impact of the proposed building on views within the wider conservation area and on the setting of nearby heritage assets, including Gray's Inn Gardens, Lincoln's Inn Fields, and listed buildings that are impacted in key views looking across those open spaces.

It should also be noted that the Townscape and Visual Impact Assessment contains summer views only, so the impact of the proposals on the settings of various heritage assets when viewed across open spaces in winter is not illustrated. In respect to the proposed impacts on setting, we draw your attention to Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended), which set out the obligation on local planning authorities to pay special regard to safeguarding



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the special interest of listed buildings and their settings. We also draw your attention to the National Planning Policy Framework, which guides decision making on safeguarding this special interest. Paragraph 128 states that in determining applications, local authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution to their setting. Paragraph 132 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm should require clear and convincing justification. Paragraph 134 is also considered relevant and refers to the requirement to weigh harm against the public benefits of proposals, including securing optimum viable use.

We await notification of the revised drawings and will comment in more detail upon the proposals at that point.

**Recommendation**

We would urge you to address the above issues, and recommend that the application should be determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

Yours sincerely

**Claire Brady**

Inspector of Historic Buildings and Areas

E-mail: [claire.brady@HistoricEngland.org.uk](mailto:claire.brady@HistoricEngland.org.uk)

cc



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