

**South Yorkshire Pensions Authority**

## **262 High Holborn | Appendix B**

**Planning Statement (incl. consultations)**

**30th April 2013**



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**262-267 HIGH HOLBORN**

# **PLANNING STATEMENT**

**IN SUPPORT OF AN APPLICATION FOR PLANNING  
CONSENT BY SOUTH YORKSHIRE PENSIONS  
AUTHORITY**

**May 2013**

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## EXECUTIVE SUMMARY

The proposed development at 262-267 High Holborn will deliver a new enhanced development to provide significant commercial, architectural and environmental benefits which can be summarised as follows:

### COMMERCIAL USE

- The proposals will provide new high quality commercial B1 floorspace in the Central Activities Zone which can be single or multi-tenanted.
- Improved arrangements at ground floor will enhance the retail offer and provide more attractive units for lease.

### HIGH QUALITY DESIGN

- The scheme has been designed to a very high quality by Sheppard Robson Architects who have an established pedigree for creating high quality developments.
- The high quality design of the proposed extensions complements the character of the building and the local area.
- The improved ground floor arrangements enhance the retail offer at ground floor and general appearance of the building.
- The scheme design has been generated following considerable review and assessment of the surrounding area and the proposals present a positive response.

### SUSTAINABILITY / ENERGY EFFICIENCY

- The scheme has been designed to meet sustainable criteria taking into account the constraints of re-using the existing building.
- Seeking to achieve BREEAM 'Very Good' in line with current planning policy.
- The development will utilise Ground Source Heat Pumps alongside PV cells on the roof which will provide significant carbon savings.
- The scheme is located in a highly accessible location taking advantage of excellent public transport links.

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## 1.0 INTRODUCTION

This Planning Statement has been prepared on behalf of South Yorkshire Pensions Authority (hereafter referred to as 'the applicant') in support of an application for planning permission to enable the partial demolition, alteration, extension, and change of use of 262-267 High Holborn ("the Site").

The proposal has been the subject of pre-application meetings with the officers at the London Borough of Camden and has been designed to respond to the comments received.

The purpose of this statement is to assess the proposed development against the planning policy framework for the site. This statement will provide an overview of the application and its context with regard to the relevant development plan considerations.

A description of the site and surrounding area is provided within Section 2.0. The justification for the proposals and a general description of the proposed development is provided in Section 3.0. An evaluation of the proposals against relevant national, regional and local planning policy is set out within Section 4.0. Section 5.0 provides a summary of the consultation undertaken and Conclusions are set out within Section 6.0.

## 2.0 SITE AND SURROUNDING AREA

### 2.1 Site Location and Description

The site is located at 262-267 High Holborn and lies within the Central Activities Zone which is the core commercial and business district in Central London. The site is also identified as being located within the Growth Area, Central London Area and Central London Frontage.

The site lies on the south side of High Holborn and is adjoined by commercial buildings to the east and the Chancery Court Hotel to the west. Buildings also within commercial use bound the site to the south which then front onto Lincoln's Inn Fields.

The building is not listed but is considered to be a building of merit in the Bloomsbury Conservation Area. The adjoining hotel is Grade II listed.

The site benefits from extremely good public transport links being close to London Underground services at Holborn and Chancery Lane. National Rail services are available within a short distance at Kings Cross and Crossrail services will also be provided from 2017 at Farringdon station. The accessibility of the site is further enhanced by frequent bus services along High Holborn.

### Existing Use of the Site

The site covers an area of approximately 734sqm and comprises one building of two basements, ground and seven upper floors with a plant room above. The small existing basements, ground and part of the first floor are occupied by three retail units whilst the remainder of the building including a small street level reception are in office use.

The existing floorspace (GEA) is as follows -

Retail (A1/A3)	434sqm
Retail – Public House (A4)	348sqm
Office	4,010sqm
<b>Total Gross Internal Floorspace (Including plant &amp; ancillary space)</b>	<b><u>4,792sqm</u></b>

The retail units are all accessed from individual shop entrances at ground floor. The office use above is accessed from a small reception area on High Holborn.

