

HEDF II UK Office Sarl and HEDF II UK Residential Sarl
278-282 HIGH HOLBORN, LONDON, WC1
PLANNING STATEMENT

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**PLANNING STATEMENT IN SUPPORT OF
A PLANNING APPLICATION FOR THE REDEVELOPMENT OF
278-282 HIGH HOLBORN, LONDON, WC1**

1.0 INTRODUCTION

This Planning Statement is submitted in support of a planning application for the redevelopment of 278-282 High Holborn, London, WC1 (known as Chichester House).

Chichester House is owned by HEDF II UK Office Sarl and HEDF II UK Residential Sarl (with Hines UK as the development manager), who have instructed GMW Architects to prepare a scheme for its redevelopment.

The application proposes to demolish the existing building comprising primarily office and retail/food and drink uses and replace this older, non-descript building with a new mixed use development of high architectural quality.

In addition to this Planning Statement, the planning application comprises the following supporting information:

- Design and Access Statement including views and a crime impact assessment (GMW Architects, David Bonnett and Associates)
- Highways Statement (Mayer Brown)
- Service Management Plan (Mayer Brown)
- Sustainability Statement (Faber Maunsell)
- Energy Statement Report (Faber Maunsell)
- Ecohomes, BREEAM Report including retail note (Faber Maunsell)
- Archaeological Desk-Based Assessment (MoLAS)
- Daylight and Sunlight Report (Gordon Ingram Associates)
- Plant Noise Assessment Report (Sandy Brown)
- Draft Construction Management Plan (Buro4)

2.0 SITE & CONTEXT

Chichester House lies approximately midway along High Holborn, a key distributor route within Camden. The application site is bound by High Holborn to the north, Great Turnstile to the east, Whetstone Park to the south and abuts the existing building at 271-277 High Holborn (Princeton House) to the west.

The site currently comprises a predominantly vacant (except for a newsagent at ground floor) 1960s era building of 8,988m² gross external area. The existing building is an eight storey, T shaped plan form over a single storey podium that occupies the entire site (therefore nine storeys in total).

The existing building displays little architectural merit and, in particular, fails to adequately address the design and townscape considerations in such a transitional space between the busier High Holborn and the quieter Whetstone Park and Lincoln's Inn Fields to the rear.

The site is not within a Conservation Area, however, the Bloomsbury Conservation Area lies directly to the south.

The existing building is not listed. There are some listed buildings in the vicinity, the closest being a collection of Grade II listed buildings at 24-28 Lincoln's Inn Fields. Another notable building is the Grade II listed Pearl Assurance building at 247-252 High Holborn. Further information is provided in the Design and Access Statement.

The site previously sat within the backdrop of the Strategic View from Greenwich Park, established by Regional Planning Policy Guidance 3a. This View has now changed following the publication of the London Views Management Framework SPG on Friday 13th July (which replaces the regional guidance in RPG3a) and the site now falls outside the protected vista.

The subject site lies within Central Activities Zone and the Holborn Area for Intensification as identified in table 5B.2 of the London Plan. The Area for Intensification extends from Bloomsbury Square along Southampton Row then moves eastwards to incorporate Great Ormond Street hospital and selected sites along Theobalds Road and High Holborn.

The nearest residential properties to the application site are on the opposite side of Great Turnstile (12-15 Great Turnstile).

3.0 THE PROPOSAL

The proposed redevelopment provides an excellent opportunity to create a mixed use development of high architectural quality.

The proposed development includes the demolition of the existing building and replacement with a contemporary mixed use building comprising office (B1), retail (A1) and residential (C3) uses.

The proposed office floorspace, occupying some of the ground floor and much of the upper floors is designed to front principally onto High Holborn. In addition, there is a large retail unit at ground floor level with separate entry from this street. 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.

The proposed building reaches a height of 8 storeys (plus plant) along High Holborn with a step back along the cornice line at the 7th level. This massing is then extended along approximately one-third of Great Turnstile where the degree of articulation increases with a further step back at the 6th floor level and most notably the commencement of a series of substantive step backs from ground level (thus widening Great Turnstile) towards the residential units at the end of this street. The building steps down significantly along Whetstone Park varying in height between 4 to 8 storeys in response to the more intimate nature of this street and massing of nearby buildings.

Within the application site boundary, ground level enhancement works including repaving are proposed along Great Turnstile and the north pavement of Whetstone Park. Further detail is provided in the Design and Access Statement and the application drawings.

Comparison of Floorspace Table (GEA sq.m.)

