

**182-184 High Holborn,**  
London WC2,

## **Heritage & Townscape Appraisal**

September 2016

Consultancy for the  
Historic Built Environment

**KMH**Heritage

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# 1 Introduction

## Purpose

- 1.1 The purpose of the report is to set out the heritage significance of 182-184 High Holborn and its context and consider the proposals presented.

## Author

- 1.2 The editor of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. He was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to this, he had been a conservation officer with the London Borough of Southwark, and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect, and has a specialist qualification in urban and building conservation.
- 1.3 The drafting of this statement was undertaken by Nick Collins BSc (Hons) MSc MRICS IHBC. Nick has been a Principal Inspector of Historic Buildings & Areas in the London Region of English Heritage. Most recently he was a Director of Conservation at Alan Baxter & Associates. Nick has extensive experience in dealing with proposals that affect the historic environment and also has a background in research, in policy analysis and in understanding historic buildings and places
- 1.4 Historical research for this report was undertaken by Jonathan Clarke, a conservation and heritage professional with many years' experience. Formerly a Senior Investigator in the Conservation & Protection Department at Historic England and the Royal Commission on the Historical Monuments of England (RCHME), Jonathan recently authored 'A Discreet Revolution: Early Structural Steel in London Buildings' (English Heritage, 2013).

## 2 The history of 182-184 High Holborn

### Background

- 2.1 182 -184 High Holborn is located on the south side of High Holborn at the junction with Smart's Place. This part of 'mid-town' central London has been subject to considerable change since the post-war period and continues to evolve today.
- 2.2 Nos 182-184 High Holborn served as the offices of Kelly & Co Ltd (became Kelly's Directories Ltd in 1897) in the late 19th and early 20th centuries, and probably longer.<sup>1</sup> The building was still occupied by publishers in the 1970s, in which decade George Harrap & Co Ltd (book publishers) were the principal occupants, with Chas H. Fox Ltd (Theatrical Costumers) occupying the basement and ground floor.<sup>2</sup>
- 2.3 Plans by the parent firm, George C Harrap & Co., to secure in 1978 a refurbishment and change of use of the building from warehousing and offices to part offices and part light industrial use seem to have come to nothing, despite being approved by Camden Planning department.<sup>3</sup>
- 2.4 In November 1980, R. Seifert and Partners submitted an application on behalf of the Holborn Property Co. for rebuilding the existing Victorian building as 'offices and light industrial' use. This redevelopment proposal comprised a six-storey office building (with basement) fronting Smarts Place & High Holborn, and a four storey light industrial building fronting Smarts Place & Stukeley Street.<sup>4</sup>

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<sup>1</sup> *The London Gazette* no. 26876. p. 4149 (23 July 1897); *Financial Times*, 18 April 1912, p. 3; *Financial Times*, 28 February 1921, 6

<sup>2</sup> *The Times*, 9 January 1974, p. 14; Planning Application -26923 (182-184 (even) High Holborn, and 13-21 (odd) Stukeley Street, WC2

<sup>3</sup> Planning Application -26923 (182-184 (even) High Holborn, and 13-21 (odd) Stukeley Street, WC2

<sup>4</sup> Application Number 31530/R2 182-184 High Holborn, WC1 & 13-21 Stukeley Street, WC2

- 2.5 The designs were revised in December 1980 and February 1981, before receiving authorisation in March 1981. Drainage plans were submitted in July 1981, and building work began at the end of the year. The consulting engineers were Ryska Smith and Ginsler (UK) Ltd, Bunyan Meyer & Partners, and RS & G, Toronto.<sup>5</sup>



Figure 1: Arab Press House, High Holborn

- 2.6 The completed building, named Fennimore House, was being advertised to prospective tenants by June 1983.<sup>6</sup> Offering 31,000 sq ft of floorspace, the developers, Townsend Thoresen Properties anticipated that it would appeal to companies looking for a headquarters building,

