

150 Holborn

London EC1

Planning statement

August 2011



GERALDEVE

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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Gerald Eve LLP in support of an application for planning permission on behalf of *Laffly LLP* ('the applicant') for extensions, refurbishment and alterations to 150 Holborn ('the site').

1.2 The proposals are described in greater detail in section 4.0 of this Statement. In summary, planning permission is sought for:

"Refurbishment and alterations to the property, including extended fifth and sixth floor and additional floor at seventh level for Class B1 offices on Holborn and Gray's Inn Road elements of the property, third, fourth and part fifth floor extension for Class B1 offices and Class C3 residential on Brooke Street element of the property, creation of residential units (Class C3) and new residential entrance core off Brooke Street and associated alterations to arch fronting Brooke Street, replacement plant and enclosures at roof levels, recladding to exterior elevations, alterations to main entrance and reception area including associated partial change of use from shops (Class A1) to offices (Class B1) at ground floor, partial change of use from offices (Class B1) to Financial & Professional Services (Class A2) at first floor level, creation of enclosed service yard to rear with amenity space above, provision of green/brown roofs, together with the provision of cycle parking and associated works."

1.3 The sections of the Statement are set out to provide:

- A description of the site and surroundings in Section 2;
- Details of the site's background and planning history in Section 3;
- Details of the development proposals in Section 4;
- The relevant planning policy framework is summarised in Section 5;
- Consideration of the material planning considerations arising from the application proposals in Section 6; and
- Conclusions in Section 7.

1.4 The proposed works designed by *Make* are described in section 4.0 of this Statement and in the Design and Access Statement. This Statement sets out the planning assessment of the proposed works. It assesses the works in the context of national, regional and local planning policy and guidance. This Statement should be read in conjunction with the plans and drawings

submitted as part of this application as well as the following documents which are all submitted in support of this application (in addition to this Statement). These documents comprise the following:

- Design and Access Statement prepared by Make;
- Energy Strategy prepared by Atelier Ten;
- Sustainability Statement prepared by Atelier Ten;
- Transport Statement including Service Management Plan prepared by Arup;
- Daylight/ Sunlight/ Solar Glare Study prepared by GIA;
- Townscape Appraisal prepared by Tavernor Consultancy and The Neighbourhood;
- PPG24 Acoustic Assessment prepared by WSP;
- Construction Management Plan prepared by Arup; and
- Statement of Community Engagement prepared by Quatro.

1.5 The planning application has been brought forward following detailed consultations with the planning and urban design teams at the London Borough of Camden ('Camden Council') and other relevant departments. Pre-application discussions have also taken place with statutory, non-statutory, local groups and residents. Specifically, the following consultees have been consulted at the pre-application stage:

- Camden Council;
- English Heritage (London Region);
- City of London (Planning and Transportation Department)
- Metropolitan Police;
- Local Ward Councillors; and
- In-Midtown.

1.6 The Bloomsbury Association, Bloomsbury Conservation Area Advisory Committee, Holborn Voice and Holborn and Covent Garden Safer Neighbourhood Team were also contacted but confirmed that there was no need for a pre-application consultation meeting.

1.7 The proposals have evolved over the consultation period and have been altered to accommodate comments made during these consultations. A public exhibition was held on 30 June 2011 and 01 July 2011 on site for members of the community to view and comment on the proposals. The public exhibition was visited by 19 people over the two days and 7 written

comments were received at the exhibition. Further details of the pre-application consultation undertaken by the applicant are set out in the Statement of Community Engagement accompanying this planning application. This Statement explains in particular the community engagement process that the applicant has undertaken.

- 1.8 The circa 0.29 hectare application site is situated on Holborn at the junction with Brooke Street and Gray's Inn Road. The application site contains a predominantly six storey modern red brick building (comprising basement, ground, six upper floors and roof top plant), which steps down to two storeys along Brooke Street. The building currently comprises a mix of retail, office and residential accommodation, in the form of 1, 3 bedroom self-contained flat.
 - 1.9 The refurbishment and recladding of the building will provide significant enhancement to the environmental conditions of this part of Holborn. The proposed development will substantially upgrade the existing office accommodation in order to increase the quality and flexibility of the floorspace, as well as providing additional residential accommodation. The proposed scheme will also bring townscape benefits to the locality. In particular the scheme will enhance the setting of nearby listed buildings and adjacent conservation areas, through the use of high quality cladding materials.
 - 1.10 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan against which development in Camden must be assessed comprises, the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor of London in July 2011, the adopted Camden Core Strategy (November 2010) and the Development Policies document (November 2010). In addition, Proposals Sites in Policy LU1 of the Unitary Development Plan are still relevant. These have been 'saved' until the Site Allocations Development Plan Document updates them; although this saved policy is not relevant to the application site.
 - 1.11 Camden has also been updating its supplementary planning documents to ensure that they are in line with the adopted Core Strategy and Development Policies LDF documents. The Stage I documents were adopted by the Cabinet on 6 April 2011. The following Camden Planning Guides ('CPG') are therefore material considerations; Design, Housing and Sustainability. The Stage II draft CPGs are also material considerations of limited weight, namely: Town centres, retail and employment (CPG5), amenity (CPG6), transport (CPG7) and Planning Obligations (CPG8).
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- 1.12 On the Local Development Framework (LDF) proposals map to the Core Strategy the application site is located in the Central London Area, the Holborn Growth Area and is designated as a Central London Frontage. The application site is also designated as an Archaeological Priority Area. The site is located outside a conservation area, but does adjoin conservation areas to the east, south and west. The Site lies within the Viewing Corridor of the Protected Vista from Primrose Hill to St Paul's Cathedral (4A.1) and the Background Assessment Area of the Protected Vista from Greenwich Park (the General Wolfe statue) (5A.2).
- 1.13 The London Plan (July 2011) identifies the application site within the Central Activities Zone ('CAZ'). The proposals for 150 Holborn are not referable to the Mayor of London having regard to the Mayor of London Order 2008.
- 1.14 The applicant's intention is to undertake the significant refurbishment of the building as set out in this planning application. The applicant has however also been progressing a scheme for a light refurbishment option which would include minor external alterations to the building (albeit there would be significant internal alterations which would not require planning permission), but which would not extend the building and provide additional office and residential floorspace or replace the façade and therefore the appearance of the building and its sustainability credentials. Due to the time constraints of bringing this building to the market, it is necessary to run the two schemes in parallel. It is therefore the intention of the applicant to submit a planning application shortly for the light refurbishment option.
- 1.15 The applicant's firm preference is to undertake the significant refurbishment works as set out in this application if they are approved by the Council. However the applicant needs to safeguard its position by submitting the alternative light refurbishment option. The light refurbishment scheme does provide a viable alternative option for the applicant, as there would be less construction work, lower construction costs and the building could still produce good office space. However this scheme would be seen as a missed opportunity as it would not deliver any new office or residential floorspace, or secure any of the design, townscape, sustainability or S106 benefits associated with this application.
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2.0 SITE AND THE SURROUNDINGS

- 2.1 The Site is located in the London Borough of Camden. The site is a predominantly eight storey, (including basement and ground floor) modern red brick building situated on Holborn at the junction with Brooke Street and Gray's Inn Road. The building comprises the following uses: offices (Class B1) (9,830 sqm GEA) located on part basement, part ground, part first and above; retail located on part basement, part ground and part first floor (Class A1, A2 & A3) (2,775 sqm GEA) and residential (Class C3) (1 x 3 bed unit) (193 sqm GEA) located on the second floor. The building also includes two squash courts in the Brooke Street wing of the building, which is ancillary to the B1 use of the building.
- 2.2 The building is not located within a conservation area, nor is it a listed building. The site is located between Hatton Garden Conservation Area to the east, Chancery Lane Conservation Area to the south and Bloomsbury Conservation Area to the west. There are a number of listed buildings in the immediate vicinity of the site, including: Obelisk marking City boundary on north side of Holborn (Grade II), 337 & 338 Staple Inn Buildings (Grade II*), Holborn Bars, 1-4 High Holborn (Grade I), Staple Inn Buildings North, 335 High Holborn (Grade II), Obelisk marking City boundary on south side of Holborn (Grade II). A plan showing the Conservation Areas and nearby listed buildings is contained in the accompanying Townscape Assessment.
- 2.3 Surrounding development is varied in use and character. By virtue of its location on Holborn, commercial and retail uses dominate the immediate locality, with residential to the north. The site is situated within the Central London Frontage Area, which recognises Holborn's role as a town centre for local workers and businesses, and which provides mix of comparison and convenience stores, banks and building societies, sandwich shops and other food and drink uses. The Holborn area is largely characterised by offices with ground floor retail (office entrances break up the retail frontage). Retailers in the immediate vicinity include Snow & Rock, Monsoon, Barclays Bank, Robert Dyas, Moss Bros and Argos.
- 2.4 The public transport accessibility level for the site is high (PTAL 6b) due to the proximity of the Chancery Lane London Underground Station (Central Line) and bus routes on Holborn and Gray's Inn Road. The site also benefits from a London Cycle Hire Docking station at the junction of Holborn and Hatton Garden.
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3.0 BACKGROUND AND PLANNING HISTORY

- 3.1 An examination of the Council's planning register has been carried out. The most relevant planning history is outlined below.
- 3.2 Planning permission was granted for the building in July 1980 to the Prudential Assurance Company Limited. The description of development is identified as *"Redevelopment by the erection of a basement, ground and part 2, part 6-storey building comprising shops, offices, banking hall, squash courts and one flat, on that part of the site within the Borough of Camden, of the site bounded by 2/12 Gray's Inn Rd, 30/40 Brooke Street and 143/150 Holborn, WC1"* (ref: N16/20/A/29129(R)).
- 3.4 150 Holborn was completed in the mid-1980s as an office headquarters. The building has performed well as a commercial office building but office standards have moved on and the space no longer provides Grade A accommodation and is in need of a refurbishment. In addition, the façade is considered to be visually unattractive and the building fails to meet modern standards for thermal performance.
- 3.5 Over the years a number of minor permissions for various alterations to the property, advertisements consents and shop front installations have been granted, but none are considered particularly relevant or prejudicial to the future refurbishment or redevelopment of the building.
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4.0 DEVELOPMENT PROPOSALS

4.1 A full description of the proposals and design evolution is contained in the Make Design and Access Statement. This Planning Statement should be read in conjunction with the architect's Statement and the other technical assessments together with the formal plans and drawings. The key details of the proposals are summarised in this section. The rationale for the proposals is to provide up to date accommodation for new office tenants and improve the overall appearance of the building.