There is an existing side access along Holborn Place to the rear service yard which provides for casual vehicle parking, limited servicing and waste storage. Unsecured cycle parking is also provided within this space.



### 3.0 THE APPLICATION PROPOSALS

The application seeks planning permission for,

*‘Demolition of the rear core and works to extend at the rear and roof level. Change of use of part of the first floor from A4 to B1 use; works at ground floor to provide new retail units (Class A) with new shopfronts and office reception area; replacement fenestration to the retained building. Cycle parking, disabled car parking together with other associated and enabling works.*

The breakdown of the proposed uses (GEA) is as follows:

Retail (A1/A3)	517sqm
Retail (A1/A3/A4)	236sqm
Office (B1)	5,227sqm
<b>Total Gross External Floorspace (Including ancillary/circulation space)</b>	<b><u>5,980sqm</u></b>

*Commercial*

The main elements of the existing building will be retained whilst the rear block and the top floor will be removed. This creates the opportunity for a modern rear extension which will expand the floorplates and provide new modern office accommodation. A new roof extension is proposed which will add to the quality of accommodation within the building. Commensurate with an office building of the nature proposed, an enlarged reception area at ground floor will provide access to the new centrally located core.

*Retail*

The existing retail provision is significantly enhanced both in quantity and quality. A large A1 retail unit is proposed alongside the expanded office reception area and runs lengthways through the building. The existing public house on the eastern end of the site is replaced with the new retail unit for which a flexible A1/A3/A4 use is sought. New shopfronts which are appropriate to the character of the building are proposed.

*Design*

The aspiration of the proposed refurbishment scheme is to develop and create a new phase of the building’s life with an aesthetic which is complimentary with the existing.

The front facade and sculpture stonework will be cleaned. New glazing will be provided to improve the thermal performance of the building. Stone mullions exist on levels 1-6 which, if condition permits, will be retained and cleaned. New full-height glazing will be provided at the set-back level 7 and a new glazed balustrade will replace the non-compliant safety handrail that exists. Level 8 glazing will be minimal in detail and without an overhang.

In addition, there are two new 'components' identified in the new-phase architectural expression of the scheme - the upper and rear extensions. The details of the proposed material and appearance of the two extensions is set out in more detail in Section 4.0 of the accompanying Design & Access Statement.

#### *Transport & Accessibility*

The site is very well located to public transport with underground stations within walking distance at Holborn and Chancery Lane. There are also regular bus services along High Holborn.

There is no vehicle parking proposed for the development site other than a space within the rear yard reserved for disabled parking associated with the office development. Secure cycle parking is proposed adjacent to the central core.

## 4.0 PLANNING POLICY ASSESSMENT

### 4.0 PLANNING POLICY ASSESSMENT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises (i) The London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor of London in July 2011, (ii) The London Borough of Camden Core Strategy (2010) and (iii) London Borough of Camden Development Policies Document (2010). The Statement also makes reference to relevant Camden Planning Guidance Notes where appropriate.

In addition to the Development Plan, regard has been had to the following:

#### **National Planning Policy Framework (NPPF)**

National planning policy is provided by the National Planning Policy Framework (NPPF), which was published on 27 March 2012.

The NPPF replaces a raft of previous national guidance, including PPGs, PPSs and circulars, with one consolidated statement of national planning policy. A small number of earlier national guidance documents remain in force and these are referred to within the planning submission where relevant.

For a period of 12 months from the date of publication of the NPPF, policies within development plan documents written since 2004 can continue to be given weight by decision makers even if there is a small degree of conflict with policies of the NPPF.

There is a presumption in favour of sustainable development running through the NPPF, both for plan-making and decision-taking purposes. The Core Planning Principles of the NPPF include encouraging the effective use of reusing land that has been previously developed (brownfield land), promoting mixed use developments and seeking to secure high quality design and amenity for existing and future occupants of land and buildings.

