

HOLBROOK HOUSE

PLANNING STATEMENT

JULY 2006

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1.0 INTRODUCTION

1.1 This planning statement is submitted in support of a detailed planning application made on behalf of our client, Holbrook House Unit Trust, for the refurbishment and alterations to Holbrook House, Great Queen Street, London. The statement sets out the planning case in support of the application scheme. It summarises the planning history of the site and assesses the development in the context of relevant policies and guidance.

1.2 The proposals are described in greater detail in section 4.0 of this Statement. In summary planning permission is sought for the refurbishment and alterations to the property, including a ground, first and second floor extension on Parker Street, additional floor to the podium block at ninth floor level, replacement plant at roof level, recladding of exterior elevations, alterations to main entrance and reception area, to meet DDA requirements, together with the provision of cycle parking, landscaping and other associated work. The proposed development will upgrade the existing office accommodation in order to increase the quality and flexibility of the floorspace.

1.3 This document provides an evaluation of the proposed development against relevant national, regional and local planning policy and guidance. The statement should be read in conjunction with the plans and drawings submitted as part of the application as well as the following documents, which have been submitted in support of the application. The majority of the uplift in floorspace has been designed for the existing occupier of the building.

- Design Statement (including Sustainability Assessment and Access Statement)
John Robertson Architects
- Transportation Report
WSP Transportation
- Noise Report
WSP Acoustics

- Daylight and Sunlight Review Drivers Jonas
- Desktop Archaeological Assessment MoLAS

1.4 The application has been the subject of ‘pre-application’ discussions with Officers of the London Borough of Camden.

2.0 DESCRIPTION OF SITE AND SURROUNDING AREA

- 2.1 The existing building has frontages to both Great Queen Street and Parker Street, with the principal entrance fronting onto Great Queen Street. Holbrook House is bisected at ground and first floor level by Newton Street, a public highway leading from Great Queen Street northwards to Parker Street. The building bridges over Newton Street at second floor level and above.
- 2.2 Holbrook House is a part twelve and part eight storey building, which was built in the 1960s. To the rear of Holbrook House, fronting Parker Street is a car park which is accessed from Newton Street. Also from the rear, accessed from Parker Street is a service yard, leading to a basement car park, providing 38 car spaces. A site plan is included at Appendix 1.
- 2.3 In terms of topography the application site is broadly flat. The application site covers an area of approximately 2387.3 sqm.
- 2.4 The building is currently occupied by The George Public House, Hercules Pillars Public House, and John Charcol Independent Financial Advisors at ground floor level and a variety of office tenants above. Apart from John Charcol Independent Financial Advisors, and the public houses the leases on the office tenants, will expire shortly. The internal layout of the existing building currently restricts the potential use of the space.
- 2.5 The existing building provides for a mix of commercial uses, with two Class A4 units on part of the ground floor and Class B1 offices above. The existing building provides the following land uses:

LAND USE	GEA (sqm)
Class A4	877.4
Class B1	11,029.5
Car park, Service, Plant	2,114.5
TOTAL	14,021.4

- 2.6 The character of the Great Queen Street and Parker Street frontages are mixed. There is a mix of units at ground floor level along Great Queen Street with further public houses, cafes, restaurants, A1 retail units and offices. The eastern side of Great Queen Street is dominated by the Freemasons Hall, Connaught Rooms and Kingsway Hall Hotel. Parker Street is a mix of mainly A1 retail units and offices. There are residential properties located above commercial premises at 6, 7, 8, 18, 30-31, 34, 35, 37, 38 and 39 Great Queen Street and at 25-37, 34, 58 Parker Street.
- 2.7 The site is very well served by public transport with Covent Garden and Holborn underground stations within a 5-10 minute walk, as well as a high number and frequency of bus services in the vicinity. Great Queen Street is identified as a Metropolitan Walk, which forms a network of walks agreed by the London Walking Forum and endorsed by LPAC in Advice on Strategic Planning for London (1994).
- 2.8 In terms of historic environment, the building is not listed but lies within the Seven Dials Conservation Area, and is adjacent to the Kingsway Conservation Area. The Seven Dials Conservation Area statement identifies Holbrook House as making no positive contribution to the Conservation Area. Great Queen Street has a number of listed buildings within it, including; six, Grade II*, 18th century houses at 27, 28, 29, 33, 34; and a number of Grade II listed buildings including 30, 31, 36, 37, and 38. The closest listed building to the site is Freemasons' Hall,

a Grade II* listed building. The listed buildings and Conservation Areas are shown on a plan contained within the Design Statement.