<sup>5</sup> Microfiche drainage plans/correspondence for Nos 182-184 High Holborn, Holborn Local Studies

<sup>6</sup> The agents were Michael Laurie and Partners and Fuller Peiser, acting on behalf of Townsend Thoresen Properties.

and that it could be rented at £17.50 a square foot - a new peak for the High Holborn area.<sup>7</sup> Geers Gross, advertising agents, considered it as its headquarters, but in early 1984 instead opted for the slightly larger (33,000 sq ft) St Martin's House in St Martin's Lane. Fennimore House was re-marketed, and by 1987 had been renamed Arab Press House.<sup>8</sup> The building was refurbished in 2006, and in 2015 was re-marketed.



Figure 2: Arab Press House, showing High Holborn/Smart's Place elevations (March 2016)

### Architectural Interest

- 2.7 The building seems to have been wholly ignored by the contemporary architectural and building press, and subsequent literature on modern architecture and topographical history similarly disregards it, including *The Buildings of England*.
- 2.8 Among newspapers, local and national, only *The Daily Telegraph* seems to have reported on its appearance within the property market, noting:
- 'Designed by Richard Seifert and Partners, the air-conditioned building is clad in striking bronze mirror glass*

<sup>7</sup> 'Peak rent for High Holborn', *Daily Telegraph*, 14 June 1983.

<sup>8</sup> *Benn's Media Directory* v134 (1987), p. 453

*and incorporates every feature required by modern tenants'.<sup>9</sup>*

- 2.9 That the building has been overlooked is not surprising, since it lacks both architectural distinction and any of Seifert's characteristic sculpted forms or bravura displays that typify some of his best works from the 1960s and 1970s. Somewhat brash and vulgar, and lacking any contextual sensitivity, it surely falls within the lower ranks of his firm's prodigious output - which included more than 500 office blocks in Britain and Europe,<sup>10</sup> and more than 600 buildings in London.<sup>11</sup>
- 2.10 Seifert and Partners' heyday is widely acknowledged to be during the 1960s/early '70s commercial property boom,<sup>12</sup> with the most iconic works - Centre Point (grade II); Space House (now Civil Aviation Authority House); The Alpha Tower in Birmingham (Grade II) reflecting the confidence and dynamism associated with the period. The most renowned, and successful of the firm's later projects is Tower 42 (Natwest Tower), completed in 1981 - although this was not recommended for listing.

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<sup>9</sup> *Ibid*

<sup>10</sup> Martin Pawley, 'Richard Seifert: Workaholic architect whose tall towers changed the urban skyline of Britain and Europe', *The Guardian*, 29 October 2001.

<sup>11</sup> 'Richard Seifert, who has died aged 90, was said to have influenced London's skyline more than anyone since Christopher Wren', *The Telegraph*, 29 October 2001.

<sup>12</sup> None of the obituaries consulted, nor reappraisals of Seifert's work and reputation, cite any buildings from the 1980s or later - with the exception of the NatWest Tower. See *Architects' Journal*, 1 November 2001, p. 20; *Building Magazine*, 25 November 2011, pp41-45; 'An assessment of the Colonel's proper rank', *Building Design*, 14 December 2001, p. 15; 'Col' Seifert 1910-2001', 2 November 2001, p. 2; Herbert Wright, 'Save our Seiferts', *Blueprint*, September 2006, p. 27; 'In praise of Seifert', *Building Design*, 16 November 1984, p. 13; 'Seifert Revisited', 16 November 1984, pp. 16-17. Only a report on an exhibition at the RIBA Heinz Gallery in 1984 commemorating 50 years in architectural practice - funded by Seifert and Partners as a PR-exercise celebrating current and recent projects - noted projects from the 1980s, although seemingly not Fennimore House: 'Projects for the 1980s showed some already completed, others under construction and some proposals. From the National Westminster tower, to the Islamic Development Bank, Jedah; and the Cutlers Gardens renovation scheme in the City, to Central ITV complex, Nottingham. Among the schemes under way was the Bank MISR, Cairo; and proposals for City Bridge, a pedestrian Thames crossing, Ankara Hotel, Turkey; and South Docks Development, Liverpool, were also on view'. 'Progress is the most important aspect of the architect's philosophy', *Architect & Surveyor*, December/January 1985, pp. 4-7