4.2 The scheme design proposes the retention of the existing structure, whilst undertaking a comprehensive redevelopment and refurbishment of the building. The scheme comprises refurbishment and alterations to the property including extended fifth and sixth floor and additional set back floor at seventh floor to the main part of the building (frontages to Holborn and Gray's Inn Road) to provide office accommodation (Class B1) and two additional floors to the Brooke Street wing of the building to provide both office (Class B1) and residential (Class C3) accommodation.

4.3 The external works can be summarised as follows:

- Extension of fifth and sixth floor to omit the sloping mansard roof to the main building;
 - New set-back seventh floor office extension to the main building;
 - New two storey part office, part residential extension to the Brooke Street wing (the residential units being 100% dual aspect with balconies and roof gardens);
 - Removal of the existing roof top plant enclosure and external plant and replacement purpose built enclosure located at eighth floor and at fifth floor (Brooke Street wing);
 - Extension of lift core (to incorporate new lifts and a fourth lift) to provide a satisfactory level of service for modern day office occupiers;
 - Creation of green/brown roofs;
 - New elevational treatment entailing rain-screen cladding with double glazed windows. The cladding proposed is a combination of faience, (glazed terracotta) and patina metals, which will meet sustainability and environmental performance criteria and better relate to the building's context including listed buildings and conservation areas;
 - Re-modelling of the main office entrance from Holborn/ Gray's Inn Road including double height office entrance door;
 - Creation of new residential entrance accessed off Brooke Street;
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- Creation of landscaped and terraced amenity space to the rear of the building above the decked over service area. The amenity space will provide hard and soft landscaping and will be accessible to residents of the flats and the office accommodation; and
- Enhanced vehicle arch, including over-clad and new gates.

4.4 Internal alterations, including an enlarged office entrance will result in the slight reorganisation of the internal accommodation at ground and first floor levels with partial change of use from shop (Class A1) to office accommodation, with the resultant loss of circa 22sqm (GEA) of Class A1 floorspace, but a resultant gain of 114sqm (GEA) of Class A2 floorspace and 22sqm of Class A3 floorspace. The minor loss of Class A1 retail accommodation at ground floor on Gray's Inn Road and associated reduction in the shop frontage, facilitates the provision of a larger and more prominent office entrance which is considered commensurate with an office building of this stature in this location in the CAZ. The minor loss of Class A1 retail accommodation would not result in the loss of a retail unit on the ground floor frontage and therefore this element of the proposal would not detract from the retail function or character of the Holborn 'Central London Frontage'. In addition, the loss of retail floorspace adjacent to the office entrance is off-set by the increase in Class A2/A3 retail area elsewhere in the development (both in relation to the retail unit on Brooke Street and the retail provision at first floor level).

4.5 The scheme re-provides the existing 3 bedroom self-contained flat and proposes an additional 786 sqm (GEA) of residential floorspace on site, in a combination of 1 and 2 bedroom units. The scheme provides a total of 6 residential units (5 additional units) which are accessed from Brooke Street, which is a quieter, secondary road, and considered most appropriate for the residential ingress/ egress (the existing residential units is accessed via the service yard, which is far from ideal). The mix of units is as follows:

Units	Number of Units	Size (GIA)
1 bed, 2 person	1	72sqm
2 bed, 4 person	4	Lower Duplex (1no.) – 89sqm Upper Triplex (3no.) – 107sqm
3 bed, 5 person	1	107sqm

4.6 The land use areas are broken down as follows:

LAND USE*	GEA (SQM)
CLASS A1	1,202
CLASS A2	1,433
CLASS A3	254
CLASS B1	11,384
CLASS C3	979
TOTAL	15,252

* Covered service area measuring 396sqm has been excluded from the above areas and mixed use policy calculations.

4.7 This compares with the existing floorspace as follows:

LAND USE	GEA (SQM)
CLASS A1	1,224
CLASS A2	1,319
CLASS A3	232
CLASS B1	9,830
CLASS C3	193
TOTAL	12,798

4.8 The total overall uplift, including commercial and residential is 2,454 sqm (GEA). The total net gain in commercial floorspace would be 1,668 sqm (GEA), although only 1,538 sqm (GEA) would be an external gain in floorspace. 7.8% of the total commercial increase arises from internal reconfiguration, being the infilling of the squash courts (130 sqm) which is already ancillary to the existing Class B1 accommodation. The commercial (offices and retail) uplift therefore represents 68% of the total uplift or 66% of the uplift excluding the squash court infill.

4.9 These figures exclude the area resulting from the creation of the external amenity space above the service yard. The decking over of the service yard to create the garden space creates 396 sqm (GEA) of ancillary accommodation, although no net lettable floorspace is created by this element of the proposal. The covered service yard is considered to provide ancillary accommodation to all uses of the building. Given the nature of the space and that the area uplift is created for the benefit of the amenity garden space, this area has been excluded from the calculations of the mixed use policy assessment. The principle of this approach has been discussed and agreed with officers at the pre-application stage. Further assessment of this issue is set out in the 'Mixed Use' section in section 6 of this Statement.

Materials

- 4.11 The building proposes a palette of materials comprising faience (glazed terracotta) tiles and patina metal framing. Taking a cue from the surrounding buildings, deep red terracotta is proposed for the building's main front elevations, whilst cream coloured faience (glazed terracotta) is proposed for the rear elevations to maximise natural light levels. The fenestration will be framed with the patina metal. In addition, green/brown roofs are proposed at roof level (the building's fifth elevation). These areas will be maximised, although will need to have regard to M&E plant enclosures and Building Maintenance Unit (BMU) equipment. All major plant is to be replaced with modern efficient units.

Access and Parking

- 4.12 The building will continue to be serviced via a dedicated service bay area at the rear of the building off Brooke Street. A car-free development is proposed, albeit one disabled car parking space will be provided. This represents a reduction of 4 car parking spaces. This creates space for new bicycle storage areas and associated showers. Secure cycle storage spaces are provided in the newly created service area, which is formed by the decking over the area to create an amenity space above.
- 4.13 The building has been designed to be accessible to users with mobility, hearing and visual impairments.

Sustainability

- 4.14 The commercial accommodation has been designed to achieve a minimum BREEAM rating of 'Very Good', but with the aspiration to achieve 'Excellent' during the detailed design stage. The new residential accommodation has been design to achieve a minimum of Level 3 of the Code for Sustainable Homes and the dwellings created in the existing building will achieve Eco-Homes 'Very Good'. In respect of the energy strategy the scheme has been designed such that it exceeds Part L 2010 requirements through a combination of passive design, efficiency measures and the incorporation of renewable technologies. The scheme also includes a CHP system, combined with absorption chillers (CCHP) to provide both heating and cooling to the office accommodation. Solar thermal for domestic hot water heating is also proposed for the residential component of the development.
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5.0 PLANNING POLICY CONTEXT

5.1 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:

- (1) The London Plan being the Spatial Development Strategy for Greater London adopted by the Mayor of London ('Mayor') in July 2011, hereinafter referred to as the London Plan ('LP').
- (2) The Camden Local Development Framework (LDF) Core Strategy and Development Policies Development Plan documents (DPD) were formally adopted by the Council on 8th November 2010. These replace the Camden Replacement Unitary Development Plan in all respects apart from policy LU1 – Land Use Proposals Schedule which will remain current until the formal adoption of the LDF Site Allocations Preferred Approach. These documents set out the Council's intentions for land use and development from 2010 to 2025. The Development Policies provide more detailed policies (from those in the Core Strategy) for assessing planning applications. The LDF documents are up to date and should be afforded full weight.

5.2 The Council uses its Core Strategy and Development Policies Document together with the Mayor of London's adopted LP as the basis for determining planning applications in the borough. In addition, to support the policies in these documents more detailed planning guidance has been prepared. Camden has updated its supplementary planning documents to ensure that they are in line with the adopted Core Strategy and Development Policies LDF documents. Camden Planning Guidance noted in paragraph 1.11 of this Statement are also therefore additional material planning considerations in planning decisions.

National Guidance

5.3 The following national guidance is considered relevant to the planning application:

- PPS1: Delivering Sustainable Development (2005)
 - Supplement to PPS1: Planning and Climate Change (2007)
 - PPS4: Planning for Sustainable Growth (2009)
 - PPS5: Planning for the Historic Environment (2010)
 - PPG13: Transport (2001) (as amended, 2011)
 - PPG24: Planning and Noise (1994)
 - PPS22: Renewable Energy (2004)
 - PPS23: Planning and Pollution Control (2004)
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London Plan (2011)

5.4 The LP is the overall strategic plan for Greater London as defined by the 32 boroughs. It aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20-25 years. The London Plan is the London-wide policy context within which the boroughs set their local planning agendas. The following policies from the LP are considered relevant to the planning application:

- 2.10 - Central Activities Zone – Strategic Priorities
 - 2.11 - Central Activities Zone – Strategic Functions
 - 3.3 - Increasing Housing Supply
 - 3.4 - Optimising Housing Potential
 - 3.5 - Quality and Design of Housing Developments
 - 3.8 - Housing Choice
 - 4.1 - Developing London's Economy
 - 4.2 - Offices
 - 4.3 - Mixed Use Development and Offices
 - 5.1 - Climate Change Mitigation
 - 5.2 - Minimising Carbon Dioxide Emissions
 - 5.3 - Sustainable Design and Construction
 - 5.6 - Decentralised Energy in Development Proposals
 - 5.7 - Renewable Energy
 - 5.10 - Urban Greening
 - 5.11 - Green Roofs and Development Site Environs
 - 5.12 - Flood Risk Management
 - 5.13 - Sustainable Drainage
 - 5.15 - Water Use and Supplies
 - 6.1 - Strategic Approach
 - 6.3 - Assessing Effects of Development on Transport Capacity
 - 7.1 - Building London's Neighbourhoods and Communities
 - 7.2 - An Inclusive Environment
 - 7.3 - Designing Out Crime
 - 7.4 - Local Character
 - 7.5 - Public Realm
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- 7.6 - Architecture
- 7.7 - Location and Design of Tall and Large Buildings
- 7.8 - Heritage Assets and Archaeology
- 7.14 - Improving Air Quality
- 7.15 - Reducing Noise and Enhancing Soundscapes
- 8.2 - Planning Obligations

