

SH/MM/DP6804

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FAO Daren Zuk

**Planning - Development Control,
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BRACTON HOUSE, 35 HIGH HOLBORN, LONDON, WC1V 6AE

APPLICATION FOR FULL PLANNING PERMISSION

Dear Daren,

On behalf of our client, TAKENAKA EUROPE GmbH – UK Branch, we hereby submit the enclosed application for the following development at Bracton House, 35 High Holborn Street, London, WC1V 6AE ('the Site')

'Alterations to the ground floor front fenestration, including replacement of existing windows and doors. Replacement of the existing roof tiles and the provision of terraces at the rear.'

Site Context

The Site is located on the north side of High Holborn, opposite the junction with Chancery Lane, and comprises a single six storey building, currently occupied as offices. The principle elevation of the building faces south onto High Holborn, including the main entrance on the ground floor. The building's side elevation fronts Fulwood Place to the east, a narrow pedestrian passage linking High Holborn to Gray's Inn Gardens.

The building consists of a double height office reception space at ground floor, and office areas at first floor and above, stepping back from the east and west elevations up to the fourth, fifth and sixth floors, where terrace and plant areas are provided alongside the office space. The basement of the building is predominantly occupied by office ancillary space, plant rooms and a UKPN substation. The part ground floor, part basement unit at 34 High Holborn does not form part of this application and as a result is indicated in grey on the application drawings.

High Holborn is characterised by a number of large scale commercial premises, and acts as a major arterial road linking the City of London to the West End. The area is well served by public transport, with the Site achieving a PTAL 6b (highest) rating due to its close proximity to Holborn and Chancery



Lane Underground stations and a number of bus routes. As such, the Site is well served to cater for office occupiers, however the building performs relatively poorly and is in need of a number of interventions in order to bring it up to modern office standards.

The building is not listed however is located in the Bloomsbury Conservation Area. A number of listed buildings lie within the vicinity, including 22-23 High Holborn and 21 High Holborn.

Relevant Designations

The site falls into a number of designations listed in the Local Plan, considered in further detail below:

- Bloomsbury Conservation Area
- Central Activities Zone
- Camden Local Plan Growth Area
- Local Plan Frontage

Proposed Development

The proposals are driven by a brief to considerably refurbish and enhance the building, creating a new identity for the reception and the entrance from High Holborn, whilst addressing ongoing issues to the exterior of the building by renovating the sloped roof and introducing plant screens to remove the existing visual clutter. The brief also aims to significantly improve the quality of the office floorspace by refurbishing the existing space, providing additional terrace space at fifth and sixth floor level, introducing cycle storage and associated facilities, and improving the energy efficiency of the building to achieve EPC A and BREEAM Excellent.

The modest scheme has been designed to be sympathetic to the host building while creating a new identity for the office building and entrance from High Holborn. This involves redesigning the entrance to improve both the aesthetic appeal and functional access to the building while respecting the historical context of the surrounding Conservation Area, ensuring the changes are harmonious with the local architecture.

The office entrance will be shifted back to the original position in the west bay, with the central bay to be utilised as a large picture window into the office reception. By shifting the entrance back to the west bay the office reception floor level will be re-aligned with the external paving level, increasing the accessibility to the office and removing the incumbrance of the internal ramp. This will also allow the office entrance doors to swing inwards rather than swing outwards. The central bay will have a large window into the reception giving increased transparency through to and presence of the reception from the street.

A significant aspect of the renovation is the refurbishment of the building's sloped roof to resolve ongoing issues. This addition will address current problems and improve the overall durability and longevity of the roof. The design will maintain the building's architectural integrity while improving long-term performance and reliability, and include a plant screen to mitigate the existing visual detriment from the rooftop excrescences, including rooftop plant.



Energy efficiency is a key focus of the development, with plans to upgrade the building to achieve an Energy Performance Certificate (EPC) rating of A and a BREEAM Excellent certification. These improvements will substantially reduce the building's carbon footprint and contribute to a more sustainable future, aligning with wider policy aspirations and ensuring the building's continued use.

The main external works to the rear of the development include the creation of openings to the flat roof areas at fourth and fifth floors, to allow the existing flat roof space to be used as office terraces. This comprises the opening in the north elevation at fourth floor level, and the creation of a dormer in the west elevation roof at fifth floor level. Together, the inclusion of these terrace areas will greatly improve the quality of the office space both by providing outdoor area and urban greening but also remove the unattractive flat roofs which are difficult to access and maintain, meaning they often became unsightly as seen from the offices and surrounding buildings and present potential problems with overlooking.

With the replacement of all mechanical plant on 35 High Holborn with modern, high efficiency equipment and the redistribution of some equipment to better utilise the existing plant areas, the sixth floor terrace will also be extended north along the west elevation, providing further high quality amenity space for office users.

Planting will be incorporated around the edge of all of the terraces to ensure that the privacy of neighbouring residents is preserved, improving on the existing condition where no screening is in place. The proposed planters will be min 0.5m deep, meaning that occupants cannot approach the edge of the terraces. The planting is proposed to stand above eye level to screen any views from the terraces and office windows behind from the neighbouring residential habitable room windows and terrace.

Through the incorporation of all of the proposed works, the overall quality of the office floor space will be substantially improved, making it more suitable for contemporary work practices. The provision of cycle storage and associated facilities will also promote sustainable commuting options, supporting the overall goal of creating a modern and environmentally friendly office environment.