- 2.11 It is difficult to think of many prominent or successful works from the 1980s or later, and the firm's fondness for tinted-reflective or mirror-glass<sup>13</sup> was often vain and ineffective. For example, their 'City Reach' in Docklands, comprising two tall tinted-glass office slabs linked by a lower, gabled atrium (1988-90) is described as 'desperately overweening' and 'awful' by Cherry and O'Brien.<sup>14</sup> The same authors considered the nearby shops, flats and offices around Milwall Inner Dock (1987-91) 'dismal'.<sup>15</sup>
- 2.12 This diminishment in quality must in part stem from the absence of Richard Seifert for most of the decade; having retired in 1984, his son John Seifert took over the practice, which survived in various forms until 2010. But until a full catalogue or monograph of all the firm's works is produced, a rigorous and balanced appraisal of its latter years is not possible.
- 2.13 Today the area around 182-184 High Holborn is subject to much redevelopment and refurbishment. The area is sufficiently of a post-war re-developed nature that it falls outside of any conservation area, although the Bloomsbury and Seven Dials Conservation Areas are close by.

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<sup>13</sup> early on used in the Former Midland Bank, Dale Street, Liverpool c 1971, by Raymond Fletcher of Bradshaw, Rowse & Harker; grade II

<sup>14</sup> Cherry, B, O'Brien, C, and Pevsner, N, *The Buildings of England London 5: East* (2005), 692

<sup>15</sup> *ibid*, 691



### 3 Heritage significance

- 3.1 This section of the report assesses the heritage significance of the surrounding area.

#### **The heritage context of the site and its surroundings**

- 3.2 182-184 High Holborn is neither listed nor in a conservation area. The site does, however, bound both the Seven Dials Conservation Area to the south and the Bloomsbury Conservation to the north east.
- 3.3 Nearby listed buildings include:
- 3.4 Holborn Town Hall & Library: Grade II
- 3.5 St Giles Almshouses: Grade II
- 3.6 186-187 Drury Lane: Grade II

#### **Locally Listed Buildings**

- 3.7 181 High Holborn is identified on the Local List of Buildings of Special Architectural or Historic Interest by the London Borough of Camden.

#### **The heritage significance of the site and its context**

##### **The relevant heritage assets**

- 3.8 In terms of the assessment of the proposals for the site, the heritage assets within Camden most relevant to considering the effect of the scheme are the setting of nearby conservation areas, and the setting of nearby listed buildings.
- 3.9 The effect of the proposed scheme on these assets will be on the *setting* of these assets.

##### **Assessing heritage significance**

- 3.10 The nearby conservation areas and listed buildings in the vicinity of the site are 'designated heritage assets', as defined by the National Planning Policy Framework (the NPPF). Other buildings and structures - such as locally

listed buildings - can be considered as 'non-designated heritage assets'.

- 3.11 'Significance' is defined in the NPPF 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'. The Historic England 'Planning for the Historic Environment Practice Guide' puts it slightly differently – as 'the sum of its architectural, historic, artistic or archaeological interest'.
- 3.12 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (Historic England, April 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.  
  
'Historic interest', 'Historical value' and 'Evidential value'
- 3.13 The buildings and conservation areas surrounding 182-184 High Holborn and their relationship to one another collectively illustrate the development of this part of London. They tell us about the nature of the expansion of London – and the areas covered by conservation areas in particular – the nature of London's 18<sup>th</sup> century expansion, the suburbanisation of previously open land by means of estate development in Bloomsbury and Seven Dials.
- 3.14 The older buildings on High Holborn are representative of how the area was adapted and changed to suit occupation in the Victorian and Edwardian periods and the rise in the number of commercial buildings. This is typified by 181 High Holborn.
- 3.15 The nearby Seven Dials area is typified by a variety of narrow alleys, hidden yards and the formality of street planning found immediate around Seven Dials itself.
- 3.16 Part of the conservation area is bounded by Shaftesbury Avenue (as well as High Holborn) which again is typified by wider 'boulevards' of grander, often commercial, Victorian and Edwardian development.