5.5 The following GLA Supplementary Planning Guidance is also relevant:

- Sustainable Design and Construction Supplementary Planning Guidance (2006)

Camden Core Strategy (2010)

5.6 The following adopted Core Strategy policies are considered relevant to the determination of this planning application:

- CS1 – Distribution of Growth
- CS2 – Growth Areas
- CS5 – Managing Impact of Growth and Development
- CS6 - Providing Quality Homes
- CS7 – Promoting Camden's centres and shops
- CS8 - Promoting a successful and inclusive Camden economy
- CS9 – Achieving a successful central London
- CS11 – Promoting Sustainable and efficient Travel
- CS13 - Tackling Climate Change
- CS14 – High Quality Places and Conserving Heritage
- CS16 – Health and Well Being
- CS17 - Safer Places
- CS18 – Waste and Recycling
- CS19 – Delivering and Monitoring the Core Strategy

5.7 The following adopted Development Policies are considered relevant to the determination of this planning application:

- DP1 – Mixed Use Development
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- DP2 – Making Full Use of Housing Capacity
- DP3 - Contributions to the Supply of Affordable Housing
- DP5 – Homes of Different Sizes
- DP6 – Lifetime Homes and Wheelchair Housing
- DP13 - Employment Sites and Premises
- DP16 – Transport Implications of Development
- DP17 – Walking, Cycling and Public Transport
- DP18 – Parking Standards
- DP19 – Managing the Impact of Parking
- DP20 - Movement of Goods and Materials
- DP21 – Highway Network
- DP22 – Promoting Sustainable Design and Construction
- DP24 – High Quality Design
- DP25 – Conserving Camden’s Heritage
- DP26 – Impact on Occupiers and Neighbours
- DP28 – Noise and Vibration
- DP29 – Improving Access
- DP30 - Shopfronts
- DP31 – Open Space and Outdoor Recreation

Site Specific Allocations

- 5.8 Within the LP, the site is located in the Central Activities Zone ('CAZ'). The LP notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London's financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media. The LP identifies that the Mayor and boroughs should *inter alia* recognise that the CAZ [and the northern part of the Isle of Dogs Opportunity Area] are the heart of London's world city offer and promote and coordinate their development so that together they provide a competitive, integrated and varied global business location.
- 5.9 On the LDF proposals map to the Core Strategy the application site is located in the Central London Area. The site is located in the Holborn Growth Area and is designated as a Central London Frontage. The application site is also designated as an Archaeological Priority Area.
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Policy CS2 (c) confirms that development will be concentrated in the growth areas, with Holborn identified as appropriate for mixed use redevelopment. The Council's overall approach to the Holborn Growth Area is stated as *"Holborn is a predominately commercial area, with a small residential community focused around Holborn underground station. High Holborn, from New Oxford Street to Holborn Circus and most of Kingsway are designed as Central London Frontages...The Council's aspirations include inter alia (1) provision of a mix of land uses with offices, and housing as the predominant uses; (2) 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; (3) high quality, sustainable design that respects its surroundings and preserves and enhances the area's historic environment; and (4) improving community safety, including reducing opportunities for crime and anti-social behaviour"*.

- 5.10 In respect of the Holborn Central London Frontages, policy CS7 and supporting text states that "Holborn operates as a town centre for local workers and businesses, with a mix of comparison and convenience stores, banks and building societies, sandwich shops etc. The Holborn area is largely characterised by offices, and large office entrances often break up the frontage."
- 5.11 The site is located outside a conservation area, but does adjoin the conservation areas to the east, south and west. The site is located between Hatton Garden Conservation Area to the east, Chancery Lane Conservation Area to the south (within the City of London) and Bloomsbury Conservation Area to the west.
- 5.12 Having regard to the London View Management Framework (LVMF), the Site lies within the Viewing Corridor of the Protected Vista from Primrose Hill to St Paul's Cathedral (4A.1) and the Background Assessment Area of the Protected Vista from Greenwich Park (the General Wolfe statue) (5A.2)
- 5.13 The policies highlighted above are considered and assessed in detail in the following section of this Statement.
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6.0 PLANNING ASSESSMENT

Principle of refurbishment and extensions

- 6.1 Planning Policy Statement 1 (PPS1) encompasses the concept of sustainable development. PPS1 sets out the Government's aims for sustainable development and highlights the contribution economic development can make towards the delivery of sustainable development.
- 6.2 In delivering sustainable development, planning authorities are encouraged to: promote urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities; promote mixed use developments for locations that allow the creation of linkages between different uses and can thereby create more vibrant places; promote communities which are inclusive, healthy, safe and crime free, whilst respecting the diverse needs of communities and the special needs of particular sectors of the community; focus developments that attract a large number of people, especially retail, leisure and office development, in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development; reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development; and promote the more efficient use of land through higher densities, mixed use development and the use of suitably located previously developed land and buildings (PPS1, paragraph 27).
- 6.3 Policy 3.4 of the LP seeks to ensure that development maximises the potential of sites. The LP seeks to ensure that development proposals achieve the highest possible intensity of use compatible with the local context, design principles and public transport capacity. This is also reflected in the strategic objectives of Camden's Core Strategy. The Core Strategy identifies four strategic themes which it seeks to address, including: *a sustainable Camden that adapts to a growing population, a strong Camden economy that includes everyone, a connected Camden community where people lead active healthy lives and a safe Camden that is a vibrant part of the world city*. In addition, policy CS1 seeks to focus Camden's growth in the most suitable locations and manage it to make sure that it delivers its opportunities and benefits and achieves sustainable development, while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit. The policy also notes that the Council will promote the most efficient use of the land and buildings in Camden.
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- 6.4 The proposed alterations and refurbishment fully adhere to these principles. The application proposes the use of previously developed urban land in a location that is well served by public transport. The proposed development is in accordance with the character and established uses of this part of Camden, which is in the CAZ and Central London Area, and is in support of the principles of sustainable development promoted by PPS1. The proposed building will provide high quality office and residential accommodation and will support London's role as an economic centre and its competitiveness in the world market, whilst providing much needed housing in accordance with the objectives of the LP and Core Strategy. The works involve the upgrade of an outmoded office building, providing more flexible space, which will improve the longevity of the building. The scheme also provides for a mix of uses within the development by providing retail and residential accommodation, which facilitates a sustainable development.
- 6.5 The works will be carried out with the use of sustainable materials and construction methods, which will result in a more energy efficient building and will meet the core principles of sustainable development set out in PPS1, the LP and the Core Strategy. The site represents a significant opportunity for improving the character and quality of this part of Camden and the setting of the adjacent conservation areas and listed buildings. The proposal seeks to maximise that opportunity through the delivery of a high quality design, which optimises the density compatible with the site's context.
- 6.6 The proposals for the site, with an increased capacity on previously developed land within an urban area are in accordance with PPS1, the London Plan and the Core Strategy. The LP supports and promotes the delivery of high density development, particularly in the CAZ. Policy CS1 seeks development that make the full use of its site (having regard to quality of design, heritage, transport accessibility and resists development that makes inefficient use of Camden's limited land). The site is also located in the Holborn Growth Area (policy CS2). The proposals are aligned with the policies of the LP and will address the priorities and objectives for the CAZ in accordance with policies 2.10 and 2.11. Therefore the principle of intensification of the application site by way of extensions and refurbishment is considered acceptable in terms of both the LP and adopted Core Strategy policy CS1 and policy CS2.

Land Use – Offices & Retail

- 6.7 The London Plan and Core Strategy identify the site as a location where office use is supported. Specifically, Core Strategy policy CS8 promotes the provision of office floorspace in the growth areas, such as Holborn. Further Development Management policy 13 –
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Employment premises and sites – confirms that the Council will retain buildings that are suitable for continued business use and will resist a change to non-business use. The upgrade and refurbishment of 150 Holborn is therefore acceptable in principle at the application site, subject to compliance with Policy DP1 – Mixed Use.

- 6.8 The LP recognises that the CAZ is the country's most important strategic office location. Policy 2.10 of the adopted London Plan recognises the CAZ as being at the heart of London's world city offer and identifies a strategic priority to promote and coordinate development to provide a competitive, integrated and varied global business location. At Policy 2.10, the Mayor recognises that the CAZ is the globally iconic core of one of the world's most attractive and competitive business locations, and will enhance and promote the unique international, national and Londonwide roles of the CAZ.
- 6.9 Development Management policy DP13 supports the modernisation and redevelopment of existing office stock within the CAZ. Paragraph 13.6 states that where premises or sites are suitable for continued business use the Council will consider redevelopment schemes which maintain the employment floorspace and provide other priority uses, such as housing. It continues "the re-provision of employment floorspace should be able to accommodate a range of business types and sizes."
- 6.10 The existing building provides 9,830 sqm (GEA) of office floorspace. The new building will provide a total of 11,384 sqm (GEA) office floorspace (including 130sqm gained by infilling the existing squash courts). The rejuvenation of the existing office building and the delivery of additional office floorspace is in accordance with strategic and local policies referred to above. The proposed development will refurbish the existing office accommodation and through extensions at roof level on the Holborn, Gray's Inn Road and Brooke Street elevations will increase the quality, quantity and flexibility of the floorspace. It has been designed in response to market requirements and will maintain important office supply in the Holborn Growth Area. Seven office floorplates will be provided in the building that will be able to accommodate arrange of business types and sizes. The new building will provide occupiers with a high degree of flexibility within various floor layouts. The office space has been flexibly designed to enable use by either single or multiple occupiers. The building will provide clear floors with good daylighting to its interior.
- 6.11 The office building will be accessed from an enhanced dedicated entrance on Holborn. The new entrance arrangement will increase the building's presence on the street and improve the quality of the reception space. The enlargement of the office entrance results in a minor loss of
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retail accommodation on Gray's Inn Road, although there will be no loss in the number of retail units. The application does not propose any other amendments to the ground floor retail units, which are designated part of a 'Central London Frontage', and indeed overall the application slightly increases the retail provision across the site. It is not considered that the minor loss of Class A1 retail floorspace as noted in paragraph 4.4 of this Statement, will have any material impact on the Holborn Central London Frontage and indeed the refurbished building will enhance the character of the centre in accordance with Core Strategy policy CS7. The proposed alterations to the shopfront to create the new office entrance are considered to be minor and would not impact on the character of the shopfronts or designated Frontage.

