

<b>Address:</b>	Chichester House, 278-282 High Holborn, London, WC1V 7HA	
<b>Application Number:</b>	2007/3976/P	<b>Officer:</b> Stuart Minty
<b>Ward:</b>	Holborn & Covent Garden	
<b>Date Received:</b>	07/08/2007	
<b>Proposal:</b> Demolition of existing Chichester House building and redevelopment of the site to include construction of a new 8-storey building plus basement level, for Class B1 office (9,297sqm), Class A1 retail (298sqm) at ground floor level and 6 residential (C3) units on the Whetstone Park frontage and external plant area at roof level.		
<b>Drawing Numbers:</b> Location Plan (3829_TP01 rev B); TP02 rev C; TP03 rev C; TP04 rev B; TP05 rev B; TP06 rev B; TP07 rev B; TP08 rev B; TP09 rev B; TP10 rev B; TP11 rev B; TP12 Rev E; TP13 rev C; TP14 rev C; TP15 rev C; TP16 rev C; TP17 rev C; TP18 rev C; TP19 rev B; TP20 rev B; TP21 rev B; TP 22 Rev A; TP30 – 39; Planning Statement (Dated 08/2007); Design and Access Statement (Dated 09/2007); Daylight and Sunlight Report (Dated 06/08/2007); Highways Statement (Dated 08/2007); Archaeological Desk-Based Assessment (Dated 10/2007); Plant Noise Assessment (Dated 07/2007); Energy Statement (Dated 04/07/2007); Sustainability Statement (Dated 31/07/2007); BREEAM and EcoHomes Pre-Assessment Document (Dated 02/08/2007); Plant Noise Calculations (Ref 07123); Lifetime Homes Standards Statement (Dated 11/2007); Addendum to sun/daylight analysis (Dated 30/11/2007)		
<b>RECOMMENDATION SUMMARY:</b>  That subject to the Council not being directed to refuse the application following referral to the Mayor, to <b>GRANT PLANNING PERMISSION</b> subject to conditions and a S106 legal agreement.		
<b>Applicant:</b>		<b>Agent:</b>
HEDF 11 UK Office Sarl & HEDF 11 UK Residential Sarl c/o Agent		Gerald Eve 7 Vere Street London W1G 0JB

## ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (m <sup>2</sup> )
Existing	A1	Retail	258
	A3	Restaurants/Cafes	40
	B1	Office	8690
	<b>Total</b>		<b>8,988</b>
Proposed	A1	Retail	298
	B1	Office	9297
	C3	Residential	668
	<b>Total</b>		<b>10,263</b>

Residential Use Details:										
	Residential Type	No. of Habitable Rooms per Unit								
		1	2	3	4	5	6	7	8	9+
Existing	Flat/Maisonette	-	-	-	-	-	-	-	-	-
Proposed	Flat/Maisonette	1	4	1	-	-	-	-	-	-

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	22	-
Proposed	-	1

## OFFICERS' REPORT

### Reason for Referral to Committee:

The proposal is defined as a 'major' application involving the creation of more than 1000m<sup>2</sup> of non-residential floorspace. The proposal also involves the creation of more than 5 residential units. Any grant of permission would also require the conclusion of a Section 106 Planning Obligation relating to matters outside the normal scheme of delegation. [Clauses 3 (i), (iii) and (vi)].

This application was deferred from the 29<sup>th</sup> November Development Control Committee, for further information relating to matters of sun/daylight. Details of which are contained within Para's 6.38 - 6.47 of this report.

### 1. SITE

- 1.1 The application site lies approximately midway along High Holborn, and is bounded by High Holborn to the north, Great Turnstile to the east, Whetstone Park to the south and abuts 271-277 High Holborn (Princeton House) to the west.

- 1.2 The existing site comprises an 8 storey 1960's building, with a T shaped plan form over a single storey podium which occupies the entire site. The existing building is primarily vacant, with the exception of a newsagent at ground floor level, and was previously in office use with four small retail units located on the High Holborn frontage.
- 1.3 The existing office entrance is from High Holborn and there is a service entrance from Whetstone Park to the rear. To the west, alongside Princeton House, a ramp from Whetstone Park provides access to a basement car park that accommodates 22 vehicles, office storage and an electricity sub-station.
- 1.4 Chichester House sits within the High Holborn Central London frontage for retail purposes, and the site is within the Central Activities Zone and the Holborn Area for Intensification as defined in the London Plan. The site is not within a conservation area, however the Bloomsbury Conservation Area lies directly to the south of the site. The existing building is not listed, however there are a number of listed buildings within close proximity to the site, namely 24-28 Lincoln's Inn Fields, located on the south side of Whetstone Park to the south west of the site, and the Pearl Assurance building (247-252 High Holborn), which is located approximately 85 metres west along High Holborn.

## **2. THE PROPOSAL**

### **Original**

- 2.1 The proposal involves the demolition of the existing building, and its replacement with a contemporary mixed use building comprising office, retail and residential uses.
- 2.2 The office floorspace would occupy a degree of the ground floor space, and the majority of the upper floors designed principally to front High Holborn. In addition, there is a retail unit located at ground floor level with separate entry from the street. Plant rooms, cycle parking with associated showering facilities, refuse storage and a substation are located at basement level. The six proposed residential units occupy the south-eastern corner of the building adjacent to the junction of Great Turnstile and Whetstone Park. There will be direct access to the residential units from Whetstone Park.
- 2.3 The proposed new building would reach a height of 8 storeys (plus plant) along High Holborn, with a set-back of 1.5m along the 'cornice line' at 7<sup>th</sup> floor level, and 2.8m from the eastern elevation. This massing is then extended along approximately one-third of Great Turnstile where the degree of articulation increases with a further step back (1.5m) at 6<sup>th</sup> floor level, coupled by a series of substantive step backs from ground level, which extend towards the proposed residential component situated in the south-east corner of the site.
- 2.4 The series of set-back bays allow for a proposed widening of Great Turnstile. Each bay of the building is proposed to be setback by 1.5m, allowing Great Turnstile to be 6 metres wide, opposite numbers 12-15 Great Turnstile, increasing to 10.5

metres opposite numbers 10-11 Great Turnstile. Great Turnstile and the north pavement of Whetstone Park would be repaved with York Stone. Various public realm initiatives are proposed including new lighting, signage, extended railings and bollards at the southern end of Great Turnstile.