The relevant planning policies are considered below and the development scheme is assessed under the headings of:

- i. Site Suitability

- ii. Land Use
- iii. Townscape & Design
- iv. Listed Buildings and Conservation Areas
- v. Highways & Servicing
- vi. Daylight & Sunlight
- vii. Environment

**i) Site Suitability**

The London Plan identifies six principal objectives for its strategic guidance, the first of which is "Making the most sustainable and efficient use of space in London."

The London Plan expects a minimum of 2,000 new jobs and 200 new homes to be provided in the area between 2006 and 2031. The Council expects that the London Plan targets will be met through relatively small scale, private sector led schemes, reflecting that the area's potential for intensification is largely from the redevelopment of existing properties, particularly offices, at higher densities.

Policy CS1 – Distribution of Growth sets out the Council's overall approach to growth and development in the Borough. It is stated that growth should be focused in the most suitable locations and managed to ensure that it delivers opportunities and benefits to achieve sustainable development. Particularly, development is to be focused in the Growth Areas of Kings Cross, Euston, Tottenham Court Road, Holborn and at West Hampstead Interchange.

In terms of site suitability, the Development accords with these underlying principles in:-

- replacing outdated and inefficient accommodation;
- providing new commercial development within the core CAZ;
- providing for development designed to achieve environmental objectives;
- improving efficiencies of existing buildings and replacing outdated space and plant;
- being situated close to existing transport infrastructure and including measures to discourage use of the motor vehicle and reducing commuter parking; &
- providing mixed use development which minimises the need to travel.

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**ii) Land Use***i) Commercial Floorspace*

The NPPF identifies the importance of building a strong and competitive economy and states that local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

Strategic policies within the Core Strategy continue to support the introduction of new commercial floorspace into the Borough with a particular focus on the Core CAZ.

Policy CS8 states that the Council will secure a strong economy in Camden and seeks to ensure that no-one is excluded from its success. They aim to:

*a) promote the provision of 444,000sqm of permitted office floorspace at King's Cross as well as in the range of 70,000 qm of office provision at Euston with further provision in the other growth areas and Central London to meet the forecast demand of 615,000sqm to 2026;*

*b) support Camden's industries by:*

- safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers;*
- safeguarding the borough's main Industry Area; and*
- promoting and protecting the jewellery industry in Hatton Garden;*

*c) expect a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace;*

*d) support local enterprise development, employment and training schemes for Camden residents;*

*e) recognise and encourage the concentrations of creative and cultural businesses in the borough as well as supporting the development of Camden's tourism sector whilst ensuring that any new facilities meet the other strategic objectives of the Core Strategy;*

*f) recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.*

The proposed development provides for an additional 1,188sqm of high quality office floorspace as part of a refurbishment and extension of the existing building to modern standards. The repositioning of the core allows for

improved floorplates across each level and improvements to the facades increases the levels of natural daylight.

The new reception area creates a strong entrance to the office building and plays a key role in improving the overall marketability of the building to modern day occupiers. The design and location of the core allows for flexibility of use so that the building could be occupied by a sole tenant or multi tenanted on a floor by floor basis.

The increase in commercial floorspace and improvement to the existing building within the CAZ is considered to be addressing the key requirements in local and strategic planning policy guidance.

*ii) Mixed Use*

The Council's mixed use policy (DP1) requires a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. In the Central London Area (except Hatton Garden) and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where more than 200sqm (gross) additional floorspace is provided, the Council will require up to 50% of all additional floorspace to be housing. The Council will require any secondary uses to be provided on site, particularly where 1,000sqm (gross) of additional floorspace or more is proposed.

Policy DP1 continues to state that where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment-in-lieu.