The proposed scheme comprises a total of 10,286sq.m. GEA floorspace allocated as follows:

Use	Existing	Proposed
B1 Office	8,690	9,297
A1/A3	298	298 (A1 only)
Residential		668
Total	8,988	10,263

Note : Proposed figures in GEA

By virtue of its height (i.e. over 30m), this application will be referred to the Mayor of London for his consideration.

Consultations

The proposals are the result of pre-application discussions with planning, design, access, sustainability and highways officers at the London Borough of Camden.

Early discussions have also been held with the Greater London Authority primarily regarding environmental sustainable design matters.

4.0 PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in line with the statutory development plan unless material considerations indicate otherwise.

The development plan in this context is the Camden Unitary Development Plan (UDP), 2006. The London Plan, which was published in February 2004, sets the relevant regional planning policy guidance for Camden and London as a whole. Following the enactment of the Planning & Compulsory Purchase Bill, the London Plan is now a component part of the statutory development plan.

In addition, the Mayor has prepared Draft Further Alterations to the London Plan. An Examination in Public (EiP) has now been completed. Whilst relevant, the fact that the further alterations are still progressing through the EiP means that they will have to be accorded less weight than the adopted London Plan.

The Mayor considers that the greatest challenge faced in the London Plan is to accommodate significant growth in ways that respect and improve London's diverse heritage while delivering his vision for an exemplary, sustainable world city. This will involve the sensitive intensification of development in locations that are, or will be, well served by public transport.

Central London is home to many of London's world city activities, including international business and finance, government, culture and tourism. The Mayor recognises that demand for these activities will continue to grow and much of it will require a Central London location.

In addition to the UDP, both Camden and the Mayor of London have published a number of Supplementary Planning Guidance documents.

5.0 KEY PLANNING CONSIDERATIONS

The key planning considerations affecting the redevelopment of Chichester House are:

- Design and the Public Realm
- Land Use
- Daylight and Sunlight
- Noise
- Highways
- Refuse and Servicing
- Accessibility
- Environmental Sustainability
- Archaeology
- Planning Obligations

Design and the Public Realm

The London Plan seeks to promote world class design in London (Policy 4B.2). The Plan goes on to state that development proposals should show that developers have sought to provide buildings and spaces that are designed to be beautiful and enjoyable to visit, as well as being functional, safe, accessible, sustainable and inclusive for all.

Camden's UDP makes clear that the Council wants Camden's buildings, spaces and places to be of the highest quality. Policy B1 sets out the design principles for new development and matters that will be taken into account in assessing the design of a development. These considerations include building lines, design of neighbouring buildings, quality and appropriateness of materials and provision of interesting facades at street level.

The architects of the scheme have taken account of all of these factors from the outset of the design ensuring the development accords with the qualitative objectives and design principles of national, strategic and local design policy.

Demolition

The Design and Access Statement identifies that the existing Chichester House is a 1960s building which has reached the end of its useful life. The building has no distinguishing architectural features and is a rather bland product of its time. The subject site also lies outside any Conservation Area and therefore demolition is considered acceptable.

Architectural Design

The proposed building has been designed to ensure that it respects the surrounding townscape, and the setting of nearby listed and other buildings within the local environment including those within the Bloomsbury Conservation Area.

The existing building fronts High Holborn in a run of buildings that generally contain a consistency in perceived height along either side of the road. Above this consistent roof or cornice line, there are a variety of setbacks with, for example, Mid City Place

risers to 10 storeys directly opposite Chichester House. Along the narrow Great Turnstile there is the side profile of the office building residing above Penderel's Public House (approximately 9 storeys) with the new office/residential development at 12-15 abutting to the south. Both the street environment and outlook then open out at the junction of Whetstone Park and Great Turnstile looking towards Lincoln's Inn Fields and properties facing onto the open space. The height and massing of buildings is generally lower in this area at between 4-7 storeys.

As outlined in the Design and Access Statement, the massing of the proposed building has been maintained on the High Holborn frontage to respect the general heights of buildings along this street, although the upper levels have been setback consistent with the prevailing streetscape. The proposed height and massing along Great Turnstile and Whetstone Park frontages also respect their surroundings.