## **Revisions**

- 2.5 Further calculations in addition to the acoustic report have been submitted to demonstrate how certain figures and limits were arrived at.
- 2.6 A statement has been submitted, confirming that all of the proposed residential units would meet or exceed lifetime homes standards.
- 2.7 The originally proposed two bedroom flat, at 4<sup>th</sup> and 5<sup>th</sup> floor level has been revised to comprise a three bedroom flat.

## **3. RELEVANT HISTORY**

- 3.1 Outline Planning Permission was granted in June 1953 for the erection of a nine-storey office building with basement. This was followed by a detailed planning application which was granted in July 1955.
- 3.2 Planning Permission was granted in March 1960 for the use of the sixth, seventh and eighth floors of the building for the sorting of diamonds and ancillary office purposes.
- 3.3 Planning Permission was granted in December 1960 for the use of the front portion of the ground floor of the building for five shops and for the formation of access to Great Turnstile.
- 3.4 Planning Permission was granted in April 1967 for the change of use of a part of the fifth floor of the building from office use to diamond sorting.
- 3.5 Planning Permission was granted in March 1999 for the change of use of part of the fifth, sixth, seventh and eighth floors of the building from use for the sorting of diamonds and ancillary office purposes to sole office use.
- 3.6 A number of other applications have been approved for shopfront alterations, advertisements and other minor works to the building. None of these are of any particular relevance to the application.

## **4. CONSULTATIONS**

### **Statutory Consultees**

- 4.1 The **Greater London Authority (GLA)** have concluded in their 'stage one' response, that the principle of a mixed-use development comprising retail, office and residential in the identified location and at the proposed scale and height would generally be supported by strategic planning policy. The Mayor has however, raised the following strategic issues:

- Further information on how discussions are progressing regarding the proposed Section 106 financial contribution for open space and local amenity improvements, specifically in relation to Lincoln Inn's Field.
- Further consideration should be given to improving the interaction between the retail and office frontages and Great Turnstile Street along the eastern edge of the site.
- Further discussions and design work to improve the residential environment of the ground floor private unit, which is located at the corner of Great Turnstile Street and Whetstone Park.
- The applicant should provide a scaled plan to demonstrate that one of the residential units would achieve the 10% wheelchair accessible housing requirement.
- TfL would also require that the preparation of a detailed travel plan be secured through planning condition.

#### **External Consultees**

- 4.2 The **Crime Prevention Design Advisor** has supported the scheme, and particularly welcomes the widening and associated changes to Great Turnstile, which will introduce new residents, business and traders, bringing increased surveillance, foot flow, lighting and removal of existing recessed areas. Such interventions would remove the fear of crime and anti-social behavior. Further details of this response are outlined in Para 6.25 - 6.27 of the report.

- 4.3 **English Heritage (Archaeological Service)** – No objections subject to a condition requiring an archaeological evaluation to be undertaken prior to development by a suitably qualified archaeological organisation.

#### **Conservation Area Advisory Committee**

- 4.4 The **Bloomsbury CAAC** have objected to the scheme for the following reasons:-  
*'We have no comments on the High Holborn frontage. The existing view from Lincoln's Inn fields could be much improved, but this building does not achieve that. The materials are a concern, and should be chosen to blend in with the existing heritage buildings in Lincoln's Inn Fields. The proposed step back on Great Turnstile would be wonderful for the office workers, but the narrow passageways of London need protection, not opening out. The building as seen from the south should not look like an import from the Docklands'.*

#### **Local Groups**

- 4.5 The **Holborn Partnership** (Business Improvement District) have supported the scheme, stating *'Chichester House is a key property within the Business Improvement District area and its lack of occupancy has been of concern. The proposed development of the site has many benefits for the local area, in addition to the provision of an architectural landmark. The residential provision will assist Whetstone Park to become part of the community rather than purely a service road, increasing natural surveillance within the area. The provision of high quality office accommodation and the multiple occupancy of the building will add to the mix of businesses and opportunities for Holborn. The re-landscaping of Great Turnstile will be achieved through the revised footprint of the new building, creating an open*

*square where it meets Whetstone Park. This is a busy thoroughfare and one that is in need of refurbishment to assist with decreasing anti-social behaviour. The proposals for improvements to the lighting, streetscape, and finishes offer an innovative solution to this run down area. The Holborn Partnership fully supports the applicant's proposal for Chichester House, and look forward to their contribution and sustainability of the area'*

#### **Adjoining Occupiers**

4.6

<i>Number of letters sent</i>	<i>27</i>
<i>Number of responses received</i>	<i>6</i>
<i>Number in support</i>	<i>2</i>
<i>Number of objections</i>	<i>4</i>

4.7 The owner/occupiers of **Flats 13, 23 and 33, Great Turnstile House (12-15 Great Turnstile)** have raised objections to the application. These are summarised below:-

- Welcome the proposals to widen Great Turnstile, however would prefer to see a more active and animated frontage. This could be achieved using clear glazing on the ground floor.
- No reason for the proposed sideways enlargement of the building other than economic gain, and would result in the loss of much needed light and space in this crowded part of Holborn by Lincoln's Inn fields.
- The increase in building massing will have an adverse impact on levels of daylight and sunlight reaching the dwellings and their associated terraces and balconies in Great Turnstile House (opposite).
- Bike calming measures should be introduced to Great Turnstile.
- Loss of privacy to residences being overlooked by offices.