- 6.12 The refurbishment will assist in meeting the demand for office space within Camden and therefore the competitiveness of this part of Holborn as an office location. It is considered that the office element of the building meets with the requirements and objectives of the LP. The proposals meet the requirements of Policy CS8, as the site is based in an existing office location, which is easily accessible to public transport networks. The proposal meets the requirement of Policy DP13, which seeks to retain existing business uses.

Mixed Use Policy

- 6.13 London Plan Policy 4.3 promotes mixed use development and states that within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such as mix would demonstrably conflict with other policies of the plan. This policy is supported by LP Policy 2.11.
- 6.14 Camden's Core Strategy policy CS1 (Distribution of Growth) confirms that the Council will expect the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of housing where possible.
- 6.15 Specifically, development management policy DP1 requires a contribution towards the supply of housing within developments in order to facilitate sustainable development and reduce the need to travel between homes, services and jobs. In the Central London Area where more than 200sqm additional floorspace is provided, the Council will require where appropriate up to 50% (our emphasis) of all additional floorspace to be housing. The Council usually requires residential to be provided on site, particularly where 1,000 sq m (gross) of additional floor space or more is proposed. Where housing 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.
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- 6.16 Policy DP1 allows for development with a lesser proportion of residential floorspace, having regard to *inter alia* the character of the development. Specifically policy DP1 states “*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.”*
- 6.17 The supporting text at paragraph 1.19 states that “existing development on or near a development site may limit the potential for the inclusion of secondary uses, particularly the inclusion of housing. The retention and extension of an existing building on-site may prevent the creation of new features such as entrances, windows, staircases and lifts to include these features.” Also, in the supporting text to Policy DP1, paragraph 1.23 outlines circumstances where a mix of uses may not be appropriate, which *inter alia* includes, where a secondary use cannot be satisfactorily accommodated by the site or buildings owing to their scale, limited access to street frontages or heritage considerations.
- 6.18 The development of 150 Holborn proposes an increase in gross floorspace over 1,000sqm and therefore in accordance with policy an element of residential floorspace is provided on site, as part of the scheme.
- 6.19 The total increase in floorspace proposed by the application is 2,454 sqm (GEA). Where appropriate the requirement of policy DP1 is to provide up to half of the additional floorspace as residential use on site. The scheme provides 5 net additional residential units (786 sqm GEA), and six units in total. This equates to 32% of the additional floorspace as residential (or 34% if the increase from the infilling of the squash courts is excluded).
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- 6.20 Whilst the enclosed service yard creates additional ancillary floorspace, this area does not create net lettable space and greatly benefits the scheme and all its occupiers by enclosing the service bays, parking areas and M&E plant (ancillary to the office, retail and residential elements) and also provides the opportunity for a landscaped amenity and biodiversity space above for all users. The provision of green space and soft landscaping will assist in softening the rear of the site, and is considered to be in accordance with policy CS15, which seeks to ensure that new development conserves and enhances wildlife habitats by greening the environment. In these circumstances it is reasonable that the service yard area has been, and should be, excluded from the calculations for the purposes of the mixed-use policy. This approach has been discussed and agreed with planning and policy officers at the pre-application stage.
- 6.21 The development provides the maximum achievable amount of residential floorspace on the site. The restricted nature of the site and the fact that the scheme is a refurbishment and extension of an existing building limits the quantum of residential that can be accommodated. The majority of the uplift in floorspace is located in roof extensions, which limits opportunities for residential accommodation, in the extensions of the existing office building. It is relevant to note that whilst, Core Strategy policy CS6 indicates that the Council regards housing as the priority land use in the Core Strategy, it acknowledges that there are other objectives of the Strategy that are not necessarily overridden by the emphasis on housing, which includes the importance of the Central London Area for businesses and shopping as set out in Core Strategy policy CS8. This is a relevant consideration in this case, as the proposal seeks to expand an existing office building with the majority of the existing floorspace retained. This places constraints on the flexibility of the site to accommodate residential units.
- 6.22 The application proposes 5 additional residential units. The units are located in the northern end of the Brooke Street element of the building, creating a vertical 'stack'. Access to the residential units is via Brooke Street, via a dedicated residential core on the northern elevation of the Brooke Street wing to minimise disruption to the street level retail. The Design and Access Statement outlines an early option of locating the residential in the seventh floor roof extension on the Holborn/ Gray's Inn Road elements of the building, however this option is not physically possible for a number of reasons, namely; the units would not be dual aspect due to the existing arrangement of the office cores; access from street level would be inadequate due to the arrangement of the existing office entrance and retail frontages; and the requirement for a service zone between the top office floor and roof level residential would push the massing
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up higher, breaching the LVMF threshold plane. It is therefore not possible to locate any additional residential accommodation in the Holborn/ Gray's Inn Road roof extension.

6.23 The new residential units are located in the northern part of the building, in the same location as the existing residential unit, however the constraints of the existing building, including the location of an existing core on the west side of the Brooke Street element of the building and Barclay's Bank tenancy on the first floor of this part of the building limits the opportunity for further residential floorspace in this location.

6.24 As noted above, development management policy DP1 requires up to 50% of all additional floorspace to be housing. The policy also states that where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment in lieu. It has been demonstrated that in accordance with policy DP1 additional housing can be provided on site. The additional housing proposed is the maximum housing that can practically be achieved on site having regard to the constraints of the existing building and existing retail occupiers in the building. The scale and nature of the housing contribution is therefore considered to be in accordance with DP1, which seeks up to 50% of additional floorspace as housing. The scheme proposes 32% of the additional floorspace as residential (or 34%, if the class B1 increase from the infilling of the squash courts is excluded) which is the maximum achievable and is appropriate having regard to the factors that the Council will take into account at policy DP1. Notwithstanding that it is considered that the proposed additional housing on site fully complies with the requirements of policy DP1, we briefly assess below a contribution to the mix of uses elsewhere in the area and a potential payment in lieu.

6.25 In terms of an off-site solution, the applicant is not in control of any sites or buildings in the vicinity i.e. Holborn and Covent Garden Ward and further it is considered that given the small amount of housing space that could be considered to be required in this instance, it would not be viable to provide a small stand-alone quantum of housing.

6.26 Paragraph 1.17, in support of policy DP1 states *"Exceptionally, where a secondary use is appropriate for the area but cannot be achieved on site, and it is demonstrated to the Council's satisfaction that no alternative site is available in the area for the secondary use, we may accept a payment in lieu of provision, directly related in scale and kind to the development proposed. Financial contributions will relate to the value of the land (or the value of the space above another development) needed to provide the secondary use elsewhere, having regard to the financial viability of the proposed development."*

6.27 The Council’s newly issued draft Planning Obligations Planning Guidance at paragraph 6.6 states that where development proposals involve a shortfall of housing or affordable housing required under Policies DP1 or DP3, the Council may negotiate a payment in lieu of the unmet requirement. Paragraph 6.10 continues by stating “*where the payment is in lieu of housing under Development Policy DP1, calculations of the payment will proceed as follows:*

6.27.1 The 50% target for on-site housing will be converted into a floorspace figure (GEA);

6.27.2 Where the floorspace figure is less than 1,000sqm (GEA) and consequently no contribution to affordable housing would be sought on-site, the target for on-site housing floorspace will be multiplied by the payment per square metre figure of £700;

6.27.3 Where the floorspace figure is 1,000sqm (GEA) or more a contribution of affordable housing would be sought on-site, and the target for all on-site housing floorspace will be multiplied by payment per square metre figure of £1,350.”

6.28 Having regard to the above guidance and the worked example number 2 on page 42 of the draft Planning Obligations CPG a contribution of £1,190,700 could be sought in lieu of the perceived residential shortfall. The contribution is calculated as follows:

Total floorspace addition	= 2,454
Total commercial floorspace proposed	= 1,668
On-site housing proposed	= 786
On-site housing shortfall	= (1,668 - 786) 882
Payment in lieu of housing	= 882 sqm x £1,350 = £1,190,700

6.29 Notwithstanding that it is considered that the application accords with policy DP1, in that the scheme provides the maximum quantum of housing on site, the applicant would be willing to make a contribution of £1,190,700 for the perceived shortfall of on-site housing. Given that the application is for a predominantly office use, and that the housing component is only present as a response to the strategic and local mixed use policy requirements and the housing element is the maximum that can be achieved on site, this financial contribution (alongside the on-site provision), is considered to satisfy the Council’s mixed use policy in every respect. Additionally, it is relevant to note that the application site is on the immediate boundary with the

City of London. The City of London is recognised as the world's leading international, financial, and business centre. Maintaining office high quality office accommodation in this area is therefore important to the national economy and the prosperity of London.

- 6.30 It is concluded that the provision of 32% of the uplift in floorspace as residential (34% if the office area gain from the squash courts is excluded), with 6 flats in the Brooke Street wing of the building, is the maximum that could be provided on site having regard to the constraints of the existing building, existing structure and tenancies and the nature of the refurbishment scheme. In light of the above considerations and planning policy 'tests', the shortfall in residential accommodation on site is considered to accord with policies 4.3 (LP), CS1 (CS) and development management policy DP1, but in this instance the applicant is willing to provide a financial contribution to the affordable housing fund to address any perceived shortfall in on-site housing. The payment is provided in accordance with the Council's draft Planning Obligations CPG.

Land Use - Residential

- 6.31 As noted above it is considered that the provision of housing as part of the development is in accordance with London Plan and Core Strategy policies regarding mixed use developments.
- 6.32 Policy CS6 of Camden's adopted Core Strategy aims to make full use of Camden's capacity for housing, and in considering the mix of dwelling sizes appropriate to a development, policy DP5 - Homes of different sizes - has regard to the different dwelling size priorities for social rented, intermediate affordable and market homes. Policy DP5 states that residential development should provide an appropriate mix of unit sizes including large and small units and highlights the different dwelling size for social rented, intermediate and market housing.
- 6.33 Paragraph 6.39 of the Core Strategy, which supports Policy CS6, provides guidance on dwelling size priorities, and states that for market housing, homes with 2-bedrooms are the highest priority and homes with 3 bedrooms of medium priority and 1 beds of lesser importance. The paragraph also notes that dwelling size priorities will guide the mix of housing sought across the borough overall, but does not provide a prescriptive basis for determining the mix of homes on individual sites.
- 6.34 The scheme proposes 5 additional units which could generate a maximum of 18 persons (including children). In accordance with policies CS6 and DP5, the proposal for 150 Holborn
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comprises predominantly two-bed units (4), which are defined as a 'very high' priority for market housing within the Dwelling Size Priority Table of DP5. In addition, one three-bed unit will be provided to replace the existing three-bed unit already on site and to meet the 'medium' level of market demand outlined in the Dwelling Size Priority Table and one one-bed unit. This mix is also considered to comply with London Plan policy 3.8 which encourages a full range of housing choice.