- 3.17 The immediate area including 182-184 High Holborn was substantially redeveloped in the post-war period which has removed most of the historic buildings and character although the road plan remains.
- 3.18 In terms of Historic England's 'Conservation Principles' the nearby listed buildings and conservation area provide us with 'evidence about past human activity' and, by means of their fabric, design and appearance, communicate information about its past.
- 3.19 Subsequent alteration, demolition and redevelopment in the immediate area to 182-184 High Holborn has largely removed the ability of the older townscape and intact historic buildings to do this; hence its exclusion from the surrounding conservation areas.
- 'Architectural interest', 'artistic interest' or 'aesthetic value'
- 3.20 The architectural merits of 182-184 High Holborn are considered in detail in the previous section. The building lacks both architectural distinction and any of Seifert's characteristic sculpted forms or bravura displays that typify some of his best works from the 1960s and 1970s. Somewhat brash and vulgar, and lacking any contextual sensitivity, it falls within the lower ranks of his firm's output.
- 3.21 The adjacent 181 High Holborn is an early 20th century commercial building which has been dated to between 1910-1914. The building is in brown brick with red brick dressings and with contrasting rendered elements. The panels between the 1<sup>st</sup> and 2<sup>nd</sup> floor window display a cipher reading 'ESA'. The repetitive elements of the architecture give it an attractive consistency and rhythm to this stretch of the street.
- 3.22 The architecture within the two nearby conservation areas ranges from the estate buildings of Bloomsbury's and Seven Dial's 18<sup>th</sup> century core, to the grander commercial buildings of the 19<sup>th</sup> and early 20<sup>th</sup> centuries. It incorporates a variety of commercial and residential

buildings and is typified overall by a variety of architectural styles. Immediately to the rear of the building, on Stukeley Street, the conservation area is typified by industrial/commercial/warehouse buildings in brick with large punched windows.

- 3.23 In the immediate environment of 182-184 High Holborn, other than the locally listed 181 High Holborn, many of the buildings are typified by post-war/redeveloped large buildings such as the previously derelict 1960s sorting office opposite.

## 4 The policy context

- 4.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.

### Legislation

- 4.2 The legislation governing listed buildings and conservation areas is the Planning (Listed Building and Conservation Areas) Act 1990. Section 66 (1) of the Act requires decision makers to ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’ when determining applications which affect a listed building or its setting. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay ‘special attention...to the desirability of preserving or enhancing the character or appearance of that area’.

### The National Planning Policy Framework

- 4.3 In March 2012, the Government published the new National Planning Policy Framework (NPPF), which replaced Planning Policy Statement 5: ‘Planning for the Historic Environment’ (PPS5) with immediate effect.
- 4.4 The NPPF says at Paragraph 128 that:
- In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 4.5 A description and analysis of the heritage significance of the site and its context is provided earlier in this report.
- 4.6 The NPPF also requires local planning authorities to ‘identify and assess the particular significance of any

heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal'.

4.7 At Paragraph 131, the NPPF says that:

In determining planning applications, local planning authorities should take account of:

- 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.

4.8 Paragraph 132 advises local planning authorities 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting'.

4.9 The NPPF says at Paragraph 133 'Good design ensures attractive, usable, durable and adaptable places and is a key element in achieving sustainable development. Good design is indivisible from good planning.' Paragraph 133 says:

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse

consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

- 4.10 Paragraph 134 says that ‘Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 4.11 Further advice within Section 12 of the NPPF urges local planning authorities to take into account the effect of an application on the significance of a non-designated heritage asset when determining the application. It says that ‘In weighing applications that affect directly or indirectly 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’.
- 4.12 Paragraph 135 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. In weighing applications that affect directly or indirectly non designated heritage asset, the scale of any harm or loss and the significance of the heritage asset.
- 4.13 Paragraph 137 of the NPPF advises local planning authorities to ‘look for opportunities for new development within Conservation Areas and World

Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably’.