4.8 The owner/occupiers of **Flats 51 Great Turnstile House (12-15 Great Turnstile)** and another **unnamed resident from Great Turnstile House** have raised support for the scheme, subject to the following comments:-

- Support the objective of improving the atmosphere of Great Turnstile, however would like to see clear glazing rather in the ground floor to create an 'active frontage'.
- Interested in what the applicant has in mind for the artwork to the base of the building.
- Suggest wall mounted street lighting on Great Turnstile, to avoid the clutter of unnecessary street furniture
- Unsure whether the glazing for the upper levels would block all views into the dwellings in Great Turnstile House.

- 4.9 A second letter was received from the owner/occupier of **Flat 51 Great Turnstile House (12-15 Great Turnstile)**, raising objection on the basis of a Deed of Grant, dated November 6th 1959, between the former owners of the Chichester House site and the former owners of 12-15 Great Turnstile. This deed gives the applicant the right to rebuild Chichester House in accordance with the existing plans of the building or such reasonably similar plans and elevations, and shall not diminish the right to light and air enjoyed by 12-15 Great Turnstile.

## **5. POLICIES**

### **Replacement Unitary Development Plan 2006**

- 5.1 Set out below are the UDP policies that the proposals have primarily been assessed against, together with officers' view as to whether or not each policy listed has been complied with. However it should be noted that recommendations are based on assessment of the proposals against the development plan taken as a whole together with other material considerations.

### **5.2 Camden Replacement Unitary Development Plan 2006**

S1-S3 Strategic Sustainable Development; (complies subject to S106);  
SD1 Quality of life (complies);  
SD2 Planning obligations (complies subject to S106);  
SD3 Mixed use development (complies);  
SD4 Density of development (complies);  
SD5 Location of development with significant travel demand (complies);  
SD6 Amenity for occupiers and neighbours (complies subject to conditions);  
SD7 Light, noise and vibration pollution (complies subject to conditions);  
SD8 Disturbance (complies subject to conditions);  
SD9 Resources and energy (complies subject to S106);  
H1 New housing (complies);  
H7 Lifetime homes and wheelchair housing (complies);  
H8 Mix of units (complies);  
B1 General design principles (complies);  
B2 Design and layout of large developments (complies);  
B4 Shopfronts, advertisements and signs (complies subject to conditions);  
B7 Conservation areas (complies);  
B8 Archaeological sites and monuments (complies subject to conditions);  
B9 Views (complies);  
N4 Providing public open space (complies subject to S106);  
N5 Biodiversity (complies subject to conditions);  
T1 Sustainable transport (complies subject to S106);  
T3 Pedestrians and cycling (complies subject to conditions);  
T8 Car free housing and car capped housing (complies subject to S106);  
T9 Impact of parking (complies);  
T12 Works affecting highways (complies subject to S106);  
T13 Adoption of highways and other access routes (complies subject to S106);  
T16 Movement of goods (complies subject to S106);

- R1 Location of new retail and entertainment uses (complies);
- R2 General impact of retail and entertainment uses (complies);
- R7 Protection of shopping frontages and local shops (complies);
- E1 Location of business uses (complies);
- E2 Retention of existing business uses (complies);

### 5.3 **Camden Planning Guidance 2006**

The following sections of the Camden Planning Guidance are of particular relevance to the application:

- P1 - Access for all
- P8 - Affordable housing and housing in mixed use development
- P30 – Biodiversity
- P39 – Car free and car capped housing
- P47 – Conservation areas
- P51 – Construction and demolition
- P58 – Cycle parking and storage
- P61 – Daylight and sunlight
- P69 – Designing safer environments
- P74 – Energy and onsite renewable facilities
- P105 – Lifetime homes and wheelchair housing
- P120 – Noise and vibration
- P125 – Overlooking and privacy
- P136 – Planning obligations
- P174 – Plant, machinery and ducting – design and siting
- P177 – Public open space
- P194 – Residential development standards
- P209 – Shopfronts
- P216 – Sustainable design and construction
- P225 – Town centres, retail and entertainment uses
- P237 – Travel Plans
- P251 – Waste and recyclables – onsite storage

## 6. **ASSESSMENT**

6.1 The principal considerations material to the determination of this application are summarised as follows:

- Land use – The principle of the development
- Housing/residential development standards
- Design related issues/townscape
- Streetscape Improvements
- Sustainability - resources and energy
- Impact on amenity
- Transport, access and parking
- Other matters



## **Land use – The principle of the development**

### *Mixed Use Policy*

- 6.2 A mixed used scheme is welcomed at this location in accordance with UDP policy SD3. This policy expects a contribution to the supply of housing from schemes in Central London that increase total gross floorspace by more than 200m<sup>2</sup> and seeks up to 50% of the additional floorspace as housing. The proposed development would increase total gross floorspace by 1,275m<sup>2</sup> and provide 668m<sup>2</sup> of residential floorspace (52%). It is therefore considered to comply with policy SD3.

