



# **WATERHOUSE SQUARE, 138-142 HIGH HOLBORN**

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M & G Real Estate

## **Planning Statement**

February 2014

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# 1.0 Introduction

- 1.1 This Planning Statement has been prepared by CBRE Ltd on behalf of M&G Real Estate (“the applicant”) to accompany the full planning application for the refurbishment of Waterhouse Square, 138-142 High Holborn, Camden, WC1V 6PA. The proposed development comprises:
- ‘The change of use of 225 sq m (GIA) B1(a) ground floor space to A3 cafe use, inclusion of a new entrance door and internal refurbishment.’*
- 1.2 A full description of the existing site and surroundings is set out in Section 2. The statement also considers:
- The context of the proposals;
  - Background to the proposals, including the planning history;
  - The planning policy framework including national and regional guidance as well as local policy within the London Borough of Camden; and
  - The proposed development’s compliance with policy and other material considerations.
- 1.3 This document should be read in conjunction with the other documents forming part of the same submission and in support of the accompanying listed building consent, comprising:
- Application Form for Planning Permission and listed building consent supported by a listed building statement outlining the scope of works to be carried out by CBRE;
  - CIL Form by CBRE;
  - Drawing Package (including Existing and Proposed Plans, Elevations and Sections and Drawing Schedule please see below) prepared by EPR Architects;
  - Design and Access Statement prepared by EPR Architects; and
  - Heritage Statement by Heritage Collective.

## Drawing Schedule

NO	DRAWING TITLE	SCALE
9991-T-00-0198-Z00 Rev 01	Location Plans	1:1250 @ A3
9991-T-00-0199-Z00 Rev 01	Site Location Plan Boundary	1:500 @ A3
9991-T-00-0200-Z00 Rev 01	Site Location Plan Boundary	1:250 @ A3
9991-T-00-0201-Z00 Rev 01	Site Location Plan – Site Area	1:250 @ A3
9991-T-10-0202-Z00 Rev 01	Existing R10 Building – Gross External Area (GEA)	1:100 @ A3
9991-T-10-0203-Z00 Rev 01	Existing R10 Building – Gross Internal Area (GIA)	1:100 @ A3
9991-T-10-0204-Z00 Rev 01	Existing R10 Building – Net Internal Area (NIA)	1:100 @ A3
9991-T-10-0205-Z00 Rev 01	Existing R10 Building – Existing Ground Floor Plan	1:100 @ A3
9991-T-10-0206-Z00 Rev 02	R10 Building – Proposed Ground Floor Plan	1:100 @ A3
9991-T-10-0207-ZEA Rev 01	R10 Building – Entrance Courtyard Existing East Elevation	1:100 @ A3
9991-T-10-0208-ZEA Rev 01	R10 Building – Entrance Courtyard Proposed East Elevation	1:100 @ A3
9991-T-10-0209-ZXX Rev 02	R10 Building – Entrance Courtyard Existing and Proposed Internal Elevation	1:50 @ A3
9991-T-10-0210-ZXX Rev 02	R10 Building – Entrance Courtyard Existing and Proposed Sections	1:50 @ A3
9991-T-10-0211-ZXX Rev 01	R10 Building – Entrance Courtyard Detail of New Entrance – Plan and Section	1:20 @ A3
9991-T-10-0212-ZXX Rev 01	R10 Building – Entrance Courtyard Detail of New Entrance – Elevation	1:20 @ A3

## 2.0 Site and Surrounding Area

### THE SITE

- 2.1 The application proposals specifically relate to the change of use of a small element of the ground floor of 2 Waterhouse Square. The site is located to the north of Holborn (A40) bound by Brooke Street to the west, Leather Lane to the east and Beauchamp Street to the north (Fig 1). Chancery Lane underground station is less than 100m to the west of the site at the junction with Gray’s Inn Road.

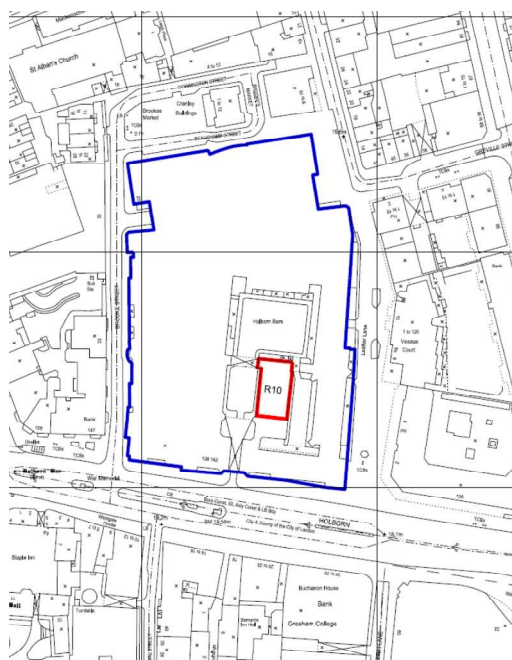


Fig 1 – Site Location Plan

- 2.2 The site comprises the Alfred Waterhouse designed grade II\* listed building built between 1885 -1901 on behalf of Prudential Assurance Company and known as “Holborn Bars”. The design was part of the Victorian Gothic Revival using moulded brick and unglazed terracotta, with glazed terracotta internally. There is a generous footpath to the south of the site along Holborn responding to the busy street environment. In contrast Brooke Street is a quiet side street with limited vehicular or pedestrian traffic, whilst Leather Lane is fully pedestrianised leading to the Leather Lane market.
- 2.3 The building frames two internal courtyards, the larger to the north with the application site bounding the southern courtyard (Fig 2). The property consists of basement, ground and five – six upper floor levels with a staggered setback from the fourth floor upwards housed in a steep mansard roof.
- 2.4 The buildings underwent a comprehensive refurbishment in the 1980s involving facade retention and predominant internal fabric removal. Although built in several phases there is consistency in the colour and material palette.
- 2.5 The site is situated within the Hatton Garden Conservation Area with Chancery Lane Conservation Area located to the south of Holborn, as part of the City of London Corporation. The site makes a positive contribution to both conservation areas with the 19<sup>th</sup> century buildings fronting Holborn creating a strong visual relationship along Holborn streetscape.
- 2.6 Full detail on the building’s heritage significance can be found in the Heritage Statement produced by Heritage Collective. There are also several listed building in close proximity to

## 2.0 Site and Surrounding Area

the site such as the Obelisk and a collection of grade I, II\* and II listed buildings within the Staple Inn complex.