4.14 Paragraph 138 says that:

Not all elements of a World Heritage Site or 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 or World Heritage Site should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, 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.

### **Camden Council’s Local Development Framework**

4.15 Camden Council adopted its Core Strategy and Development Policies on 8 November 2010. Core Strategy Policy CS14 deals with ‘Promoting high quality places and conserving our heritage’ and says:

‘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'.

4.16 The commentary to the policy says:

'Our overall strategy is to sustainably manage growth in Camden so it meets our needs for homes, jobs and services in a way that conserves and enhances the features that make the borough such an attractive place to live, work and visit. Policy CS14 plays a key part in achieving this by setting out our approach to conserving and, where possible, enhancing our heritage and valued places, and to ensuring that development is of the highest standard and reflects, and where possible improves, its local area'

4.17 It goes on to say:

'Development schemes should improve the quality of buildings, landscaping and the street environment and, through this, improve the experience of the borough for residents and visitors'

4.18 Regarding Camden's heritage, the Core Strategy refers to Policy DP25 in Camden Development Policies as providing more detailed guidance on the Council's approach to protecting and enriching the range of features that make up the built heritage of the borough.

4.19 Policy DP25 is as follows:

Conservation Areas

In order to maintain the character of Camden's conservation areas, the Council will:

- a) take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
- b) only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
- d) not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

#### Listed Buildings

To preserve or enhance the borough's listed buildings, the Council will:

- e) prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention;
- f) only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and
- g) not permit development that it considers would cause harm to the setting of a listed building.

#### Archaeology

The Council will protect remains of archaeological importance by ensuring acceptable measures are

taken to preserve them and their setting, including physical preservation, where appropriate.

Other heritage assets.

The Council will seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

## **5 The proposed scheme and its impact on heritage assets and townscape**

- 5.1 The proposals are outlined in more detail in the Design & Access Statement prepared by SPPARC Architects. This section of the report assesses its effect on the heritage significance described earlier in this report.

### **The proposed scheme**

- 5.2 The proposal is to externally remodel 182-184 High Holborn in a way that reflects the historic origins and materiality of the area using traditional brick and masonry.
- 5.3 Influenced by the neighbouring Post Office building at 181 High Holborn, the proposed replacement street elevations have an expressed horizontal and vertical rhythm that rises from a lightweight base over ground and first floor as a modern interpretation of a piano nobile.
- 5.4 Above first floor, a robust brick horizontal cornice subtly integrates the proposal into the established street pattern.
- 5.5 The rhythm of the articulated brick elevations aims to break up the mass of the building to reflect the more historic plot forms in this part of London and at variance with the monolithic elevations of other buildings in the area (and to a certain extent the existing glazed elevations). This will also have the benefit of creating a connection between the site and the characteristics of the nearby conservation areas – reintroducing materials that are sympathetic and better harmonise with the older buildings.
- 5.6 The proposal carefully articulates the difference between the ‘Victorian/Edwardian’ scale of High Holborn and the more intimate scale of Smart’s Place. It will create an effective and crisp corner building that then reduces in scale along Smart’s Place.
- 5.7 The frontage onto High Holborn has been modelled to effectively mediate the changing scale between 190 High

Holborn and 181 Holborn using, in part, articulation and materials to make the transition. This articulation benefits views from the east and west where both 190 and 181 High Holborn can both be seen in the context of Nos. 182-184.