### *Increase in Office Accommodation*

- 6.3 The proposal retains the predominant office use of the site and increases the amount of floorspace from 8690m<sup>2</sup> to 9297m<sup>2</sup> (607m<sup>2</sup>). The uplift in office floorspace is consistent with UDP policies E1, E2 and Strategic Policy S14, the latter of which, seeks to retain existing businesses and encourage expansion of business development in appropriate locations in order to maintain and expand the economic role of Central London. The site is also within the 'Central Activities Zone' and is also an 'Area for Intensification' as outlined within the London Plan. The increase in office accommodation is supported by such policies.
- 6.4 The office footplate has been influenced by the requirements for modern, flexible and well-serviced office accommodation. The accommodation would allow for column free space for the occupants, allowing for a good standard of day lighting, and higher floor-to-ceiling heights.

### *New Retail Uses and Loss of A3 Floorspace*

- 6.5 The site lies within the Holborn Central London Frontage and therefore the proposal requires assessment under policy R7A which resists the net loss of ground floor shopping floorspace. The proposal replaces the existing A1 (258m<sup>2</sup>) /A3 (40m<sup>2</sup>) floorspace with an equivalent amount of solely A1 space (298m<sup>2</sup>). There are no policies to retain A3 floorspace, and the proposal is therefore considered acceptable.

## **Housing/residential development standards**

### *New Housing*

- 6.6 The proposal includes the provision of 6 residential units, in the south-east corner of the site independently accessible via Whetstone Park. This is consistent with policy H1 which supports the increase in residential floorspace. The inclusion of 6 units, with a residential site of significantly less than 0.5ha results in no affordable housing being required.

### *Lifetime Homes*

- 6.7 In accordance with policy H7, all flats either comply or exceed lifetime home standards. The policy for wheelchair housing is not applicable, given the number of residential units proposed.

### *Mix of Units*

- 6.8 Policy H8 expects an appropriate mix of unit sizes, including large and small units, taking into account the mix best suited to site conditions and the locality. The

proposal includes 4 x 1 bed flats, a studio flat and a 3 bed flat. This mix is considered acceptable given the limited size of the floor plates within the separate residential component, and the small number of units proposed. All unit sizes meet the minimum space standards for units and bedrooms as set out within the Council's supplementary planning guidance.

## **Design related issues/townscape**

### *High Holborn Frontage*

- 6.9 The proposed High Holborn elevation respects the established benchmark height characteristic of this street frontage. The proportions (both vertical and horizontal) and composition of this 'street wall' element remain similar to the existing building, albeit with a more contemporary manifestation. The building plot/lines are comparable to the existing, whilst a contemporary design approach is considered appropriate for the area given the context of varied architecture.
- 6.10 The main facade is restrained in its vertical proportion by a linear cornice formed in Portland stone that caps the first setback storey to High Holborn. Beyond this level, the architectural detailing becomes more recessive and lightweight. The cornice feature folds down through 90 degrees onto the Great Turnstile boundary, forming a solid stonewall signalling a transition between frontages. The underside of the projecting cornice as well as its inner vertical surface is proposed to be lined with a coloured material that will be seen in oblique views, when approaching from the west, providing a subtle contemporary intervention to the building's primary frontage.

### *Great Turnstile Elevation*

- 6.11 The glazed facade to Great Turnstile is clad in a crisply detailed glazing system with a fine steel mesh inserted between the double glazed layers. This is designed to reduce the sense of overlooking which might otherwise (and currently does) affect adjoining properties, by veiling views directly across the alleyway. The combination of a translucent skin, south facing vision windows, coupled with a level plan optimises daylight within the offices, whilst creating an interesting and positive gesture interfacing with the newly created and improved public realm of Great Turnstile.
- 6.12 The full height glazed units are defined by slender anodised aluminium framing. The ground floor of this section of the building is to be finished with the same cladding material, however in this instance; artwork will be incorporated into the cladding as a mural using an applied colour process to provide an interesting edge to the pedestrian route.

### *Whetstone Park Elevation*

- 6.13 The rear elevation to Whetstone Park, comprises the 6 storey residential component, which incorporates high quality coloured render and a tilt and turn window arrangement. Along side this at ground to 3<sup>rd</sup> floor level the office component is continued with a Portland stone finish. The elevation is complete with a continuation of the full height clear glass panels on the upper levels. The proposal would bring a degree of articulation, and is appropriately scaled as to respect the

setting of the nearby listed buildings at 24-28 Lincolns Inn Fields and the wider adjacent Bloomsbury Conservation Area.

#### *Materials*

- 6.14 The proposed north, south and east elevations reflect the differing characteristics of the adjoining townscape, with the use of a simple, but varied palette of materials ranging from Portland Stone fronting High Holborn, to a minimalist translucent cladding system forming the recessive planes in Great Turnstile, coupled with high quality render for the residential component. It is considered necessary to reserve the proposed materials of the scheme via planning condition, to ensure the highest possible quality. In addition, all external facing materials including windows, glazing, balconies, doors, brick facing materials, meshing, fencing and landscaping are recommended to be reserved via condition.

#### *Localised Views*

- 6.15 A number of important localised views (summer and winter) have been submitted for consideration in the context of the proposals. These include:-

- From the south, including both a close and longer range view along the eastern edge of Lincoln's Inn Fields;
- From the south, a view from within Lincoln's Inn Fields;
- From the south, a view from within Lincoln's Inn; and
- Views of the site, looking east and west down High Holborn.

- 6.16 On the basis of this view assessment, it is considered that the proposed height, bulk, massing and detailed design is such that the scheme will not be detrimental to these localised views of the site and that the scheme relates well to the context within which it is set.

#### *Strategic Views*

- 6.17 Under RPG 3a the site was within the Background Consultation Area from Greenwich Park to St Paul's Cathedral. However the recently adopted Supplementary Planning Guidance to the London Plan – London View Management Framework (LVMF), July 2007, redefines this view and now excludes the site from any Background Assessment Area. Similarly, no new views adopted in the LVMF affect the site.

