

Land bounded by High Holborn, Hand Court, Bedford Row and Brownlow Street.

Planning Statement

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Court, Bedford Row and Brownlow
Street.**

Planning Statement

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Indigo Planning Limited
Swan Court
Worple Road
London SW19 4JS

Tel: 020 8605 9400
Fax: 020 8605 9401

info@indigoplanning.com
www.indigoplanning.com

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Plan Showing Location of the Site

Appendix 2

Farebrother Midtown report Q8 2008

Appendix 3

Property Week Article – A High for Holborn

Appendix 4

Letter from Stephen Page

Appendix 5

Letter from University College London

Appendix 6

Conservation Area UDP Extract

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Listed Building Description

1. Introduction

- 1.1. This planning application is submitted by Indigo Planning on behalf of Bedell Corporate Trustees Ltd and Atrium Trustees Ltd. It follows an appeal decision on the site dated 23 December 2008, confirming that mixed use development of the size and form proposed in this application is acceptable.
- 1.2. The site comprises 50-57 High Holborn (including Brownlow House, High Holborn House and Caroline House), 18-25 Hand Court and 45-51 Bedford Row. A plan indicating the location of the site is provided at **Appendix 1**.
- 1.3. A schedule of the properties on the site are set out in Table 1.
- 1.4. The site is currently predominately in office use with limited retail and service elements at ground floor fronting High Holborn and Hand Court, including a wine bar. Six residential units are also provided at 23 Hand Court.
- 1.5. The majority of the site falls within the Bloomsbury Conservation Area (excluding Caroline House and 18 Hand Court). The buildings comprising 46-48 Bedford Row are Grade II Listed Buildings.
- 1.6. This application seeks planning consent for:

“Mixed use redevelopment of the site involving the demolition of Caroline House, 18-22 Hand Court and parts of High Holborn House, retention and refurbishment of High Holborn House to provide new B1 (office) space. Retention and refurbishment of the facades of 23 Hand Court, 49-51 Bedford Row, Brownlow House and 45-48 Bedford Row. Provision of A1/A2/A3/A4 floorspace at Ground floor level together with new B1 (office) space. Conversion of 46-48 Bedford Row to create 3 single family dwellings, provision of 15 residential units within 24-25 Hand Court, 45 Bedford Row and 49-51 Bedford Row, conversion of Brownlow House to provide 10 residential units (total of 22 additional residential units – 6 existing on site). Redevelopment of 23 Hand Court to provide 22 student units, new servicing access from Brownlow Street, and various public realm works to Brownlow Street, Bedford Row and Hand Court. (Revised Application).”

- 1.7. This application is submitted to the London Borough of Camden in conjunction with an application for Conservation Area consent.

“Demolition of 19-22 Hand Court and parts of High Holborn House, and demolition behind retained facade of 23 Hand Court. (Revised Application).”

- 1.8. The three Grade II listed buildings (46-48 Bedford Row) benefit from listed building consent (Ref: 2008/4964/L). This consent enables the works to the buildings if necessary to convert them back to residential properties to be undertaken. However, planning consent for the actual change of use from office to residential is still required and comprises part of this application.
- 1.9. The existing site is being redeveloped to increase and upgrade the office accommodation available. In line with local planning policy, residential accommodation including affordable housing will be provided on site. There will also be provision of A1, A2, A3 and A4 uses at

ground floor level. The proposed mixed use development is in accordance with national, London-wide and local planning policy aims.

- 1.10. This report sets out the planning context for the proposals and describes how they accord with policy at the national, regional and local level. The following sections address the following issues:
- Section 2 outlines the recent appeal decision;
 - Section 3 describes the site and its surroundings;
 - Section 4 identifies the benefits of the scheme;
 - Section 5 establishes the planning and site history;
 - Section 6 sets out the relevant national planning guidance and development plans against which the application is considered;
 - Section 7 describes the proposed mix of uses;
 - Section 8 considers the provision of office space in the proposals;
 - Section 9 examines the quantum and type of residential uses proposed;
 - Section 10 considers the site within the specific context of the Conservation Area;
 - Section 11 relates to the conservation and restoration of the Listed Buildings at 46-48 Bedford Row;
 - Section 12 provides an overview of the transport case for the proposals including car parking and servicing;
 - Section 13 discusses the sustainability elements of the proposals;
 - Section 14 considers the aspects of the proposals in relation to archaeology, daylight and sunlight, noise, and important views;
 - Section 15 considers the heads of terms for the S106 Agreement;
 - Section 16 provides a summary and concludes that the application accords with planning policy and should, therefore, be approved.
- 1.11. The application should be read in conjunction with the following reports which are submitted in support of these applications:
- A Planning Design Report (Inc Design and Access), prepared by Sheppard Robson;
 - A Conservation Area Statement, prepared by Indigo;
 - A Transport Assessment, prepared by Watermans;
 - An Energy Statement, prepared by Ove Arup and Partners Ltd;
 - A BREEAM Pre-Assessment, prepared by Ove Arup and Partners Ltd;
 - A Code of Sustainable Homes Assessment, prepared by Sheppard Robson;
 - An Archaeological Impact Assessment, prepared by the Museum of London Archaeology Service;

- A Structural Assessment, prepared by Watermans;
- A Historic Building Architects Report, prepared by Peter Riddington of Donald Insall Associates;
- A Noise Impact Assessment, prepared by Arup Acoustic;
- A Daylight and Sunlight Assessment, prepared by GIA
- A Crime Prevention Statement, prepared by Sheppard Robson;
- A Life Time Homes assessment, prepared by Sheppard Robson;
- An Affordable Housing Toolkit prepared by Affordable Housing Solutions;
- Framework Residential Travel Plan, prepared by Watermans; and
- Framework Office Travel Plan, prepared by Watermans;

Table 1: Schedule of Sites

Existing Building Name	Address	Listed Building/CA Status	Existing Use	Proposed Use	Proposed Floorspace (m ² gross external)
Brownlow House	50-51 High Holborn	Within CA Not listed	Ground & Basement – Retail / Financial Services Levels 1-4 – Office	Lower Ground – Retail (A1) Ground - Retail (A1) Levels 1-5 – Affordable Housing	235 100 965
High Holborn House	52 - 54 High Holborn	Within CA Not listed	Ground & Basement – Retail Levels 1-6 - Office	Lower Ground – Office Service/Plant Area Ground - Retail (A1) Level 1 to level 6 - Office	252 134 1,854
Caroline House	55 - 57 High Holborn	Outside CA Not listed	Ground & Basement – Retail / Wine Bar Levels 1-8 – Office	Lower Ground – Level 8 – Main Office	21,533
	18 Hand Court	Outside CA Not listed	Office	Forms Main Office	Included in main office floorspace figure
	19-22 Hand Court	Within CA Not listed	Offices	Ground -Retail/café (A1/A3) Main Office	85 Included in main office floorspace figure
Montague House	23 Hand Court	Within CA Not listed	Basement & level 1 - Office Level 1-3 - Residential	Ground & Lower Ground – A3/A4 Level 1-5 – Student Accommodation	245 710
	24 Hand Court	Within CA Not listed	Ground – Retail	Lower Ground-Level 5 – Residential Ground – Retail (A1)	745 45
	25 Hand Court	Within CA Not listed	Offices		
	45 Bedford Row	Within CA Not listed	Basement-level 5 - Office		
	46 Bedford Row	Within CA Grade II listed	Basement-level 3 - Office	Residential	495
	47 Bedford Row	Within CA Grade II listed	Basement-level 3 - Office	Residential	312

	48 Bedford Row	Within CA Grade II listed	Basement-level 3 - Office	Residential	305
	49-51 Bedford Row	Within CA Not listed	Office	Ground – Office	90
				Residential	945

2. Appeal Decision

- 2.1. As detailed in the Planning History Section below two previous applications for mixed use development have been submitted on this site. They both comprised office, retail and residential elements. The key difference between the two applications known as Scheme A and Scheme B was that Scheme A was a storey higher than B. Both applications were refused by the Council and subsequently appealed.
- 2.2. The Inspector considered the planning, conservation and listed building appeals for both schemes A and B. The key issues he considered were:
- Extent of Demolition
 - The setting of the listed buildings;
 - The Bloomsbury Conservation Area; and
 - Benefits and Harm.

Scheme A

- 2.3. His key conclusions on the Scheme A proposal which led to the appeal being dismissed related to the height, massing, and scale at the northern end of the site, the relationship of the new office element to the upper part of High Holborn House on the High Holborn frontage, and the effect of the additional mansard storey on Brownlow House.
- 2.4. Overall, the Inspector concluded that the benefits that would arise from the proposals (the mix of uses including residential and student accommodation, the amount of affordable housing, the provision of modern commercial floorspace suited to business needs, and the balance between commercial imperatives and development of good architectural quality) were insufficient to outweigh the harm he considered the works would cause that he had identified and that are outlined above.

Scheme B

- 2.5. The Inspector's key conclusions on the Scheme B proposals differed from those for Scheme A. His view on the development proposed for the northern part of the site was that the height, massing, and scale, whilst only being one commercial storey lower than Scheme A and taken with other design differences, ensure that the development would be acceptable in terms of its effect on the setting of the listed buildings, would not dominate views southwards from Bedford Row and would not conflict with conservation area policies in this area.
- 2.6. His view on the proposed additional mansard storey to Brownlow House was that this would not have the same effect as Scheme A of unbalancing the existing building as the roof slope would be considerably less steep and hence it would preserve the building's contribution to the conservation area.
- 2.7. The one key aspect of Scheme B that led to his dismissing the appeal was the relationship of the new office element to the upper part of High Holborn House on the High Holborn frontage and the removal of the pantile roof on this frontage. His conclusion on the effects of demolition behind the façade and the introduction of accommodation similar in style and appearance to the new office element in place of the pantile roof would detract from the building's integrity and fail to preserve the character or appearance of the conservation area.
- 2.8. The Inspector's conclusions on the overall benefits and harm of Scheme B were ultimately reached through his view of the harm he identified to the character of the conservation area similar to Scheme A. However in the case of Scheme B this was restricted to the harm he considered to arise to the conservation area from his view of the need to retain more than just

the façade of High Holborn House to High Holborn and a substantial part of the pantile roof. His report indicates that he considered all other aspects of Scheme B to be acceptable in their listed building, conservation area, and planning context.

Changes to High Holborn House

- 2.9. This revised application shows the retention of the pantile roof form and treatment to High Holborn House along with a substantial proportion of the floorplate behind. The revised proposal identifies High Holborn House as a separate office building on six levels over ground floor retail. The proposal reiterates the intention to enhance the quality of this building by introducing a stone return to the party wall with Brownlow House. It also seeks to eliminate the brick stair tower that dominates this backdrop to Brownlow House and continues the pantile roof to this return thereby enhancing the appearance of High Holborn House.

Brownlow Street Elevation

- 2.10. During the course of the appeal process the Council raised concerns about the lack of active frontage along Brownlow Street. Although this was discussed in detail during the course of the inquiry the Inspector stayed silent on this matter. This indicates that he did not find the design of the elevation so unacceptable as to dismiss the appeal on this basis. However, the scheme has been revised in order to introduce some additional interest into this elevation at pedestrian level to improve the human experience
- 2.11. This has been achieved by introducing vertical projected glass fins spanning between the top of the ground floor down through the lightwell to lower ground floor level. These are located at the midpoint between the large stone fins proposed in the previous application. The intention is for these new glass fins to add colour using either a colour frit or interstitial layer which could be lit at night. These details we would like to develop under reserved matters. The glass fins by the nature of their size and colour would help add a more intimate scale, relief and animation to the pedestrian experience along Brownlow Street.
- 2.12. The transparency of the glazing at ground floor level is increased in this revised scheme by removing the vertical fritting that was previously proposed for Scheme B glazing at this level. This will subtly add to the differentiation of the base of the building from the levels above.
- 2.13. The balustrading to the lightwells previously formed a continuous line along Brownlow Street. These have been amended so that the balustrades are expressed between stone fins to add another level of layering and detail.

Bedford Row Elevation

- 2.14. With relation to the office elevation that forms the backdrop to Bedford Row the Inspector stated in the appeal decision that
- 2.15. “Although, I have reservations about the effectiveness of the ‘green wall’ as a feature of the design, these do not greatly affect my opinion of the overall merit of Scheme B”
- 2.16. Although the design of the ‘green wall’ was not a reason for dismissing the appeal this feature has been modified as part of this application.
- 2.17. The stair case feature has been enclosed in glass and the design of this feature has been simplified. This modification helps to provide interest and depth to this elevation whilst ensuring that it does not detract from the listed buildings.

Hand Court Elevation

- 2.18. During the course of the appeal process the Council raised concerns about the lack of active frontage along Hand Court. Although this was discussed in detail during the course of the inquiry the Inspector stayed silent on this matter. This indicates that he did not find the design of the

Hand Court elevation so unacceptable as to dismiss the appeal on this basis. However, as with Brownlow Street above, the scheme has been revised through discussions with officers, in order to introduce some additional interest into this elevation at pedestrian level, and above, to improve the human experience.

- 2.19. The major change to this elevation is the increased size of the “cut-out” adjacent to No. 23, which makes reference to that building. This reflects the height, scale and proportion of the terracotta element of No. 23 and addresses the two storey datum of 23 Hand Court and the extent of the retail unit at ground floor level. A hierarchy has also been created between the ground and the first floor level by the position of the glass face that is flush with the column face at first floor level and the rear of the column at ground floor level. The ‘revealed’ 3 bays at first floor are intended as special meeting / break out spaces which will help to provide more animation to Hand Court. In addition, the frontage of the commercial unit has been differentiated from the adjoining office space by projecting the frontage flush with the face of the columns and provision for signage has been made in the spandrel above.
- 2.20. The stone clad structural pillars that have been exposed by the peeling away of the outer skin have been increased in width to give a more robust appearance. The glass fins are omitted at ground floor to distinguish the base of the building, which ties into a common datum level along the west side of Hand Court.
- 2.21. As in Brownlow Street the balustrading to the lightwells has been amended so that these are expressed between stone fins to add another level of detail.

Recessed Doorways

- 2.22. The Inspector remained silent on the issue of recessed doorways in his appeal decision although it did form a reason for refusing both Schemes A and B. However, as part of the appeal process fully revised elevational drawings were submitted showing how the recesses could be reduced to help minimise the possibility of attracting anti social behaviour. Together with other measures such as pavement studs, CCTV and 24 hour security, it was agreed that these design changes were sufficient to overcome the Council’s reservations. These changes have been incorporated into this revised scheme.

Wheelchair units

- 2.23. The provision of wheelchair units within Scheme B was agreed to be acceptable and did not form a reason for refusing this application. this application follows the Scheme B layout and wheelchair units are provided as follows:
 - 1 x 2 bed unit in Brownlow House (affordable housing);
 - 2 x 2 bed unit in 49-51 Bedford Row (market housing); and
 - 3 x student bedrooms in 23 Hand Court (student accommodation).
- 2.24. The provision is above 10% of the units in the scheme and in accordance with Policy H7.