3.0 COMMERCIAL RATIONALE FOR REFURBISHMENT

Existing Building

3.1 Holbrook House was built in the in the 1960's and now offers restricted accommodation for the following principal reasons:

- Dated internal architecture;
- Low floor to ceiling heights;
- Inefficient floorplates;
- Dated mechanical and electrical services;
- Small entrance hall; and
- Non compliance with Disability Discrimination Act requirements.

3.2 The building is currently multi-tenanted by a variety of occupiers mainly until 2007. The two public houses will remain at ground floor level.

Options for the Building

3.3 The letting prospects for the existing building in its current condition are considered poor given the inherent problems with the building, such as the low floor to ceiling heights and small entrance hall.

3.4 Internally the building has now reached the end of its useful life and a substantial refurbishment of the building must now be considered. In order to justify refurbishment, the building must appeal to a wide market and provide high quality accommodation.

3.5 The proposal for Holbrook House will provide state of the art office accommodation, and will offer a higher profile for the existing building. Given

the location of the building, a refurbished building of this size is expected to appeal to a wide range of potential occupiers from many sectors.

4.0 PLANNING HISTORY

- 4.1 The building was built in the later 1950s to provide 84,000 sqft of office and retail accommodation. Over the years a number of applications have been made for alterations to the building and changes of use to the frontage units. The following section provides a summary of the planning history.
- 4.2 In May 1957 planning permission was granted for the erection of a building and the formation of a new roadway on the site of the Kingsway Theatre and Nos. 7-18 Great Queen Street and Nos. 44-46 Parker Street, Holborn, and for its use for office, shop and public house purposes. In June 1958 planning permission was granted for the erection of a building comprising basement, ground and twelve floors above for use for shop, public house and office purposes and for the formation of a new roadway on the site of Nos. 8-18 Great Queen Street and 44-48 Parker Street. It is understood that the latter of the two permissions that was implemented.
- 4.3 In January 1961, planning permission was granted for the use of the ground floor of 8-18 Great Queen Street and Nos. 44-48 Parker Street for the purposes of (i) a telephone exchange and display area; and (ii) a publicity display area and banking counter, and for alterations to the layout of the ground floor, including the formation of a staff exit and the re-siting of a loading bay.
- 4.4 In February 1974 planning permission was refused for the change of use of the 'Pillars of Hercules' public house, 18 Great Queen Street from a public house to offices on the basement, ground and first floors.
- 4.5 The building was partially refurbished in 1991, following a 1990 planning permission for the erection of new entrance canopy; infill of fireman's balconies from 1st to 11th floors; and installation of additional air conditioning plant on the fourth and eighth floor roofs.

- 4.6 Over the years a number of minor applications have been approved for various alterations, plant and additions to the building, including; installation of new air conditioning system plant on the roof; replacement of timber screen with glazed front; installation of railings to a height of 2 metres and a gate around the rear; installation of permanent cradle access track on roofs above 4th, 8th and 12th floor levels.

5.0 THE DEVELOPMENT PROPOSALS

- 5.1 A full assessment of the proposals is contained in the Design Statement prepared by John Robertson Architects. The key points are summarised in this section.
- 5.2 The proposals are for the refurbishment and extension of the existing building, which will result in an uplift in commercial floorspace of 746 sqm (GFA). The office floor space is broken down as follows:

LAND USE	GEA (sqm)
Class A4	877.4
Class B1	12,411.0
Car park, Service, Plant	1,479.7
TOTAL	14,768.1

- 5.3 This compares with existing floor space of:

LAND USE	GEA (sqm)
Class A4	877.4
Class B1	11,029.5
Car park, Service, Plant	2,114.5
TOTAL	14,021.4

- 5.4 The following works are proposed:

- It is proposed that the building will have a new elevational treatment to the tower with full height high performance glass retaining the existing stone framing and emphasising the vertical nature of this building element. The lower (podium) block will have, by way of contrast, a more horizontal treatment with the fenestration pattern picking up and expressing the lines of the existing structure behind and integrating an element of feature colour. The window cill height will

be lowered to improve the quality of the office space but the majority of the existing stone cladding will be retained. The new façade treatment will upgrade the façade to current Building Regulation standards and will reduce heat loss by a minimum of 45%. In addition, the upgraded fenestration will reduce the solar heat gains by a minimum of 20%.