- 5.8 In views along Smart's Place the scale of the building will be remain as existing, with the 6<sup>th</sup> and 7<sup>th</sup> floors stepping back.
- 5.9 The Seven Dial's Conservation Area, which follows Stukeley Street to the rear of the building is largely industrial/commercial in character with brick being the predominant material and large punched windows in the commercial building facades. This has been reflected stylistically in the elevational treatment of the proposal.
- 5.10 Roof mounted plant will be rationalized and encapsulated behind the new external elevations so as not to be visible in longer views along High Holborn and Smart's Place. This will be a considerable benefit to the backdrop of the locally listed 181 High Holborn.
- 5.11 The building when seen in views along High Holborn from the west combines a crisp silhouette with careful detailing and articulation. When seen in the context of 181 High Holborn, the materials sit in harmony with the locally listed building and the proposed extension at roof level 'floats' above ensuring the silhouette of No.181 is undiminished and better appreciated than previously.
- 5.12 The extended height sits comfortably alongside the other buildings further to the east.
- 5.13 Overall, the proposals aim to enhance the setting of the nearby conservation areas, in particular the immediately adjacent Seven Dial's Conservation Area by relating in materials and form the predominant characteristics of Stukeley Street.
- 5.14 The proposal also aims to provide a better setting to the locally listed 181 High Holborn – creating a building with a crisp and elegant form in materials that relate to the building and the rhythm of its elevation.

- 5.15 The proposals will not have any impact any nearby listed buildings.

## 6 Compliance with policy and guidance

- 6.1 This report has provided a description and analysis of the existing building and its context as required by Paragraph 128 of the National Planning Policy Framework. In addition, the report also describes how the proposed scheme will affect that heritage significance. The effect is positive, and for that reason, the scheme complies with policy and guidance. This section should be read with Section 5 and.

### **The level of ‘harm’ caused by the proposed scheme**

- 6.2 As outlined in Section 4, the NPPF identifies two levels of potential ‘harm’ that might be caused to a heritage asset by a development: ‘substantial harm...or total loss of significance’ or ‘less than substantial’. Both levels of harm must be caused to a *designated* heritage asset – in this instance the setting of the Bloomsbury and Seven Dial’s Conservation Areas.
- 6.3 The proposed scheme, in our considered view, preserves the character and appearance of the Seven Dial’s & Bloomsbury and Conservation Areas, and thus complies with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. It does not lead to ‘substantial’ harm or any meaningful level of ‘less than substantial’ harm to the setting of any designated heritage assets. The considered approach to the new elevational treatment has had full regard for the nature and materiality of the nearby buildings and conservation area.
- 6.4 Further, the proposal has been carefully considered to provide a sensitive and improved setting to the adjacent locally listed 181 High Holborn.

### **The National Planning Policy Framework**

- 6.5 In respect of Paragraph 131 of the NPPF, the proposed scheme can certainly be described as ‘making a positive contribution to local character and distinctiveness’.

Despite sitting outside the conservation area it has taken its cue from the materials and form of the nearby historic buildings, as well as the adjacent 181 High Holborn.

- 6.6 The proposed scheme complies with Paragraph 133 of the NPPF - it certainly does not lead to 'substantial harm to or total loss of significance of a designated heritage asset'. It also complies with Paragraph 134 for the reasons given in detail earlier in this report – the scheme cannot be considered to harm the setting of the nearby conservation areas, but rather enhances them by re-introducing materials and forms that are more sympathetic to the character of the area.
- 6.7 The effect on the non-designated heritage asset (181 High Holborn) was given full consideration as per paragraph 135 and the design specifically tailored to ensure its setting was not harmed – but positively enhanced - by the proposals

#### **Camden's Local Development Framework**

- 6.8 As has been shown, and for the same reasons that are given in respect of the NPPF, the scheme would preserve and enhance the setting of the nearby conservation areas. It would also enhance the setting of the adjacent locally listed building.
- 6.9 The proposals and associated alterations will also improve its environmental sustainability.
- 6.10 For these reasons, and those given earlier, the proposed development is consistent with Camden's Local Development Framework policies relating to the historic built environment.



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