Careful consideration has also been given to the elevations of the new building following extensive discussions with Camden Planning and Design Officers. In general, the design intent has been to balance the requirements of an attractive contemporary office environment with the enhancement of the urban grain, scale and texture of the surrounding environment in High Holborn, Great Turnstile and Lincoln's Inn Fields to the south. The design of each elevation has therefore been designed to recognise and respond to the differing urban qualities of, for example, the more historic context of Lincoln's Inn Fields or the more contemporary environment along High Holborn. Material selection also provides for a contrast of textures and colours. This includes a palette of Portland Stone, mix of glazing types and a rendered finish to the housing units. Further detail, including potential artwork along Great Turnstile, is provided in the Design and Access Statement.

Overall, the proposed scheme responds to the policy context for the site, realising its development potential, whilst respecting the scale and character of the surrounding conservation areas and listed buildings. The exterior of the proposed building represents a well considered synergy of architectural features, building materials and organisation to improve the attractiveness of the area.

Views

The Design and Access Statement identifies important local views of the site and any new proposals will need to be considered in the context of these views.

Important local summer and winter views of the site include:

- From the south, including both a close and longer 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
- Views of the site from the east and west along High Holborn

The Design and Access Statement provides existing and proposed views from these selected locations. It is considered that the height, bulk, massing and detailed design of the proposal is such that the scheme will not be detrimental in local views of the site and relates well to the context within which it is set. This has been agreed with Council officers.

The site has, to date, fallen partly within the strategic view of St Paul's Cathedral from Greenwich Park as prescribed within RPG3A. As identified in the London Plan (2004) the Mayor has sought to replace these strategic view directions with the preparation of the London View Management Framework SPG (LVMF). The LVMF was adopted on July 13 2007 and new directions from the Secretary of State have been issued. The LVMF redefines this View and the subject site now lies outside the revised Vista. In addition, no new view within the draft document affects the site.

Great Turnstile

The existing building extends to the property boundary extending the full length of Great Turnstile. The resultant narrow space has low amenity and little natural surveillance. The staggered setback of the proposed buildings offers an unparalleled opportunity to recast and improve the quality and usability of this pedestrian/cycle route. The resultant increase in width (over land within the subject site) and upgraded paving provides a more inviting, brighter and safer space for all users.

Safety and Security

The problems of rough sleeping and other anti-social behaviour along the narrow Great Turnstile and its environs are known. A part of the success of this project at ground level will be its ability to significantly reduce these unwanted activities and create a safer, more pleasant area to live, work and visit.

This has been a strong consideration in the design of the proposals and the team is firmly of the view that the enhancements including opening up the narrow Great Turnstile, new paving and the potential introduction/contribution of CCTV (subject to further discussion with the Council, Metropolitan Police and The Holborn Partnership) will lead to an environment which is significantly more resistant to crime and anti-social behaviour.

In addition, the introduction of an element of housing will promote both passive ownership (overlooking) and active responsibility (reduced tolerance of anti-social behaviour) for the immediate and wider public realm.

In this way the proposal will assist in combating the crime and community issues which impact this location. Crime impact is addressed as part of the Design and Access Statement.

Land Use

Mixed Use

Camden UDP Policy SD3 ~~Mixed Use Development~~+states that the council will seek a mix of uses in development, including a contribution to the supply of housing. The policy seeks, where appropriate, up to 50% of the additional gross floorspace to be allocated as residential use for development adding 200m² or more to the floorspace on site. Paragraph 1.25 further identifies that there is capacity for mixed use development including business and housing within the Holborn Area for Intensification. London Plan Policy 3B.4 also seeks a mix of uses including housing within the CAZ wherever increases in office floorspace are proposed.

The scheme proposes a genuinely mixed use development, incorporating office and retail activities with slightly more than 50% of the additional gross floorspace allocated as residential floorspace.

The new residential accommodation is configured as 6 units at the rear south-eastern corner of the site. As sought, the residential accommodation is independent of other uses within the proposed building and has separate access at street level (Whetstone Park).

The proposal therefore complies with Camden's mixed use policies.

Office

The Mayor considers in his London Plan that there is substantial pressure for further growth in the Central Activities Zone, where the main concentration of employment already exists and where a significant part of the market wishes to continue to locate. As an Area for Intensification this is particularly important.

In response to this, London Plan Policy 3B.3 states that, "The Mayor will and boroughs should seek to rejuvenate office-based activities in the Central Activities Zone and in strategically specified locations in view of their contribution to the London economy and their role in rejuvenating suburban town centres".

The UDP states that Camden, in particular the Central London area, has a strong, diverse economy that makes an important contribution to the economy of London. In this context, Camden Strategic Policy S14 seeks to retain existing business sites and encourage expansion of business development in appropriate locations in order to maintain and expand the economic role of Central London. Policy E2 further seeks to prevent the loss of business uses where there is potential for that use to continue.