#### *Summary of Design Approach*

- 6.18 Whilst the building's address and principle frontage is High Holborn, the form of the replacement building acknowledges all three, differing site frontages, which have equally sensitive urban settings. This has been achieved by resolving to reinforce the unique character of its 'mid-town' location on High Holborn, improve the form, enclosure and quality of public realm of Great Turnstile (which forms part of Camden's Metropolitan Walk), whilst presenting an appropriately scaled and articulated interface with the Grade II\* listed buildings in Lincoln's Inn Fields.

#### **Streetscape Improvements**

- 6.19 Great, Little and New Turnstile were originally gateways designed to keep cattle and sheep out of Lincoln's Inn Fields as they were driven along Holborn to

Smithfield. When the turnstiles were abandoned, the alleyways were built up with shops and Great Turnstile became a major centre for the book trade. Printers and engravers also worked there and the area became associated with publishing as late as the 1860s.

- 6.20 The brick clad podium of the existing 1960s Chichester House currently runs the entire length of Great Turnstile, defining and containing its western edge, engendering a narrow linear space, poorly lit with an uneven and unsightly tarmac finish, which does little to enhance the ambience of this well used pedestrian through route. The existing street lighting and signage is proposed to be replaced as part of an integrated design approach.
- 6.21 The footprint of the proposed Chichester House is incrementally recessed as it progresses towards Lincoln's Inn Fields. Each bay of the proposed echelon elevation is setback by 1.5 metres. Incrementally this will splay Great Turnstile and at its widest point open to a width of 10.5 metres. A vertical glass fin emphasises each 1.5 metre setback, rising from first floor to the parapet level. These are formed in toughened glass and may incorporate a mild translucent colour. The 1.5 metre returns to each bay are finished in clear glazing facing to the south. The removal of the confining edge of the existing podium will create a new public space, engendering a more comfortable; user friendly transition into Lincoln's Inn Fields and is in keeping with the principle of Camden's Metropolitan Walks.
- 6.22 At street level, cohesive and high quality finishes such as York stone are proposed to replace the existing tarmac. Lighting is proposed to be sympathetic to the new space and will improve the ambience and aesthetic, while addressing existing safety issues which currently detract from the environment.
- 6.23 In connection with the widening of Great Turnstile, the applicants have proposed some 'kinetic lighting' artwork. Although, an interesting intervention the Councils Arts Development Officer has concerns over the long term maintenance and effectiveness of the proposals. The Camden Clear Zones project for the Lincoln's Inn Fields area proposes a number of public realm improvements, including a degree of public art. All proposed public art initiatives have already obtained full funding, and therefore a contribution towards public art in line is not considered reasonable in line with the tests of circular 05/05 (Planning Obligations).
- 6.24 An integrated approach to the design of Great Turnstile will be enabled with the redevelopment of Chichester House and is considered to greatly improve the quality of the space, the sense of ownership and degree of surveillance. Whilst acknowledging the objections of the Bloomsbury CAAC relating to '*the narrow passageways of London needing protection*', it is considered that the public safety and design benefits associated with the opening up this area outweigh any harm to the character caused by its loss.

#### *Designing Out Crime*

- 6.25 Great Turnstile has for many years been a favoured spot for 'anti social behaviour'. The existing nature of Great Turnstile is a narrow, poorly lit alleyway which contains recessed doorways, and is out of sight of passers by in either High Holborn or Lincoln's Inn Fields. There is little pedestrian movement outside of recognised

trading/business hours, whilst there is very little surveillance from premises located in Great Turnstile.

- 6.26 A degree of work has been carried out in the local area to remove recessed doorways, closure of lightwells and the addition of conservation style security shutters. However, the Crime Prevention Officer has advised that the 'hot spot' for such activity has been in Great Turnstile and Whetstone Park. Whetstone Park has experienced many alterations in terms of building design and physical security which have had a positive impact on its crime profile.
- 6.27 The Crime Prevention Officer has raised strong support for the widening of Great Turnstile proposals, as it would introduce new residents, businesses and traders which in turn would bring increased surveillance, foot flow, new lighting and removal of some of the recessed areas. A combination of all the above is considered to go some way to removing the fear of crime and anti-social behaviour use, and would accord with advice provided in the Camden Planning Guidance and the SPG 'Secure by Design'.

### **Sustainability - resources and energy**

#### *BREEAM/EcoHomes*

- 6.28 The application's preliminary assessments indicate that the proposal would achieve a BREEAM rating of 'Excellent' for the office element and 'Very Good' for the retail and residential components. The Excellent rating for the office area exceeds that targeted under the Camden Planning Guidance. Commitment to ensure the scheme obtains these ratings in the final assessments is to be secured via S106 Agreement.
- 6.29 The Camden Planning Guidance also requires developments to meet targets of 60% in the Energy and Water categories and 40% in the Materials categories. The undertaken pre-assessments illustrate that the office and residential elements of the scheme meet the required standard in these categories. The retail element meets the required standard in the water and materials and waste categories, however the retail element's score for the energy category (44%) is below the 60% required. This reflects the small scale of the retail provision in the scheme and the shell-level of the fit out to be undertaken. It means that only two of the energy assessment criteria were considered relevant to the retail element which increases the relative importance of the credits that are available and limits the ability of other measures to be undertaken to meet the 60% target.
- 6.30 Given these circumstances it is not considered necessary to undertake a separate post-construction BREEAM assessment of the retail element of the scheme. However, a management plan for the retail element is considered necessary to ensure that its energy performance under future occupiers is acceptable. This shall be secured via S106 agreement.