Cycle Parking Spaces - Office

- 2.25. Through the appeal process it became clear that the Council were not convinced that sufficient space had been set aside for cycle parking to serve the office space. This issue has been revisited and it is confirmed that the office cycle parking space, as shown on the proposed lower ground floor plan is sufficient to accommodate the number of cycle parking spaces that the development requires. The stands will be double stacker style cycle stands that have been requested by the Council’s transport officer, Sam Longman.

3. The Site and Surrounding Area

The Site

- 3.1. The development site fronts onto High Holborn and is bounded by Brownlow Street, Hand Court and Bedford Row. The site comprises a variety of buildings dating from the late 17th/early 18th century (46-48 Bedford Row) to the middle of the 20th century.
- 3.2. The existing buildings comprise a range of heights, architectural styles and materials resulting in the site having a lack of distinctive character. The buildings tend to be reflective of their historic uses, which, in some cases, differ from their present uses.
- 3.3. Numbers 46-48 Bedford Row are Grade II Listed Georgian buildings. They have been subject to considerable alteration from their original form as terraced houses, as a result of their conversion to office use.
- 3.4. A number of the existing buildings, High Holborn House, 18-22 Hand Court and Brownlow House in particular, provide a very poor quality office environment. These buildings cannot realistically be upgraded or refurbished to meet the needs of modern office occupiers, nor can they meet the required sustainability objectives of occupiers and the Council.
- 3.5. Much of the site lies within the Bloomsbury Conservation Area. A plan indicating the extent of the Conservation Area is included within the Sheppard Robson Planning Report.
- 3.6. A summary of the site's designations in the Camden Unitary Development Plan (UDP) is as follows:
 - Central Activities Zone (CAZ);
 - Bloomsbury Conservation Area (excluding Caroline House and 18 Hand Court);
 - Archaeological Priority Area;
 - Central London Frontage;
 - Background Assessment Area of the Protected Vista of St Paul's Cathedral from Greenwich Park; and
 - The site abuts the Holborn Intensification Area.
- 3.7. In terms of accessibility, the site is a PTAL 6b location, which means that it is highly accessible by public transport and is an appropriate location for intensification.

The Surrounding Area

- 3.8. High Holborn is a busy and thriving commercial area. High Holborn itself is a key thoroughfare linking the West End with the City of London. It is generally dominated by large modern office blocks with active frontages at ground floor level providing a mix of shops, eating and drinking establishments and services. High Holborn acts as a link between the City and the West End. Consequently, given the site's strategic proximity to the City of London and West End it can address the acknowledged need for new office development in Midtown.
- 3.9. Hand Court, on the west boundary of the development, is a pedestrian only route although at the northern end it provides access to the underground servicing to the adjacent Mid-City Place, a 10 storey, modern office building which adjoins Caroline House to provide a continuous frontage

at High Holborn above ground level.

- 3.10. Bedford Row to the north of the site is characterised by Grade II Listed terrace houses, all but two of which have been converted to offices. It is much wider than other streets surrounding the development and is lined by trees, providing a more open and welcoming environment.
- 3.11. Brownlow Street has no active frontages and is of restricted width. It provides a through route for motorised vehicles from Bedford Row to High Holborn with very narrow pavements providing a very poor pedestrian environment.
- 3.12. Holborn and Chancery Lane underground stations lie a few minutes walk in either direction from the site. There are a number of bus routes that serve High Holborn and further routes a short walk to the north along Theobald's Road, east on Grays Inn Road and west on Southampton Row.

4. Benefits of the Development

4.1. The acceptability of the proposed mixed-use development scheme has been comprehensively assessed against planning policy and in relation to the appeal decision. From the policy analysis that follows, it is clear that this revised scheme fully accords with aims and objectives of the relevant planning policies as set out in national, regional and local policy documents. The appeal decision recognises that the redevelopment of this site and its immediate environment will both enhance the High Holborn area and make a positive contribution to the environment, commercial requirements and housing needs. The following list summarises the main positive benefits of the scheme:

- The new development makes more effective use of the existing, underutilised site;
- The replacement of existing inefficient and uneconomic buildings by new buildings that meet the considerably higher sustainability standards will have long-term environmental benefits;
- The new commercial floorspace is of a size and configuration that will attract high quality occupiers and raise the prestige and profile of the Midtown;
- There is a clear, identified need to provide high quality, large floorplate office space in High Holborn;
- Encouraging Camden's economy and improving office provision in appropriate locations are key aims of the London Plan and Camden UDP;
- Providing new residential units on the site is a priority for the Council;
- The additional residential accommodation addresses a range of needs, including providing 10 affordable housing units and 22 students units, complying with planning policy;
- Providing 10 affordable units will help to meet an identified need in Camden;
- Providing 22 student units will meet an identified need in this part of Camden;
- The retention, restoration, and reuse of the three Listed Buildings as residential accommodation for which they were originally designed is a significant heritage improvement complying with planning policy;
- The retention of other buildings and facades on the site where they are considered by the Council to make a positive value in the Conservation Area and the removal of buildings and features of poor quality will enhance the Bloomsbury Conservation Area;
- The new buildings are of a high standard of design that responds to their context in their scale, articulation, and materials, and introduce renewed vitality and interest in the area, as well as enhancing the Bloomsbury Conservation Area;
- The enhanced pedestrian links and a considerably improved pedestrian environment in the immediate surroundings of the site will improve the wider area;
- The rationalisation and improvement of servicing to the buildings on the site, including improvements to Brownlow Street;
- The revitalisation of Hand Court by introducing a mix of uses to that element, including retail and wine bar uses at ground floor level;

- The sustainable mix of uses proposed at the site will ensure that historic buildings and elements of value are safeguarded and the setting of the Listed Buildings and improve the Bloomsbury Conservation Area;
- Incorporation of green roof technology that is sustainable, visually attractive and also serves as amenity space for office workers; and
- The new scheme will achieve a cumulative reduction of carbon dioxide by almost 30% through design and the use of sustainable and renewable technologies, including energy efficient systems, a gas fired CHP system and the introduction of a biomass boiler, with a 13.5% reduction for the CHP and biomass boilers combined.

4.2. In summary, the redevelopment of this complex site will have many benefits for Midtown and Camden. The scheme will provide much needed good quality office floorspace, new residential accommodation (including affordable housing), and environmental improvements to the wider area in a sustainable development which respects and enhances the heritage value of the site.

5. Planning History

- 5.1. Two schemes comprising Planning, Listed Building and Conservation Area applications have been submitted in the recent history of the site that were broadly similar in their proposals to this application. The first was submitted to the London Borough of Camden in October 2007, and was refused, leading to a revised application to address the Council's reasons for refusal that was submitted in May 2008. This was subsequently also refused. Both applications were then the subject of an appeal which co-joined the two schemes for consideration alongside each other on the basis of their similarities.
- 5.2. The first submission, which for the purposes of consistency with the appeal, is called Scheme A, comprised a full planning application (Ref: 2007/5412/P) for a mixed use, office led development, a Listed Building application (2007/5414/L) for partial demolition and alterations to 46 – 48 Bedford Row to allow their restoration to three residential units and an application for Conservation Area consent (2007/5415/C) for complete demolition of 19-22 Hand Court and partial demolition of High Holborn House, 23 Hand Court and Brownlow House. The applications were subsequently refused in March 2008 for 18 reasons for refusal in respect of the planning application. These included:
- height, scale, bulk and design;
 - roof extensions to High Holborn House, Brownlow House, 23 Hand Court and 45 Bedford Row / 24 & 25 Hand Court;
 - contribution to housing;
 - contribution to affordable housing;
 - wheelchair accessible units;
 - daylight / sunlight;
 - recessed doorways; and
 - s106 contributions.
- 5.3. The revised application, called Scheme B, sought to revise the refused scheme by addressing the reasons for refusal. This comprised a full planning application (Ref: 2008/2956/P) for a mixed use, office led development, a Listed Building application (2008/2961/L) for partial demolition and alterations to 46 – 48 Bedford Row to allow their restoration to three residential units and an application for Conservation Area consent (2008/2958/C) for complete demolition of 19-22 Hand Court and partial demolition of High Holborn House, 23 Hand Court and Brownlow House. The applications were subsequently refused in September 2008 with 17 reasons for refusal reasons in respect of the planning application.
- 5.4. The reasons for refusal were the same as with Scheme A, however, after the committee report was published (but prior to the committee meeting), the case officer confirmed that reason for refusal 8 in respect of wheelchair accessible units had been addressed and would, therefore, be removed as a reason for refusal.
- 5.5. Furthermore in Supplementary Information for Camden's Development Control Committee meeting on 18 September 2008, the case officer for appeal Scheme B stated that the Council's Valuation Department had provided advice in respect of the financial appraisal and concluded that, subject to certain clarifications, the figures are reasonable and fairly demonstrate that the development is on the margins of viability.

- 5.6. As a result, the case officer recommended that reason for refusal 6 and 7 be removed in respect of Scheme B. At the Council's Development Control Committee on 18 September 2008, however, a majority of 3 Members voted to reinstate reason for refusal 6 and 7.
- 5.7. Following the determination of the applications, the case officer submitted further information to the Development Control Committee held on 9 October in respect of reasons for refusal 6 and 7 and requested that the Committee remove these reasons as part of the appeal process for Scheme A and B. Committee members agreed to their removal.
- 5.8. Scheme A and Scheme B became the co-joined subject of a Planning Appeal and an Inquiry was heard between the 25 and 18 November 2008. The Inspector found the principle and form of Scheme B acceptable, however it was dismissed on the basis of the treatment of High Holborn House and its effect on the conservation area. Full analysis of the appeal is found in section 2 of this planning statement.
- 5.9. An application for Listed Building consent (Ref: 2008/4964/L) for the works proposed as part of this application has since been considered separately and consent was granted on 25 November 2008.
- 5.10. Prior to the refusal of the mixed use scheme, the planning history of the site is more fragmented and complex, as the site comprises a number of separate buildings each with their own planning histories. There have been numerous small scale applications for things such as signage that have no bearing on the current applications. Consequently, the planning history below concentrates on key applications on this site that helped to inform the current submission.
- 5.11. The key planning applications on this island site are identified as:

23 Hand Court

- **8900510/511 (duplicate applications) April 1990:** Planning permission was refused for the erection of a basement plus five storey building for use as offices. The applications were refused on four grounds relating to:
 - over development of site;
 - increase in office accommodation contrary to planning policy;
 - loss of educational accommodation; and
 - impact on visual amenity. This decision was appealed, but the appeals were later withdrawn.
- **PS9804575R1 January 1999:** Planning permission was granted for the change of use from a non-residential institution to food and drink use on part basement and part ground floor, together with offices on part ground and part first floors, the creation of 6 flats on part first, second and third floors with a mansard roof extension. This application is particularly important as it relates to the 6 existing residential units on site which will be re-provided in the scheme.

50-51 High Holborn

- **9000395 February 1991:** Planning permission was granted for the replacement of roof mounted plant.

52-54 High Holborn (High Holborn House)

- **9401828 July 1995:** Planning permission was granted for a change of use of the first floor from offices to use as a fitness and educational training centre and the conversion of a shop in Brownlow Street including a new shopfront to provide an access to the first floor.

- **PS9804163 May 1998:** Planning permission was granted for the installation of comfort cooling units to two 1st floor office suites, including siting of external plant at basement level within enclosed lightwell.
- **PSX0205392 Feb 2003:** Alterations at roof level including new plant and infill of internal lightwells to provide additional office floorspace. This application was refused on the grounds that it would increase the clutter and bulk at roof level and impact on views from the Conservation Area.

5.12. Across the site as a whole there is a lot of mechanical plant. The sporadic addition of plant over time to the buildings has had a negative impact on the Conservation Area, and this is underlined by the 2003 refusal at High Holborn House. The proposed redevelopment will help to improve this situation as it incorporates necessary plant within a plant room.

47 Bedford Row

- **2003/1791/P February 2004:** Planning permission was granted subject to a s106 for a change of use from offices to a single residential dwelling. This planning permission was not implemented. However, it establishes that the principle of converting this property back to a single family dwelling house, as proposed by this current application, is acceptable.

47a Bedford Row

- **8900149 September 1989:** Planning permission was granted for a mix use of residential and offices with associated alterations. Listed Building Consent was also granted for this work. These permissions were not implemented.

5.13. In summary, the planning history confirms the complexity of the site and its past piecemeal development. The current application seeks to address the site in a comprehensive manner in line with the findings of the recent appeal decision. It is proposed to provide a high quality development which respects the heritage value of the site whilst providing much needed large floorplate office floorspace and residential accommodation, including affordable homes.

6. Planning Policy Overview

6.1. In this section, we summarise the key planning policy documents against which the acceptability of the proposals will be considered. The proposal has been separated into three topics: the mix of uses; the rationale for new office space; and housing provision. These elements are assessed against planning policy over the next three Sections of the report.

6.2. Planning policy is set out in national guidance, London-wide and strategic guidance and local planning policy documents. We consider these below.

The site falls within several designations within the Camden Unitary Development Plan (UDP). These designations are vital in considering the acceptability of the proposals on the site. The designations are as follows:

- Bloomsbury Conservation Area (excluding Caroline House and 18 Hand Court);
- Archaeological Priority Area;
- Central London Frontage;
- Background Assessment Area of the Protected Vista of St Paul's Cathedral from Greenwich Park; and

6.3. The site also abuts the Holborn Intensification Area.

National Planning Policy

6.4. Planning Policy Guidance Notes (PPGs) and their replacements, Planning Policy Statements (PPSs), are prepared by the Government to explain statutory provisions and provide guidance to local authorities on planning policy.

6.5. This national guidance has been duly considered in preparing these proposals in order that the application accords with national guidance as set out in the following key documents:

- PPS1: Delivering Sustainable Development (2005) sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system;
- PPS3: Housing (2006) sets out how the planning system supports the growth in housing completions needed in England;
- PPS6: Planning for Town Centres (2005) sets out the Government's policy on planning for the future of town centres uses; and
- PPG15: Planning and the Historic Environment (1994) sets out policy for dealing with heritage issues such as Conservation Areas and Listed Buildings. PPG15 is independently assessed in the Listed Building Statement, and the Conservation Area Statement.

6.6. It is considered that these are the most relevant to the application, however, the proposals further take account and accord with guidance provided by PPG13: Transport, PPS22: Renewable Energy and PPG24: Planning and Noise.

The London Plan

6.7. The London Plan is the spatial development strategy covering London's 32 boroughs and the City of London and deals only with matters that are of strategic importance to Greater London.

- 6.8. The London Plan sets out an integrated social, economic and environmental framework for the future development of London and provides a London-wide context within which individual boroughs set their local planning policies. The site falls within the Central Activities Zone (CAZ).
- 6.9. The London Plan was adopted in 2004 and is currently under review. Policies set out in the London Plan consolidated with alterations since 2004 (Spatial Development Strategy for Greater London), published in February 2008, are also considered in this statement.