Policy Considerations

The relevant Planning Policy documents for this application are as follows:

- The National Planning Policy Framework;
- The London Plan 2021;
- Camden Local Plan 2017;
- Camden Planning Guidance Design (2021) and Amenity (2021);
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Land Use

Policy E1 of the Local Plan states that Camden will:



- *b. maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;*
- *c. support local enterprise development, employment and training schemes for Camden residents;*
- *d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;*
- *f. direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031;*
- *g. support Camden's industries by: i. safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;*

The Proposed Development, by refurbishing existing office premises in a Central London location, bringing the building into alignment with modern office occupier requirements, and ensuring its continued use, fully align with the aspirations of Policy E1 and should be fully endorsed as a result.

Design

Policy D1 of the Local Plan states that developments must exhibit urban design quality, enhancing the area's function, appearance, and character. Part (f) of the policy highlights the need for developments to integrate well with surrounding streets and contribute positively to street frontage.

Local Plan Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.

Camden's Design CPG sets out in more detail the need for developments to consider the context of the surrounding area, the use, and design of the building itself and how it can improve the character and quality of an area.

The proposed entrance changes aim to add value to the existing street scene through the use of new ground floor glazing and returning the entrance to its original position in the west bay, a positive move towards the original design intent for the building that was altered in 2014 with the planning permission that saw the removal of decorative steel elements on the south facade and bronze statue in the historic central, bay, and the shifting of the office entrance from the west bay to the central bay.

By shifting the entrance back to the west bay the office reception floor level will be re-aligned with the external paving level increasing the accessibility to the office and removing the incumbrance of the internal ramp. This will also allow the office entrance doors to swing inwards rather than swing outwards. The central bay will have a large window into the reception giving increased transparency through to and presence of the reception from the street.

By returning the office entrance to the west bay and through the sensitive use of materials to the south facade, as detailed in the Design and Access Statement, the Proposed Development ensures compliance with Policy D1 and D2 of the Local Plan and wider design policy.

Townscape and Heritage



Policy D2 of the Local Plan states that *'In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas. The Council will: e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;'*

In accordance with part e) of this Policy D2, the minor changes to the building will enhance the character and appearance of the conservation area. As set out in the Townscape and Heritage Statement submitted with this application, The Proposed Development is modest in nature and of a high quality design appropriate for its location. In respect of the design considered in its own right, and the relationship between the proposed alterations and the host building, as well as its heritage context, the effects will be positive or neutral. The new ground floor glazing and entrance will enhance the appearance of the building and its contribution to the local townscape of High Holborn and the significance of the Bloomsbury Conservation Area. There will be no harm to the significance of any heritage asset or its setting.

The Proposed Development will enhance the Bloomsbury Conservation Area. The modest nature of the proposals and the distance of the identified heritage assets from the Site, or their relationship with it, and the character of the intervening townscape are such that there will be no effect on any element of setting that contributes to the significance of any listed building or RPGSHI.

The Proposed Development is based on a clear understanding of the heritage significance of the Site context. It complies with the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act (1990) and special regard has been had to the significance of the Bloomsbury Conservation Area, and the setting of listed buildings in the surrounding area. There will be no harmful effect on the setting of any heritage asset in the surrounding area.

Amenity

Policy A1 of the Local Plan states that *'The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity'* which include visual, privacy and outlook, noise and vibration levels, and odour, fumes and dust.

To address concerns related to adverse noise, a Noise Impact Assessment has been prepared by Hoare Lea to satisfy any concerns relating to the noise emitted from the new rooftop plant machinery and the use of the new terrace areas, ensuring the changes are compliant with the allowed limits set out in Appendix 3 of the Local Plan and Guidance, and noise levels will be maintained below the established levels, and improved where possible. In this context it is important to note that all existing plant areas are unscreened and present an untidy and disruptive view from both the office areas and neighbouring buildings along with being a potential noise disturbance to surrounding sensitive receptors. The proposals include the installation of quartz zinc louvred plant screens and plant enclosures with acoustic performance, improving on the existing condition both in terms of visual appearance and acoustics.

Mitigating the impact of overlooking from the existing and new roof terraces, in compliance with Policy A1 of the Local Plan, has also been considered during the design phase of this proposal. The



proposals look to address the existing and potential overlooking to the nearby residential units at 31-33 High Holborn by installing landscape buffers to the perimeter of the proposed terraces at fourth and fifth floors and the extended terrace at sixth floor. The landscape buffers will be formed of planters along the extent of the east edge of the terraces facing 31-33 High Holborn. The proposed planters will be min 0.5m deep, meaning that occupants cannot approach the edge of the terraces. The planting is proposed to stand above eye level to screen any views from the terraces and office windows behind from the neighbouring residential habitable room windows and terrace.

An Air Quality Assessment has also been provided in support of this application, which demonstrates the overall impact on air quality will be neutral, thus preserving amenity in this regard and complying with Policy A1.

Submission

This application will be submitted alongside the following list of required documents, agreed with Planning Officers in pre-application discussions.

- Completed Application form;
- Site Location Plan;
- Existing and Proposed Plans, Elevations, and Sections;
- Design and Access Statement;
- Heritage Statement;
- Noise Impact Assessment;
- Air Quality Assessment;

After pre-application discussions, the additions proposed at 35 High Holborn have been sensitively amended to better comply with the requirements set out in the Development Plan. The Proposed Development has been thoughtfully designed to have a minimal impact on the amenity of the surrounding area, whilst enhancing the Bloomsbury Conservation Area and improving the borough's offering of high-quality office stock. As such the proposals fully align with wider policy and aspirations and should be supported as a result.

We look forward to receiving confirmation that the application has been received. If you have any queries or require any further information, please contact Mike Moon of this office.

Yours faithfully

DP9 Ltd.

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