- 6.35 The London Plan (July 2011) and the Mayor's Housing Strategy (February 2010) place new emphasis on the need to ensure that new dwellings are large and flexible enough to meet current and future occupancy needs, including adequate storage space. Policy 3.5 of the LP introduces a new policy on the quality and design of housing developments. Part A of the policy states that housing developments should be of the highest quality internally, externally and in relation to the wider environment. Part C of the policy states that new dwellings should meet the dwelling space standards set out in Table 3.3, have adequately sized rooms and convenient and efficient room layouts. To address this, the Mayor has produced a new draft Housing SPG on the implementation of Policy 3.5 for all housing tenures, drawing on his Interim Housing Design Guide.
- 6.36 In addition, development management policy DP26 states that developments will be required to provide an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space. Policy DP6 – Lifetime Homes and Wheelchair Housing – and the CPG states that all housing developments should meet lifetime homes standards, and 10% of homes developed should either meet wheelchair housing standards, or be easily adapted to meet them.
- 6.37 The proposed residential units meet the minimum space standards for residential units outlined in the Mayor's Interim Housing Design Guide and Camden's Housing Planning Guidance (2011). The residential accommodation is located as a vertical 'stack' at the end of the Brooke Street wing, occupying floors from ground to fourth floor. All of the residential units are dual aspect and it is expected that the proposed units will all receive ample natural light and ventilation. All of the units will meet the Mayor's residential standards, Lifetime Homes standards and one unit will be developed to meeting wheelchair housing standards.
- 6.38 All new residential development is required to make provision to amenity space to meet the needs of the residents and users. The Housing Planning Guidance states that outdoor amenity
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space can be provided in the form of private garden spaces, balconies, roof terraces or communal gardens.

- 6.39 The development provides balcony spaces for all units and the top three duplex units have access to a sun room and roof gardens. The balconies range from approximately 5msq to 10sqm and the roof terraces measure approximately 9.7sqm. In addition, the enclosed service yard also provides a central courtyard area, providing a communal garden area for residents of this development and provides approximately 395.7 sqm (GEA) as hard and soft landscaping.
- 6.40 Policy CS15 of the Core Strategy seeks to ensure that new development conserves and enhances wildlife habitats by greening the environment. In addition to the communal garden area, green/brown roofs are proposed on all elements of the building. The green/brown roofs should provide a high level of biodiversity and will also aid in the sustainable drainage of the site.
- 6.41 Development Management policy DP31 requires the provision of 9 sqm of open space per person for residential developments providing 5 or more additional dwellings, and this will initially be expected on site. Paragraph 3.17 of the development policies document states that the Council's priority for on-site provision will be play and informal recreation facilities for children and young people and provision for residents, especially allotment or community garden space. It is considered that the balconies, roof terraces and garden space provide sufficient open space for the residents of the development in accordance with policy CS15 and policy DP31.
- 6.42 Paragraph 1.12, in support of Development Management policy DP1 states that affordable housing will be sought in appropriate circumstances in line with Core Strategy policy CS6 – providing quality homes and development policy DP3 – Contribution to the supply of affordable housing. Policy DP3 requires all residential developments that would provide additional residential floorspace of 1,000 sqm to make a contribution to the supply of affordable housing.
- 6.43 This application proposes 6 residential units (5 net additional units) or 979sqm (GEA) of total residential floorspace (786 sqm net additional floorspace) and the application does not trigger the requirement for affordable housing.
- 6.44 The quantum of residential accommodation is justified above and it is considered the scheme accords with policy DP1 as noted earlier. The applicant is proposing to make a contribution of
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£1,190,700 to the Council's affordable housing fund to address any perceived 'shortfall' on site residential accommodation.

Design and Scale

- 6.45 The achievement of high quality urban design is set out as a key objective through all levels of policy. PPS1 which sets out the government's objectives for the planning system, states at paragraph 1 that "*good planning ensures that we get the right development, in the right place and at the right time*". Under the heading '*Design*' (at paragraph 33) PPS1 states that good design ensures attractive, useable, durable and adaptable places, and is a key element in achieving sustainable development. It also states in the same paragraph that good design is indivisible from good planning.
- 6.46 London Plan policy 7.1 sets out a series of overarching design principles for development in London, seeking to achieve a city of diverse, strong, secure and accessible neighbourhoods and advises that large scale buildings should be of the highest quality design including *inter alia*:
- Maximise the potential of sites;
 - Promote high quality inclusive design;
 - Contribute to adaption to, and mitigation of, the effects of climate change;
 - Respect local context, history, built heritage;
 - Provide for or enhance a mix of uses; and
 - Be attractive to look at and where appropriate, inspire, excite and delight.
- 6.47 Policy 7.6 (page 217) of the LP states that "*architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape*". It states in paragraphs 7.21 and 7.22 that a building should enhance the amenity and vitality of the surrounding streets and the building form and layout should have regard to the density and character of the surrounding development. In addition, the London Plan states that new development will be required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (policy 7.1).
- 6.48 Policy CS14 of Camden's Core Strategy *inter alia* seeks to ensure that Camden's places and buildings are attractive, safe and easy to use and requires development to be of the highest standard of design that respects local context and character. Policy CS14 plays a key part in
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setting out the Council's approach to preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens.

6.49 Camden Development Policy DP24 – *Securing high quality design* – sets out Camden's detailed approach to the design of new developments including alterations and extensions. DP24 reflects the LP design policies and goes on to state 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 *inter alia*:

- The character, setting, context and the form and scale of neighbouring buildings;
- The character and proportion of the existing building;
- The quality of materials to be used;
- The provision of visually interesting frontages at street level;
- The appropriate location for building services equipment;
- The provision of appropriate hard and soft landscaping; and
- The provision of appropriate amenity space.

6.50 Camden Council has also produced an SPG on achieving high quality design known as "Camden Planning Guidance - Design". This guidance considers a range of design-related issues for both residential and commercial property and the spaces around them. The SPG reinforces or, where necessary, amplifies existing guidance and defines Camden Council's expectations for new buildings and commitment to excellence in design.

6.51 The design for the building at 150 Holborn has been considered in terms of townscape and is based upon a number of key design principles which are explained in the Design and Access Statement. The design has evolved in response to assessment work undertaken by the design team and feedback from pre-application consultation with Camden Council and other consultees. The proposals for the refurbishment and alterations to 150 Holborn have been designed by Make architects to a high standard using material commensurate with a building in a prominent location, surrounded by heritage assets.

6.52 The building has been designed as a sensitive response to its context between the Hatton Garden, Chancery Lane and Bloomsbury Conservation Areas. The proposal provides one additional set back floor along the Gray's Inn Road and Holborn elevations and two additional floors on the Brooke Street elevation, and is considered to create an appropriate response to

the context. The setting back of the roof extension on the main element of the building reduces the visual impact of the extension. As a result, the extended building will have a similar visual impact on the locality as existing and ensure that there would be no harm to the character and of the building or the appearance of the locality. It is considered that the extensions in every respect relate sensitively and correctly to the original building and hence are in accordance with policy DP24.

- 6.53 Through pre-application discussions with the council, the design of the proposed roofline has been amended to provide a more detailed and interesting silhouette. The extended building has been designed having regard to its surroundings including the listed Staples Inn buildings and the Prudential building adjacent. These buildings are robust and impressive in their own right, and the proposal has been designed to enhance views of these key buildings, which is illustrated in accompanying Townscape Assessment. It is considered that the proposed building accords with LP policies 7.1 and 7.6, and development management policy DP24.
- 6.54 The building adopts an architectural language that attempts to complement the dominant architectural typology in this part of Camden and particularly having reference to the adjacent Prudential building. Make have creatively designed a high quality refurbishment and extension of the existing building that complements this part of Camden and provides an appropriate setting for the neighbouring conservation areas and listed buildings, in accordance with policy DP25 – Conserving Camden’s Heritage.
- 6.55 The external appearance will be enhanced, with the over-cladding of the facades, which will significantly improve the exterior of the building and enhance the locality generally. The proposed materials, including faience (glazed terracotta) and patina metal are of a very high quality and would not be out of keeping or be detrimental to the context, the setting of the nearby listed buildings or the character or appearance of the nearby Conservation Areas. The proposed materials will make a clear contextual response, enhancing the existing streetscape composition. The recladding will improve the overall composition of the building and will enliven the public realm interface.
- 6.56 The proposed design for each façade includes the over-cladding of the existing brickwork with insulation and finished with a faience (glazed terracotta) and patina metal rainscreen, reflecting a considered response in terms of material, townscape and environmental considerations. In addition, the existing windows are to be replaced with high performance glass windows, with
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spiralling cassettes framing the windows. Patina metal will be used to provide solar shading where necessary.

- 6.57 The proposed green walls lining areas around the ground floor of the building to the north of the Brooke Street wing will provide a greenbase to the building, provide a landscaped connection with the garden area and add visual interest. The proposed materials will connect visually with the elevations of the nearby buildings and provide a very high quality response to its context.
- 6.58 The Design and Access Statement for the application demonstrates that the building would be fully accessible to all user groups.
- 6.59 In considering design matters in the context of the advice given in PPS1 and the LDF, it is considered that the proposed development does represent a high class design and would contribute positively to the urban environment, character and appearance of this part of Camden. It is considered that the proposals are consistent with an important objective of Government policy as set out in PPS1 and the LDF, to achieve a high standard of design. The proposals meet the objectives of the Mayor of London at Policy 7.1 of the London Plan in seeking to enhance the built environment of London as a world city, and satisfy the requirements of policies CS14 of the Core Strategy and development policy DP24.