Sub-Regional Development Frameworks

- 6.10. The Sub-Regional Development Frameworks were published in May 2006. At this time, the application site fell within the Central Sub-Region. However, the London Plan Consolidated with Alterations published in February 2008 amends these Sub-Regions with the removal of the Central Sub-Region. The site now falls in the North Sub-Region.

London Borough of Camden Unitary Development Plan

- 6.11. The Replacement Camden Unitary Development Plan (UDP) was adopted in June 2006. It sets out Camden's aims and priorities for land use in the Borough.
- 6.12. The Plan seeks to:
- achieve sustainable new development of the highest quality in the most suitable locations;
 - protect and enhance the built and natural environment;
 - improve the quality of life of the people who live in, work in and visit the Borough; and
 - support sustainable communities.
- 6.13. The UDP aims to meet the needs of Camden by:
- meeting housing needs;
 - improving economic prosperity and diversity;
 - protecting and improving its town centres and protecting; and
 - enhancing the environment.
- 6.14. Camden is pursuing an environmentally sustainable pattern of land use thus reducing the need for travel.

- 6.15. The UDP further seeks to balance the needs of residents with the Borough's London-wide role.

Supplementary Planning Guidance (SPG)

- 6.16. Camden Supplementary Planning Guidance was published in 2006 and gives additional advice and information on the application of policies in the Replacement UDP.

Local Development Framework (LDF)

- 6.17. The Local Development Framework (LDF) will be made up of a collection of documents and cover all of the relevant planning policies for Camden. When adopted, the LDF will replace the current UDP.
- 6.18. The Local Development Scheme sets out the timetable for the production of LDF documents with first stage Issues and Options consultations set for autumn 2007 on the initial core documents. Therefore, LDF documents are not considered by this statement.

Draft Conservation Area Appraisal

- 6.19. A Bloomsbury Draft Conservation Area Character Appraisal was published by the Council in April 2008 for consultation and comments were submitted in June 2008. The applicant has submitted a letter outlining concerns at the approach adopted and the robustness of the assessment, particularly as it affects some of the unlisted buildings on the site and the conclusions on any contribution they might make to the Conservation Area. This Draft Conservation Area Statement has yet to be adopted and was not considered to be a material consideration in the recent appeal on this site.

7. The Mix of Uses

- 7.1. The proposed redevelopment of the site will result in an office-led, mixed-use development which will maximise the use of the site and intensifies existing uses to achieve the goals of planning policy at national, regional and local levels.
- 7.2. The proposed mix of uses is:
- **Office:** A greater quantum of office floorspace which replaces existing, inferior office space and responds to an identified need for modern, large floorplate offices in the Midtown area;
 - **Retail:** A mix of A class units (including Class A1/A2/A3/A4 Uses) which re-provide existing uses at the site and maintain an active frontage to High Holborn and introduce more active uses to Hand Court to meet the Council's objectives;
 - **Residential:** A significant increase in the number of residential units in accordance with Camden Council's policy, including the renovation and reinstatement of family housing within the Georgian Listed Buildings at Bedford Row;
 - **Affordable Housing:** The provision of much needed affordable housing in Brownlow House; and
 - **Student Accommodation:** The provision of much needed student accommodation.
- 7.3. The sustainable mix of uses proposed at the site will ensure that historic buildings and elements of value are safeguarded. The setting of the Listed Buildings and the part of the Bloomsbury Conservation Area in which the site lies will be enhanced by the proposed development.
- Planning Policy Statement 6: Planning for Town Centres**
- 7.4. High Holborn is designated as a Central London Frontage in the adopted Camden UDP, therefore, PPS6 is relevant. PPS6 confirms that a wider policy objective of the Government is to ensure locations are fully exploited through high-density, mixed-use development.
- 7.5. Paragraph 1.8 notes that main town centre uses include:
- retail;
 - leisure, entertainment facilities, and the more intensive sport and recreation uses (including bars and public houses);
 - offices, both commercial and those of public bodies; and
 - arts, culture and tourism uses.
- 7.6. Further, it is noted that housing is an important element in most mixed-use, multi-storey developments.
- 7.7. The proposed development responds to PPS6 by the inclusion of a mix of town centre uses including offices, retailing, eating and drinking establishments, as well as a significant element of housing.
- 7.8. Local planning authorities are required to encourage diversification of uses. Paragraph 2.22 notes that a diversity of uses in centres, such as those proposed by this application, make an important contribution to their vitality and viability. The PPS notes that policies should

encourage a range of complementary evening and night-time economy uses, including public houses and bars, which appeal to a wide range of age and social groups.

London Plan and Draft Further Alterations

- 7.9. Policy 3B.3 refers to mixed use development and states that within the Central Activities Zone wherever increases in office floorspace are proposed, they should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the Plan. In accordance with Policy 3B.3, the proposed development includes residential accommodation (both market and affordable) and student accommodation, in addition to office, retail and service floorspace.
- 7.10. The policy further states that beyond the strategically specified locations identified in paragraph 3.148, mixed use development and redevelopment should support consolidation and selective rejuvenation of office provision in line with policy 3B.2 which considers office demand and supply.
- 7.11. Section 5B of the North London Sub-Region SRDF states that priorities will be to take advantage of the exceptional access to the CAZ and sustain relatively high levels of population growth, especially in the CAZ and inner parts of the sub-region. The proposed development re-introduces family housing to the Georgian Listed Buildings on Bedford Row, replaces six existing apartments, and introduces nine new market residential units together with ten affordable units, and 22 units of student accommodation. this development therefore responds positively to this policy providing a wide range of housing choices.
- 7.12. The North London Sub-Region SRDF further expects developments to maximise residential and non-residential and contain mixed use, citing the Holborn Intensification Area as one such area for development at higher density (Table 5B.1 & para 5.48)
- 7.13. The proposal achieves this objective of mixing uses within buildings. Retail and other Class A uses provide active frontages at ground level with offices and residential uses at upper floors.
- 7.14. The various buildings proposed as part of this comprehensive redevelopment also comprise a mix of uses which have been located to achieve the greatest benefit given the individual uses proposed. For example:
 - office uses are predominantly fronting High Holborn to give them the most prominent frontage and to reflect the commercial nature of High Holborn;
 - retail, service and eating and drinking establishments are located at ground level at High Holborn to provide active frontage in accordance with Camden UDP policies;
 - retail, eating and drinking uses are also provided along Hand Court to bring vitality into this underused space and to reflect its historic character;
 - student residential uses are included at Hand Court above the proposed Wine Bar use as this achieves an increase in housing provision in a location which the Council did not consider appropriate for permanent residential units; and
 - permanent residential provision is provided at the rear of the site and at the front of the site in Brownlow House, in accordance with planning advice from Camden.
- 7.15. Therefore, we consider that the mix of uses is in accordance with the London Plan.

Camden Unitary Development Plan (UDP)

- 7.16. The proposed redevelopment of the site is in accordance with local policy to create an office-led, mixed-use development.
- 7.17. Camden's UDP seeks a mix of uses in development proposals including a contribution to the

supply of housing. Specifically, Policy SD3 states that where a proposal would increase total gross floorspace by more than 200m² within the Central London Area, the Council will seek to negotiate up to 50% of additional gross floorspace as housing.

- 7.18. The proposed development achieves 53% additional gross floorspace as residential accommodation. Given the retention of the Listed Buildings and parts of other buildings at the site which the Council view as important to the character of the Conservation Area, it would be extremely difficult to achieve a higher percentage of housing. This is discussed in more detail at Section 9 of this Statement.
- 7.19. Further, the policy states that in considering the mix of uses and the appropriate contribution to the supply of housing, the Council will have regard to:
- the character, diversity and vitality of the surrounding area;
 - the suitability of the site for mixed use development;
 - the need and potential for continuation of an existing use;
 - whether the floorspace increase is needed for an existing user;
 - the need for an active street frontage and natural surveillance; and
 - any over-dominance of a single use in the area, and the impact of the balance of uses proposed on the area's character, diversity and vitality.
- 7.20. Given the location of the site is in the CAZ, in an Opportunity Area, and that the existing use of the site is predominantly commercial, it is appropriate for office use to continue as the primary use, complemented by the secondary uses of residential, retail and service uses.
- 7.21. The existing commercial buildings on the site are poor quality and unsustainable. They do not meet the recognised need for large floorplate, modern offices in this area of London. The existing buildings have failed to attract the type of occupants typical of the Midtown area and cannot realistically be made to do so. The poor internal arrangement of the buildings is inefficient and even extensive internal alteration would fail to provide the quality of accommodation necessary. This is further discussed at Section 8 of this Statement.
- 7.22. Currently, 12,660m² of lettable office floor area is provided on the site. Redevelopment of the site will result in the provision of approximately 14,337m² (net internal) office floorspace (23,477m² gross external).
- 7.23. There is an identified need for high quality, flexible new office floorspace in this Midtown area, particularly to replace existing buildings and floorspace that do not provide adequate standards of accommodation for modern commercial organisations' requirements. This need is evidenced by the most recent London Office Policy Review from the GLA and the latest research on Midtown (October 2008) published by independent property agents Farebrother (**Appendix 2**). The latter shows that the level of demand for office space from both occupiers and investors has continued to remain strong despite the uncertainties caused by current credit market conditions. The new office floorspace provided in both Scheme A and Scheme B helps to meet these needs through the replacement of existing office buildings that are inadequate and cannot be physically or viably upgraded for modern office requirements.
- 7.24. Office floorspace of the size and configuration proposed will provide a Head Quarters building, attracting high quality occupiers and raising the prestige and profile of the area. In addition, a small office suite will be provided in 49-51 Bedford Row at ground floor level. The site will, therefore, cater for a mix of office requirements.
- 7.25. The proposal reflects the need for an active street frontage and natural surveillance on High Holborn, as stated in Policy SD3 of the UDP. In order to achieve this, retail uses will be retained

on the ground floor of High Holborn House (134m²) and A1 uses at the ground floor of Brownlow House (100m²).

- 7.26. Additionally, new secondary uses will be introduced into the area fronting Hand Court to increase its footfall and vibrancy. An A3/A4 unit of 245m² will be provided at lower ground and ground floor level of Montague House whilst a retail unit (85m²) will be provided at ground floor level adjacent to Montague House (23 Hand Court). Combined with public realm improvements in the area of Hand Court, the provision of A1/A2/A3 and A4 uses will create a vibrant and attractive space in an area that is currently underutilised.
- 7.27. In respect of housing provision on the site, the matter is addressed in more detail in Section 9 of this Statement. It should be noted, however, that the proposed scheme is in accordance with policy given that 53% of the uplift in floorspace is residential accommodation.
- 7.28. Overall 22 new, self contained residential units will be provided together with the re-provision of six residential units currently located at Montague House (23 Hand Court). These are included within the breakdown of the residential accommodation below.
- three family units will be provided in the three Georgian Listed Buildings on Bedford Row;
 - five two bed units will be provided at 45 Bedford Row;
 - ten new two bed residential units will be provided at 49-51 Bedford Row; and
 - ten affordable units of a range of sizes will be provided above ground floor level in Brownlow House.
- 7.29. In recognition of housing pressures and the specialist need for student accommodation in the area, it is also proposed to provide 22 student units at Montague House (23 Hand Court). In pre-application discussions, this was considered an appropriate location by the Council for non-permanent residential accommodation given its north-south orientation. Including student accommodation adds to the mix of uses and increases the level of housing which can be provided as part of the proposals. It is recognised that providing purpose built student accommodation can reduce pressure on existing housing stock, particularly larger units, so that it is released for other occupiers. A letter of support for this provision of student accommodation has been provided by the University College, London which details the lack of purpose built accommodation available in the area. (**Appendix 5.**)
- 7.30. In summary, there will be a net increase of 22 units, plus 22 student units on the site, providing a total of 4,477m² of new residential floorspace.

Supplementary Planning Guidance

Camden Planning Guidance (SPG)

- 7.31. Paragraphs 12-22 of the Town Centres, Retail and Entertainment Uses Chapter of the Guidance refer to controlling the impact of food and drinks uses. It states that such uses can have a positive or negative impact on the character of an area depending on the type of use, location, size and the character and nature of its surroundings. These uses are already provided at the site and their re-provision ensures that this comprehensive redevelopment includes a sustainable mix of uses.
- 7.32. The introduction of A3/A4 uses at Hand Court will improve the vitality in an area that has little commerce directly serving it and is currently lifeless and uninviting. Any noise or vibration that could potentially result from the A3/A4 development will be controlled through the design of the premises and appropriate conditions controlling external seating areas and hours of operation.

Summary

- 7.33. To conclude, the mix of uses to be provided by redevelopment of the site is in line with planning

policy contained in both Camden's UDP and the London Plan. The uplift created by the redevelopment is now 53% residential, in accordance with policy SD3 in the Camden UDP. The residential element includes 10 affordable units which make up 45% of the new residential provision complying with the aims of policy H2 in the Camden UDP. In addition, the proposed mixed-use redevelopment of the site will protect buildings and elements that are of value, improve the setting of the Listed Buildings and the Bloomsbury Conservation Area as a whole, whilst also achieving a more vibrant and sustainable mix of uses on the site.

8. Rationale for New Office Space

- 8.1. The proposed redevelopment of the application site seeks to provide a new office-led scheme that makes more effective use of a poorly performing site in an important business location. The current offices are unsuitable for modern requirements. The internal arrangement of the buildings is inefficient and even extensive internal alteration would fail to provide the quality of accommodation necessary in this location.
- 8.2. The office-led scheme will replace existing inefficient and uneconomic buildings with new commercial floorspace which will be of a size and configuration that will attract high quality occupiers and raise the prestige and profile of the area.

The Need for Offices in Midtown

- 8.3. The proposal to redevelop the application site will significantly improve the quality and amount of office space on the site.
- 8.4. The existing offices provide approximately 12,660m² of lettable floor area. The current buildings provide no opportunity to attract high quality occupiers to this key area and cannot realistically be made to do so due to the structural and servicing limitations of the existing buildings.
- 8.5. The redevelopment of the site will result in 22,569m² (gross external) of office floorspace accommodated in the main office and a smaller office suite of 90m² (gross external) accommodated in 49-51 Bedford Row.
- 8.6. The site is in an ideal location for new office floorspace as it is located within the Central Activities Zone (CAZ) and adjacent to an Area for Intensification in the London Plan. The site is also located within the Midtown area where there is strong demand for quality office floorspace.
- 8.7. The article 'A High for Holborn' in the 8 December 2006 issue of Property Week notes the rapidly rising rents for office space in Midtown citing the decreasing level of supply as the biggest factor in the upward trend in rents. The article states that new and refurbished supply fell 40% in the third quarter of 2006. Most importantly, it puts the figure for the availability of grade A space at less than 1%.
- 8.8. The article further notes that the development pipeline shows a shortage of good-quality offices coming through to match demand, which continues to move into this part of London due to its accessibility and lower rental levels than the City of London and the West End. A copy of this article is provided at **Appendix 3**.
- 8.9. Many of the existing buildings at the proposal site are unsuitable for refurbishment to provide the large-floorplate modern office space together with sufficient headroom to meet the demands of tenants referred to in the Property Week article.
- 8.10. The London Office Market Report 2nd Quarter 2007, prepared by Focus, notes that in Midtown there is a shortage of new or refurbished space.
- 8.11. A letter from Stephen Page of Anton Page, a local agent, is provided in **Appendix 4**. It confirms that the existing buildings comprise poor quality offices which are small, fragmented and fail to provide any large open plan floor areas. Further, the fabric and plant of the existing buildings have reached the end of their lifespan and the refurbishment of the existing buildings would be uneconomical and unviable. The letter also confirms that there is a significant demand for good quality office floorspace in Midtown which cannot be met by the current supply. The proposal will be a welcome addition to the office market in Midtown.