The proposed scheme which includes an increase in office floorspace satisfies these aspirations and will further:

- Provide high quality new office space throughout with a much improved working environment
- Generate greater flexibility in accommodation choice and allow team working and communication
- Achieve high standards of building services and energy efficiency throughout the building
- Introduce an environment into which modern Information Technology can be accommodated

Retail

Chichester House sits within the High Holborn Central London Frontage. In general, Policy R7A resists the net loss of ground floor shopping floorspace (A1) and will only grant permission for applications that it considers will not cause harm to vitality and viability. The Council has further prepared Supplementary Planning Guidance on Food, Drink, Entertainment, Specialist and Retail Uses in Central London (June 2004). A revised draft version has been issued for public consultation.

Both adopted and draft Central London SPG provides additional guidance on how the relevant shopping, food and drink and entertainment policies in the UDP are interpreted and implemented. They recognise the important retail function of Central London Frontages and seek to avoid proposals that would cause harm to the area. In part, this is achieved by providing a proportion of the number of units in any defined Frontage as being in A1 use.

Both the adopted and draft SPG do acknowledge however, that in the High Holborn Central London frontage slightly less than half of all shop units are in retail use; that banks are also well represented and that large office entrances break up the continuity of shop units.

The proposed unit (298m²) matches the existing retail on site and is therefore compliant with policy R7A.

The proposed mix of retail and office entry at ground level strikes the appropriate balance in achieving the aims of both the adopted and draft SPG and will not cause harm to the area.

Housing

The proposed development provides 668m² of new residential accommodation apportioned as 6 units comprising 1 x studio, 4x 1bed units and 1 x 2 bed unit. The increased residential floorspace will contribute to meeting Camden's strategic housing target as sought by UDP Policy H1.

Camden UDP Policy H2 seeks residential developments of 15 dwellings or 0.5ha or more to provide affordable housing. The proposed scheme includes 6 new dwellings with a residential site of significantly less than 0.5ha. Thus, this policy does not apply in this context and no affordable housing is required.

The proposed mix of residential units is considered to be an appropriate response taking into account site conditions and the locality. Pre-application discussions with Council Officers indicate that the mix is acceptable and accords with UDP Policy H8. The size of each unit exceeds the minimum standard set out in Camden SPG and each unit will receive adequate daylight and sunlight while enjoying an outlook towards Lincoln Inn's Fields.

Daylight & Sunlight

Policy SD6 of the UDP seeks to take into account sunlight and daylight into and between properties when assessing the impact of development.

UDP supporting paragraph 1.42 states that the Council will apply the standards recommended in the BRE *Site Layout Planning for Daylight and Sunlight . A Guide to Good Practice*+

BRE guidelines note that to *interpret the findings in a flexible manner, consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations*" and that it will wish to "ensure that

surrounding dwellings ... continue to receive daylight and sunlight appropriate to their use and city centre context”.

The only nearby residential properties to the site are the flats residing within the new development at 12-15 Great Turnstile. The recent development includes two studio, five 1 bed, two 2 bed and one 4 bedroom unit within a five storey building with ground floor office use. From their assessment, Gordon Ingram Associates state that *“Having undertaken a full computer generated assessment on the surrounding properties in relation to the daylight/sunlight caused by this proposed development, we confirm that there will be no significant impact to the residential units within 12 -15 Great Turnstile.”*

Gordon Ingram Associates further conclude that *“We are confident that if consent were granted so as to enable the proposed development to proceed, once built the local residents will continue to enjoy relatively the same levels of light than they are currently benefiting from. In our professional opinion the situation that would exist once the total development is in place would not be at odds in any way with the intention and direction of the Building Research Establishment handbook ‘Site Layout Planning For Daylight And Sunlight’.*

It is therefore considered that the impact of the proposed development on the daylight and sunlight amenity to surrounding buildings is acceptable, given the city centre context.

The proposed scheme has been designed so that there will be no loss of privacy and no visual intrusion to neighbouring buildings.

Noise

Policy SD6 and SD7B of the UDP seeks to take into account noise pollution into and between properties when assessing the impact of development. Further detailed guidance is also outlined in Camden’s Planning Guidance (2006).

Policy SD7B makes clear that unless appropriate mitigation measures are available and included the Council will not grant planning permission for development likely to generate noise/vibration pollution.