- It is proposed to add an extension adjacent to the podium building at ground, first and second floor levels on Parker Street. This new extension has been designed to satisfy the requirements of the existing tenant, John Charcol. The extension will have a stone treatment with punched windows to reflect the 'grain' of the surrounding streetscene.
- Public realm improvements are proposed on Newton Street where it underpasses the building at ground level, this includes traffic calming measures, hard landscaping, public art and lighting.
- Hard and soft landscaping enhancements are proposed on Great Queen Street and the other streets.
- The scheme proposes the refurbishment of the office space with new suspended ceilings and lighting and the introduction of '2 pipe fan coil air conditioning' with perimeter radiators.
- It is proposed to reduce the car parking spaces in the basement from 38 to 5 cars. This reduction creates space for a new bicycle storage area for 44 bikes and associated shower facilities. The additional space created in the basement by the loss of car parking spaces, allows the opportunity to create new plant and office floorspace.
- It is proposed to remove the existing plant on the roof of the 8th floor of the podium block and create a new full width eight floor, and create a new floor at level 9. This roof extension will incorporate a new plant area, which allows the opportunity to remove the unsightly plant at this level. All major plant is to be replaced with efficient modern units.
- It is proposed to remove the 13th floor plant room and create a new external plant room at level 12. All the plant will be housed inside new purpose built enclosures.

- The proposals include alterations to the main entrance and reception area which will allow level access from Great Queen Street so that the building complies with the Disability Discrimination Act requirements.

6.0 PLANNING POLICY ASSESSMENT

- 6.1 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 is the London Borough of Camden Unitary Development Plan adopted by the Council in 2000 and the London Plan (2004). Additionally the emerging UDP Review was placed on Deposit in June 2003. A revised Deposit Draft was placed in Deposit in May 2004. A UDP public local inquiry took place in early 2005, and Proposed Modifications were published in January 2006.
- 6.2 Other documents of relevance include, supplementary planning guidance, prepared by Camden and various national and regional planning guidance. In particular Camden has also adopted further policy in relation to mixed use and affordable housing known as Alteration No.2. This was adopted in November 2003, but has been revised in June 2005.
- 6.3 This planning application has been considered in accordance with the following statutory development plans, planning policy guidance and other planning related materials considerations:-
- Camden Unitary Development Plan, Adopted (March, 2000);
 - Camden Unitary Development Plan, Revised Deposit Draft (May 2004);
 - Camden Unitary Development Plan, Proposed Modifications (January 2006);
 - Planning Policy Guidance Notes, various dates;
 - Planning Policy Statements, various dates;
 - The London Plan, Spatial Development Strategy for Greater London, Great London Authority, February 2004;
 - Seven Dials (Covent Garden) Conservation Area Statement (2000);
 - Affordable Housing and Housing in Mixed Use Development Supplementary Planning Guidance (Revised June 2005).

Land Use Considerations

Office

- 6.4 The London Plan recognises London's world city status (paragraph 1.1). Regional policy in the LP emphasises the importance of promoting London, recognising its role as a world class business, commercial, educational and heritage centre and seeking strong, diverse long term economic growth. In particular Policy 3B.2 of the London Plan; seeks a significant increment to current stock through changes of use and development of vacant brownfield sites; seeks the renovation and renewal of existing stock to increase and enhance the quality and flexibility of London's office market offer, in line with policies for maximising the intensity of development; and seeks the provision of a variety of type , size and cost of office premises to meet the needs of all sectors, including small and medium sized enterprises. This is supported by a policy which seeks to rejuvenate office-based activities in the Central Activities Zone (Policy 3B.3).
- 6.5 Both the adopted and emerging UDP is consistent in promoting economic activity in the Central London Area. Under adopted Policy EC3, the Council seeks to retain sites and premises which it considers to be suitable for continued employment use. Policy EC4 states that the Council has defined Central London Area, King's Cross Opportunity Area; Major Centres; and Kentish Town and West Hampstead District Centres as having most potential for an expansion of business development.
- 6.6 Emerging policy E1 states that the Council will grant planning permission for office development in locations by a choice of means of transport.