- 8.12. Intensifying the office uses on the site would be entirely in accordance with planning policy in PPS6, the London Plan and in the Camden UDP. We consider the key policies below.

Planning Policy Statement 6: Planning and Town Centres

- 8.13. PPS6 sets out the Government's key objectives for town centres including the promotion and enhancement of existing centres by focusing development there and encouraging a wide range of services in a good environment which is accessible to all. This mixed use application which proposes office, retail, service and residential uses embodies this aim.
- 8.14. Chapter 2 of PPS6 notes the importance of making better use of existing land and buildings, including alteration, and where appropriate, redevelopment. Paragraph 2.4 states that wherever possible, growth should be accommodated by more efficient use of land and buildings within existing centres. Further, it states that local planning authorities should aim to increase the density of development, where appropriate.
- 8.15. Paragraph 2.20 requires that local planning authorities should formulate planning policies which include the promotion of mixed-use development and mixed-use areas. It is stated that residential or office development should be encouraged as appropriate uses above ground floor retail, leisure or other facilities within centres.

The London Plan and Consolidated Alterations

- 8.16. The London Plan sets out the strategic context for offices in London, and it is clear that there is a high demand for office floorspace in the capital. According to the London Plan, there has been a phenomenal growth in the finance and business services sector, but this has not been matched by investment in office stock. This has led to an upward pressure on business costs made worse by a shortage of appropriate office space.
- 8.17. The need for office floorspace is such that the London Plan considers the supply of appropriate office stock a critical issue. Growth in office jobs is estimated to reach 510,000 by 2026. The Central Activities Zone (CAZ) is expected to absorb 37% of this growth, which translates to the need for 2,870,000m² of office space to be delivered by 2026. The intensification of the site for offices would, therefore, contribute to London's economy and help meet a need for office floorspace in the capital.
- 8.18. One of the objectives of the London Plan (Objective 3) is to make London a more prosperous City by having a stock of office planning permissions three times the rate of starts over the previous three years. These proposals to increase the amount of office floorspace on the site contribute to meeting this objective. The proposals also meet the objectives of a number of other planning policies in the London Plan.
- 8.19. Policy 3B.1 of the London Plan seeks to provide offices of different types, sizes and costs and to remove supply side blockages. The Draft Alterations further state that the Mayor will address the spatial needs and implications of the developing World City economy and the sectors, work practices and linkages that this gives rise to.
- 8.20. The Draft Alterations acknowledge at paragraph 3.110i that larger companies account for a higher share of private sector employment than they do in other regions in the UK. This leads to a higher demand for larger office space provision.
- 8.21. The Plan also notes at 3.142 that there is pressure for further growth in the CAZ, where the application site is located.
- 8.22. In addition, Policy 3B.2 seeks the renovation and renewal of existing stock to increase and enhance the quality and flexibility of London's office market offer. Further, it notes that boroughs should enhance the environment of London's office locations in terms of physical attractiveness, amenities, ancillary and supporting activities as well as services, accessibility, safety and security.

- 8.23. The redevelopment proposals will greatly improve the quality of the existing offices at the site by:
- maximising the intensity of development in the context of the heritage value of the site;
 - responding to the demand for large floorplate offices in Central London, and particularly in Midtown;
 - utilising high quality design and design features such as green roofs to positively contribute to the visual amenity of the area;
 - contributing toward the site's sustainability; and
 - increasing accessibility for all.
- 8.24. The quality of the existing offices is so poor that keeping the existing office tenants is proving very difficult. Proposals to develop the site will make the office space more flexible and a larger floorplate will make it more attractive to many tenants in the Midtown area.
- 8.25. In respect of the North London sub-region, within which the site falls, paragraph 5.23 of the Plan notes that in terms of employment growth almost 300,000 jobs are projected by 2026, especially in the CAZ. This is almost 60% of the predicted growth in office jobs estimated for the whole of London.
- 8.26. The London Plan further states that the Holborn Intensification Area (which abuts the application site) should benefit from improved public transport accessibility and capacity through mixed-use redevelopment at higher densities. By virtue of its proximity to the Holborn Intensification Area, the development will contribute to the mixed-use nature of the area whilst benefiting from the general transport improvements in the area. The indicative employment capacity for the 13 hectare area of the Holborn Intensification Area is 2,000 jobs up to 2026. This means that currently there is only the floorspace capacity for less than 1% of predicted growth.
- 8.27. For these reasons, developing the site to provide large floorplate, modern office space is in accordance with the objectives and policies of the London Plan.

London Office Policy Review (GLA, 2006)

- 8.28. Further support for providing more office floorspace is given in the London Office Policy Review (LOPR). The purpose of this document is to provide policy makers with the most up to date information on supply and demand for offices in London. The Report includes the planning pipeline, and provides evidence of the operation of the office market and its relationship to planning policy.
- 8.29. In 2005, the number of planning consents for offices fell for the first time since 1998 and this has had a detrimental impact on the availability of office floorspace. According to the LOPR, when the London office space availability rate falls below 8%, office rents tend to increase. At the end of 2005, the availability rate in London's West End was 6.4%, while the City rate was 8.8%. Office rents in Midtown have been on the rise since 2003 and the LOPR suggests it is time to promote office supply.
- 8.30. There is a significant demand for new office floorspace in the Midtown area. According to the LOPR, Midtown has only two years supply based on current planning permissions. In contrast, there is 6 years supply in the City and 6.7 years supply in Central London overall.
- 8.31. In addition, the LOPR identifies a need for Camden to provide between 1.5 and 6.1 million square feet of office space (depending on density assumptions). Of the Central London boroughs, Camden currently has the lowest percentage of its identified capacity through to 2026, at only 17%.
- 8.32. LOPR clearly demonstrates the need for additional office provision in Camden, and specifically

in the Midtown area. This development would help Camden to address this need.

London Borough of Camden Unitary Development Plan

- 8.33. Any proposals to intensify the office use on the site will also support the aims of the Camden UDP including:
- Encouraging the development of Camden as an economically successful place;
 - Guiding business development to appropriate locations in the Borough; and
 - Providing for a range of business needs and maximising job opportunities.
- 8.34. The location of the site, close to the City of London also makes it an ideal location for a large floorplate building and the City of London UDP (Policy E3) actively encourages large floorplate buildings. As the site is adjacent the boundary with City of London, this identified need is a material consideration, especially in view of the limited availability of opportunity sites in the City.
- 8.35. Policy E1 of the Camden UDP states that the Council will grant planning permission for office development in locations accessible by a choice of means of transport in accordance with the sequential test set out in Policy SD5. This policy refers to development that significantly increases travel demand and requires that preference is given to the King's Cross Opportunity Area, Central London Area and Town Centres. Supporting paragraphs state that the Council aims to direct business developments to appropriate locations across the Borough and as such will guide new office development to areas that can easily be reached by public transport.
- 8.36. The application site has a PTAL rating of 6b and is situated equidistant between Chancery Lane and Holborn underground stations, each being approximately 300m from the site. The site is also served by a variety of bus routes. Therefore, it meets the aims of Policy E1. Transport issues are further considered in Section 12 of this Planning Statement.
- 8.37. Strategic Policy S13 of the UDP states that the Council will seek to meet economic needs by encouraging the development of a range of businesses and securing and retaining a choice of sites suitable for a range of office, industry and warehousing activities. In addition, Policy S14 aims to retain existing business sites and encourage the expansion of business development in appropriate locations. Paragraph 7.12 of the Plan also states that the Council will seek to retain land and buildings that are currently suitable, or have the potential to remain suitable, either through redevelopment or alteration. It has been demonstrated that at this site, redevelopment provides a more efficient use of the land.
- 8.38. The proposals are also in accordance with Policy S1 which seeks to “ensure that all development is sustainable with regard to social needs, the protection of the built and natural environment, the sensible use of resources and the maintenance of a viable economy”.
- 8.39. The intensification of office use on the site seeks to provide high quality office floorspace in accordance with national, regional and local planning policies. In particular, it responds to the requirements of the London Plan to provide 2,870,000m² of office floorspace in the Central Activities Zone (CAZ) by 2026. The proposed redevelopment of the site will regenerate a currently under utilised site and create a high profile, landmark building with a mix of uses, whilst preserving and enhancing the setting of the Listed Buildings and Conservation Area.
- 8.40. In providing new sustainable office floorspace, the proposals on the site will also contribute to the supply of market and affordable housing in the Borough, in accordance with Policy SD3 which requires the Council to seek to negotiate up to 50% housing of the uplift in commercial floorspace. This would contribute to meeting the Borough's housing needs and, therefore, would be in accordance with Policy H1 of the UDP. Policy H1 seeks to meet and exceed the strategic housing target for the Borough stating “the Council will grant planning permission for development that increases the amount of land and floorspace in residential use and provides additional residential accommodation”.

- 8.41. Therefore, the provision of a significant quantum of office floorspace at the site is in accordance with the Camden UDP.

Summary

- 8.42. Intensification of office uses at the site, together with additional housing provision and retail space accords with national, regional and local planning policies and is supported by the London Office Policy Review, 2006. In particular, the proposed development accords with the aims of PPG6, providing a quality mixed use development in a central location. The redevelopment of the office space will provide new commercial accommodation with large floorplates, which is more suited to current demand in Midtown. To reflect the outcome of the appeal decisions on the two previous schemes High Holborn House will be retained and refurbished to create a self-contained office unit on 6 floors over ground-floor retail. The integrity of High Holborn House is maintained and ensures the frontage onto High Holborn reflects its history. This addresses the Council's concerns regarding how the scheme projects onto High Holborn and the wider Conservation Area.
- 8.43. The location is easily accessible by public transport being close to both Holborn and Chancery Lane Tube stations and on a number of bus routes. The application therefore, complies with the aims of policy E1 of the Camden UDP. In short, there is a strong rationale for providing additional high quality office space in this area both with regard to planning policy and business demand.

9. Housing Provision

- 9.1. Providing housing is one of the most important issues facing Camden as the demand for housing exceeds supply. In the Borough, pressure for new housing arises from a shortage of land, a growing population and high prices.
- 9.2. Camden has established meeting housing demand as its priority land use and as such, the provision of housing is required within most development in the Borough.
- 9.3. The proposed development will provide 22 new residential units and reprovides the six residential units as follows:
- 10 x two bedroom units split between 49-51 Bedford Row;
 - 5 x two bedroom units at 45 Bedford Row;
 - 3 family units achieved by returning the Listed Buildings at 46-48 Bedford Row to residential use; and
 - 10 affordable units in the refurbished Brownlow House (2x 3 bed, 4x 2 bed, 4x 1 bed).
- 9.4. Given the lack of amenity space on the site and amenity issues with regard to noise, it would be difficult to provide additional residential accommodation of an acceptable standard anywhere else on the site apart from those buildings already identified by the development.
- 9.5. To complement the permanent residential housing and to widen the choice of housing in the area, 22 units of student housing will be located in Montague House (23 Hand Court). In discussions with the Council, it was accepted that Montague House (or anywhere along Hand Court) was not an appropriate location for permanent residential development given its orientation and lack of sunlight.
- 9.6. However, the use of Montague House for student accommodation was considered suitable due to the lifestyle of students who will be studying during the day, and are likely to only live in the accommodation on a short term basis, during university term time.
- 9.7. Providing student housing on the site also fulfills an existing demand for student housing which it is accepted may free up other market housing for private rental. At **Appendix 5**, we attach a letter from University College London which confirms that the College requires much more purpose built accommodation, and reiterates that providing student accommodation helps reduce pressure for large family units from students needing to share accommodation.
- 9.8. **Housing Green Paper, July 2007**
- 9.9. A Housing Green Paper '*Homes for the Future: more affordable, more sustainable*' that was published in July 2007. This highlights the importance of developing homes that are more environmentally sustainable and have lower carbon emissions as well as the need for additional housing to meet continuing and rising demand. It is an important document that reflects emerging policy and has relevance as a material consideration in planning decisions.

Planning Policy Statement 3: Housing

- 9.10. PPS3 confirms at paragraph 9 that to achieve its key housing policy goal of ensuring "that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live". This proposal meets the objectives set by the Government, which are primarily:

- to achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community;
 - to widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need;
 - to improve affordability across the housing market, including by increasing the supply of housing; and
 - to create sustainable, inclusive, mixed communities in all areas, both urban and rural.
- 9.11. As part of the overall development, it is proposed to provide both market housing, affordable and student accommodation making best use of the constraints of this Central London site.
- 9.12. Camden's UDP Policy H1: New Housing states that:
- "the Council will seek to meet and exceed the strategic housing target for the Borough. The Council will grant planning permission for development that increases the amount of land and floorspace in residential use and provides additional residential accommodation, provided that the accommodation reaches acceptable standards".*
- 9.13. The UDP also contains a number of strategic policies for housing. Strategic Policy S4 seeks to provide housing to meet strategic housing needs by securing net additions to the housing stock wherever possible and retain existing permanent residential accommodation.
- 9.14. To achieve the strategic aim of Policy S4, UDP Policy SD3 states that up to 50% of the uplift in new floorspace should be residential on non-residential schemes with an uplift greater than 200m². This scheme is fully in accordance with the aims of Policy SD3 as new residential accommodation comprises 53% of the uplift in the proposals.
- 9.15. There are six existing residential units on site (in 23 Hand Court, Montague House) that were granted planning permission in 1999. It is proposed to re-provide these six residential units in 49-51 Bedford Row comprising of five storeys, each of which will be divided to provide 2 units per floor, providing ten units in total. The residential units are being relocated as it is recognised that the existing accommodation is of a poor standard, due to the orientation of the building and the levels of natural daylight / sunlight together with inadequate environmental standards to meet emerging policies. Consequently, this redevelopment will both improve and increase the residential accommodation available on the site.
- 9.16. The three Listed Buildings at 46-48 Bedford Row have historically been converted from family homes and are currently used as office accommodation. It is proposed as part of the redevelopment to convert these back to family houses. This is supported by UDP Policy B6 which promotes Listed Buildings being used for their original purpose. There are small private courtyards to the rear of each of these properties providing amenity space.
- 9.17. Five further two bed residential units will be provided in 24-25 Hand Court which is currently used as office space. Converting this building to residential units complements the refurbishment of the neighbouring Listed Buildings. Furthermore, Bedford Row is historically a residential street so returning residential uses to this area helps enhance the Conservation Area.
- 9.18. In all, therefore, the proposal will provide 28 residential units, plus 22 student units. Of these 6 are re-provided. The total uplift of new residential units is 22. When looking at the overall proportion of uses on the site, the residential provision is substantially greater, with the number of units increasing by over 350%.