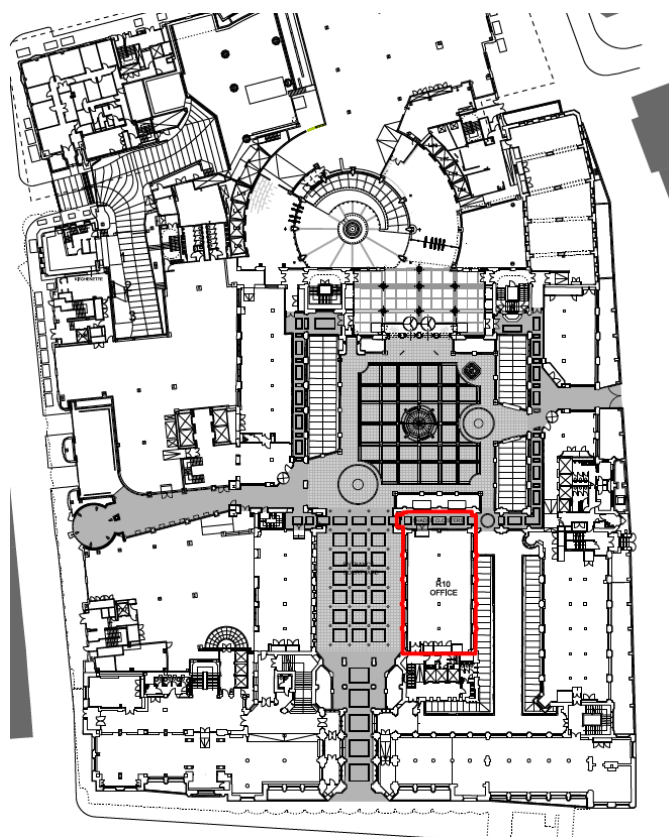


Fig 2 – Site location within Waterhouse Square office complex

- 2.7 The building is primarily used as B1(a) office accommodation with ancillary storage in the lower ground floor. The area of Waterhouse Square which specifically relates to this application is an area of approximately 225 sq m (GIA) to the east of the south courtyard which is currently used as B1(a) office accommodation. The internal space holds no historical significance and whilst the east and west inward facing elevation to the courtyard do have historical merit they are somewhat unbalanced with mismatched architectural detailing.
- 2.8 The site has a Public Transport Accessibility Level of 6b (where 6b is the highest) with Chancery Lane underground station and Farringdon underground and over-ground station within 500m of the site serving the Central, Circle, Hammersmith & City and Metropolitan line. It is also served by numerous bus routes along Holborn and Gray’s Inn Road towards London Bridge, Homerton, Paddington, Pentonville, Upper Holloway, Streatham Hill, Waterloo and other locations (bus nos. 17, 45, 46, 341, 8, 242, 521 and N8)

### SURROUNDING AREA

- 2.9 The surrounding area is characterised predominantly by commercial and retail premises, with a mix of modern and periodic historic architectural styles reminiscent of the two conservation areas. Irrespective of the varying architectural styles the buildings north and south of Holborn present a consistently strong facade line. Further north of the site there is a concentration of residential accommodation along Portpool Lane and south of Holborn behind the key bordering sites.

## 2.0 Site and Surrounding Area

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- 2.10 The architectural style to the east of the site is more modern with large tinted glazed facades. The massing both north and south of Holborn to the west of the site, encompass a diverse range of building styles with the use of stucco, red brick, Tudor style, concrete framed office blocks interspersed with blocks dating from the 1970/80s.
- 2.11 The surrounding area is populated by traditional perimeter style blocks accommodating individual or a series of courtyards within the building envelope. This arrangement results in heavy solid massing presenting the blocks prominence along the key access routes. Most of these courtyards are hard surfaces with limited green space in the area other than Gray's Inn Gardens and Bourne Estate, both to the northwest of the site.
- 2.12 The main buildings along High Holborn are predominantly 6-7 storeys with an additional 1-2 storeys set back reducing the visual impact along the streetscape. The height of the buildings increase to 10-13 storeys as High Holborn continues east towards the junction of St Andrew Street, Charterhouse Street and Hatton Garden.

## 3.0 Planning History

### PLANNING HISTORY OVERVIEW

- 3.1 Waterhouse Square is located at 138-142 Holborn however the specific unit that applies to this application site is 2 Waterhouse Square with the corresponding address of 140 Holborn. The planning history presented below relates not only to the immediate application site but also to the wider site noting relevant works carried out to Waterhouse Square buildings.
- 3.2 There is no significant planning history for the site with those referred to below relating to minor alterations for maintenance purposes and external additions such as the use of chairs within the courtyard area.
- 3.3 Taking account of the wider planning history for the overall development of Waterhouse Square the principle planning applications are for minor internal alterations associated with the reconfiguration of the office layout or for maintenance requirements.
  - 2012/3633/L – Internal alterations to include the insertion of partition walls, new flooring and lighting alterations at first and second floor level of existing offices (Class B1(a)). This application was granted permission on the 18 September 2012.
  - 2011/5218/P (associated listed building consent 2011/5219/L) – Installation of seats and planters to the external courtyards of the offices. This application was granted permission on 15 December 2011.
  - 2010/2347/P – External alterations including the replacement of shop fronts by new window openings to the east elevation at ground floor level and installation of new main entrance doors, frameless lobby and associated alterations to southern elevation on inner courtyard of office (B1). Granted permission on 25 June 2010.
  - 9400288/9470055 – Full planning permission with listed building consent and conservation area consent for minor external alterations associated with the installation of new toilets to the R8 (ground floor) area. Both applications were approved on 22<sup>nd</sup> April 2014.
- 3.4 Whilst there is no further information available on the Council’s website, the Heritage Statement refers to the extensive array of alterations undertaken at Waterhouse Square in the 1980s resulting in facade retention. Further detail on this can be found in Section 4 of the Heritage Statement.