Heritage Assets

- 6.60 Policy HE10 provides policy principles guiding consideration of applications for development affecting the setting of a designated heritage asset. Policy HE10.1 states that local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset.
- 6.61 The application site itself is not located within a conservation area, nor is it a listed building. However, the site is located between Hatton Garden Conservation Area to the east, Chancery Lane Conservation Area to the south and Bloomsbury Conservation Area to the west. There are also a number of listed buildings within the immediate vicinity of the site, and thus all of these designated heritage assets must be taken into account in the proposed design.
- 6.62 The advice given at Policy HE 7.5 of PPS5 is that local planning authorities should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment, and that the consideration of design should include scale, height, massing, alignment, material and use. Paragraph 80 of the PPS5
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Practice Guide outlines characteristics of the surroundings, to which successful schemes should take into account.

6.63 Policy 7.8 (page 219) of the LP, under the heading 'Heritage Assets and Archaeology', advises that "Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate." Policy 7.8 also emphasises that development proposals that affect heritage assets should conserve their significance, by being sympathetic to their form, scale, materials and architectural value.

6.64 Paragraph 7.29 emphasises that "London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life."

6.65 Also at paragraph 7.29 it states that:

"Ensuring the identification and sensitive management of London's heritage assets, in tandem with promotion of the highest standards of modern architecture, will be key to maintaining the blend of old and new that gives the capital its unique character."

6.66 Camden Core Strategy policy CS14 and development policy DP25 reflect the PPS5 tests and the desirability to preserve and enhance the character and appearance of conservation areas and the character and setting of listed buildings. Core Strategy policy CS14 deals with all heritage assets in Camden, and requires development of the highest standard of design to respects local context and character and preserves and enhances Camden's rich and diverse heritage assets and their settings.

6.67 As noted already, the massing of the proposed extensions is considered appropriate for the building and its surroundings. The extended building is considered to achieve an appropriate relationship with the nearby listed buildings in terms of form and character, and indeed is considered to enhance local views of these heritage assets.

6.68 With regard to the setting of listed buildings, policy HE10 of PPS5 states that local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset. As already noted it is considered that the form, mass and quality of architecture means that the building does not have an adverse impact upon the setting of the nearby listed buildings. In this instance therefore the decision maker does not need to consider the balance between the harm and the wider benefits of the scheme (HE10). The application is therefore considered to accord with Core Strategy policy CS14 and DP25.

- 6.69 The application site is located within the Viewing Corridor of the Protected Vista from Primrose Hill to St Paul's Cathedral (4A.1) and the Background Assessment Area of the Protected Vista from Greenwich Park (the General Wolfe statue) (5A.2) within the London View Management Framework (LVMF). Above the Viewing Corridor to St Paul's Cathedral the threshold plane of view is a constant height of 52.1m, whilst the Background Assessment Area has a minimum threshold plane height of a minimum of 52.1m. The LVMF emphasises that the principal objective is to ensure that landmarks are visible and can be appropriately appreciated as a focus in the specific view.
- 6.70 Core Strategy policy CS14 emphasises the importance of protecting important views of St Paul's Cathedral from sites inside the Borough, in accordance with London-wide policy, and protecting important local views. For example, the Council will seek to protect views into conservation areas and of listed buildings and monuments. In response to these policies the proposed extensions do not breach the threshold height of the viewing corridors.
- 6.71 A number of key local views have been considered in the evolution of the design. The impact and acceptability of the proposal has been tested through a series of local townscape views within the vicinity of the site. The townscape images confirm that the impact of the extensions on the locality would not harm the adjacent conservation areas or listed buildings.
- 6.72 The Townscape Assessment contains computer generated images which show the proposed building. The images show that the proposals have been designed to be responsive to its context and that the refurbished building would make a positive contribution to the character and appearance of the adjacent conservation areas. The townscape assessment's overall conclusion is as follows: *"The Proposed Development will deliver a high quality refurbishment and external reconfiguring of the existing building. Its massing and new materials have been conceived specifically in relation to its context, such that it will enhance the townscape character of the locality and the setting of nearby Listed Buildings and Conservation Areas. While having no impact on relevant LVMF views, the Proposed Development's impact on some local views is judged to be particularly sensitive, but beneficial because of the very high architectural and urban design quality of the building. The Proposed Development will enhance the setting of all relevant heritage assets identified within the area. Based on the Views Assessment, the likely impact significance on heritage assets will range between negligible to major significance, and this is judged to be entirely beneficial. This is due to the high design quality of the reconfigured building and the careful selection of its materials and the attention to detail, and recognition that the existing building currently lacks architectural distinction and – as*
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an existing commercial development – would benefit from upgrading internally and enhancing externally.”

6.73 In determining the acceptability of the proposal one of the principal considerations is the effect of the proposals on the setting of the listed building and the three conservation areas. The impact of the proposal on the historic environment in the area has been carefully considered in developing the design and the applicant has consulted with Camden Council and English Heritage. The proposals are considered to accord with policy HE10 of PPS5, Policy 7.8 of the London Plan and policy CS14 of the core strategy and development policy DP25.

Sustainability and Energy

6.74 Sustainability and Energy Statements have been submitted to accompany the planning application. These assess how the building accords with policies and principles for sustainable development and energy efficiency. The content of the Statements have been discussed with Camden during pre-application consultation.

6.75 Sustainability principles are incorporated within the detailed design of the proposals both during the construction and within the final building itself. The additional floorspace proposed at 150 Holborn has been fully assessed against the GLA's Supplementary Planning Guidance on Sustainable Design and Construction and demonstrates compliance with the essential standards and a majority of the preferred standards. This includes compliance with LP policies associated with energy, heating and cooling hierarchies (Policy 5.5 and 5.6).

6.76 Chapter 5 of the LP considers climate change. Policy 5.2 requires an overall reduction in carbon emissions over minimum building regulation levels following the energy hierarchy. These are based on improvement targets on 2006 Building Regulations. Within the context of the energy hierarchy, the LP (policy 5.7) seeks to increase the proportion of energy generated from renewable sources. The policy also states major development proposals should provide a reduction in carbon dioxide emissions through the use of onsite renewable energy generation, where feasible.

6.77 Policies 5.1 and 5.2 of the LP focus specifically on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this. Developments are required to make the fullest contribution to tackling climate change by

minimising carbon dioxide emissions (be lean), adopting sustainable design and construction measures and prioritising decentralised energy (be clean), including renewables (be green).

- 6.78 Policy 5.5 of the LP seeks to ensure that all Development Plan Documents (DPDs) identify and safeguard existing heating and cooling networks and maximise the opportunities for providing new networks that are supplied by decentralised energy. The Mayor and boroughs will also work to identify and establish network opportunities to ensure delivery of networks and to maximise potential for existing development to connect to them.
- 6.79 Decentralised Energy in Development Proposals is addressed through Policy 5.6 in the LP which requires all development proposals to evaluate the feasibility of Combined Heat and Power (CHP) systems and Policy 5.2 seeks to ensure that developments should make the fullest contribution to minimising carbon dioxide emissions.
- 6.80 LP Policy 5.7 further states that major developments should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible. There is a presumption that all major development proposals will achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible. The LP incorporates policy to encourage future adaptation to climate change, with paragraph 5.46 stating that “*all developments should make the fullest contribution to London’s adaptation to climate change*”. The following LP policies promote and support the most effective adaptation to climate change, including:
- a) minimising overheating and contribution to heat island effects (Policy 5.9);
 - b) minimising solar gain in summer (Policy 5.9);
 - c) contributing to reducing flood risk including applying principles of sustainable urban drainage (Policies 5.12 and 5.13);
 - d) minimising water use (Policy 5.15); and
 - e) protecting and enhancing green infrastructure (Policy 5.10).
- 6.81 Policy CS13 – *Tackling climate change through promoting higher environmental standards* – requires developers to take measures to minimise the effects of climate change and all developments are encouraged to meet the highest feasible standard of sustainable design and construction that are financially viable. The Camden Core Strategy reflects the London Plan in terms of the energy hierarchy and seeks a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation.
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- 6.82 Policy DP22 – *Promoting Sustainable Design and Construction* – provides further guidance on what measures can be implemented to achieve an environmentally sustainable building. DP22 requires that all schemes demonstrate how sustainable development principles have been incorporated into the design and states that schemes involving an increase or change of use of 500 sq m floorspace or more will be required to meet a minimum very good rating using the BREEAM assessment. Camden’s CPG also goes beyond the very good score in requiring a minimum 60% score in the energy and water categories, and a minimum 40% score in the materials category. Additionally, the Council will expect new build housing to meet Code for Sustainable Homes Level 3.
- 6.83 Policy DP22 also seeks to ensure that new development incorporates green and brown roofs wherever suitable.
- 6.84 Policy DP22 sets out Camden Council’s requirement for development 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 uses in basements in flood-prone areas.
- 6.85 The development would involve the intensification of use of a brownfield site in a highly accessible location, with the majority of the existing building to be retained. Furthermore, the site’s existing car parking space would be eliminated (apart from one disabled space) and replaced with, amongst other things cycle parking, beneath a landscaped communal garden.
- 6.86 The Sustainability Statement confirms that the proposed office scheme for 150 Holborn has achieved a projected BREEAM score of “Very Good” in the formal pre-assessment that has been undertaken, with an aspiration of ‘Excellent’. In addition, the residential dwellings within the additional floors of the scheme will achieve a minimum Code for Sustainable Homes Level 3, and dwellings created in the existing building will achieve Eco-Homes “Very Good”. These standards are therefore compliant with policy DP22, and indeed for the commercial
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accommodation the proposed scheme will exceed the policy requirement of Camden Planning Guidance 3: Sustainability (CPG 3).