In accordance with the above, Sandy Brown has been engaged to undertake an assessment of the noise impact of the proposed development on its surroundings. Taking into account likely plant and proposed screening, their assessment concludes that noise from the proposed plant will be controlled to 5dB below background noise at the nearest noise sensitive receivers in accordance with the London Borough of Camden's requirements.

Highways

Relevant UDP Policies on transportation issues cover issues such as car parking, servicing and refuse collection. In particular, Camden UDP Policy T1A seeks development that would encourage travel by walking, cycling and public transport. UDP Policy T7 seeks car free housing in the Central London Area.

The applicant's transport consultants, Mayer Brown, has prepared a Highways Statement in support of the proposed development. The Statement considers transport and movement issues associated with the new development in respect of the road network, bus and underground services, local access and the pedestrian and cycle environment. The scope of this Statement was agreed with Camden officers prior to submission.

The Highways Statement demonstrates that:

- the site lies in an accessible location with good pedestrian and bus links and is within walking distance of the nearest tube station
- the site has a PTAL of 6 which indicates a very high level of accessibility
- on-site parking will be limited to a single disabled space, in-line with sustainable transport policies
- the proposal includes provision of 38 cycle spaces for commercial and residential occupiers consistent with UDP standards
- the development will result in a minor increase in trips to the site, which could be easily accommodated by the local public transport network

- the new development will improve the existing situation regarding the developments servicing and delivery arrangements
- the proposals will not be likely to materially increase accident rates in the area

In summary, Mayer Brown's assessment has demonstrated that the proposal for Chichester House may be comfortably integrated into the local and wider transport network. The proposed scheme provides positive benefit to existing pedestrian movement issues. It accords with both local and regional transport policy.

Servicing and Refuse

In addition to the Highways Statement, Mayer Brown has also prepared a Service Management Plan. This Plan describes the existing servicing and refuse arrangements in detail and outlines future arrangements for proposed retail, office and residential uses.

The ground floor retail uses (currently unoccupied except for one unit) are serviced from High Holborn taking into account any general loading restrictions imposed. Refuse is stored in stacks and placed on High Holborn for collection circa four times a day. The proposed development will maintain these existing arrangements.

Waste from commercial uses (currently vacant) is collected from Whetstone Park with general servicing also taking place from this street. The proposed development will maintain the existing refuse arrangements, with the benefit of an appropriately sized dedicated refuse area next to the service yard.

Existing servicing arrangements will be enhanced as the proposed development incorporates a service yard to allow for off street servicing.

With regard to servicing trips, the assessment shows that there will be approximately 19 servicing trips per day which represents an increase of 2 trips per day from that existing. The majority of these deliveries will be from motor cycles, cars and transit vans with approximately one larger 7.5 tonne box van delivery expected per day.

Accessibility

Camden UDP Policy SD1C identifies that the Council expects all new development to meet the highest standards of access and inclusion. This reflects regional and national planning guidance. To ensure best practice is met, the applicant has commissioned David Bonnett Associates to provide guidance as the design is developed from schematic to detailed design stage. The scheme has therefore been designed to promote the idea of inclusive design.

David Bonnett Associates have consulted with the London Borough of Camden Access Officer to discuss how the proposed development responds to the needs of access and inclusive design. For example, the proposed development includes:

- Level access to the office building and retail unit from High Holborn
- Automated entrance door and clear access to reception/foyer space
- Step free circulation routes, including doors and corridors designed to enable easy movement by wheel chair users
- All residential units are designed to meet or exceed current Lifetime Homes standards (UDP Policy H7)

As there are only 6 units no dedicated wheelchair housing unit is proposed. Further detail on access provision is provided in the Design and Access Statement.

In line with UDP policy T7, there will be a car parking space within the building specifically for disabled users.

Environmental Sustainability

Significant regard has been had to the sustainability policies and provisions in the Camden UDP, the London Plan and additional Supplementary Planning Guidance including Camden Planning Guidance and the Mayor's Sustainable Design and Construction SPG.