## 4.0 The Proposals

### OVERVIEW

- 4.1 The planning application proposes a change of use of 225 sq m from B1 (a) office to A3 use for the use as a cafe, with the inclusion of a new entrance door of the southern courtyard and refurbishment to the internal space.
- 4.2 The concept and design have developed through a series of design iterations, team meetings and consultation with LB Camden and English Heritage in October 2013.
- 4.3 This application seeks full planning permission for:
 

*'The change of use of 225 sq m (GIA) B1(a) ground floor space to A3 cafe use, inclusion of a new entrance door and internal refurbishment.'*

  - Change of use of 225 sq m (GIA) from B1(a) floorspace to A3 retail unit at ground floor, accessed from the southern courtyard off Holborn (Drawing 9991-T-10-0206-Z00 Rev 02);
  - Improved access by dropping the existing floor to provide level access from the southern courtyard to the existing and new entrance. The entrance door will seek to retain a matching architectural style to that of the eastern elevation of the courtyard. (Drawing 9991-T-10-0208-ZEA Rev 01);
  - Enhanced interior to create a welcoming and friendly atmosphere providing services for the occupants of the office accommodation. Internal refurbishment will take account of the significance of the external facade (Drawing 9991-T-10-0209-ZXX Rev 02);
  - Reconfiguration of the internal space to open up the existing northern entrance off the cloister, insertion of required partition walls for improved layout associated cafe use. (Drawing 9991-T-10-0206-Z00 Rev 02);
  - Replacement of the existing windows of the eastern elevation to provide modern double glazed units with timber profiles matching existing window frames. The existing windows do not hold any heritage significance and by upgrading them it ensure a high quality 'shop front' with improved acoustic and thermal performance;
  - The cafe will use the existing servicing and delivering and refuse strategy that is in place for Waterhouse Square complex; and
  - Through rationalisation of the existing air conditioning within the space, no new plant provision or mechanical equipment will be needed. Existing risers will be used if required and appropriately designed drainage connections will facilitate the use of system already in place. Due to the nature of the A3 cafe use no new flues. (Design and Access Statement)



## 5.0 Consultation

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5.1 Pre-application consultation for the proposed change of use from B1(a) office accommodation to provide a new A3 cafe use and alterations to the eastern elevation of the courtyard to provide new entrance door was conducted between August and October 2013 with LB Camden and English Heritage.

5.2 A summary of the key issues raised during this period is set out below.

### Pre-application Advice with LB Camden

5.3 A pre-application meeting and site visit was held with LB Camden officers (Rachel Miller and Alan Wito (conservation officer)) on 4 October 2013 regarding the proposals. The main concerns arising from this meeting were;

- Loss of B1(a) office floorspace;
- Potential impact of cafe use on the surrounding Central London Frontages;
- The provision of the cafe and new entrance will have an adverse impact on the original design intent of this space, which was to channel people through to the courtyard beyond; and
- Alteration of the central window to new entrance door will result in unnecessary loss of the historic elevational fabric.

5.4 Following this pre-application meeting it is understood that further conversations have been held internally establishing that given the overall benefits that the proposals will provide this justifies the minimal loss of office floor space.

### Consultation with English Heritage

5.5 English Heritage issued a pre-application advice response in August 2013 (Appendix A) having reviewed the pre-application material with the following comments;

- No objection in principle to the change of use;
- Any alterations should be sensitively designed in order to retain to the architectural significance of the grade II\* listed facade;
- Accept that the new door entrance on the eastern facade of the southern courtyard could be provided whilst retaining the architectural significance of the elevation; and
- Advice upon the removal of a projecting glass canopy over the new entrance causing visual harm.

5.6 Taking account of the advice received the design was revised and the glass canopy was omitted with simple signage applied to the internal face of the glazed door above the entrance way. This will appear as an unobtrusive element (Drawing 9991-T-10-0208-ZEA Rev 01).

## 6.0 Planning Policy Overview

### PLANNING POLICY FRAMEWORK

- 6.1 The Town and Country Planning Act 1990 (the “1990 Act”) and the Planning and Compulsory Purchase Act 2004 (the “2004 Act”) establish the legislative basis for town planning in England and Wales. Together these acts establish a “plan led” system which requires planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise (section 38(6) of the 2004 Act). In assessing and determining development proposals, the National Planning Policy Framework (March 2012) sets out that local planning authorities should apply the presumption in favour sustainable development.
- 6.2 In London the development plan comprises the Borough plan and the London Plan.
- 6.3 This section identifies the principal policies applicable to the determination of these proposals and the principal material considerations.
- 6.4 The statutory development plan for the application site comprises:
  - The London Plan (July 2011)
  - London Plan (Incorporating Revised Early Minor Alterations), October 2013)
  - The LBC Core Strategy (November 2010)
  - The LBC Development Policies Document (November 2010)
- 6.5 The Mayor and LBC have also published supplementary planning guidance on specific planning issues, including, of pertinence:
  - Draft Sustainable Design and Construction SPG (July 2013);
  - CPG 1 Design (updated September 2013);
  - CPG3 Sustainability (updated September 2013);
  - CPG7 Transport (September 2011); and
  - CPG8 Planning Obligations (September 2011).

### CENTRAL GOVERNMENT GUIDANCE

#### National Planning Policy Framework (NPPF)

##### Presumption in Favour of Sustainable Development

- 6.6 National planning guidance is contained within the National Planning Policy Framework (“NPPF”) (March 2012). It introduced a presumption in favour of sustainable development where development proposals that accord with up-to-date development plan should be approved without delay (Para 14).
- 6.7 It sets out the core planning principles that underpin the planning system (Para 17), which include:
  - Proactively driving and supporting sustainable economic development to deliver businesses and thriving local places that the country needs;
  - Promote mixed use development and encourage multiple benefits from the use of land in urban and rural areas;

## 6.0 Planning Policy Overview

- Encouraging the effective use of land by reusing land that has been previously developed (brown field land), provided that it is not of high environmental quality;
- Seeking high quality design and a good standard of amenity for all existing and future occupants of lands and buildings; and
- Conserving heritage assets in a manner appropriate to their significant, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

### Employment

- 6.8 The National Planning Policies Framework (“NPPF”) seeks to balance the Government’s commitment to securing economic growth in order to create jobs and prosperity (Paragraph 18) with the need to “boost significantly the supply of housing” (Paragraph 47).
- 6.9 Paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

### Requiring Good Design

- 6.10 Well-designed buildings and places can improve the lives of people and communities (Para 8). Section 7 requires good design in all development. Para 58 sets out criteria which LPAs should ensure development aims for, including:
- Function well and add to the overall quality of the area over the lifetime of the development;
  - Optimise the potential of sites;
  - Respond to local character and history and reflect the identify of local surroundings and material, while not preventing or discouraging appropriate innovation;
  - Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
  - Are visually attractive as a result of good architecture and appropriate landscaping.
- 6.11 LPAs should expect the use of relevant design codes where this can assist in the delivery of high quality homes however policies should avoid unnecessary prescription or detail and concentrate on providing guidance to encourage creativity and innovation (Para 59).