*In considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:*

- a) the character of the development, the site and the area;*
- b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;*
- c) the need for an active street frontage and natural surveillance;*
- d) the economics and financial viability of the development including any particular costs associated with it;*
- e) whether the sole or primary use proposed is housing;*
- g) whether secondary uses would be incompatible with the character of the primary use;*
- f) whether an extension to the gross floorspace is needed for an existing user;*
- h) whether the development is publicly funded;*

*i) any other planning objectives considered to be a priority for the site.*

The proposed commercial uplift across the site is 1,188sqm and as such Policy DP1 would normally require the provision of 50% of this floorspace for housing – 594sqm.

Following a pre-application meeting on 17 January 2013, officers confirmed that,

*The assessment suggests the provision of residential accommodation, either within the proposed roof extension or rear extension would result in a poor standard of accommodation, particularly in terms of amenity (outlook, daylight security). The assessment indicates the provision of residential accommodation at main roof level would result in a poor standard of office accommodation (internal layout), due to the requirement for an internal lift.*

*Whilst it is acknowledged the provision of quality residential accommodation may be limited, it is considered further alternatives at other floor levels should also be assessed.*

The further study undertaken to address the comments from officers regarding the potential for residential floorspace on intermediary floors concluded that similar issues arose regarding poor amenity and outlook and is therefore not considered to be a suitable or appropriate solution. This was confirmed by officers following a second pre-application meeting on 26 February 2013 by stating,

*It is considered the revised information suitably assesses alternative locations within the building for residential accommodation*

The enclosed 'Residential Planning Report' prepared by Farebrother sets out the investigations undertaken by the applicant in seeking a suitable donor for the housing floorspace as required under Policy DP1. This confirms that the applicant does not own sites in the wider area and has analysed alternative locations for residential housing on the open market. The conclusions of the report are clear and on-going monitoring of available sites has continued without any viable opportunities arising.

As a result and following the guidance set out in the Council's CPG8 'Planning Obligations', the applicant is proposing a financial contribution of £415,800 in lieu of the provision of the housing floorspace. This will be secured via the Section 106 Agreement.

In addition, officers noted the requirement to consider secondary uses into the building as required under DP1. It is important to note that the development is

already considered to be a 'mixed use' proposal with retail uses at basement, ground and first floors with offices above. The retail use is considered to be a 'secondary' use to the primary office use of the building and this is being enhanced, increase in area and upgraded to maximise its letting potential on High Holborn. This important office location should not be compromised by the introduction of a further use which in any event will be subject to the same constraints that have been set out in respect of the introduction of residential floorspace in terms of access and circulation.

### iii) Retail

The Council's aspirations for the area include the provision of a mix of land uses, with offices and housing as the predominate uses; the provision of appropriate retail and service uses in the area's Central London Frontage and taking opportunities to introduce ground floor retail uses where the continuity of the frontage is currently broken.

The Council's Central London Planning Guidance Note defines Holborn as a Central London Frontage which have an important retail function and planning permission will not be granted for the net loss of retail floorspace where it will damage the character and function of a Central London Frontage.

The Council's Revised Planning Guidance for Central London (Food, Drink and Entertainment, Specialist and Retail Uses) which was adopted in 2007 sets out the requirements for the protection of retail frontages and certain restrictions on the extent of food, drink and entertainment uses.

In the Council's formal response following the pre-application meeting, officers stated that,

*Should it be demonstrated that the proposal would not result in A1 retail frontage/accommodation at ground floor level falling below 50% of the total units between Nos. 242 – 310 (Cons) High Holborn, the proposal would be acceptable. Should the frontage assessment show to the contrary, the loss of the A4 use frontage to B1 office frontage without the loss of retail frontage could be an acceptable alternative.*

An assessment of the identified retail frontage running east from the site to Chancery Lane (as set out on Map 17 within the RPG) has been undertaken based on a visual inspection and a review of the relevant planning permissions. Presently, the retail frontage comprises 14 retail uses of which 8 are within A1 use. If, as officers have suggested, that retail frontage study area is extended to the west to include 242 High Holborn, then this increases to 9 units. This results in an overall A1 retail frontage of 57% (or 60% with 242 High Holborn)



The proposed development seeks to retain and enhance retail use at the ground floor albeit with a slightly reduced shopfront area due to the expanded office reception (which is supported by officers). The nature of the proposed new retail unit has yet to be established and therefore a flexible use (A1/A3/A4) is sought. In any event, the current provision of three shopfronts on the ground floor of the building would be reduced to two.