Affordable Housing

- 9.19. Policies 3A.8 and 3A.9 of the London Plan consider affordable housing targets and the provision

of affordable housing on private residential and mixed use schemes. Policy 3A.9 states that targets should be applied flexibly taking account of individual site costs, the availability of public subsidy and other scheme requirements.

- 9.20. The Camden UDP strategic policy S5 seeks the provision of affordable housing for those on low and middle incomes. This is expanded upon, and detailed requirements, are provided at Policy H2.
- 9.21. Policy H2: Affordable housing states that “the Council will expect all residential developments with capacity for 15 or more dwellings and residential development sites of 0.5 ha or more to make a contribution to the supply of affordable housing. The Council will seek to negotiate on the basis of a target of 50% affordable housing in each development, taking into account factors that it considers to affect the suitability of the site.”
- 9.22. Paragraph 2.23 of the UDP states that the inflexible treatment of the 15 dwelling threshold can encourage development of 14 large units in a location suitable for 15 or more smaller units. To ease this effect, the Council will seek affordable housing on sites which are sufficient in size to accommodate 15 or more dwellings.
- 9.23. The uplift in residential provision is 22 units since six of units provided on the site are to replace those units currently provided in Montague House (23 Hand Court). Of these 22 units, 10 will be affordable units, to be provided in Brownlow House. This equates to an affordable housing provision of 45%. This is very close to the Council's target of achieving 50% provision of affordable housing.
- 9.24. In negotiating the provision of affordable housing and the level appropriate to a particular site, UDP paragraph 2.25 states that the Council will consider the full range of costs, benefits and planning objectives associated with a development. These may include costs associated with contaminated land, heritage considerations (such as restoration of a Listed Building), and environmental considerations (such as environmental improvements to facilitate regeneration of an area).
- 9.25. In this case, the provision of affordable housing is only marginally below the Council's target and there are significant mitigating circumstances which mean that providing the additional 5% is not practicable because the following constraints:
 - the original family residential use of the Listed Buildings is being reinstated and, whilst they represent a sufficient quantum of floorspace for the provision of more than 3 units, it is considered of greater historic value to return them to their original use without further compromise to the historic fabric in the properties;
 - the three units being provided within the listed buildings must be considered with regard to Policy H2 parts (d) and (e) which state that consideration must be given to the benefits derived from returning the Listed Buildings to their original use and the costs involved in doing so;
 - in pre-application discussions, the Council have accepted that the Listed Buildings are not suitable for the provision of affordable housing;
 - in pre-application discussions, the Council did not consider Hand Court to be appropriate for permanent residential uses given its poor orientation; and
 - the retention of the existing buildings at the Council's request, at 49-51 Bedford Row; and Brownlow House reduce the scope to provide more residential accommodation.
- 9.26. Having considered the UDP's affordable housing policies, it can be concluded that given the constraints of the site, the number of new units of housing proposed and heritage consideration of returning the Listed Buildings to residential use, the provision of 10 affordable units (45% of the new provision) is adequate to meet the aims and objectives of the Council's policies on

affordable housing.

- 9.27. To support this conclusion a report has been submitted to explain the quantum and tenure mix of affordable housing being provided and why, with a higher affordable component the project would not be viable. It is noted that the total affordable contribution, in terms of the net additional units, is 45% and therefore does not fall far short of the 50% target.
- 9.28. The report notes that there are a number of location and site specific features which have an impact on the viability of the scheme and the ability to provide affordable housing.
- The scheme is a complex mixed use scheme in a tight central London location which dictates a high quality design and specification.
 - The scheme comprises a number of listed buildings which have previously been converted from family homes to office use. It is proposed as part of the redevelopment to convert these back to family houses. On this basis, significant exceptional costs result from the specific requirements associated with listed building conversion / restoration.
 - The retention of a number of facades and structures which require specialist trade input in order to suitably repair. The cost of this work being in excess of the norm.
 - Extensive structural alterations to the retained building elements with the introduction of communal staircase/fire escapes and lifts to deliver adequate accessibility and safety in event of a fire.
 - An allowance has been made to comply with sustainability requirements.
- 9.29. In addition to site specific restraints the s106 contributions that the development is likely to attract have been taken into account.
- 9.30. The report concludes having evaluated the costs and values associated with the scheme that it offers the maximum reasonable proportion of affordable housing possible beyond which the proposed development would be unviable.

Mix of Residential Units

- 9.31. The London Plan notes in Policy 3A.5 that new developments should offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups.
- 9.32. UDP Strategic Policy S6 seeks to secure and protect a range of housing, in terms of size and type, to meet London-wide and local needs and seek housing designs that are accessible to all, including people with mobility difficulties.
- 9.33. UDP Policy H8: Mix of Units states that the Council will only grant planning permission for residential development that provides an appropriate mix of unit sizes, including large and small units. The Council will consider the mix and sizes of units best suited to site conditions and the locality, and the requirements of special needs housing.
- 9.34. As previously discussed and in accordance with Policies S6 and H8, this development will provide a range of housing including:
- Three family houses;
 - 15 two-bedroom private market flats;
 - Four one-bedroom affordable flats;
 - Four two-bedroom affordable flats;

- Two three-bedroom flats; and
 - 22 units of student housing.
- 9.35. Residential units will all aim to meet the requirements of lifetime homes where possible, but compliance will be more limited because of the constraints of converting existing buildings.
- 9.36. In support of the application a Lifetime Homes assessment has been submitted which appraises the private market housing, affordable housing and student accommodation against the sixteen criteria that make up the 'Lifetime Homes' standard. It is noted that this standard is only applicable to new build accommodation. The residential accommodation on site is located within existing buildings, three of which are grade II listed, and whilst the applicant has made every effort to achieve lifetime home standards not all the criteria can be fulfilled as the accommodation is not new build.
- 9.37. The UDP views larger units of three or more bedrooms as providing flexibility and are able to be used by a range of household sizes, including families. Where possible, it states that large units suitable for families should be provided on the ground floor and should have access to gardens or public open space where children can play in safety.
- 9.38. In accordance with the UDP, the Listed Buildings within the development are being converted back to their original use as 3 family sized residential units, each with access to a small private amenity area to the rear of the property.
- 9.39. It is, therefore, concluded that this mix of accommodation is both in line with planning policy contained in Camden's UDP and the London Plan. It is also sensitive to the specific constraints of the site, making the best use of the Listed Buildings, the need to re-provide residential accommodation, and taking into account the lack of outdoor amenity space.

Student Housing

- 9.40. A number of universities are based in Central London so the demand for student accommodation in this area is high. This is confirmed in the letter provided by University College, which is set out in **Appendix 5**.
- 9.41. UDP paragraph 2.19 acknowledges that accommodation provided for and designated for students is a feature of the Central London Area of the Borough.
- 9.42. It is proposed to provide 22 student units within the development at Montague House (23 Hand Court). These would comprise bedrooms with en-suite bathrooms and shared kitchen areas.
- 9.43. In pre-application meetings the Council considered that Montague House was unsuitable for permanent housing due to its poor outlook and the low levels of daylight enjoyed by the property. Consequently, the provision of student housing in this block provides a realistic alternative for achieving the Council's desired uplift in residential accommodation at the site.
- 9.44. Also, given that a bar/restaurant will be provided at ground floor level to bring life into Hand Court, it is considered that student accommodation sits more comfortably with an A3/A4 use below than permanent housing given the amenity considerations.
- 9.45. Camden's UDP accepts that, while student housing does not come within the meaning of affordable housing in Policy H2, it meets a specialist housing need and can reduce pressure on the general housing stock.
- 9.46. As a consequence of this, student housing can be exempted from the requirements of Policy H2 provided that conditions or planning obligations ensure that the housing costs significantly less than the cost of suitable housing in the general market in Camden that the accommodation meets a defined specialist need and it cannot subsequently be let or sold as general market housing.

- 9.47. It is considered that given the constraints of the site and the market pressures for student housing in this area, the provision of student accommodation is the most appropriate residential use within this element of the site.

Summary

- 9.48. The proposed development will provide a mix of housing provision catering for a range of users. In total there will be 22 new residential units together with the reprovision of the six units already on site, making 28 units in all. Of these, ten will be affordable and located to the front of the site in Brownlow House. Due to the constraints of the site, the provision of 45% affordable housing is acceptable and accords with the aims of UDP policy H2. The private market units will be to the rear, facing Bedford Row. This will include returning the Grade II Listed Georgian houses at 46-48 to their original use as three family units. The remaining units are a mix of sizes incorporating 1 bed, 2 bed and 3 bed units, which accords with the aims of policy H8 in the UDP. To complement these, 22 student units will be provided within Montague House (23 Hand Court). This makes best use of the site recognising its deficiencies with regards to amenity, but still providing much needed residential accommodation to a specific and recognised market. This application, therefore, complies with national, regional and local planning policies with regards to housing provision.

10. The Conservation Area

Conservation Area Designation

- 10.1. The original Bloomsbury Conservation Area (BCA) was designated in 1968 and included only that part of the site fronting Bedford Row. The original designation was then focussed on original planned development that took place in the area principally in the 18th and early 19th centuries. The Conservation Area has been extended a number of times during following decades to include later development principally Victorian and Edwardian. Most of the site is within an extension confirmed by the Council in 1991.
- 10.2. A BCA Statement was agreed by the Council and published as Supplementary Planning Guidance (SPG) in 1998. A copy of the boundary map and relevant UDP extract are included at **Appendix 6**. A Conservation Area Appraisal that includes this part of the BCA is currently being considered by the Council, but it has not yet been out to consultation.
- 10.3. It is noted that a Draft Conservation Area Character Appraisal covering the whole of the BCA is currently undergoing a public consultation exercise with comments submitted on 2 June. The conclusions of this consultation process and the final CA Appraisal will not be available for some time. The applicant has submitted comments on the Appraisal document specifically in relation to the non-listed buildings on the site and the conclusions on their contribution to the Conservation Area.

PPG 15: Planning and the Historic Environment

- 10.4. PPG15 sets out national planning policy on protection of the historic environment. Although this was published in 1994 it remains relevant. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires LPAs when considering planning applications to take into account whether a proposal would preserve or enhance the Conservation Area. Advice on conservation areas and their assessment is provided through non-statutory documents including English Heritage Guidance on Conservation Area Appraisals (2006).
- 10.5. The key principle of PPG15 is that, where a building makes a positive contribution to the character or appearance of the Conservation Area, the general presumption should be that it will be retained (paragraph 4.17). Where it is proposed to demolish such buildings, PPG15 requires an assessment to be made of that building as if it were a Listed Building so that the criteria for considering demolition set out in paragraphs 3.16 – 3.19 applies in determining the acceptability of the proposed demolition.

The London Plan

- 10.6. The London Plan has overarching policies relating to design and the historic environment. These include the public realm as well as Listed Buildings and Conservation Areas.
- 10.7. Policy 4B.3 emphasises the importance of the public realm and notes that planning applications will be assessed in terms of their contribution to enhancement of the public realm. Policy 4B.12 requires Boroughs to base their approach to the protection and enhancement of historic assets on an understanding of their special character and as part of a wider design and urban improvement agenda. Policy 4B.13 provides support for schemes that make use of historic assets and bring about economic and community regeneration where they bring redundant or under-used buildings and spaces into appropriate use. The proposals include a mix of refurbishment and redevelopment of the buildings on the site, to bring them into much more effective economic and energy efficient use. As well as physically enhancing the buildings the scheme upgrades the public realm around the site, namely Brownlow Street, Bedford Row and Hand Court, having a positive impact on the Conservation Area.

Camden Unitary Development Plan

- 10.8. The proposals include demolition of 19-22 Hand Court and parts of other buildings within the BCA (including internal parts of High Holborn House maintaining the frontage to High Holborn and that part known as 49-51 Bedford Row, and Montague House - 23 Hand Court – except for the frontage to Hand Court). The question of the contribution of these buildings to the special character or interest of the BCA is discussed in detail in the accompanying Conservation Area demolition statement which accompanies this application. Where buildings do make a positive contribution to the conservation area Policy B7B of the Camden UDP, which states that the Council will not grant consent for demolition of any unlisted buildings in a Conservation Area that make a positive contribution to the Conservation Area unless exceptional circumstances can be shown to outweigh the principle of its retention, applies. It is evident that the applicant has sought to retain all the elements on site found to make a positive contribution to the area.
- 10.9. A separate Conservation Area application for demolition accompanies this planning submission. This addresses the specific buildings for which demolition consent is required. Conclusions on any contribution made by a specific building to the CA and the extent of any positive contribution can be subjective. The individual non-listed buildings to be demolished in this application are addressed in the accompanying CA application in terms of their contribution to the CA, their characteristics, and whether the criteria of PPG15 relating to the appropriateness of any demolition can be satisfied. PPG15 criteria for demolition and LB Camden Replacement UDP Policy B7 include provision for the design of new development to be a material consideration in considering justification for demolition of a non-listed building in a CA where a building may be considered to make some positive contribution to the conservation area. The current proposals are for a revised design that does provide a high quality building which addresses its surroundings in a thoroughly considered and appropriate manner following comments on the previous refused proposals.
- 10.10. The planning application comprises a detailed submission that addresses matters of design, the relationship to its surroundings, and important views including those that are not in the conservation area. These issues including the effect of the proposals on the setting of the Conservation Area are dealt with in detail in the accompanying Planning Design Report prepared by Sheppard Robson. The design of the buildings and the related streetscape is of high quality and improves the site and its surroundings through enhancing the pedestrian environment, particularly of Hand Court and Brownlow Street, and views from within the Conservation Area itself including the very important view from Bedford Row which is currently degraded by the unsightly upper levels and plant of High Holborn House visible above the listed Bedford Row properties. It accords with the requirement of Policy B7A of the Camden UDP that development within or affecting the setting of a Conservation Area should either preserve or enhance its special character or appearance.

Local Development Framework (LDF)

Supplementary Planning Guidance

- 10.11. The Council's LDF Scheme (2007) notes that Conservation Area Appraisals will be produced in the future. It notes that they are not considered to be Supplementary Planning Guidance and will not be included in the Council's LDF Scheme. Relevant elements of Conservation Area Statements are incorporated in the Councils' Supplementary Plan Documents – Camden Planning Guidance. This includes generic advice on the implications of Conservation Area designation and reiterates the principle that buildings making a positive contribution should generally be retained. It highlights the requirement for development to preserve or enhance the character of appearance of the Conservation Area. The proposals comply with the advice in this SPG.