### Conserving and enhancing the Historic Environment

- 6.12 Section 12 sets out policy guidance in respect to conveying and enhancing the historic environment.
- 6.13 In accordance with para 128 and 129 of the NPPF it sets out that the local authority should take into consideration the heritage asset of any proposal and the contribution if any made by its setting. The local planning authority will expect the applicant to set out the level of detail proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 6.14 Para 131 sets out that in determining applications, LPAs should take into account:

## 6.0 Planning Policy Overview

- 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 viability;
  - The desirability of new development making a positive contribution to local character and distinctiveness; and
  - Opportunities to draw on the contribution made by the historic environment to the character of the place.
- 6.15 An appropriate weight should be applied to the overall impact of a proposed development on the significance of any designated heritage asset and its conservation. The significance of an asset can be impacted through alteration or destruction and as such should be justified where necessary.
- 6.16 Where less than substantial harm to the significance of a designated heritage asset will occur as a result of a proposed development any harm should be weighed against the public benefits of the proposals, including securing its optimum viable use (Para134).

### STATUTORY DEVELOPMENT PLAN

#### London Plan (July 2011)

- 6.17 The London Plan sets out the Mayor’s vision until 2031 to:
- “excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change”.*
- 6.18 This vision is supported by a number of detailed objectives, which include ensuring London is:
- A city that meets the challenges of economic and population growth;
  - An internationally competitive and successful city with a strong and diverse economy and entrepreneurial spirit;
  - A city of diverse, strong, secure and accessible neighbourhoods; and
  - A city that delights the senses.

#### London’s Places

- 6.19 The London Plan’s focus for Inner London is to realise its potential in ways that sustain and enhance its recent economic and demographic growth while also improving its distinct environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, whilst improving the quality of life and health for those living, working, studying or visiting there (Policy 2.9).
- 6.20 The Mayor will encourage boroughs to promote the international, national and Londonwide role of the Central Activities Zone (CAZ) supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses. Development should in appropriate areas of the CAZ improve the retail offer for residents, workers and visitors and bring forward development that enhances offers of the CAZ particularly in intensification areas (Policy 2.10).

## 6.0 Planning Policy Overview

- 6.21 The site is within the Holborn Intensification Area and as such policy 2.13 applies to the site whereby the Mayor will expect development proposals to optimise both residential and non-residential output and densities to sustain growth and where appropriate to contain a mix of uses.

### London's Response to Climate Change

- 6.22 The Mayor's energy hierarchy is to:
- be lean - use less energy;
  - be clean - supply energy efficiently; and
  - be green - use renewable energy.
- 6.23 Sustainable design and construction standards include minimising carbon dioxide emissions, avoiding pollution, minimising waste and maximising recycling and avoiding impacts from natural hazards (Policy 5.3).
- 6.24 Regard should be had to sustainable retrofitting of existing buildings. Opportunities for reducing carbon dioxide emissions from the existing building stock should be taken by identifying potential synergies between new developments and existing buildings through the retrofit of energy efficiency measures, decentralised energy and renewable energy opportunities (Policy 5.4).

### London's Transport

- 6.25 The Mayor will encourage closer integration of planning and development and will encourage development that reduces the need to travel and encouraging walking by improving the urban realm (Policy 6.1).
- 6.26 Development proposals should ensure that impacts on transport capacity are assessed (Policy 6.3).

### London's Living Places and Spaces

- 6.27 Development should be of the highest standards of accessible and inclusive design (Policy 7.2) and consistent with the principles of "secured by design" (Policy 7.3).
- 6.28 Architecture should contribute to a coherent public realm, streetscape and wider cityscape (Policy 7.6). Buildings should:
- Be of the highest architectural quality;
  - Be of a proportion, composition, scale and orientation that enhances, activates and appropriately redefines the public realm;
  - Comprise details and materials that complement, not necessarily replicate the local architectural character;
  - Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate;
  - Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
  - Be adaptable to different activities uses, particularly at ground floor;
  - Meet the principles of inclusive design; and

## 6.0 Planning Policy Overview

- Optimise the potential of sites.
- 6.29 Developments should promote sustainable design and construction methods to reduce emissions (Policy 7.14) and should aim to be “air quality neutral” and not lead to further deterioration of existing poor air quality. Offsetting should be used to ameliorate negative impacts associated with development proposals.
- 6.30 Existing and potential adverse noise impacts should be minimised in development proposals, separating new noise sensitive development from major noise sources and promoting new technologies and improved practices to reduce noise at source (Policy 7.15).
- 6.31 A proactive approach should be taken to the protection, promotion and management of biodiversity in support of the Mayor’s Biodiversity Strategy (Policy 7.19).

### LBC Local Development Framework

#### Site Designations

- 6.32 The site is subject to the following site designations in accordance with the Proposals Map of Camden’s Core Strategy;
  - Holborn Intensification Area (London Plan);
  - Designated View : Primrose Hill summit to St. Paul’s Cathedral;
  - Central London Area (CLA);
  - Holborn Growth Area;
  - Hatton Garden Conservation Area; and
  - Archaeological Priority Area.
- 6.33 Whilst the site does not fall directly within the protected Central London Frontage, the frontages predominantly along High Holborn and Holborn form part of the Central London Frontages located directly either side of Waterhouse Square. Other key designations that are located in close proximity to the site are; the Hatton Garden Area (east of the site), designated view from Kenwood viewing gazebo to St. Paul’s Cathedral (northwest of the site) and Neighbourhood Centre (north of the site).