As a result, if the unit was occupied by an A1 retail tenant, then the retail frontage percentage would actually increase to 62% due to the loss of the existing A4 unit. In the event that the new unit was occupied by an A3 or A4 tenant, then the A1 retail frontage would be 54%. If the study area is extended to include 242 High Holborn, the frontage ratios increase to 64% and 57% respectively.

In summary, the overall provision of retail floorspace increases above existing which is supported by officers. In addition, the extent of A1 retail along the identified High Holborn frontage will remain above 50%.

### **iii) Townscape & Design**

The NPPF considers that “Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.

It goes on to say that “it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes”.

The NPPF further states that “in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”.

The London Plan states that the achievement of high quality urban design is also set down as a key factor to achieving a more attractive and green city. The architects of the application schemes have taken account of all of these factors in the design of the development.

Core Strategy Policy CS14 promotes high quality places and seeks to ensure that Camden’s places and buildings are attractive, safe and easy to use by requiring development of the highest standard of design that respects local context and character. Development Policies Policy DP24 adds to this stating that 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:

- 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;
- 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.

The proposed scheme has been designed by Sheppard Robson Architects who have a reputation for high quality schemes which are sensitive to their locations. The design rationale for the scheme is described in detailed in the accompanying Design & Access Statement. The development accords with the qualitative objectives of national and local policies on design having regard to its local and wider context.

#### **iv) Listed Buildings and Conservation Areas**

The NPPF states that Local Planning Authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

In developing this strategy, local planning authorities should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- 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 a place.

This follows the statutory duty laid down in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and is carried through in

Camden's Development Policies Policy DP25 which seeks to maintain the character of Camden's conservation areas by not permitting development outside of a conservation area that causes harm to the character and appearance of that conservation area. The Policy also seeks to preserve or enhance the borough's listed buildings by not permitting development that it considers would cause harm to the setting of a listed building.

The building is not listed but does lie within the Bloomsbury Conservation Area following amendments to the conservation area boundary in 2011.

A Heritage Statement accompanies this submission and sets out the key policy principles alongside an assessment of the development within its immediate context of the adjoining listed hotel.

The quality of architectural design is an integral part of the assessment of the effects of a development upon heritage interests. It is concluded that the proposals have been sensitively designed and will positively enhance the conservation area when compared with the existing building and its current condition in accordance with policy DP25.

#### **v) Highways & Servicing**

Paragraph 34 of the NPPF states that "Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised".

Paragraph 32 requires developments that generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment, and states that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Development Policies Policy DP17 promotes walking, cycling and public transport use. Development Policies Policy DP18 seeks to ensure that developments provide the minimum necessary car parking provision.

The site is located within a highly accessible location both in terms of public transport and other sustainable means of travel. Bicycle spaces have been provided for all of the proposed units in compliance with Policy.

In terms of servicing, the building will continue to be serviced in the same way as existing with some improvements proposed to the layout and access to refuse and servicing area at the rear of the building. Waste and recycling provisions have been made within each unit alongside communal storage areas at the rear.

#### **vi) Daylight & Sunlight**

The Councils Policy DP26 addresses managing the impact of development on occupiers and neighbours. It states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors to be considered include:

- a) visual privacy and overlooking;
- b) overshadowing and outlook;
- c) sunlight, daylight and artificial light levels;
- d) noise and vibration levels;
- e) odour, fumes and dust;
- f) microclimate;
- g) the inclusion of appropriate attenuation measures.

There are no residential properties within close proximity to the application site and none that would be affected by the proposals. As such a short statement from GIA has been provided which confirms this.