Summary

- 10.12. The proposed redevelopment is a high quality scheme which succeeds in preserving the historic elements of the site. It serves to enhance the Conservation Area by improving the quality of the

building across the site and creating a cohesive development. The modern development plays to the strength of the historic buildings and is set back at higher levels so as not to over-whelm them. Its lightweight structure complements the heavier frontages of High Holborn House and Brownlow House to the front, whilst forming a backdrop to the three listed properties to the rear. None of the buildings and structures that are to be demolished on site are considered by the Bloomsbury Conservation Area Statement to make a positive contribution. Although the Draft Conservation Area Character Appraisal recently published for consultation indicates that all the non-listed buildings on the site within the CA make a positive contribution to the CA this is not supported by any robust assessment or analysis and is not considered a valid conclusion on all these buildings. Whilst some may be considered to make a positive contribution this is generally only a little and redevelopment proposals that are of high quality design and enhance the special character and appearance of the CA including the surroundings and local area can be accepted as providing justification for demolition of such buildings. These matters are considered in more detail in the concurrent CA application and statement.

- 10.13. In short, the proposals accord with Conservation Area policies set out in PPG15, the London Plan and the Camden UDP. Further information about the Conservation Area and listed buildings is located in the Historic Buildings Architects Report accompanying this submission, together with the Conservation Area statement.

11. Listed Buildings

Integration and Restoration of Listed Buildings

- 11.1. Listed Building consent was granted by the Council on 25 November 2008 (Ref: 2008/4964/L). As a consequence of this consent this application is not accompanied by a separate listed building application.
- 11.2. This planning application considers whether it is appropriate to return the listed buildings to residential use. The recent appeal decision supports this change of use as does National, Regional and Local planning policy.
- 11.3. The Listed Buildings included within these proposals are 46, 47, and 48 Bedford Row. They are included under one listing. A copy of the Listing description appears at **Appendix 7**. Originally constructed as three separate houses probably in the early 18th century, they have been subject to extensive alteration and change of use. The rear parts of the buildings were also affected by bomb damage and the rear elevations and projections have been rebuilt. Currently divided up and in use for offices their original features and character have been considerably eroded.
- 11.4. An important aspect of the proposals is the introduction of amenity space at the rear of the proposed houses through setting back the proposed new building that will replace the existing rear part of Montague House (23 Hand Court) and High Holborn House. This will enhance both the use of the buildings for family residential units and their setting as Listed Buildings.

PPG15 Planning and the Historic Environment

- 11.5. PPG15 paragraph 3.5 sets out the issues that are generally relevant to the consideration of all Listed Building consent applications and planning application affecting Listed Buildings:
 - the importance of the building, its intrinsic architectural and historic interest and rarity, in both national and local terms;
 - the particular physical features of the building (which may include its design, plan, materials or location) which justify its inclusion in the list: List descriptions may draw attention to features of particular interest or value, but they are not exhaustive and other features of importance (such as interiors) may come to light after the building's inclusion in the list;
 - the building's setting and its contribution to the local scene, which may be very important, such as where it forms an element in a group, park, garden or other townscape or landscape, or where it shares particular architectural forms or details with other buildings nearby; and
 - the extent to which the proposed works would bring substantial benefits for the community, in particular by contributing to the economic regeneration of the area or the enhancement of its environment (including other Listed Buildings).
- 11.6. Paragraph 3.10 of PPG15 states that “the best use will very often be the use for which the building was originally designed, and the continuation or reinstatement of that use should certainly be the first option when the future of a building is considered”.

The London Plan

- 11.7. The London Plan has overarching policies relating to design and the historic environment. These include the public realm as well as Listed Buildings and Conservation Areas.

- 11.8. Policy 4B.12 requires Boroughs to base their approach to the protection and enhancement of historic assets, including Listed Buildings, on an understanding of their special character and as part of a wider design and urban improvement agenda. Policy 4B.13 gives support for schemes that make use of historic assets and bring about economic and community regeneration where they bring redundant or under-used buildings and spaces into appropriate use, which accords with these policy objectives.
- 11.9. The proposals include the retention, refurbishment, and restoration of a listed terrace of three Georgian town houses to their original family residential use.

Camden Unitary Development Plan

- 11.10. Policy B6 of the Camden UDP requires that any proposals affecting a Listed Building should preserve or enhance the character or appearance of that building. It confirms that the Council will grant consent for alterations or extensions that do not harm the building's special interest as a Listed Building and that planning permission will be granted for a change of use where similarly it will not harm the building's interest. In relation to development that would affect the setting of a Listed Building, Policy B6 confirms that the Council will not grant permission if the proposal is considered to harm the building's setting.

Summary

- 11.11. The scheme provides for the return of the Listed Buildings to their original single family use and the restoration of historic features. The rear elevation of the office building provides a more recessive and muted backdrop to the listed buildings in recognition that it forms a back drop to the listed buildings and forms an important view from Bedford Row to the north. The revised application further improves the setting of these listed buildings particularly when compared to the existing degraded appearance and setting with the rear of the existing High Holborn House and its associated plant paraphernalia visible as the backdrop to these buildings.

12. Transport

- 12.1. Transport is a key issue in redevelopment proposals. The proposed redevelopment seeks to encourage sustainable forms of transport, reduce the need to travel by car and ensure that there is minimal impact on the existing transport network.

Planning Policy Guidance 13: Transport

- 12.2. PPG13 promotes three key objectives to integrate planning and transport at the national, regional, strategic and local level to:
- promote more sustainable transport choices for both people and for moving freight;
 - promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and
 - reduce the need to travel, especially by car.
- 12.3. PPG13 directs local planning authorities to ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking, and cycling. It further promotes accommodating housing principally within existing urban areas and planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling.
- 12.4. The proposed development is clearly in accordance with the aims of PPG13.

The London Plan

- 12.5. London Plan Policy 3C.1 states that developments will be encouraged to reduce the need to travel especially by car and that the level of parking provision permitted will be determined on the level of accessibility to the site by other means of travel.
- 12.6. Policy 3C.2 states that Borough's should take a strategic lead in exploring opportunities for development in areas where there is appropriate transport access in terms of accessibility and capacity.

Camden Unitary Development Plan

- 12.7. Section 5 (Transport) seeks to encourage sustainable forms of transport and will grant planning permission to developments that would encourage travel by walking, cycling and public transport (Policy T1.A).
- 12.8. The Council requires applicants to provide a transport assessment if that development significantly increases travel demand or would impact the transport system. A Transport Assessment has been prepared by Watermans, and is submitted in support of this application. (T1.B)
- 12.9. Policy T2 states that The Council will only grant planning permission for development where extra travel associated with the development is met by:
- existing capacity;
 - the capacity of any planned transport where the works are funded and programmed or;
 - where design will cause minimum environmental harm.

- 12.10. Policy T8 states that the Council will grant planning permission for car free housing in areas of on street parking control. The Council will particularly seek car free housing in the Central London area.
- 12.11. Design considerations for off-street cycle parking are addressed in the table in Chapter 13, with particular given to ensuring the security of users, ease of pedestrian movement, and access for bicycle owners.

Public Transport

- 12.12. The Transport Assessment prepared by Watermans identifies the site as being located within an area with excellent public transport accessibility level (PTAL). It is measured as having a PTAL level of 6b, the highest grade achievable.
- 12.13. The site has good pedestrian accessibility, and very good public transport accessibility, with bus stops located outside the site on High Holborn and Chancery Lane and Holborn Underground stations in close proximity. Footpaths in the vicinity of the site are of sufficient width to accommodate the proposed development and the site is also accessible by cycle.
- 12.14. The proposed development will result in a small increase in the number of trips generated by the site. It is considered that this level of increase can be accommodated on the local public transport network. Further, the proposed development is not expected to have any significant impact on the capacity of Holborn or Chancery Lane Underground stations, or local bus services.

Car Free for Housing

- 12.15. The site is located within a controlled parking zone and the existing residential units at Montague House (23 Hand Court) are subject to a s106 Agreement (dated 29 January 1999) for the provision of car free development. The s106 Agreement states that the development has been designated to be free with there being no parking provision on-site and no entitlement on behalf of the residents to purchase a residential parking permit which would allow residents to park in a Residents Parking Bay or to use Council controlled parking spaces in the locality.
- 12.16. It is accepted that the residential units in the scheme are also car free. The applicants are willing to enter into a s106 Agreement in respect of this matter and this is included in the draft legal agreement.
- 12.17. Two disabled parking bays will be provided within the proposed service yard.

Cycle Parking

- 12.18. In accordance with TfL's cycle parking standards of 1 space per 250 m² office space and 1 space per residential unit, a total of 113 cycle parking spaces will be provided for the office and retail uses along with 50 cycle parking spaces for the residential units.

Servicing

- 12.19. As part of the redevelopment proposals, a service yard will be provided within the site off Brownlow Street. This will be accessed from the northern part of Brownlow Street, which in turn will be accessed from Bedford Row.
- 12.20. The service yard will include two loading bays, capable of accommodating service vehicles up to 8m in length, two disabled parking bays and storage areas for refuse and recycling. It is estimated that there will be 34 service vehicle movements per day. It is noted that these trips could be reduced through consolidation but this is highly dependent on the type and numbers of occupiers and cannot realistically be addressed until the detailed travel planning stage. Given the constraints of the service yard, it is proposed that the maximum size of service vehicles is controlled by way of planning condition or through a clause in the s106 Agreement.

- 12.21. The southern section of Brownlow Street will be closed to vehicular traffic and pedestrianised. Vehicles will be diverted via Bedford Row and Red Lion Street. Given the low numbers of vehicles involved, it is considered that this arrangement will not have any detrimental impact.

Summary

- 12.22. The proposed development is in accordance with national, regional and local planning policy. In particular, the development accords with policy T2 of the Camden UDP, which requires that extra travel associated with the development is met by existing capacity. Further, the development is in accordance with policy T8, which promotes car free housing.
- 12.23. The application is supported by a transport assessment and two framework travel plans (office and residential) that provide further information on the impact that this development will have in relation to transport and travel.
- 12.24. In conclusion, it is considered that there are no substantive reasons on highway or traffic grounds why the proposed development should not be granted planning permission.

13. Sustainability and Energy Efficiency

- 13.1. A primary objective for the redevelopment is to provide living and working accommodation that will set a benchmark for sustainability. The redevelopment proposals will significantly reduce the current carbon footprint of the site, produce renewable energy on site and enable the people that visit and use the buildings to do so in a more sustainable way.

PPS 1: Delivering Sustainable Development

- 13.2. PPS1 sets out the overarching planning policies on the delivery of sustainable development through the planning system.
- 13.3. In particular, paragraph 5 states that planning should facilitate and promote sustainable and inclusive pattern of urban and rural development.
- 13.4. PPS1 encourages pre-application discussions, viewing them as critically important and to the benefit of both developers and local planning authorities in ensuring a better mutual understanding of objectives and the constraints that exist. Paragraph 13 notes that in the course of such discussions proposals can be adapted to ensure that they better reflect community aspirations and that applications are complete and address all the relevant issues.
- 13.5. This application was the subject of considerable pre-application discussions with the Council, English Heritage, the GLA and the local community. The proposals have evolved as a result of the input from key interest groups.

PPS 22: Renewable Energy

- 13.6. PPS22 addresses the Government's commitments to generate 10% of UK electricity from renewable energy sources by 2010. It states that positive planning which facilitates renewable energy developments can contribute to all elements of the Government's sustainable development strategy.
- 13.7. Key principles include regional and local planning authorities recognising the full range of renewable energy sources, their differing characteristics, locational requirements and the potential for exploiting them subject to appropriate environmental safeguards. In addition, it is stated that the wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission.
- 13.8. Considerations in the use of renewable energy resources include: landscape and visual effects; noise; odour and the transportation of energy crops for biomass projects. Such considerations are further dealt with in the energy statement that accompanies this application.

The London Plan

- 13.9. One of the Mayor's key objectives is to make London an exemplary World City in mitigating and adapting to climate change and to make it a more attractive, well designed and green city (Objective 6).
- 13.10. Additionally, Policy 2A.1 states that the Mayor will, and boroughs and other stakeholders should promote, support and encourage the development of London in ways that secure this plan's social, environmental and economic objectives.
- 13.11. Policy 4A.1 refers to tackling climate change. It states that the Mayor will and boroughs should require developments to make the fullest contribution to the mitigation of and adaptation to

climate change. In particular the policy seeks to minimise emissions of carbon dioxide, adopt sustainable design and construction measures and prioritise decentralised energy generation, including renewables. The supporting text notes that these contributions should most effectively reflect the context of each development in terms of its nature, size, location, accessibility and operation.

- 13.12. The design team for this development has taken a holistic approach in respect of energy efficiency and sustainability in response to the GLA's requirements for on site renewable energy by considering the following:
- examination of the building design;
 - assessment of services plant efficiencies; and
 - assessment of available renewable technologies for incorporation into the development.
- 13.13. Policy 4A.3 considers sustainable design and construction. Future developments should meet the highest standards of sustainable design and construction measures including:
- making the most effective use of land and existing buildings;
 - supplying energy efficiently and incorporation of decentralised energy systems, and using renewable energy where feasible;
 - promoting sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes, combined heat and power (CHP) / combined cooking, heating and power (CCHP) schemes and other treatment options; and
 - encouraging major developments to incorporate living roofs and walls where feasible.
- 13.14. Policy 4A.6 refers to decentralised energy. It states that the Mayor will require all developments to demonstrate that their heating, cooling and power systems have been selected to minimise CO₂ emissions. The selection of heating and cooling systems should be in accordance with the following order of preference:
- connection to existing CCHP/CHP distribution networks;
 - site-wide CCHP/CHP powered by renewable energy;
 - gas-fired CCHP/CHP or hydrogen fuel cells, both accompanied by renewables;
 - communal heating and cooling powered by renewable energy; and
 - gas fired communal heating and cooling.
- 13.15. In terms of onsite renewable energy generation, the Mayor requires developments to achieve a reduction in carbon dioxide emissions of 20%.
- 13.16. The residential accommodation building fabric is to be retained to varying degrees and therefore, the scope for energy efficiency improvements is more limited than in the new build development. This factor combined with the smaller area of the residential units has led to CO₂ reductions in the office development being the primary target for the sustainable redevelopment of the site.
- 13.17. The proposed redevelopment is in accordance with London Plan policy given that the development achieves a carbon dioxide reduction of 30.2% against the baseline. This is achieved as follows:
- the development achieves an initial 19.8% carbon dioxide reduction against baseline by use of energy efficient systems including chilled beams and airside heat recovery;

- a gas fired combined heat and power (CHP) system matched to the summer baseload achieves a further 8.2% carbon dioxide reduction; and
 - a further reduction of 5.3% is achieved by the use of biomass boilers to meet the remaining base heating load.
- 13.18. The mixed-use redevelopment provides an annual heat demand profile that is suitable for CHP. However, it should be noted that gas CHP does not contribute to the GLA renewable energy target.
- 13.19. To exceed the target for reduction in CO₂ emissions using entirely renewable energy technologies, the most cost effective solution would be to use an enlarged biomass boiler plant in lieu of the combined heat and power plant. However, the greatest carbon reduction can be achieved with the combination of the CHP plant and biomass boilers giving an overall reduction in carbon emissions of 13.1% against baseline after efficiency improvements.
- 13.20. The Energy Statement, undertaken by Arup that accompanies this application confirms a combination of CHP and biomass boilers to serve a site-wide heating network meeting the base heating demand in office, retail and residential accommodation on the site.
- 13.21. It should be noted that as of April 2008, a new requirement under the revised London Plan is for a 20% reduction in carbon dioxide emissions through the use of renewable energy technologies. The Energy Statement accompanying this application demonstrates that, a realistic reduction of 13.5% including gas-fired CHP and biomass boilers is achievable from an already efficient design; indeed, the total carbon dioxide savings when compared to compliant building are nearly 30%.