Assessment

- 6.7 The office provision within the proposed development will comply fully with these policies. The proposed development will refurbish the existing office accommodation in order to increase the quality and flexibility of the floorspace. It has been designed in response to market requirements and will continue to make an important contribution to office supply in the area. The new entrance arrangement will increase the building's presence on the street and improve the quality of the reception space. The accommodation is flexible to allow a high proportion of cellular accommodation or open plan working. The development will assist in meeting the demand for office space within this part of Camden and therefore the competitiveness of the London Borough of Camden as a major office location. The refurbishment will provide for the requirements for a variety of 'medium sized' occupiers. The building will remain a prominent building suited to the many types of commercial and financial occupiers.

Mixed Use

- 6.8 The UDP seeks to encourage a mixture of land uses in the Central London Areas under adopted Policy RE5, which is supported by PPS1, and the London Plan. Camden's policies on mixed use underwent a revision in November 2003, with the adoption of Alteration No.2 to the Adopted Plan of 2000. Revised policy RE5 expects developments to incorporate a mix of uses but states, "where appropriate, up to 50% of the additional floorspace should be for residential uses". The emerging policy SD3 on mixed used development applies the same trigger for the requirement of an element of housing within a development, although the threshold is lowered to 200 sqm. It states ".....the Council will expect a contribution to the supply of housing, and where appropriate will seek to negotiate up to 50% of additional gross floorspace as housing.....". In considering the mix of uses and appropriate contribution to the supply of housing the Council will have regard to:

- a) the character, diversity and vitality of the surrounding area;
- b) the suitability of the site for mixed use development;
- c) the need and potential for contribution of an existing use;
- d) whether the floorspace increase is needed for an existing user;
- e) the need for an active street frontage and natural surveillance; and
- f) 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."

6.9 The policy adds "In developments adding less than 1,000 sqm of floorspace, where a secondary use is appropriate for the area but cannot be achieved on the site, the Council may accept a contribution to secondary uses directly related in scale and kind to the development proposed, either off-site or exceptionally a payment in lieu...".

Assessment

6.10 The development provides for an enhanced office element (the proposed office uplift is approximately 746 sqm) and significant enhancements to the Seven Dials Conservation Area and of the public realm. As discussed with Officers at the pre-application meeting, the scheme cannot accommodate new residential floorspace without compromising the use and efficiency of the building, as outlined below. Whilst it is recognised in proposals involving major demolition and new build, that circumstances exist to provide residential floorspace in a scheme; in this instance it would be impracticable to incorporate small amounts of residential use into this refurbishment scheme.

6.11 The policy does make allowance for an off-site provision or commuted sum to be made in lieu of this provision on-site, as outlined above.

- **On-site provision**

- 6.12 The professional team has examined several options to integrate residential accommodation into the proposed refurbishment.
- 6.13 Firstly, the option of putting the residential component in the Parker Street extension was investigated but as one of the driving forces of the refurbishment was to accommodate an existing tenant, this option was not feasible.
- 6.14 Secondly, the option of putting the residential component in the 9th floor extension was considered. However, given the limitations of the existing structure and the difficulties in accommodating a separate residential access and stair core etc within the refurbished building, it was considered that this proposal was impractical.
- 6.15 Thirdly, the option of converting the north-west portion of the first and second floors of the building to residential accommodation has been considered. However, to create a separate entrance to these units the emergency standby generator would need to be relocated. This is needed to meet Building Regulations requirements for a tall structure. Due to the quantity of fresh air required to run this generator it would be very difficult to locate it in a basement space and is therefore best kept at ground floor in its existing location. Due to this, the horizontal division between the different uses and the loss of daylight that the adjacent office space would suffer, it is considered that this proposal would also not be viable.
- 6.16 Therefore due to the requirements of the existing tenant, the constraints of the existing structure and the difficulties in accommodating a dedicated access it has not been possible to integrate the residential use into the proposal to refurbish the building. In addition the inclusion of a small number of residential units is not financially viable.

- **Off-site provision**

- 6.17 Where it is not physically possible to provide the residential on the same site as the commercial, its provision on an alternative site may be considered under the Council's policy. In this instance 100% of the increase in gross office space should be provided as off site housing. If the off site housing is itself provided in a building converted from offices the requirement is reduced by 50%
- 6.18 A search by commercial agents EA Shaw has been undertaken of sites in the main within the Holborn and Covent Garden Ward (although the search area has also been extended, given the site's peripheral location in the Ward) and consideration was given to all available office properties between 300-1200 sqm.
- 6.19 The results of the search, which were compiled from the *Focus* office database and which have been submitted to the Council under separate cover, demonstrate that no suitable commercial premises that could be converted to residential use are currently available in the vicinity (either freehold or long leasehold).