#### *Energy efficiency*

- 6.31 In accordance with policy SD9c and the Mayor's energy hierarchy (use less, supply efficiency, use renewable energy), the proposal includes a number of initiatives to

reduce the energy use of the building. These initiatives go beyond the requirements of the Building Regulations, and include:-

- A Building Management System;
- Chilled Beam office cooling rather than conventional air conditioning (this alone saves 11% carbon emission annually over conventional Fan Coiled Units);
- High performance glazing for the office and retail elements to reduce the solar gain;
- Thermal wheel heat recovery with high operating efficiencies for all main air handling units, which significantly reduces the heating required to warm up incoming fresh air in winter;
- All heaters and radiators to have TRV control for more precise control and heating;
- Natural ventilation within the residential building except for a mechanical extract system specified for the bathrooms;
- Energy efficient light fittings that will be supplied in the office areas and at least 75% of all of the fixed light fittings that will be specified as dedicated low energy fittings;
- Low NOX emission gas boilers will be specified within the scheme. The residential units will be provided with SEDBUK A rated NOX class 5 gas condensing boilers, which have a dry NOX emissions level of \_70mg/kWh;
- All plant will be subject to regular servicing to maximise efficiency and minimise emissions

6.32 Para 1.64 of the UDP states that major developments are expected to provide at least 10% of predicted energy requirements from renewable sources. The proposal includes ground source heat pumps, photovoltaics and solar water heating. These are estimated to provide a CO<sub>2</sub> reduction of up to 6.55% from the predicted building carbon emissions of this highly efficient building. This is below the level targeted in the UDP, although SD9C takes into account to the feasibility of the use of renewables in a development.

6.33 The Energy Statement submitted as part of the application assesses the suitability of various renewable and low carbon technology options and the compatibility of different systems being used together. The Energy Statement identifies that most of Low or zero carbon emission technologies, such as GSHP, CHP, Tri-gen CHP, Biomass and solar thermal are targeting heating demand of the building, and that these cannot be used together. The heating demand is relatively low for this development, and the buildings heating demand has been significantly reduced through a number of energy efficiency measures such as heat recovery system on ventilation system and high performance facade. Therefore, the carbon saving

from heat targeting LZC technologies is limited, however, the applicant has sought to deliver renewable systems that provide the highest percentage of carbon saving overall when combined for the development.

- 6.34 Wind turbines were rejected due to their visual impact and uncertainties over their performance at the proposal site. Ground source heat pumps were found to be more suitable than biomass heating as they contribute to both heating and cooling demand, rather than just heating in the case of biomass (cooling demand for the scheme is approximately 3 times greater than that for heating) due to the high performance facade and heat recovery systems proposed.
- 6.35 The proposed GSHP cooling system enhances the carbon saving of the building, however because the site constraints, the size of GSHP cooling system is limited. The term 'limited site area' means the numbers of boreholes are limited, and hence limit the size of GSHP. The number and positions of structural piles also limit the size of GSHP as the boreholes need to be spaced apart from the structural piles. Cooling demand is relatively high (approximately 3 times more than the demand of space heating & DHW), however a limited size of GSHP cooling system limit its carbon savings. It should be noted that bio-mass heating delivers only 2.6% carbon saving, while GSHP deliver 3.75% carbon saving. Overall, the performance of ground source heat pumps with photovoltaics and solar thermal was found to be greater than that for bio-mass heating used in conjunction of PV and solar thermal.
- 6.36 CHP and Trigeneration were discounted as impractical due to the relatively small size of the site. Also the office nature of the scheme means that the heating element of these technologies would largely not be needed, limiting their usefulness in this case. Further, CHP and Trigeneration delivers only 2.6% carbon saving, while GSHP deliver 3.75% carbon saving. The performance of ground source heat pumps with photovoltaics and solar thermal was found to be greater than that for bio-mass heating used in conjunction of PV and solar thermal. While this is accepted, the ability to connect to any future CHP/CCHP system in the area is recommended to be secured through a planning obligation.
- 6.37 Although the contribution of renewable sources to energy requirements is below that sought, other options have been assessed as identified in the Energy Statement and found not to be appropriate or feasible. Given this, the reduction in the future energy use of the building provided through the range of sustainability / energy efficiency measures proposed and the proposal's performance in the BREEAM/EcoHomes assessments, the scheme is considered to be acceptable in terms of its sustainability and energy performance.

## **Impact on amenity**

### *Daylight/Sunlight*

- 6.38 The application was deferred from the 29/11 Development Control Committee, in order for further information to be submitted in relation to sun/daylight and in particular the impact on the residents of 12-15 Great Turnstile. The applicants have

obtained more precise internal layout arrangement drawings which results in a higher degree of accuracy in the modelling results.