Faber Maunsell has prepared a detailed Sustainability Statement, Energy Statement and an Ecohomes, BREEAM Report including retail note. These address, in detail the environmental sustainability issues to be considered for this application. This includes how the proposed development addresses the Mayor's energy hierarchy (use less, supply efficiency, use renewable energy). In summary, the proposed scheme will seek to include the following key measures:

- A significant improvement in energy efficiency of the new building (for example, up to 47% better than a notional building under Part L) by incorporating such measures as improved levels of insulation and air tightness, energy efficient light fittings, control operations through a Building Management System and Chilled Beam office cooling (this alone saves 11% carbon emission annually over conventional Fan Coiled Units)
- Following extensive research, utilising Ground Source Heating and Cooling, Solar Thermal Heating and Solar Photovoltaics to achieve a further carbon reduction of 6.55% from the predicted building carbon emissions of this highly efficient building
- Achieving a preliminary BREEAM assessment score of Excellent for office, Very Good for residential and Very Good for retail (please refer to the Breeam/Ecohomes report for further discussion on the approach to the retail assessment). The Excellent rating for the office area exceeds that targeted under Camden Planning Guidance

The Sustainability Statement further identifies that the proposed redevelopment at Chichester House contributes towards current national, regional and local planning policies with respect to sustainable development, as follows:

- Sustainable location for development, being a brownfield site with very strong public transport links
- Use of sustainable transport is encouraged by the provision of cycle facilities, including showers. One car parking space is provided on site for disabled use (visitors)
- The design proposes to incorporate measures to make efficient use of water. Water efficient fittings are to be specified to both the office and residential units

- The specification of materials will have regard to the whole life environmental impact of construction materials and a Sustainable Materials Specification will be developed, which the contractor will be required to sign up to
- Provisions have been made within the design to enable the segregation and storage of recyclable waste
- Pollution will be minimised through specification of low NOX boilers, specification of refrigerants with low GWP, provision of fully bunded fuel storage areas, and minimal volume and vibration of plant and services
- The building will meet the principles of inclusive design and will be secure
- It is envisaged that environmental impacts during construction are to be minimised through following best practice measures with regards to waste management, waste minimisation, air and noise pollution

The applicant will also register with the Considerate Constructors Scheme and require all contractors to comply with the Mayor and ALG London Best Planning Guidance on Control of Dust and Emissions.

The proposed scheme including energy efficient design, the incorporation of renewable energy technology and other systems (such as chilled beams) provides a highly sustainable development that is in accordance with UDP and London Plan Policy and wider guidance.

Archaeology

The site lies within a defined Archaeological Priority Area within the Camden UDP. Replacement UDP B8B states that the Council will only grant consent for development where acceptable measures are undertaken to preserve remains of archaeological importance and their settings or where this is not possible no development shall take place until satisfactory excavation and recording of the remains must be carried out.

The Museum of London Archaeological Service (MoLAS) has prepared an Archaeological Desk-Based Assessment of the site, in accordance with the UDP and government guidance on archaeology (PPG 16).

This Assessment concludes that there is low potential for the survival of prehistoric remains, moderate potential for Roman burials and a low potential for Saxon and later medieval features to be revealed at the site. The site has a moderate potential for the survival of features of post-medieval date, although it is likely that previous ground reduction will have removed any horizontal stratification (eg floor levels, road surfaces). However, isolated deep features such as cellars, wall foundations, pits and wells could survive below this truncation level.

The Assessment recommends geotechnical work for engineering purposes should be monitored by a competent archaeological organisation. The results will enable an appropriate mitigation strategy if necessary. The assessment further concludes that in light of the degree of past truncation on site, it is unlikely that remains of national significance survive, warranting preservation in situ, and thus mitigation is likely to entail preservation by record, i.e. archaeological excavation or watching brief for remains of lower significance.

Other

An initial Construction Management Plan explaining measures that will be taken to minimise the impact from construction works accompanies this application.

Planning Obligations

Camden UDP Policy SD2 outlines relevant guidance on the negotiation of planning obligations. Paragraph 1.18 identifies items that may be sought through a planning obligation including affordable housing, transport and community safety.

As described above, the application does not trigger the threshold for the provision of affordable housing.

The application provides for the widening of Great Turnstile and York Stone paving within the site boundary. The application drawings also note additional local environmental improvement works including York Stone paving to be agreed with Camden outside the site boundary. Other measures could include

introduction/contribution to CCTV and artwork within the proposed Great Turnstile elevation.

6.0 CONCLUSIONS

The planning application now submitted is in accordance with the relevant planning policy contained within the adopted Camden Unitary Development Plan, the Mayor's London Plan and the relevant Local, Regional and National Planning Policy Guidance. It meets the objectives and aspirations for new development within the Holborn Area for Intensification. It has been the subject of extensive discussions with planning, access and design officers.

The proposed development will provide high quality mixed use accommodation with new office space to suit modern occupier requirements, appropriate replacement of retail floorspace and provision of new housing. It has been designed to the highest architectural quality having regard to its local context and will complement and enhance its surroundings.