- **Commuted sum**

- 6.20 Where neither on-site nor off-suite residential spaces can be accommodated, the emerging UDP and SPG states that a financial contribution to the Council's affordable housing fund could be offered. In view of the difficulty in locating a suitable property for conversion to market sale units, it is therefore proposed that the applicants make a commuted payment towards affordable housing. In the absence of an adopted policy position on commuted payments, a viability assessment was submitted with the letter, so that an appropriate contribution can be calculated.

- 6.21 The assessment has been carried out in accordance with the 'GLA Toolkit' financial viability assessment model, which is widely recognised as the most appropriate method for calculating contributions against residual site value. This assessment has been prepared by Ian Stuart of Housing and Economic Development Consultancy, and has been forwarded to the planning authority under separate cover.
- 6.22 In short, the assessment concludes that a contribution of £223,500 in lieu of a provision on-site would be appropriate. This figure is based on the potential profit from 4 units of off-site market sale housing in an office conversion. It is therefore proposed to offer this sum to your Council in lieu of a provision on-site or off-site.

Design

- 6.23 In terms of design, the UDP seeks to achieve the highest standard of architecture and design. Adopted UDP Policies EN13 and EN14 and emerging Policy B1 provide general design guidelines for new development. A number of criteria are applied to the acceptability of a proposed design with the overarching requirement for it to be of a high standard. Of particular relevance to the application site is the need to consider 'the character of the area, in terms of existing land uses and general environmental quality, including its degree of openness; the prevailing architectural style of the area; the scale and general proportions of surrounding development; and the impact of the proposal on existing views and skylines.
- 6.24 Emerging policy B1 lists a number of criteria that the Council will consider when assessing the design of development, these are; building lines and plot sizes in the surrounding area; the existing pattern of routes and spaces; the height, bulk and scale of neighbouring buildings; existing natural features, such as topography and trees; the design of neighbouring buildings; the quality and appropriateness of

detailing and materials used; the provision of visually interesting frontages at street level and; the impact on views and skylines.

- 6.25 Adopted policy EN21 states that in dealing with applications involving alterations, the Council will seek the retention of existing original features or their restoration if they have been lost, where these are either an important townscape element or contribute to the architectural integrity or proportions of a building or group of buildings. Materials which make a positive contribution to the character of the building should be used. Additionally, adopted policy EN22 states that in considering applications for extensions to existing buildings, the Council will seek to ensure that proposals relate to the form, proportions and character of the building and its setting and have regard to the historic pattern of development in the surrounding area. Extensions should be subordinate to the original building in terms of scale, situation or use of materials and should not dominate neighbouring buildings.
- 6.26 Policy EN24 states that the Council will resist inappropriate alterations and extensions at roof level. In determining whether a particular proposal is inappropriate, the Council will have regard to the following criteria:
- (a) the prominence of the roof concerned;
 - (b) the characteristics of the roof and those neighbouring buildings in terms of shape, design, materials, and the existence of traditional features such as chimney stack and protruding fire walls;
 - (c) the symmetry of pairs, and the integrity of terraces and other cohesive building groups; and
 - (d) the proportions and architectural treatment of the building itself and its relationship to the original style and materials of other buildings in the vicinity.

6.27 The emerging UDP, Policy BA3 states that the Council will not grant planning permission for alterations and extensions that it considers causes harm to the architectural quality of the existing building or to the surrounding area. The Council will consider whether:

- (a) the form, proportions and character of the building and its setting, including the garden and nearby trees, are respected;
- (b) the extensions are subordinate to the original building in terms of scale and situation;
- (c) the original features are retained and restored;
- (d) high quality materials that match or complement existing materials are used;
- (e) unsympathetic alterations or extensions are removed or improved;
- (f) the architectural integrity of the existing building is preserved; and
- (g) building services equipment is appropriately located.

Assessment

6.28 A full explanation of the alterations and their relationship to the surrounding urban context is set out with the Design Statement, which is submitted as part of the application. The architects who have prepared these proposals have taken account of all of these factors in the design scheme.

6.29 The proposals for the refurbishment and alterations to Holbrook House have been designed by the architects to a high standard using high quality materials commensurate with a building in a Conservation Area, as described in the accompanying Design Statement. In this way the proposals enhance the Conservation Area (see below). The external appearance will be enhanced, with the re-cladding of the facades, which will significantly improve the exterior of the building and enhance the locality generally. The re-cladding will improve the overall composition of the building and will enliven the public/private realm interface.