- 6.39 The modelling has been undertaken in connection with the BRE Guidelines 'Site Layout for Daylight and Sunlight – A Guide to Good Practice'. These guidelines stipulate three methodologies for understanding daylight within a room and the alteration experienced as a consequence of implementing neighbouring development. The method for determining the adequacy of daylight would consider the assessment of the Vertical Sky Component (VSC), Average Daylight Factor (ADF) and No Sky Line (NSL). In a City centre and in particular in a location such as Chichester House, it is common to affect daylight and sunlight to a higher degree than the criteria suggested within the BRE guidelines. This is because the guidelines were originally drafted for suburban residential environments and it is therefore recognised that the flexibility should be incorporated in City centre locations, bearing in mind site layout constraints.
- 6.40 The Vertical Sky Component (VSC) method calculates the amount of visible sky on a vertical face (normally a window) at a given point. This is normally the central point of a window except at ground floor level where it is taken two metres above the ground. This method of measurement is limited because it only records the potential for light by reference to visible sky. It does not take into account the size of the windows, the number of windows serving a room, the room layout and use. Thus it only measures light reaching the outside plane of the windows and not the actual light in a room.
- 6.41 Within a suburban context for which this test was devised the VSC is very helpful; however within a densely developed urban context it is not particularly useful. The reason for this, is that where buildings are built closely to one another, as is the case in Great Turnstile, the existing levels of VSC are very low and do not comply. Consequently a modest level of development at such proximity can result in large percentage changes in VSC which in real terms are little more than a few percent.
- 6.42 The 'No-Sky Contour' method seeks to determine the internal distribution of light by reference to the extent of light penetration into a room at the working plane level (approximately desk height). It is more accurate than the Vertical Sky Component method as it does take into account of the window sizes and room plan but still only considers sky visibility and disregards room use. It is useful as a guide; however in practice can often be misleading, because if a substantial part of the room falls behind the 'no skyline contour' the distribution of light within the room may look worse than truly the case.
- 6.43 The BRE Guidelines suggest that where the NSL is altered by more than 20% this may become noticeable to the occupant. On the basis of which all but 2 rooms out of 11 (which face the proposed site) will experience satisfactory and BRE compliant daylight by reference to this methodology. In relation to the two rooms that fall below the suggested guideline (a living room connected with flat 13 on the 1<sup>st</sup> floor, and a bedroom/study within flat 23 on the second floor), further consideration is given below in relation to the most accurate of the three methods of daylight analysis, namely the Average Daylight Factor.



- 6.44 The Average Daylight Factor (ADF) considers the average amount of light based upon sky visibility and reflectivity of internal surfaces. It thus incorporates the Vertical Sky Component but takes into account the quality of light in the room (albeit averaged) based upon room size and volume and use. The minimum levels of Average Daylight Factor that are suggested are as follows: Kitchens 2%; Living rooms 1.5%; Bedrooms 1%.
- 6.45 One of the rooms within Flat 13 on the 1<sup>st</sup> floor is uses a living room and the ADF is currently 1.07%, a level below the general threshold by reference to the BRE Guidelines. This will be reduced to 0.68% if the proposed scheme is implemented. One of the rooms within Flat 23 on the 2<sup>nd</sup> floor is used a bedroom/study and the ADF is currently 1.18%. This level is considered acceptable for a bedroom by reference to the BRE, and will be 0.81% as a consequence of the proposed scheme, slightly below the British standard. Whilst the light enjoyed by these two rooms is reduced slightly, the changes in light levels would not alter the way in which the space is materially being used, and supplementary electric lighting would still continue to be required at the same levels/ periods as it is currently utilised.
- 6.46 The modest level of change proposed is drive by a very tight urban site in which any small increase in massing will result in fluctuations in light levels to neighbouring properties. This is something which the BRE Guidelines acknowledge when they state they should not be read in a mandatory way, but should be applied flexibly particularly in historic or urban centres such as this. In addition to which the scheme has been designed in such a way to step back from the aforementioned properties and create a greater sense of openness than the existing building offers.
- 6.47 In conclusion only two rooms are affected by this proposal, one to a slightly greater degree than the other. In both cases the levels of light are considered to be acceptable, and the reduction to be non-discernible to the human eye.

#### *Overlooking*

- 6.48 The glazing on the section of the elevation fronting the residential block at 12-15 Great Turnstile is proposed to be obscurely glazed to limit any direct overlooking. This matter is recommended to be reserved via planning condition. No other overlooking would occur as a result of the development.

#### *Impact of plant/machinery*

- 6.49 Plant is proposed at both basement level at externally at roof level. The applicants have submitted an acoustic report which evaluates any noise/vibration associated with the proposed plant/machinery, in comparison with existing background noise levels. This report has been reviewed by the Council's Environmental Health officer and is adjudged to comply with the Council's noise standards.

### **Transport, access and parking**

#### *Travel Plans*

- 6.50 The proposed redevelopment will result in an increase in the number of pedestrian movements to and from the site. A travel plan that informs office staff about public transport options along with walking and cycling routes is recommended to be

secured via S106 agreement, and agreed with the Council prior to occupation of the development

#### *Cycle Parking*

- 6.51 The Council's standards require the provision of secure cycle parking, with Appendix 6 of the replacement UDP requiring residential units to provide 1 space per unit. 7 cycle parking spaces have been proposed in the basement of the residential block; which would exceed the standards, however vertical cycle parking has been indicated with is considered unacceptable for accessibility reasons. A suitable design solution, potentially using 'Sheffield stands', is recommended to be reserved via planning condition.
- 6.52 For office developments, 1 space per 250sqm or part thereof is required for staff and a minimum of 2 spaces for visitors are required. Additional spaces are also required for any further visitor demand. The proposals include 9,297m<sup>2</sup> of office floorspace and therefore a minimum of 37 cycle parking spaces are required. Visitors are considered likely at an office development of this size so additional 3 cycle parking space would be required, bringing a total requirement of 40 spaces. The office cycle parking store, proposes only 29 spaces, and like the residential block vertical cycle parking is proposed. This matter is recommended to be reserved via planning condition. No cycle parking is required for the retail component, as the floorspace would not exceed 500m<sup>2</sup>