#### Relevant Policies

- 6.34 The relevant policies from LB Camden Core Strategy (November 2010) comprise:
  - Policy CS1 Distribution of Growth;
  - Policy CS2 Growth Areas;
  - Policy CS5 Managing the impact of growth and development;
  - Policy CS7 Promoting Camden’s centres and shops;
  - Policy CS8 Promoting a successful and inclusive Camden economy;
  - Policy CS9 Achieving a successful Central London;
  - Policy CS11 Promoting Sustainable and Efficient Travel;
  - Policy CS13 Tackling climate change through promoting high environmental standards; and
  - Policy CS14 Promoting high quality places and conserving our heritage.

## 6.0 Planning Policy Overview

- 6.35 The relevant policies from LB Camden Development Policies Document (November 2010) comprise:
- Policy DP1 Mixed use development;
  - Policy DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses;
  - Policy DP13 Employment sites and premises;
  - Policy DP17 Walking, cycling and public transport;
  - Policy DP19 Managing the Impact of Parking;
  - Policy DP20 Movement of Goods and Materials;
  - Policy DP22 Promoting sustainable design and construction;
  - Policy DP24 Securing High Quality Design;
  - Policy DP25 Conserving Camden’s Heritage;
  - Policy DP26 Managing the impact of development on occupiers and neighbours;
  - Policy DP28 Noise and Vibration;
  - Policy DP29 Improving Access;
  - Policy DP32 Air Quality and Camden’s Clean Zone.

6.36 Those relevant policies are set out by topic below.

### Growth Distribution

- 6.37 The most efficient use of land should be promoted: Camden will focus growth in the most suitable locations, including appropriate development in accessible locations in particular Central London (Policy CS1).
- 6.38 The Council seek to promote the most efficient use of Camden’s limited land supply and so will seek development that makes full use of its site taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site (Policy CS1). The Council will resist development that is inefficient within site boundaries. Developments with a higher density should be located in places that are well served by public transport (Policy CS1).
- 6.39 In order to achieve efficient developments the Council will encourage higher densities in the most accessible parts (i.e. Central London and town centres) of the borough and other appropriate areas whilst having regard to the density matrix of the London Plan. Such developments should be of excellent design quality and sensitively consider the amenity of surrounding occupiers (para 1.22).
- 6.40 The Council seeks that Holborn Growth Area will offer an appropriate provision of retail and service uses in the Central London Area alongside offices and housing. Development should deliver an improvement to the street environment, in particular pedestrian environment and make appropriate contributions to open space and regeneration initiatives. Design of such development should respect its surroundings and strive to enhance the area’s historic environment (Policy CS2).
- 6.41 Camden will manage the impact of growth and development by ensuring that development provides sustainable buildings and high quality spaces, whilst protecting and enhancing the existing environment, heritage and amenity of local communities. This will be achieved by

## 6.0 Planning Policy Overview

encouraging development that all impacts to neighbours and occupants of buildings is considered (Policy CS5).

- 6.42 The Council will seek a mix of uses in development where appropriate in all parts of the Borough, and include a contribution towards housing where applicable. If redevelopment proposals exceed the provision of new floorspace by 200 sq m GEA, 50% of all additional floorspace will need to be allocated for housing. Any secondary uses should be provided on site (Policy DP1). In establishing whether a mix of uses is appropriate for a particular site the Council will consider several elements, such as
- The character of the development and the area;
  - Site size;
  - The need for an active street frontage and natural surveillance; and
  - Whether the mix of uses complement one another.
- 6.43 Developing a mix of uses on an individual site can be beneficial for a number of reasons such as reducing the need to travel for jobs and services, provides a range of activities through the day, community safety and security, contributes to the creation of an area that is diverse, distinctive and successful, allows for the efficient use of land and provides more opportunities (Policy DP1, para 1.7).
- 6.44 Camden's Central London Area is amongst the parts of the borough that have the best access to public transport hence the best potential for a mix of uses (Policy DP1, para 1.12).

### Holborn

- 6.45 The Council will promote successful vibrant centres throughout the borough serving the needs of visitors and workers by protecting and enhancing the role and unique character of each area. Development should be of similar scale and character to the identity of the surrounding area that is Holborn Growth Area.
- 6.46 The Holborn area is primarily characterised as a town centre for local workers and businesses with a mix of other convenience stores, banks and other food and drink uses. There are large offices and entrances that often break the facade and the Council will encourage the provision at ground floor level of new shop premises, or other appropriate uses as part of the redevelopment of properties. The Council will also seek to increase the availability of retail uses at Holborn to create more active public spaces. In addition the Council will expect the provision of new shop premises or other appropriate uses as part of the redevelopment of properties that do not currently contribute to the shopping service character of the Holborn Central Frontage (Policy CS7).

### Retail

- 6.47 The Council will promote retail growth across the borough as part of redevelopment schemes in growth areas such as Holborn.
- 6.48 Policy DP12 seeks to promote a successful and vibrant Central London Area by encouraging new retail development in growth areas such as Holborn, whilst protecting the character of the area and resisting any development that may cause harm to existing services. In considering new development the Council will also take account of the cumulative impact of food, drink and entertainment uses, the impact the development may have on nearby residential uses and amenity, noise, fumes and the potential for crime and anti-social behaviour.



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- 6.49 The Council will seek to manage the potential harm to amenity or the local area and in appropriate cases will use planning conditions to address issues such as hours of operation, siting of plant, the ability to change the use of the premise within the A Class Use (Policy DP12).
- 6.50 The Council will expect new shop fronts of a high quality and those which are sensitive to the area in which they are located, transparent shop fronts are encourage in appropriate locations due to the contribution that they make to the vitality and attraction of centre and growth areas (Policy DP30, para 30.6).

### Employment

- 6.51 In order to maintain a successful and inclusive Camden economy, the Council will seek to secure existing employment uses whilst recognising the importance of other employment generating uses including retail and leisure (Policy CS8).
- 6.52 Camden will support a strong economy within the borough by promoting the provision of a concentration of office supply in the King’s Cross area, however further provision will be located primarily in other growth areas and Central London to meet the demand of 615,000 sq m by 2026 with over 40% of the jobs in the borough in offices (Policy CS8).
- 6.53 Promoting a successful Central London area is key for Camden by seeking to ensure that development in the growth areas contribute to London’s economic, social and cultural role and meeting the needs of the local residents whilst respecting their quality of life (Policy CS9).
- 6.54 Development in Central London should seek to improve the quality of the area’s streets and places and always consider the impacts of the proposed mix of uses in a development (Policy CS9).