- 6.87 The proposed development involves the re-use of the bulk of the building, with some minor modification, and the addition of one floor along Holborn and the Gray's Inn Road elevation, and two floors along the Brooke Street elevation. Plant enclosures located at eighth floor, (fronting Gray's Inn Road/Holborn) and fifth floor, (fronting Brooke Street), step away from the street. This re-use therefore accords with DP22, which notes that the most sustainable use for an existing building is to continue to use it, rather than undertake demolition and erect a new building. In addition, the proposal incorporates sustainable design measures including low energy usage and reduced carbon emissions, and it is hoped that by undertaking these works the building will be viable for many years to come, thus saving the significant material and other environmental impacts that would be associated with the demolition of the existing building and construction of a new one in its place.
- 6.88 Green/brown roofs will be constructed, in accordance with policies CS13 and DP22. These proposals will increase the amount of exposed living planting and ecological habitat on the site, in line and exceeding Camden's planning policy objectives as outlined in Policy DP22 and CPG. Additionally, while large scale water attenuation is not possible, the use of soft landscaping and harvesting for irrigation within the new podium garden will reduce the peak storm water runoff.
- 6.89 Water consumption in the office accommodation, both refurbished and new build will be minimised, through the use of water conserving appliances such as low flow wash hand basins and dual flush toilets. In the residential units a number of water conserving strategies will be utilised, including as a minimum low water consumption appliances and dual flush WC's, but may also include 'in unit' grey water harvesting and treatment systems.
- 6.90 A number of passive energy savings are proposed for the new build elements of 150 Holborn, including the use of:
- High levels of insulation to achieve low U-values to limit the effects of heat loss from the construction;
 - Balancing the areas of opaque and transparent glazing within the façade to balance daylight against excessive solar gains;
 - Detailing of the façade and penetrations to minimise the risk of uncontrolled infiltration;
 - and
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- Use of extensive solar shading to further limit excessive solar gains.

6.91 In accordance with CPG3 and Approved Document L2B (ADL2B) of the building regulations, it is proposed that 10% of the budget for the new works will be spent on replacing the façade of the existing building that is being renovated to the standards of the new extension, thus significantly improving the insulation standards of the building. This is expected to result in significant energy and carbon savings within the overall building.

6.92 A number of active energy saving measures are proposed to minimise the energy consumption and consequential carbon emissions of the additional floors within the building, including:

- Use of energy efficient lighting within the office and residential accommodation;
- Lighting to be fully zonally controlled within the office areas to allow flexibility of usage to minimise consumption;
- Daylight dimming to be installed in the perimeter areas;
- Occupancy sensing will be used in appropriate areas within the office and residential accommodation;
- 'Variable Air Volume' (VAV) Chilled Beams are proposed for the office accommodation;
- Central power factor correction; and
- High efficiency condensing combination boilers are proposed for the residential units.

6.93 Investigations are underway to fully evaluate the feasibility of connection to the University College District Heating System, however at present as the site is a significant distance from the University College District Heating Network (approximately 1km) and the District Heating Network is operating at capacity, it is not felt that a connection would be viable to the development. However, the proposed scheme includes a CHP system, combined with absorption chillers to provide both heating and cooling to the office accommodation and which will result in significant carbon savings. The CHP system will incorporate flanged connections to enable a future connection to a district heating system if one should be brought into the area at a later date. In addition the design of the building aims to minimise its heating requirement through energy efficient design.

6.94 The use of the toolkit to evaluate the differing renewable options has identified that the site has limited ability to use renewable energy technologies. Solar thermal is proposed for the residential component of the development, and although photovoltaics are technically viable, they are a very costly technology and with the uncertainty regarding the Feed In Tariff funding, the opportunity for co-financing is limited. However, the proposed scheme includes an

alternative carbon abatement strategy to the use of on-site renewables, delivered through improving the performance of the existing accommodation that is to be renovated. It is proposed to adopt the same highly efficient design measures incorporated in the new accommodation within the existing accommodation, including the use of VAV Chilled Beams, low energy lighting and controls and the use of CHP. It is predicted that the savings from these measures would result in the reduction of emissions of 145,792kgCO₂ per annum below that of the existing accommodation. This is approximately 6 times the remaining carbon savings that would be delivered from an on-site renewable energy strategy providing 20% carbon reduction.

- 6.95 The energy efficiency of the building has been optimised and thus complies with policies in the LP chapter 5, Core Strategy policy CS13 and development policies DP22. By utilising the alternative measures described above, beyond the policy requirement, it is proposed that the building as a whole will have comparable energy consumption, even though the works comprise both new build extensions and internal refurbishment. This will result in a higher degree of carbon abatement than required by policy. It is acknowledged that the development is constrained in terms of the level of energy efficiency and on-site renewable generation that can be achieved since the majority of the building currently on site is retained. Nevertheless a high performance system is proposed that would represent a marked improvement to the energy consumption of the site at present.
- 6.96 In addition to the above energy strategy, the accompanying Sustainability Statement confirms that the applicant is committed to achieving a BREEAM 'Very Good' rating for the new offices (under BREEAM Offices, 2008) with the aspiration for 'Excellent' and the residential dwellings within the additional floors of the scheme will achieve a minimum of Code for Sustainable Homes Level 3, and the dwellings created in the existing building will achieve Eco-Homes "Very Good". The scheme is therefore considered to accord with policy CS13, DP22 and the Council's Planning Guidance on Sustainability.

Transport and Servicing

- 6.97 PPG13 (2001) (as amended) sets out the Government's policy in relation to Transport. The overall aims of the guidance are to: promote more sustainable transport choices for both people and for moving freight; promote accessibility for jobs, shopping, leisure facilities and services by public transport, walking and cycling; and reduce the need to travel, especially by car.
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- 6.98 In order to deliver these objectives paragraph 6 states that local authorities should, *inter alia*:
- Plan for increased densities at locations which are highly accessible by public transport, walking and cycling;
 - Use parking policies to promote sustainable transport and reduce the reliance on the car for work and other journeys;
 - Consider how best to reduce crime and fear of crime, and seek by the design and layout of developments and areas to secure community safety and road safety; and
 - Ensure that development comprising jobs, shopping, leisure and services offer a realistic choice of access by public transport.
- 6.99 The LP seeks to ensure the integration of transport and development by:
- Encouraging patterns and nodes of development that reduce the need to travel, especially by car.
 - Improving public transport capacity and accessibility, where it is needed, for areas of greatest demand and areas designated for development and regeneration.
 - Supporting high trip generating development only at locations with high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect the levels of public transport accessibility (Policy 6.1).
- 6.100 Camden's transport policies are in line with national and strategic guidance. Camden's Local Implementation Plan (LIP) sets out how the Council intends to deliver more sustainable transport, and is a key mechanism for the implementation of the transport objectives set out in the Core Strategy. Core Strategy policy CS11 – *Promoting sustainable and efficient travel* – promotes a range of sustainable transport measures and the delivery of additional infrastructure to support growth and relieve existing pressures on the transport system. CS11 builds on, and helps to deliver the sustainable transport priorities outlined in the Council's Green Transport Strategy, which aims to encourage more walking and cycling and reduce traffic in the borough by 15% from 2001 levels.
- 6.101 Policy CS11 seeks to minimise the provision for private parking in new developments, in particular through car free developments in the borough's most accessible locations and car capped developments. CS11 states that Camden will improve public spaces and pedestrian
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links across the borough, continue to improve facilities for cyclists and work with Transport for London to improve the bus network.

- 6.102 In support of the Core Strategy policy, development policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. DP17 seeks to promote walking, cycling and public transport use, and as such development should make suitable provision for pedestrians, cyclists and public transport. Consequentially, Camden will resist development that would be dependent on travel by private motor vehicles, and this is supported by DP18 which states that the Council will ensure that developments provide the minimum necessary car parking provision.
- 6.103 DP20 deals with servicing and deliveries, stating that the Council will expect development that would generate significant movement of goods or materials by road, both during construction and in operation, to be located close to the Transport for London Road Network or other Major Roads, accommodate goods vehicles on site and seek opportunities to minimise disruption for local communities through effective management.
- 6.104 To assess the overall implications of developments, Camden Council under DP16 expects the submission of a Transport Assessment (TA) where the implications of proposals are significant. Discussions have been held with the relevant Transport Officers at Camden, and given that the proposed scheme is working with an existing building, represents minimal change to the vehicle servicing at peak times, and reduces the number of car parking spaces on site, it is not deemed necessary to submit a formal TA. However, a Transport Statement (TS) has been prepared by Arup, and is submitted as part of this planning application.
- 6.105 The Transport Statement sets out the transportation characteristics of this part of Camden and the anticipated impacts associated with the proposals. The TS also sets the strategy for deliveries and servicing to the office and retail accommodation.
- 6.106 The site is very well located in relation to public transport, with a PTAL rating of 6b, and is immediately adjacent to the Chancery Lane Underground station and a number of bus stops along Holborn Gray's Inn Road and High Holborn. There are currently approximately 5 off-street parking spaces to the rear of the building. The development proposes to reduce this to 1 disabled parking space within the enclosed service area. As the site is within the Central London Area, the reduction in off-street parking is supported by policy DP18. The disabled parking space will serve the office building and no disabled car parking is proposed for the
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residential units, in accordance the Development Policy Appendix 2 – Parking Standards - which recommend the provision of at least one parking space for disabled users as part of developments. In addition, the site will facilitate convenient access by all modes of transport including taxis, buses, Underground trains, pedestrians and cyclists. It is anticipated that the site will generate very few movements by private car.

6.107 Secure and enclosed cycle parking is proposed in the service area beneath the garden deck at ground floor level, in addition to internal locker and shower facilities for staff. In keeping with Camden Development Policies Appendix 2 and Code for Sustainable Homes, 84 cycle spaces are proposed in total for the office, retail and residential components, arranged in the following breakdown:

Cycle Parking	Proposed
Office (11,086 sq m)	
1 per 250 sq m staff	46
2 Visitor	2
Retail	
1 per 250 sq m staff	12
1 per 250 sq m visitor	12
Residential (6 units)	
2 per unit (CfSH)	12

6.108 The cycle parking would be secure, undercover and have level access. The cycle parking is considered to comply with Camden's parking standards.

6.109 The TS sets out the strategy for deliveries and servicing at the proposed building. The servicing area for the office and retail accommodation is provided in the service yard below the garden deck, and has been carefully designed to be easily accessible to occupiers, whilst not adversely impacting on the amenity space or aesthetics from the residential accommodation. The requisite number of bins for the commercial uses is provided.

6.110 The TS concludes that a total of 50 delivery and servicing vehicles per day will service the building, with no change to the existing vehicle servicing at peak times. The TS notes that the peak hour arrival of deliveries is approximately 6 vehicles. In order to accommodate this peak hour demand, 2 loading bays will be required in the off-street loading area. A draft Servicing Management Plan is appended to the Transport Statement. It is expected that a detailed

Service Management Plan will be submitted to the Council prior to occupation of the building and this will be secured via the Section 106 Agreement.