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- 13.22. Strategic Policy S1 of the Camden UDP states that the Council will seek to ensure that all development is sustainable with regard to social needs, the protection of the built and natural environment, the sensible use of resources and the maintenance of a viable economy. Further, Policy S2 seeks to ensure that development promotes a high quality of life for all members of the community, contributes to sustainable land use patterns and does not harm local amenity.
- 13.23. Strategic Policy S3 states that the Council will seek to ensure that development adequately considers resources, energy, waste and minerals, minimises their impacts, and protects the environment and people from hazards.
- 13.24. Resources and energy are addressed by Policy SD9 of the UDP. In regard to air quality, it states that applicants will be required to submit an air quality assessment where the Council considers that development could potentially cause significant harm to air quality. Pre-application discussions with Camden's Air Quality Officer, Gloria Esposito, have confirmed that a full air quality assessment is not required for the proposed redevelopment of the site. A basic air quality report has been included in the Planning Design Report for information.
- 13.25. In terms of the use of energy and resources part C of Policy SD9 states that the Council will seek developments that conserve energy and resources through:
- designs for energy efficiency;
 - renewable energy use;
 - optimising energy supply; and
 - the use of recycled and renewable building materials.
- 13.26. The accompanying Energy Statement provides detailed information on proposed energy efficiency measures including:

- improvements to façade performance;
 - the chilled beam office air conditioning system;
 - air handling unit heat recovery;
 - the use of high efficiency chillers and boilers;
 - the use of efficient fans and pumps;
 - office domestic hot water generation;
 - the use of automatic lighting controls;
 - building management system; and
 - retained structures and façades;
- 13.27. Camden policy further states that the Council will require major developments to demonstrate the energy demand of their proposals and how they would generate a proportion of the site's electricity and heating needs from renewables wherever feasible.
- 13.28. The accompanying Energy Statement provides an analysis of site energy requirements for the proposed development. As previously noted, the document also provides an assessment of renewable technologies for incorporation into the development resulting in a cumulative carbon dioxide reduction of 30.2%.
- 13.29. A BREEAM Pre-Assessment conducted by Ove Arup & Partners Ltd is submitted in support of this application. This is appended to Sheppard Robson's Planning Design Report. When considering the highly likely credits only the proposed development easily achieves a BREEAM rating of Good and could achieve Excellent.

Summary

- 13.30. The proposals accord with national, regional and local planning policy in respect of sustainability and energy efficiency. A holistic approach has been taken to address energy efficiency and as a result, the proposed redevelopment significantly reduces the carbon footprint of the site through the use of CHP and on-site renewable energy supplying the office, retail and residential accommodation. In particular, it can be seen that the sustainable measures put forward in the accompanying Energy Statement and BREEAM Pre Assessment comply with the aims of policy SD9 as well as the wider strategic policies in the UDP.

14. Other Considerations

- 14.1. In the previous Sections we have addressed key policy issues to be considered in promoting this site for development and confirmed that the scheme accords with policy. However, given the complexity of the site, there are a number of other issues that must be considered. In this Section we address:

- Archaeology;
- Daylight and Sunlight;
- Noise;
- Strategic views;
- Local views;
- Public realm enhancements; and
- Crime Prevention.

Archaeology

- 14.2. The application site lies within an Archaeological Priority Area (APA) as defined by the Council. Likely reasons for the APA designation include its proximity to a Roman road and to an ancient river course. Existing development of the site during the 19th and 20th Centuries included extensive basements that are likely to have greatly compromised the survival of archaeological remains.

PPG 16: Archaeology and Planning

- 14.3. PPG16 provides policy advice on archaeological remains on land and how they should be preserved or recorded. It notes that archaeological remains should be seen as a finite and non-renewable resource, and in many cases highly fragile and vulnerable to damage and destruction. As a result, appropriate management is essential to ensure that remains survive in good condition.
- 14.4. It is stated in PPG16 that developers and local authorities should take into account archaeological considerations and deal with them from the beginning of the development control process.
- 14.5. Paragraph 21 of the guidance outlines the need for archaeological field evaluation to be carried out where the presence of such remains is likely, in order to help define the character and extent of the archaeological remains that exist in the area of a proposed development. Such a process can indicate the weight which ought to be attached to their preservation.
- 14.6. Local planning authorities can, therefore, expect developers to provide the results of such assessments and evaluations as part of their application for sites where, as in this case, there is good reason to believe there are remains of archaeological importance. Paragraph 23, however, clearly states that existing information about a site is often sufficient to allow authorities to make planning decisions which take into account all material considerations.
- 14.7. Paragraphs 25-30 outline how the preservation, excavation and recording of archaeological remains can be achieved through the use of agreements and/or conditions.

The London Plan

- 14.8. In respect of archaeology, Policy 4B.15 of the London Plan states that the Mayor, in partnership with English Heritage, the Museum of London and boroughs, will support the identification, protection, interpretation and presentation of London's archaeological resources.

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- 14.9. Local planning policy recognises the importance of the buried archaeological heritage, reflecting the national and regional policies outlined above. The Council seeks to ensure the preservation of the archaeological heritage and to promote its interpretation and presentation to the public.
- 14.10. Policy B8 notes that, in respect of sites of archaeological importance, the Council will only grant consent for development where acceptable measures are undertaken to preserve remains of archaeological importance and their settings. Further, it states that developers should adopt measures that allow such remains to be permanently preserved in situ. Where this cannot be achieved, it requires that no development shall take place until satisfactory excavation and recording of the remains has been carried out.
- 14.11. Supporting paragraphs suggest that there is considerable likelihood that archaeological remains will be found in the Borough's APAs and, therefore, when assessing the development potential of a site, developers should assess whether the site is known or likely to contain archaeological remains. Where necessary, the Council will consider directing applicants to supply further details of proposed developments including the results of an archaeological desk-based assessment.

Summary

- 14.12. In accordance with the national, regional, and local policy, an archaeological desk-based assessment of the site was conducted by the Museum of London Archaeology Service. This Report has informed the redevelopment proposals for the site and is submitted in support of this application. The Report was conducted prior to the development of detailed proposals for the site and as such provides an assessment of typical impacts.
- 14.13. The Report finds that most of the site has been truncated by relatively modern basements, beneath which there is only a low potential for the remains of deeply cut features, and for Palaeolithic artefacts within the underlying gravels to survive. It notes that even deeply cut features are less likely to survive where the basements extend several metres below the surface of the natural geology.
- 14.14. In areas where there are no basements the Report indicates that there is:
- low potential to contain archaeological remains dated to the prehistoric period;
 - moderate potential to contain remains dated to the Roman period;
 - low potential to contain remains dated to the early medieval period;
 - moderate potential to contain remains dated to the later medieval period; and
 - high potential for post-medieval remains.
- 14.15. The Report recommends that those areas that have no basements be investigated via archaeological test pits and/or trial trenches, in order to evaluate the nature and extent of any archaeological remains.
- 14.16. It is also proposed that any necessary geotechnical pits that are excavated for engineering purposes should be closely monitored by a competent archaeological organisation. These would provide further information on the nature and levels of deposits beneath the existing basement slabs. The results of these evaluations would enable an appropriate mitigation strategy to be recommended by the Council, if required.

Daylight and Sunlight

- 14.17. Gordon Ingram Associates (GIA) have undertaken a Survey Analysis of Daylight and Sunlight in

respect of the residential elements of the proposals. It is noted that 24-25 Hand Court and 49-51 Brownlow Street although proposed for residential use are not included in this analysis as they have no windows facing onto the site. This survey and analysis is based upon the Building Research Establishment (BRE) guidelines as set out in the document "Site Layout Planning for Daylight and Sunlight".

- 14.18. The analysis draws the following conclusions in respect of the properties below.

46 – 48 Bedford Row

- 14.19. This terrace of Listed Buildings does not achieve minimum standards for either Average Daylight Factors (ADF) or Annual Probable Sunlight Hours (APSH) as specified by BRE guidelines. In arranging the internal layout, care was taken to place habitable rooms to the front of the property where daylight levels are greatest, with non habitable rooms, such as bathrooms located to the rear, to try and minimise the effect of low light levels.
- 14.20. It is considered that the benefit of returning these properties to their original residential use outweighs any concerns about daylight and sunlight guidelines. Furthermore, low daylight and sunlight levels are not uncommon in City Centre locations, by virtue of their densely developed context. The BRE guidelines are not a rigid set of rules, and it is certainly appropriate for the Council to adopt a flexible approach, particularly in circumstances where the development is within a City Centre and involves retaining existing buildings.

23 Hand Court

- 14.21. 23 Hand Court is a 5 storey building which it is proposed to convert to student accommodation. This form of accommodation is of a quasi- residential nature as a consequence of the transitory nature of the inhabitants. However, in terms of daylight / sunlight provision it has been assessed in the same way as the permanent residential units.
- 14.22. Of the 15 rooms surveyed five exceeded the BRE minimum daylight standard receiving ADF levels above 1.5%. Of the remaining 10 rooms, four gained in daylight terms when compared to the existing situation, although still falling short of the minimum standard, and six achieved the minimum standard of 1% ADF. Given that the proposed scheme actually improves the existing situation it is considered that although a small proportion of the student accommodation does not meet BRE guidelines is overall of an acceptable standard.

Brownlow House

- 14.23. The analysis undertaken shows that three rooms in Brownlow House currently fail to meet the minimum daylight standard. The proposed development does not alter this situation and therefore in terms of daylight it has a neutral impact on this property.
- 14.24. With relation to sunlight the property does not achieve the recommended winter sun levels but will enjoy excellent sunlight levels in the summer months. Overall the sunlight levels are consistent with the urban context of the development and are better than those that many similar developments enjoy.

Summary

- 14.25. Generally, it can be concluded that the dense urban nature of the site provides significant challenges to the proposed residential units achieving the minimum BRE standards for daylight and sunlight. However, as demonstrated in the above analysis the proposed scheme does actually improve the existing daylight levels at 23 Hand Court and does not make it any worse with relation to Brownlow House.
- 14.26. Furthermore, it is not a mandatory requirement to achieve minimum BRE standards. The BRE guidance in its introduction states:

“advice given here is not mandatory and this document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly.”

There is a general acknowledgement that development should be looked at in a wider context. For instance, it is not unusual for many contemporary flats in city locations to require artificial lighting at some times of the day for some activities. The guidance, therefore, promotes flexibility in its application to take into account the constraints of a site. This means that in special circumstances, different target values could apply. The standard for provision of natural lighting and artificial lighting should therefore be considered in terms of severity or extent of defects. In addition, it should be noted that the BRE Guidance was published in 1991. It is clear that development pressures and life style choices have changed since this date. This is well in advance of more recent Government guidelines which emphasises the need to make best use of urban sites in accessible locations.

- 14.27. The development site has obvious constraints such as the Listed Buildings, and other retained buildings / facades, as well as its central location. It is clear that the development of the site and its form has been constrained by the Conservation Area and elements, such as window locations and sizes, are fixed by their historic value to the character of the properties.
- 14.28. In conclusion, given the requirement for a significant uptake in housing provision at the site, and when taking into account the development as a whole these properties provide the best opportunity to deliver the housing element of the scheme. For this reason the guidelines must be applied flexibly. We consider that in the historic context of the site, the daylight and sunlight levels are acceptable. The appeal decision accepted that the light levels were appropriate for this location.

Noise

- 14.29. The considering noise, the proposals have had regard to planning guidance and requirements as set out in Planning Policy Guidance Note 24: Planning and Noise and Appendix 1 of Camden's UDP.
- 14.30. A complete acoustic assessment was undertaken by Arup Acoustics in support of this application and has been used to:
- establish noise exposure categories (NEC) as defined by PPG24;
 - assess the proposed uses against requirements at Appendix 1 of the Camden UDP; and
 - set noise limits for plant in accordance with planning guidance.
- 14.31. PPG24 sets out noise exposure categories for residential development. The results of Arup's assessment indicate that the proposed residential units at the rear of the site would fall into NEC B. However, Brownlow House falls into category NEC C for daytime and NEC D for night time.
- 14.32. PPG24 states that for proposed residential units designated as NEC B:
- “Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection”.*
- 14.33. This is also consistent with the requirements of Camden's UDP in relation to residential properties during night-time periods.
- 14.34. For units designated NEC D, PPG24 states that planning permission should not normally be granted. However, the PPG does acknowledge at paragraph 9 that where there is a *“clear need for new residential development in an already noisy area”*, some or all NECs might be increased by up to 3dB (A) above the recommended levels.

- 14.35. In this case, the site is already noisy and there is a clear need for new residential development. For this reason, we consider that the Council should increase the NEC ranges by 3dB (A). This would mean that Brownlow House would fall into NEC C for daytime and night time. This means that residential development is appropriate if there are no quieter sites available (there is not in this case) and appropriate conditions are imposed to ensure a commensurate level of protection against noise.
- 14.36. In accordance with UDP Appendix 1's assessment of places of entertainment, the report also sets out maximum noise levels for the proposed new wine bar which must not be exceeded. These are restricted to:
- $L_{Aeq\ 5min}$ shall not increase by more than 5dB* between 0700 – 1900;
 - $L_{Aeq\ 5min}$ shall not increase by more than 3dB* between 1900 – 2300; and
 - $L_{Aeq\ 5min}$ (in the 63Hz octave band measured using "fast" time constant) should show no increase in dB* between 2300 – 0700.
- * As compared to the same measure, from the same position, and over a comparable period, with no entertainment taking place.
- 14.37. The survey information further allows Arup to establish design rating levels for noise emitted from new building services plant. It is proposed that a full assessment of the proposed building services will be made once details are confirmed.
- 14.38. Therefore, these proposals are acceptable in terms of noise, given the strong policy requirement to provide more housing in the Borough, and provided that appropriate conditions are attached to a planning consent.
- 14.39. Arup's full report is submitted in support of this application and should be reviewed alongside this brief summary.