#### *Works Affecting Highways*

- 6.53 The Council's Transportation Officer and Highways Engineers have welcomed the proposed widening of the southern part of Great Turnstile, and the associated repaving of both Great Turnstile and Whetstone Park frontages. The Council's Highways engineer has concluded that the extension of the repaving works along Newman's Row would not be suitable as a shared surface. However, the footways on either side of Newman's Row down to Lincoln's Inn Field and the thin area of footway on the southern side of Whetstone Park opposite the development would be required to be repaved in order to tie the development in with surrounding environment.
- 6.54 It is recommended that the proposed widened part of Great Turnstile be given over as public highway via S106, to ensure a consistent use of material and maintenance. All proposed repaving works would be in York stone to Camden's 'high-spec' specifications (formally known as Full Boulevard as described in Camden's Streetscape design manual).
- 6.55 In order to reduce Street Clutter, it is proposed to mount street lighting on the Whetstone Park and Great Turnstile frontages of the building rather than having lamp columns on the footway. In addition the existing street lighting on southern side of High Holborn in front of the development is also proposed to be replaced. All new lighting will be installed and redundant street lighting removed by Camden's contractors at the cost to the developer and secured via S106. Camden's contractors will also carry out maintenance of the new street lighting and the Council will cover the associated cost of this maintenance.

- 6.56 The transport assessment states that the development will generate over 1300 additional walking trips, so as well as the improvements immediately surrounding the site, a financial contribution of £30,000 towards pedestrian/ environmental improvements in the wider area is required. This is in order to help mitigate the cumulative impacts of the vast amount of development that takes place in this central London location. Such funding will be reserved for (i) £15,000 for pedestrian signage and way finding initiative; (ii) £15,000 for the Lincolns Inn Field project (A clear zone project to improve Lincoln's Inn Field).

*Car Free Housing*

- 6.57 The site is in the Clear Zone Region and has a Public Transport Accessibility Level of (PTAL) of 6b (excellent). The site is also located within the Holborn (CA-C) CPZ operating Mon-Sat 08:30-18:30, and has a ratio of parking permits to available parking bays of 1.44. This means that more parking permits have been issued than spaces available. The reduction in off-street parking from the existing 22 spaces to the proposed single disabled bay will not result in a displacement of parking on street provided the development is car-free. This shall be secured via S106 agreement.

*Construction Management Plan*

- 6.58 The applicants have submitted a draft Construction Management Plan which is broadly considered acceptable by the Council's Transport Officer. Further details are required however, in relation to the likely size, numbers and frequency of vehicles travelling to and from the development during the construction period as well as the local access routes to and from the site. All such matters will be secured via S106 agreement.

*Servicing Management Plan*

- 6.59 The applicants have submitted a draft Servicing Management Plan which is broadly considered acceptable by the Council's Transport Officer. All such matters will be secured via S106 agreement.

**Other Matters**

*Biodiversity*

- 6.60 Policy N5 expects schemes to have considered conserving and enhancing biodiversity, including by creating wildlife habitats. The proposed building will incorporate green roofs on south terraces of the 4th and 5th floors. A condition is recommended to ensure sedum roofs are planted, and are sufficiently retained and maintained.

*Open Space Financial Contributions*

- 6.61 In accordance with policy N4 a financial contribution of £6,764.00 towards open space provision within the locality is required, and shall be secured via S106 agreement. This is on the basis that no private amenity space has been provided for the residential component, whilst the uplift in office floorspace increases the working population and the demand on local amenity provision.

**7. CONCLUSION**

- 7.1 The replacement building is considered to be contextually responsive, and would successfully reconcile three differing street interfaces. Whilst it is acknowledged the increase in building height and massing compared to the existing Chichester House building, the replacement scheme is considered well conceived and an appropriate response to the redevelopment potential of the site. The widening of Great Turnstile and the associated public realm works would improve community safety, and visual amenity through the proposed contemporary design idiom.
- 7.2 The scheme introduces an office led mixed-use development which would encourage the retention and expansion of business development with modern and flexible accommodation. The provision of residential accommodation on the site would make a positive contribution to the Borough's Housing Stock in line with UDP policy whilst the increase in retail floorspace would enhance the vitality and viability of the High Holborn Central London frontage. Although the proposal does not provide 10% of energy use from renewable sources, a range of measures are proposed that will significantly reduce energy use, and it has been adequately demonstrated that other renewable / low carbon options are not appropriate or feasible.
- 7.3 The uses of the building would not significantly conflict with the residential amenities of neighbouring occupiers, the general character of the area or the adjacent conservation area. Other conditional/obligation controls are sufficient to address various management, sustainability, biodiversity, design/materials and highway objectives.

## **8. LEGAL COMMENTS**

- 8.1 Members are referred to the note from the Legal Division at the start of the Agenda.

## **9. RECOMMENDATION**

- 9.1 That planning permission be granted subject to conditions and to the satisfactory conclusion of a Section 106 Planning Obligation covering the following heads of terms:
- A financial contribution of £3,148.00 towards education provision;
  - A financial contribution of £6,764.00 towards open space provision within the locality, in-lieu of direct provision;
  - Widened part of Great Turnstile to be designated as public highway;
  - Highway Works, financed by the applicant and carried out by Camden's contractors: -
    - (i) Street lighting on the new building, and replacement street lighting on High Holborn;

- (ii) Repaving of the Great Turnstile, Whetstone Park frontage and footway on the south side, Newman's Row, and associated street furniture changes;
  - (iii) £15,000 for pedestrian signage and way finding initiative;
  - (iv) £15,000 for the Lincolns Inn Field project (A clear zone project to improve Lincoln's Inn Field).
- All proposed residential units to be designated as car free;
  - The submission of a construction management plan;
  - The submission of a servicing management plan;
  - The submission of a business travel plan
  - All building works to be implemented in accordance with the submitted BREEAM and ECOHOMES pre-assessments, and a commitment to ensure these ratings are met in the final assessments.
  - Clause to enable connection to any future CHP/CCHP system in the area
  - Submission of a sustainability management plan for the retail component.

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