### Design

- 6.55 Policy CS14 expects development of high quality which will respect and enhance the local character of the area. In addition to this the Council will protect the most famous of London’s views in accordance with London-wide policy and will resist proposals that exceed the permitted height relevant to each viewing corridor.
- 6.56 The Council will ensure that proposed developments preserve and enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas and listed buildings whilst promoting the highest standards of access in all buildings and places (Policy CS14).
- 6.57 Policy CS14 also focuses on encouraging good design that is safe and accessible, and responds flexibly to the needs of its users creating designs that have minimal negative impact on the environment. High quality design should also take account of its surroundings and what is distinctive and valued about the local area (Para 14.6).
- 6.58 The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider (Policy DP24):
  - Character, setting, context and the form and scale of neighbouring buildings;
  - The character and proportions of the existing building, where alterations and extensions are proposed;
  - The quality of materials to be used;

## 6.0 Planning Policy Overview

- The provision of visually interesting frontages at street level;
  - The appropriate location for building services equipment;
  - Existing natural features, such as topography and trees;
  - The provision of appropriate hard and soft landscaping including boundary treatments;
  - The provision of appropriate amenity space; and
  - Accessibility.
- 6.59 Camden will seek to encourage outstanding architecture and design, both in contemporary and traditional styles. Innovative design can greatly enhance the built environment and, unless a scheme is within an area of homogenous architectural style that is important to retain, high quality contemporary design will be welcomed (DPD, Para 24.6).
- 6.60 In particular development should consider:
- The character and constraints of its site;
  - The prevailing pattern, density and scale of surrounding development;
  - The impact on existing rhythms, symmetries and uniformities in the townscape;
  - The compatibility of materials, their quality, texture, tone and colour;
  - The composition of elevations;
  - The suitability of the proposed design to its intended uses;
  - Its contribution to public realm, and its impact on views and vistas; and
  - The wider historic environment and buildings, spaces and features of local historic value (DPD, Para 24.7).
- 6.61 Policy DP25 seeks to maintain the character of Camden’s conservation areas and will only permit development that preserves and enhances the character and appearance of the area. In order to preserve and enhance the borough’s listed buildings the Council will only grant consent for a change of use or alterations to a listed building where it considers that the proposals will not cause harm to the special interest of the building or to the setting of the listed building.
- 6.62 The Council will protect the quality of life of occupiers and neighbours by only granting permission for development by considering visual privacy and overlooking, sunlight/daylight, odours, fumes and dust (Policy DP26).

### Sustainability

- 6.63 All development is expected to take measures to minimise the effects of, and adapt to, climate change and is encouraged to meet the highest feasible environment standards that are financially viable during construction and occupation (Policy CS13).
- 6.64 Land use should minimise the need to travel by car and help support local energy networks. The efficient use of land and buildings should be promoted and carbon emissions minimised from redevelopment, construction and occupation. Buildings should be designed to cope with, and minimise the effects of, climate change.
- 6.65 Schemes must demonstrate how they have incorporated sustainable design and construction measures and incorporate green or brown roofs and green walls wherever

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suitable (Policy DP22). Specifically, non-domestic development of 500sq m of floorspace or above should achieve 'Very Good' in BREEAM assessments up to 2016.

- 6.66 Development will be required to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures, such as:
- Summer shading and planting;
  - Limiting run-off;
  - Reducing water consumption;
  - Reducing air pollution; and
  - Not locating vulnerable use in basements in flood-prone areas.
- 6.67 Developments will be expected to connect to decentralised energy networks and use the heat unless developers can demonstrate it is not technically feasible or financially viable.
- 6.68 The Council will require developments to reduce their water consumption, the pressure on the combined sewer network and flood risk (Policy DP23). Developments should incorporate water efficient features and equipment and capturing, retaining and re-using surface water and grey water on-site. Reducing the amount and rate of run-off and waste water entering the combined storm water and sewer network and other sustainable urban drainage methods should reduce the risk of flooding.

### Transport

- 6.69 LB Camden will minimise provision of private parking in new developments through car free development in the most accessible locations and car capped developments elsewhere. The availability of car clubs and car pooling will be encouraged and low emission vehicles will be encouraged through the provision of electric charging points (Policy CS11).
- 6.70 Development should be integrated with the transport network and be supported by adequate walking, cycling and public transport links (Policy DP16).
- 6.71 Development should make suitable provision for pedestrians and cyclists with the provision of suitable storage and cycle parking spaces (Policy DP17). Cycle parking provision should be provided with convenient access to street level and must be secure and easy for everyone to use (Policy DP17, para 18.13) Cycle standards for A Class Uses have a minimum threshold of 500 sq m prior to the requirement of providing cycle spaces (Appendix 2 Parking Standards).
- 6.72 Development that would generate significant movement of goods and materials during construction should minimise the movement of goods and material by road, and consider the use of more sustainable alternatives, such as rail and canal links (Policy DP20).
- 6.73 Policy DP21 seeks that any development connecting to the highway network should ensure the use of the most appropriate roads by each form of transport. Direct vehicular access to the Transport for London Road Network (TLRN) and other major roads should be avoided.

### Access

- 6.74 Policy CS14 seeks the highest standards of access in all buildings and places and requires schemes to be designed to be inclusive and accessible.
- 6.75 All buildings should meet the highest practicable standards of access and inclusion, secure car parking for disabled people; and secure accessible homes (Policy DP29).

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### MATERIAL CONSIDERATIONS

#### Camden Supplementary Planning Guidance (CPG1 – 7)

- 6.76 Camden have produced a raft of supplementary planning guidance which provides further detail on how policies will be implemented for specific topics:
- CPG 1 Design (updated September 2013);
  - CPG3 Sustainability (updated September 2013);
  - CPG6 Amenity (September 2011);
  - CPG7 Transport (September 2011); and
  - CPG8 Planning Obligations (September 2011).
- 6.77 Regard has been had to the additional guidance in bringing forward the proposals for the site at Waterhouse Square.