- 6.111 Policy DP20 seeks to protect the safety and operation of the highway network. A construction method statement is submitted with this planning application, highlighting the likely construction impacts of the development; however it is anticipated that a full Construction Management Plan will be submitted prior to the implementation of a planning permission.
- 6.112 The transport impacts of the building can be satisfactorily accommodated. It is considered that the proposed scheme accords with the relevant PPG13 guidance, the LP policy 6.1 and the relevant Core Strategy policies and Development Policies highlighted above.

Daylight and Sunlight

- 6.113 The Camden DP26 – *Managing the impact of development on occupiers and neighbours* – seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors that Camden will consider include sunlight, daylight and artificial light levels, and the policy seeks to resist development which would reduce noticeably the daylight and sunlight to nearby neighbours and new occupiers which would be contrary to the BRE guidelines. Policy DP26 states that “development should avoid harmful effects on the amenity of existing and future occupiers and to nearby properties”.
- 6.114 The proposed extensions and façade alterations have been assessed in terms of their potential for impact on the amenity of the site and the surrounding area. In particular there are a number of residential units immediately opposite the site at 1-23 Gray’s Inn Road. The accompanying daylight and sunlight report prepared by Gordon Ingram Associates (GIA) assesses the daylight and sunlight impact of the external works on the nearby residential properties. GIA has worked closely with the applicant and the design team to ensure that the refurbished and extended building at 150 Holborn will leave neighbouring residential properties with adequate levels of daylight and sunlight.
- 6.115 The report by GIA concludes, as follows:

The proposed alterations to the existing building at 150 Holborn will not result in any noticeable change in the daylight or sunlight levels to the adjoining residential accommodation in 1-23 Gray’s Inn Road. The results demonstrate that the proposal is fully compliant with the BRE

guidelines and that any reductions in daylight which do occur are well within the 20% threshold given in the BRE handbook. There will be no change in sunlight values to those windows relevant for a sunlight assessment. There will be no likely change in the quantum of light spill arising from the proposed development or enhanced potential for solar glare than the existing building. There will not, in our opinion, be any light pollution or solar glare issues arising from this proposal.

- 6.116 In summary, the impact of the development in terms of daylight and sunlight is considered to accord with policy DP26 in respect of daylight and sunlight.
- 6.117 In respect of overlooking, the building line for the refurbished and extended building is very similar to the existing building, and although views from the building will be maximised, demands of privacy, daylight, glare and insulation will be adhered to and overlooking through the new windows is not expected.

Other potential impacts on residential amenity

- 6.118 The primary purpose of PPG 24 Planning and Noise is to determine the suitability of land for proposed residential development. It guides local authorities on the use of their planning powers to minimise the adverse impact of noise. It outlines the considerations to be taken into account in determining planning applications both for noise-sensitive developments and for those activities which generate noise in addition to advising on the use of conditions to minimise noise.
- 6.119 Policy 7.15 of the LP deals with reducing noise and this policy requires boroughs to minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.
- 6.120 Camden Policy DP28 seeks “*to ensure that noise and vibration is controlled and managed and will not grant planning permission for:*
- a. development likely to generate noise pollution; or*
 - b. development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided’.*
- 6.121 WSP Acoustics has been commissioned to undertake an environmental noise survey and carry out a planning assessment of the acoustic issues potentially affecting the proposed development at 150 Holborn. The environmental noise survey notes that the dominant source
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of noise at the exposed facades (eastern, southern and western) of the building on the site is due to road traffic, and is considered to be dominant during both day-time and night-time periods.

- 6.122 The proposed residential units are situated in the north-east of the building, and whilst higher noise levels are experienced on the Brooke Street façade as a result of road traffic movements, the noise can be controlled via glazing elements and ventilation systems. The acoustic report by WSP confirms that the minimum glazing sound insulation performance on all bedroom windows that face onto the common balcony overlooking Brooke Street must be at least 36 dB Rw + Ctr (provided by the glazing and frame element), but this can be achieved with an acoustic double glazing unit, i.e. 8mm glass / 10mm gap / 10.8mm glass.
- 6.123 With only one on-site car parking space, the noise generated by arrivals and departures to the site by car is likely to be minimal, and most movement to and from the site will be pedestrian. Given the nature of the surrounding streets and the level of pedestrian movements that already occur on the roads surrounding the site, especially given the adjacent location of Chancery Lane Underground Station, it is not considered that the proposal would result in significant additional impact on the current amenities of neighbours as a result of activity or potential noise generation.
- 6.124 The servicing of the building is considered in the transport and servicing section above. The servicing arrangements off-street, beneath the garden deck, will minimise its impact on the building, its occupiers and the locality generally and reduce the potential for noise nuisance.
- 6.125 Plant and machinery is located in enclosed casing on the roof of the additional seventh floor, although it will be located some distance to any sensitive receptors. Given this fact, and distance between the application site and nearby residential properties, it is not expected that the new plant and machinery from the building would result in noise disturbance to residents.
- 6.126 The majority of the existing building is to be recycled, which will therefore dramatically reduce noise and dust during the construction period, thus reducing the impact on neighbours.
- 6.127 Having regard to the above, it is not considered that the development will generate additional noise pollution and hence accords with policy DP26 in this regard.

Archaeology

- 6.128 Core Strategy policy CS14 confirms that the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by *inter alia* preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens. In addition, Development Policy DP25 notes that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, including physical preservation, where appropriate.
- 6.129 The application site is designated an archaeological priority area, although the extent of below ground works proposed as part of the proposals is extremely limited. The areas subject to below ground works relate to the area beneath the newly created residential core to the north of the Brooke Street element of the building and the lift pits for the new goods and passenger lifts. The rest of the basement slab is being retained and no works are anticipated at this stage. At this stage it is anticipated that given the close proximity of the residential core area to the existing building and basement, this area is likely to have been substantially truncated when the existing building was constructed and as such the archaeological potential of this area severely comprised. This is also likely to be the case for the new lift pits. It is anticipated that a watching brief will be carried out during the main works, with the scope for full excavation if deposits are identified. It is anticipated that this approach would be in accordance with policies CS14 and DP25.

Planning Obligations

- 6.130 This section of the Statement sets out the planning case for the proposal in the context of Regulation 122 of the CIL regulations. Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land. Regulation 122 provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
- a. necessary to make to the development acceptable in planning terms;
 - b. directly related to the development; and
 - c. fairly and reasonably related to the scale and kind to the development."
- 6.131 Under Policy 8.2 of the LP - Planning Obligations - boroughs should include appropriate strategic as well as local needs in their policies for planning obligations.
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- 6.132 Policy 8.2 of the LP further states that boroughs when negotiating planning obligations should seek a contribution towards the full cost of provision that is fairly and reasonable related in scale and in kind to the proposed area and its impact on the wider area.
- 6.133 Core Strategy policy 19 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.
- 6.134 The applicant confirms that they will enter into a Legal Agreement with the Council to secure the reasonable and necessary planning obligations associated with the development and that are in accordance with Regulation 122 of the CIL Regulations, Circular 05/05 and Core Strategy policy CS19.
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7.0 CONCLUSIONS

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the statutory development plan unless material considerations indicated otherwise. This Planning Statement has assessed the proposed development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 7.2 The Statement has demonstrated that the proposed development would provide a significant upgrade to an existing office building in a highly sustainable development of excellent design quality.
- 7.3 It considered that the proposals are entirely appropriate in land use terms. The proposed new office accommodation in the building will comply fully with the economic and office policies in the London Plan and Core Strategy. The scheme would provide a mix of uses, including the provision of housing in accordance with development management policy DP1, which allows for lower proportions of housing where the physical circumstances of a particular site or building place constraints on the development. In addition, the applicant will make a financial contribution to the Council's affordable housing fund in accordance with the draft Planning Obligations CPG.
- 7.4 It has been demonstrated that the building accords with PPS5, the London Plan and policies, CS14, DP24 and DP25. It is considered that the scheme creates a high quality building. The refurbished building maintains a positive relationship with its neighbours, creates attractive street facades and delivers a significant scheme, enhancing the character and appearance of this part of Camden and the nearby conservation areas and listed buildings.
- 7.5 The scheme provides an opportunity to enhance this part of Camden with a high quality building. The proposals will not cause harm to the historic environment generally, or in particular have any adverse effect on any designated heritage asset. The building would not adversely impact on the nearby conservation areas or their settings, and would contribute positively to the setting of the nearby listed buildings. Section 6 of the Planning Statement demonstrates that the proposals are consistent with an important objective of Government policy as set out in PPS1 and PPS5 and the development plan, which is to achieve a high standard of design, particularly within an historic environment.
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- 7.6 The scheme for the refurbished building follows a series of meetings and discussions with officers from relevant departments at Camden, English Heritage and other consultees. During this process, there have been alterations to the scheme in terms of the building form and elevational treatment and it has been shown that the design team have responded positively to feedback.
- 7.7 The proposals provide the opportunity for the building to meet the requisite thermal and energy efficiencies, in keeping with the aims of the LP and Core Strategy. The proposals will enable the project team to create an energy efficient and sustainable building, achieving a pleasant internal environment for users of the building. The building responds to the issues of climate change in accordance with the LP and the Core Strategy. The building incorporates passive and energy efficient measures. It is considered that in accordance with London Plan policy 5.1 and Core Strategy policies the development makes the fullest practicable contribution to the mitigation of and adaption to climate change and minimisation of emissions of carbon dioxide, and specifically responds to development policy DP22.
- 7.8 The application benefits from excellent public transport accessibility, pedestrian provision and cyclists provision. The scheme is car free. It is considered that the proposals accord with PPG13, LP policy 6.1 and Development policies DP16-DP21.
- 7.9 In terms of residential amenity considerations, it is considered that the proposals comply with the principles of good neighbourliness as required by development policy DP26.
- 7.10 The application complies with the policies within national guidance, the LP and Core Strategy and principles of sustainable development. PPS1, at paragraph 10, advises that there is a presumption in favour of the grant of planning permission for proposals which conform to the development plan. From this Statement it is concluded that there no material considerations of sufficient weight to determine that the planning application for the refurbished building is other than in accordance with the development plan.
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