#### **vii) Environment**

The NPPF includes a number of sustainability related objectives, notably:

- presumption in favour of sustainable development, meaning that local planning authorities should positively seek opportunities to meet the development needs of their area;
- contribution to conserving and enhancing the natural environment and reducing pollution;
- the allocation of land for development should prefer land of lesser environmental value;
- encourage the effective use of land by reusing land that has been previously developed (Brownfield land), provided that it is not of high environmental value; and
- to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility

on all communities to contribute to energy generation from renewable or low carbon sources.

The NPPF notes that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.

Paragraph 96 of the NPPF states that in determining planning applications, local authorities should expect new development to:

- comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

The sustainability of the proposed scheme has been a key element of the design approach and has been carefully considered throughout the scheme's evolution.

Development Policies Policy DP22 requires development to incorporate sustainable design and construction measures and expects schemes to demonstrate how sustainable development principles have been incorporated into the design and proposed implementation; incorporate green or brown roofs and green walls wherever suitable; and achieve "very good" in BREEAM assessments.

The proposed development is accompanied with an Energy Statement which sets out the sustainable credentials of the building and the design. The Statement outlines the measures that have or will be incorporated into the design and build of the development to address the requirements of both strategic and local planning policy.

The statement concludes that the proposals accord with the main themes of current planning guidance due to the site's excellent location near to public transport links, the sustainable re-use of existing buildings for mixed use purposes and the omission of on-site car parking, the provision of cycle spaces, sustainable measures in terms of façade treatments and construction materials and minimising the use of plant and mechanical ventilation where possible.

The proposed commercial/retail element of the development will seek to secure a BREEAM rating of 'Very Good' and the pre-assessment is submitted with the application which confirms that this level is currently achievable.

In respect of renewable energy, the options are limited by the small footprint of the building and the fact that the proposals seek to retain the vast majority of the building. The applicant is currently proposing ground source heat pumps to meet a proportion of the building's heating and cooling demand used in conjunction with PV cells on the roof. This has been estimated to provide a maximum of up to 6.5% CO2 reduction. This will be subject to further detailed geotechnical studies and design development during the detailed design stages. Whilst this is less than the target provision of 20% it is considered that this is the highest provision that can be achieved on a tight centrally located development which is principally a refurbishment of an existing building. The assessment is addressed in more detail in the accompanying Energy Statement.

The application is submitted with a Noise Assessment which confirms that the proposed plant will be operational at a level that will meet the relevant guidance and this can be secured by planning condition.

## 5.0 CONSULTATION

Formal pre-application consultation has been undertaken with the Planning and Design Officers at Camden Council with regard to the formulation of the development proposals prior to the submission of this application. The changes to the scheme as a result of those consultations are reflected in the submitted planning drawings.

Following the pre-application meeting with officers in January 2013, revisions were made to the scheme in respect of the detail of the extension and the materials proposed. Further details were also provided in respect of the secondary uses and retail frontages.

A second formal meeting was held on 26 February at which the further design work was presented and agreed in principle. Further design work in respect of the proposed materials and treatment of the ground floor office reception area have been undertaken as a result of comments received at the meeting.

Details of the proposed works have been discussed with the Council's Secure by Design advisor and comments from the meeting have been incorporated into the submission documents.

Further details of the consultation with Officers at Camden can be found within Appendix A of the Design & access Statement.

## 6.0 CONCLUSIONS

The proposed scheme at 262-267 High Holborn represents an opportunity to enhance and revitalise a prominent building whilst providing new high quality commercial and retail accommodation.

The proposed land uses are supported by local and regional planning policy.

The proposed scheme comprises a sensitively designed proposal which addresses the complexities and constraints of the site. The proposed development offers the optimum solution of safeguarding the long term future of the building whilst taking into account its special character and that of the adjoining buildings.

The proposed development is in accordance with national, regional and local planning policy guidance, being both desirable and necessary and therefore we respectfully request that the application for planning permission in relation to 262-267 be granted.