## 7.0 Policy Assessment

### INTRODUCTION

- 7.1 This section of the Planning Statement provides an assessment of the proposed development in relation to planning policy and material considerations relevant to the determination of the application. It is considered that the key planning issues, pertinent to this application are:
- Principle of Mixed Use Development/Proposed change of use;
  - Design; and
  - Transport, Accessibility and Servicing.

### PRINCIPLE OF REFURBISHMENT

#### Mixed Use Development/Proposed Change of Use

- 7.2 The current existing lawful use of the entirety of the Waterhouse Square complex of buildings is for B1(a) office use.
- 7.3 The principle of providing a mix of uses on site through the introduction of a cafe use (A3) at ground floor of 2 Waterhouse Square will enhance and complement the primary office use on site by activating the ground floor courtyard frontage. The surrounding area is populated by mixed use developments of a similar nature with retail at ground floor, activating the street frontage and office accommodation above (Policy CS1 and DP1).
- 7.4 The site forms part of the Central London Area and as such the optimisation of the site's use will also contribute to the distinct character of Central London (London Plan policy 2.9) The Mayor also expects development within the Central London Area, and more specifically the Holborn Intensification Area to improve retail provision where appropriate thus supporting the mix of uses at ground floor of Waterhouse Square (Policy 2.10 and 2.13).
- 7.5 The site is located within the Holborn Growth Area, which predominantly accommodates office floorspace with cafe and retail uses located in the vicinity responding to the needs of visitors, residents and workers in the area. Waterhouse Square currently lacks the provision of onsite ancillary uses that occupiers of modern office complexes expect. Acknowledging the predicted growth in the Holborn Area, Camden encourages the efficient use and optimisation of sites. The introduction of a secondary use (cafe) that will increase the attractiveness and vitality of the existing office complex for prospective tenants presents Waterhouse Square more competitively within the overall business market (Policy CS1, CS2 and CS7).
- 7.6 Waterhouse Square currently supplies approx 38,000sqm NIA of office floorspace that employs a total of 3,500 people. The proposals seek the change of use of a very small proportion (213 sq m NIA – drawing 9991-T-10-0204-Z00 Rev 01) of the overall quantum that is currently vacant. The space has historically been underutilised, resulting from its secondary location in comparison to the majority of the prime open office floor plates that the complex provides to the north and west. The change of use to cafe will only account for the loss of 0.5% of overall employment floorspace.
- 7.7 Furthermore, it is not considered that there will be any loss in the level of employment density arising from the change in use. The previous operation of the area was used to support the principle role of the core office accommodation, hence the suitability of its detached location and never quite optimising the potential density of the space. Thus the cafe will have negligible impact to the function of the office as a whole, with wider benefits

## 7.0 Policy Assessment

to the site whilst maximising the usage of an area previously underutilised (Policy CS5, CS8 and DP12).

### Change of Use

- 7.8 Waterhouse Square presents an important frontage along Holborn with the historical significance of the grade II\* listed external facade and is one of few which does not offer retail at ground floor level along the Holborn frontage. The dominance of the building takes the form of a traditional perimeter block sheltering a series of courtyards along the central thorough fare of the site. The area applicable to this planning application is situated to the east of the south courtyard (9991-T-10-0206-Z00 Rev 02), entered under the archway from Holborn. Therefore the location of the cafe will avoid any interference with the Holborn elevation and the architectural interpretation of the elevation and building, and the existing perceived office use of Waterhouse Square (Policy CS7 and DP12).
- 7.9 The proposed use would not impact on the main Holborn commercial frontage, nor would it result in the over proliferation of A3 uses within the surrounding area.
- 7.10 The intention of the proposed cafe use is predominantly to serve those on site and would not be visually prominent from the main retail frontage along Holborn, thus its presence would not be detrimental to the primary frontage (Policy CS9 and DP26). There are 3,500 workers overall within Waterhouse Square and so 225 sq m is not excessive to cater for the needs of such a volume of people (Policy CS5).
- 7.11 The historical design intent of the southern courtyard was to channel people through to the main courtyard this arrangement responded to the culture and surrounding character of the time (DP25). The proposed cafe use presents an opportunity to rejuvenate how the original design intent is perceived reflecting the modern use of the building and bringing it in line with similarly sized office blocks in the Holborn area. The cafe will enliven the southern courtyard, encouraging interaction between the various users and celebrate an important space within the grounds of Waterhouse Square (NPPF, para 138, Policy CS8 and DP25).
- 7.12 As part of the proposals, a new entrance will be created providing access from the southern courtyard which will enhance and optimise the floorspace. The existing entrance off the northern cloister will be retained, however by introducing a secondary entrance it will further contribute to the vitality and vibrancy of the area, and reduce the over concentration of people along the narrow circulation route of the northern cloister which is poorly lit in its existing state (Policy DP24 and DP29).

### Summary

- 7.13 National and local policy promotes sustainable economic development that will enhance an area whilst protecting local amenities and the character of the area. The proposed change of use to provide an A3 cafe unit will incur a loss of employment floor space, however this space is currently ancillary to the other floors. Through more efficient use of the existing space these operations will be absorbed into the existing office floorspace. Subsequently the provision of an A3 cafe unit will diversify the range of uses on site, enhance the occupier perception of the overall site functionality contribute to an increase in vitality of the open spaces on site, increase activity whilst respecting the existing environment and amenities.
- 7.14 The introduction of the proposed use will activate the ground floor, creating greater diversity that will promote increased footfall within the southern courtyard of Waterhouse Square. This will enhance the vitality of the location making it an important more sustainable

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destination that will enhance the overall offer to existing and future occupiers and also in its contribution and enhancement of the building's heritage significance.

### DESIGN

- 7.15 The design has been informed by consultation with English Heritage and LB Camden (October 2013) and through a series of team meetings to result in a sensitive, contemporary and light refurbishment of key elements of the internal space and inclusion of a new entrance. Further detail of the materials and design considerations are presented within the Design and Access Statement produced by ERP Architects.
- 7.16 The proposed change of use will incur very little external alterations to the building given the heritage listing of the external facade and the relationship of the east - west elevations within the southern courtyard. The building last underwent significant internal refurbishment in the late 1980s which resulted in the retention of the external envelope. For this reason any alterations to the interior will offer an improved condition over the existing arrangement, however will be carried out with a sensitivity.
- 7.17 The design seeks to modernise the internal space of the eastern wing of the southern courtyard at ground with modern, high quality, clean lined materials, reflecting the needs of current office market. Any external alterations will adopt an approach respecting the material palette and architectural language of the listed building and further surrounding context (Policy DP24) (Design and Access Statement). The main design considerations are:
- The internal works; and
  - External Alteration – New entrance.