Strategic Views

- 14.40. London Plan Policy 4B.18: Strategic Views states that the Mayor will review development proposals where they fall within the Assessment Areas of Designated Views.
- 14.41. The London View Management Framework (LVMF) Supplementary Planning Guidance (SPG) was published in July 2007. It provides additional guidance to the London Plan in dealing with the management of strategically important views.
- 14.42. The LVMF identifies the north east corner of the site as lying within the Background Assessment Area (BAA) of the Protected Vista 5A.2 of St. Paul's Cathedral from Greenwich Park.
- 14.43. The Height for Threshold Plane minimum for the BAA is 52.1m. The SPG directs that developments which exceed the threshold plane of the BAA must be referred to the Mayor. The height of the proposed development is 41.7m which is below this threshold and is, therefore, acceptable in terms of the LVMF.
- 14.44. Gordon Ingram Associates (GIA) has undertaken a technical assessment of the strategic viewing corridor analysis of the proposed site, using the revised viewing corridors published in July 2007. The views are taken from protected vista 5A.2 of St. Paul's Cathedral from Greenwich Park.
- 14.45. The drawings provided in the appendices of the Sheppard Robson Planning Design Report, confirm that the majority of the proposal is obscured by the international press centre in the foreground of the development, and the viewing corridor running from Black Point towards St Paul's Cathedral does not impact upon the project site.

Local Views

Camden Unitary Development Plan

- 14.46. The Camden UDP identifies strategic views which relate primarily to views of St Paul's Cathedral and the Palace of Westminster. The UDP also identifies important local views which should be taken into account in designing new schemes.

A - Strategic views

- 14.47. The Council will not normally grant planning permission for development within a viewing corridor of a strategic view as shown on the Proposals Map if the proposed height exceeds the development plane between the viewpoint and either the base of the lower drum of St. Paul's Cathedral or the general roofline of the Palace of Westminster.
- 14.48. The Council will only grant planning permission for development within the defined wider setting consultation area and background consultation area as shown on the Proposals Map, where the wider setting of the viewing corridor is protected and the background of the view is protected from development that would reduce the visibility or setting of St Paul's Cathedral or the Palace of Westminster.
- 14.49. As noted above, the proposals are designed to be below the threshold plane for views of St Paul's Cathedral. There is no impact on views of the Palace of Westminster.

B - Important local views

- 14.50. The Council will not grant planning permission for development that it considers causes harm to important local views:
- of Listed Buildings;
 - into, within and out of Conservation Areas;
 - of landmark buildings and groups;
 - of monuments and statues;
 - of and from Hampstead Heath, Kenwood Estate, Primrose Hill and
 - Regent's Park;
 - of London Squares, historic parks and gardens; and
 - of, across, and from Regent's Canal.
- 14.51. The Sheppard Robson Planning Design Report considers important local views of the Listed Buildings on Bedford Row and within and into the Conservation Area. It concludes that the important views are not adversely affected. Indeed, the key view from the northern end of Bedford Row into the site is improved by the proposed development.
- 14.52. The Bedford Row elevation is set back 28.5m from the pavement edge thus helping reduce its impact on the listed buildings to the front of it and the wider conservation area. Furthermore, it has been designed as a neutral backdrop, blending in with the urban environment. To minimise light pollution from this elevation the soft landscape treatment that characterises the terraced areas of the building has been extended to flow down the vertical face of the building connecting it with the green roof garden of the courtyard. The greenery has been coupled with the use of a solid wall to the northern core of the building. In addition a semi opaque screen has been placed 3m in front of the wall housing the external stairs servicing the rear of the office. This arrangement helps to reduce the level of light pollution from the office floorspace (this is particularly apparent when compared with the refused scheme) and create a more private and

intimate courtyard space. The elevation thus forms an attractive feature terminating and enhancing the long view down Bedford Row.

Public Realm Enhancement

- 14.53. There is potential to enhance the public realm around the development site. At the moment there are clear problems with regards to Brownlow Street. It is very narrow and is uninviting to pedestrians and vehicles. On the Western flank of the site, Hand Court is an underutilised space with very little activity fronting onto it. An integral aim of this development is to improve these areas and an important element of this is landscaping. Policy B1 of the UDP considers hard and soft landscaping and states at paragraph 3.16 that:

“Landscaping, such as planting and paving, and boundary features, such as walls and fence, should be provided to a high standard.”

- 14.54. Having regard to this, the following public realm enhancement measures have been discussed with the Local Highway Authority and have their in principle support. The proposals to improve the area around the listed pump on Bedford Row are not included within the application, but will form part of the s106 package.

- Improvement to pavement and road surfaces as well as street furniture in Brownlow Street and the section of Bedford Row by the listed pump.

- 14.55. In addition to this, the scheme will introduce active frontages to Hand Court in order to increase its attractiveness.

- 14.56. These proposals address the wider area, and the relationship with the area and how it will relate to the street scene. This comprehensive approach is encouraged by planning policy at all levels and the application in particular is seen to comply with the aims of policy B1 in the UDP. This matter is considered more fully in 4.08 of the Planning Design Report prepared by Sheppard Robson.

Crime Prevention

- 14.57. Appendix 13 of the Planning Design Report addresses this issue in full considering how the scheme complies with guidance set out in the ‘Safer Places: The Planning System and Crime Prevention’ 2004. This assessment underlines that the scheme will both increase activity in the area and natural surveillance levels as a consequence of the mix of residential, office and retail uses proposed.
- 14.58. This scheme has particularly considered the recessed frontages along High Holborn in response to comments made in relation to the previously refused schemes. It is noted that the recessed frontage relating to High Holborn House is a historic feature that forms part of the existing building. The main entrance to the new build element is recessed from the public footpath to allow people to safely enter and exit the building. This recess is kept to a minimum depth to reduce the risk of anti social behaviour. In addition there will be 24 hour security on site so the main entrance will be kept under surveillance, further discouraging any anti social behaviour from taking place. Given these measures it is considered that the revised scheme complies with policies SD1d and B1 of the LB of Camden Replacement UDP.

Summary

- 14.59. This section considers the issues of archaeology, daylight and sunlight, noise, strategic views, local views public realm enhancements and crime prevention.
- 14.60. With regards to archaeology, it is confirmed that the site has relatively low archaeological potential as a result of the relatively modern basements. The Archaeological Report recommends that in areas where there are no basements that test pits / trial trenches should be used to evaluate archaeological potential. This can be controlled by an appropriate condition. It

is therefore, considered that the application complies with the aims of UDP Policy B8.

- 14.61. The daylight and sunlight assessment considers the residential units in the development. It shows that a proportion of the rooms do not meet the 1991 guidelines for daylight. However, when taking into account the urban context of the site, the constraints of the development due to the requirement to retain some buildings, and the Listed Building status of three of the units, the light levels are considered to be acceptable. In terms of sunlight, it is advised that low sunlight levels are not uncommon in City Centre locations. It is, therefore, concluded that the light and sunlight levels in this development are acceptable in policy terms given the context of the development.
- 14.62. The Noise Assessment has been carried out in relation to the residential accommodation on site. It recognises that the site is already noisy given its central London location and categorised the units accordingly. Brownlow House at the front of the site on High Holborn is seen to have a greater exposure to noise than the residential units along Bedford Row. The report undertaken by Arup's concludes that if the Council apply the standards flexibility, the proposed development complies with planning policy subject to appropriate conditions being imposed.
- 14.63. Addressing Strategic and Local Views together, the accompanying Planning Design Report prepared by Sheppard Robson demonstrates that the proposed development will not have an adverse impact on these. It, therefore, complies with national, regional and local planning policy.
- 14.64. With relation to crime prevention measures have been taken to reduce opportunities for anti social behaviour. The main entrance recess has been minimised and there will be 24 hour security in operation in the building.
- 14.65. The enhancement of the public realm recognises the interaction that the new development will have with its immediate environment. The proposed works consider hard and soft landscaping as an integral element of a scheme and, therefore, comply with planning policy aims.

15. Planning Obligations

- 15.1. Planning obligations exist to help mitigate any unacceptable impacts a development may have. Circular 05/2005, 'Planning Obligations' sets out policy tests for whether or not an obligation is valid and material.
- 15.2. The Circular underlines that an obligation must be necessary to make the proposed development acceptable in planning terms. In addition, it should be directly related to the application in terms of there being either a functional or geographic link between the development and the contribution.
- 15.3. A legal agreement was submitted as part of the appeal process. It is proposed that this document should be used as the basis for any discussions going forward regard planning obligations.

16. Summary and Conclusions

- 16.1. This planning application is submitted by Indigo Planning on behalf of Bedell Corporate Trustees Ltd and Atrium Trustees Ltd. It follows an appeal decision that ruled development of this scale and form was appropriate on this site as long as the integrity of High Holborn house was maintained.
- 16.2. The site comprises 50-57 High Holborn (including Brownlow House, High Holborn House and Caroline House), 18-25 Hand Court and 45-51 Bedford Row. A plan indicating the location of the site is provided at **Appendix 1**.
- 16.3. The site is currently predominately in office use with limited retail and service elements at ground floor fronting High Holborn and Hand Court, including a wine bar. Six residential units are also provided at 23 Hand Court.
- 16.4. The majority of the site falls within the Bloomsbury Conservation Area (excluding Caroline House and 18 Hand Court). The buildings comprising 46-48 Bedford Row are Grade II Listed Buildings. Numbers 46-48 Bedford Row are Grade II Listed Georgian buildings. They have been subject to considerable alteration from their original form as terraced houses to enable their conversion to office use.
- 16.5. The proposed redevelopment of the site will result in an office-led, mixed-use development which will maximise the use of the site and intensifies existing uses to achieve the goals of planning policy at national, regional and local levels.

The Mix of Uses

- 16.6. The proposed mix of uses is:
 - **Office:** A greater quantum of office floorspace which replaces existing, inferior office space and responds to an identified need for modern, large floorplate offices in the Midtown area, while maintaining the integrity of High Holborn House;
 - **Retail:** A mix of A class units (including Class A1/A2/A3/A4 Uses) which re-provide existing uses at the site and maintain an active frontage to High Holborn and introduce more active uses to Hand Court to meet the Council's objectives;
 - **Residential:** A significant increase in the number of residential units in accordance with Camden Council's policy, including the renovation and reinstatement of family housing within the Georgian Listed Buildings at Bedford Row;
 - **Affordable Housing:** The provision of much needed affordable housing in Brownlow House; and
 - **Student Accommodation:** The provision of much needed student accommodation.
- 16.7. The existing commercial buildings on the site are poor quality and unsustainable. They do not meet the recognised need for large floorplate, modern offices in this area of London. The existing buildings at the site have failed to attract the type of occupants typical of the Midtown area and cannot realistically be made to do so. The poor internal arrangement of the buildings is so inefficient that even extensive internal alteration would fail to provide the quality of accommodation necessary. Comprehensive redevelopment of the site is therefore necessary to ensure that it recognises its full potential. The redevelopment of under performing centrally located brownfield sites is supported by planning policy.

- 16.8. The redevelopment of the office space will provide new commercial accommodation with large floorplates, which is more suited to current demand in Midtown. The location is easily accessible by public transport being close to both Holborn and Chancery Lane Tube stations and on a number of bus routes.
- 16.9. The proposed development will provide a mix of housing provision catering for a range of users. In total there will be 22 new residential units together with the re-provision of the six units already on site, making 28 units in all. Of these, ten will be affordable and located to the front of the site in Brownlow House. The private market units will be to the rear, facing Bedford Row. This will include returning the Grade II Listed Georgian houses at 46-48 to their original use as three family units. The remaining units are a mix of sizes incorporating 1 bed, 2 bed and 3 bed units, which accords with the aims of policy H8 in the UDP. To complement these, 22 student units will be provided within Montague House (23 Hand Court).
- 16.10. The mix of uses to be provided by redevelopment of the site is in line with planning policy contained in both Camden's UDP and the London Plan. The uplift created by the redevelopment exceeds 50% residential, in line with policy SD3 in the Camden UDP. This residential element provides 10 affordable units making up 45% of the new residential provision complying with the aims of policy H2 in the Camden UDP.

Heritage Issues

- 16.11. The proposed redevelopment is a high quality scheme which succeeds in preserving the historic elements of the site. It serves to enhance the Conservation Area by improving the quality of the building across the site and creating a cohesive development. The modern development plays to the strength of the historic buildings and is set back at higher levels so as not to over-whelm them with this separation having been increased in the revised proposals. Its lightweight structure complements the heavier frontages of High Holborn House and Brownlow House to the front. The backdrop to the three listed properties to the rear has been revised to incorporate a more recessive and muted elevation using a perforated screen providing a more solid appearance that improves the relationship in the view from Bedford Row. The buildings and structures that are to be demolished are considered either not to make a positive contribution to the special architectural or historic interest that provides the character or appearance of the Bloomsbury Conservation Area to be protected, or their demolition is appropriate when considered against the relevant criteria of PPG15.
- 16.12. In short, the proposals accord with Conservation Area policies set out in PPG15, the London Plan and the Camden UDP. Further information about the Conservation Area and listed buildings is located in the appropriate statements accompanying the conservation area and listed building applications and the Historic Buildings Architects Report accompanying this submission.
- 16.13. The proposals provide for the return of the Listed Buildings to their original single family use and the restoration of historic features as well as allowing greater distance of development at the rear so reducing the cramped setting of the restored buildings. By these means the proposals enhance the buildings themselves and restore in considerable measure their special character and historic interest. This application can therefore be seen to accord with the aims set out in policy B6 of the Camden UDP which promotes the idea that a listed building should be returned to its original use where possible. It also complies with wider listed building policy aims as set out in National, Regional and Local guidance. Further information about the listed buildings can be found in the Historic Buildings Architect Report accompanying this application.

Sustainability

- 16.14. Sustainable practices have also played an important role in shaping the development. A holistic approach has been taken to address the site's energy efficiency and as a result, the proposed redevelopment significantly reduces the carbon footprint of the site through the use of CHP and on-site renewable energy supplying the office, retail and residential accommodation. The green roofs also help provide a sustainable urban drainage solution, whilst being visually attractive and

providing amenity space for office workers.

Conclusions

- 16.15. The recent appeal decision would allow the site to be developed according to the principles of the two previous applications. The Inspectors concludes that the proposals in Scheme B are acceptable as long as a greater proportion of High Holborn House is retained. The proposals in the current application reflect the inspectors' decision, in that they accord with and improve the upon the accepted principles of scheme B and retain High Holborn House as a separate office building. These considerations, and the additional design measures set out in this statement and the accompanying Planning Design Report, make this scheme acceptable.
- 16.16. The sustainable mix of uses proposed at the site will ensure that historic buildings and elements of value are safeguarded. The setting of the Listed Buildings and the part of the Bloomsbury Conservation Area in which the site lies will be enhanced by the proposed development.
- 16.17. The increase in the number of residential units and, in particular, the inclusion of affordable housing at the site where there was none before, helps both Camden and the Mayor of London address the significant need for housing in general and affordable housing specifically in this central and accessible location.
- 16.18. In summary, the application will provide a high quality, mixed-use development that makes more effective use of a poorly performing site in a vital business location that accords with national, strategic and local planning policy.