### Internal Works

- 7.18 The building last underwent a large scale refurbishment in the late 1980s as set out in the Heritage Statement (Section 3), whereby a significant amount of the internal structure was replaced with no historic fabric remaining behind the facade as part of the application site (Heritage Statement, para 4.3). Since then there have been a number of minor alterations, however no major improvements leaving the space dated and in need of modernisation. The proposed change of use to provide a cafe seeks to rationalise the internal layout and finishes to reflect a suitable arrangement for the cafe user and remain in keeping with existing materials (Policy CS13, DP24 and DP25).
- 7.19 The level of the existing raised floor will be dropped as part of the refurbishment to improve the overall access to the internal area, removing the existing step access by the entrance off the northern cloister. This will also provide flush access via the new entrance from the courtyard (Policy DP29).
- 7.20 Sustainable methods of construction will be used where possible to improve the overall performance of the space including the replacement of the existing windows to provide double glazing within the existing framing (Policy CS13 and DP22).
- 7.21 The change of use is for 225 sq m and so does not trigger the benchmark whereby BREEAM will be applied (500+ sq m), however the client seeks to utilise sustainable methods and form of construction.

### External Alterations – New Entrance

- 7.22 The proposed external works and associated design including the new entrance has been informed through consultation with English Heritage. The extension of the glazed window to

## 7.0 Policy Assessment

meet the ground in the form of a doorway will preserve the overall symmetry of the eastern facade and retain the proportions of the existing window. The existing window presents itself as a large span of glazed area with three vertical muntins and one horizontal which will remain with the conversion to the glazed doorway maintaining the existing proportions (CS14 and DP24).

- 7.23 The initial design that was the subject of pre-application discussions included a glazed canopy over the doorway, demarking the entrance to the cafe. However following advice from English Heritage, the application proposals include signage which will appear as an unobtrusive element of the design applied to the internal face of the glazed door above the entrance way (Policy DP24 and DP25).
- 7.24 The southern courtyard’s original design intent was to funnel people through to the main northern courtyard. Whilst the external conditions including the outdoor seating will remain the same within the courtyard area, the proposed cafe function will bring a slightly new character to the area. Notwithstanding this the slight alteration and how the space is used will not harm the character or result in an undesirable change for reasons aforementioned (Heritage Statement, para 4.10).

All materials have been carefully selected to replicate the existing conditions to ensure that no impact arises to the architectural quality of the grade II\* listed building. Where the brickwork is removed from the historical fabric, care will be taken to ensure that no unnecessary harm comes to any other nearby element of the brickwork.

### Summary

- 7.25 The key focus of the refurbishment is to provide a design approach that is contemporary, using materials that complement and enhance the existing building and character and to ensure that the architectural language of the facade and wider context is not compromised. This is achieved through high quality design, ensuring the existing symmetry is retained and consideration given to the surrounding urban grain both within and outside Hatton Garden Conservation Area.
- 7.26 The proposals would therefore be entirely in accordance with the strategic aims of the NPPF (in particular para 58), the London Plan (particularly policy 7.5) and the aims of Camden Policies CS14, DP24 and DP25.

### TRANSPORT, ACCESSIBILITY AND SERVICING

- 7.27 As part of the refurbishment, improved access is a key consideration (Policy CS14 and DP29), and one of the driving reasons for the inclusion of a second entrance in the eastern elevation of the courtyard. The existing floor level will be dropped to allow for level access from the existing entrance off the northern cloister as well as the new entrance.
- 7.28 The proposed cafe will focus solely on the provision of light snacks and coffees and so new mechanical services and flue, ventilation etc will not be required. Servicing and deliveries for the cafe will operate in accordance with the existing system.

### AMENITY

- 7.29 Whilst the operator has not been determined the proposed A3 cafe use will not require additional plant or mechanical equipment or the inclusion of a surplus flue as the preparation of hot food will not be the primary function of the cafe unlike a restaurant use. The re-configuration of the existing air conditioning system will prove sufficient for the extent of the cafe operation and with the upgrade of the single glazed window it will mitigate any



## 7.0 Policy Assessment

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impact on the surrounding amenities (further information is set out as part of the Design and Access Statement).

## 8.0 Conclusion

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- 8.1 This Planning Statement has assessed the proposed development against the NPPF, the London Plan, Camden’s Local Development Framework and both the Mayor and Camden’s Supplementary Planning Guidance.
- 8.2 It sets out how the applicants have taken account of numerous elements throughout the design process through consultation with LB Camden and a series of design team meetings.
- 8.3 The Planning Statement and accompanying planning application documents demonstrate the wide-ranging benefits of the proposed development and that it substantially accords with planning policy and guidance. In particular, the proposals will:
  - Provide an enhanced overall use of the building with the introduction of the A3 cafe element at ground floor which will re-vitalise and optimise the offer of the southern courtyard. The inclusion of a cafe use on site reflects the demands of the current market with a mix of uses and will increase the premise’s attractiveness to potential tenants :-by updating the overall offer of the complex whilst retaining the historical presence of the building;
  - Replace the central window of the eastern elevation of the southern courtyard to improve access to the cafe in conjunction with dropping the existing floor level to ensure all entrances are accessible to all. All alterations will take account of the Grade II\* listed facade and ensure that no harm arises;
  - Ensure that the external finishes and details of the refurbishment respect the historical significance of the grade II\* listed facade and maintain the symmetry of the eastern elevation;
  - Contribute to the attractiveness of the external courtyard space by encourage greater use of the area and appreciation of the architectural richest of the surrounding buildings; and
  - Incorporate principles of sustainable design and construction where appropriate as part of the refurbishment.
- 8.4 In conclusion, the proposed development entirely accords with the aims and objectives of the National Planning Policy Framework and policies of the London Plan and LB Camden LDF (and all other material considerations including Camden’s Supplementary Planning guidance).