- 6.30 The extension at the 9th floor level has been designed in relation to the existing building's architectural character. The roof extension will be constructed using suitable materials to match the existing. The design of the extension ensures that it would cause no material harm to the character of the building or the appearance of the locality. It is considered that this aspect of the proposal in every respect relates sensitively and correctly to the original building, and hence is in accordance with adopted and emerging policy. The application is supported by accurate visual representations, which have been taken in the locality. The AVRs confirm that the extension's impact on the locality would only be minor. It would not have a significant effect on the quality of these views and would not harm the conservation area. The existing plant is being rationalised within the building, and the large amount of plant on the podium block will be removed, and hence the extension on this level is considered to enhance the character and appearance of the Conservation Area.
- 6.31 The two storey extension on Parker Street, will reinstate the street edge and the windowed frontage will encourage interaction/activity of this frontage. The extension at ground and first floor level has been designed to sensitively relate to the building and its surrounding townscape context and will therefore enhance the appearance of the locality, and is hence considered satisfactory in its relationship to the established streetscape. This extension is considered to enhance the Parker Street elevation.
- 6.32 At present disabled access to the building is limited, however the revised entrance arrangement and office refurbishment overcome this issue.
- 6.33 The proposals accord with the qualitative objectives of national and local policies on design having regard for its local context. Detailed design aspects are considered more fully in the architect's Design Statement, which also includes details of a BREEAM Assessment. The refurbishment work will comply with the

energy efficiency standards set down in the 2006 Building Regulations but will also be carried out to achieve a 'Very Good' rating under the British Research Establishment Environmental Assessment Method Office 2006 (BREEAM).

Listed Buildings and Conservation Areas

- 6.34 Planning Policy Guidance 15: Planning and the Historic Environment (PPG15: 1994) sets out guidance to protect the setting of listed buildings and to enhance and preserve the character and appearance of conservation areas.
- 6.35 Paragraph 4.14 requires that special attention be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area.
- 6.36 The London Plan states that the Mayor will work with Strategic Partners to protect and enhance London's historic environment (Policy 4B.10). In addition Policy 4B.11 states that Boroughs should ensure that the protection and enhancement of historic assets in London is based on an understanding of their special character, and forms part of the wider design and urban improvement agenda, and that policies recognise the multi-cultural nature of heritage issues.
- 6.37 There are a number of listed buildings in proximity of the application site, to which this application has had regard to. Adopted policy EN38 and emerging Policy B6 states that the Council will not grant planning permission for development that it considers would cause harm to the setting of a listed building.
- 6.38 The application site is located in the Seven Dials Conservation Area. Adopted policy EN31 states that the Council will seek to ensure that development in conservation areas preserves or enhances their special character or appearance, and is of high quality in terms of design, materials and execution. Applicants will be expected to provide sufficient information about the proposed development and

its immediate setting to enable the council to assess the potential effect of the proposal on the character or appearance of the conservation area. Additionally policy EN33 states that where permission is necessary for the repair or maintenance of unlisted buildings in conservation areas, the Council will seek to ensure that the design and detailing of the proposed works is of a high standard and materials are used which are sympathetic to, or which make a positive contribution to, the architecture and character of the building and its surroundings.

- 6.39 Emerging Policy B7A states that the Council will only grant consent for development in a conservation area that preserves or enhances the special character appearance of the area.

Assessment

- 6.40 The building is given specific mention in the adopted Conservation Area Statement, it states “At the junction with Newton Street is a 1960s office development, part 12 storeys and part six which makes no positive contribution as it is out of scale and character”.
- 6.41 The existing building has plant rooms on the sixth storey and twelfth storey parts of the building, which are set back behind a parapet wall. The relocation and downsizing of the plant on the roofs will represent an improvement to the character and appearance of this part of the Seven Dials Conservation Area. The re-cladding of the exterior will also significantly enhance the Conservation Area
- 6.42 The area of the proposed extension is currently used for housing plant and car parking, and makes this a poorly defined space. It is proposed to replace the ground and first floor level extension which will enhance the appearance of the conservation areas and add to its character.

- 6.43 It is not considered that any nearby listed buildings or structures would be directly affected by the proposals.

Archaeology

- 6.44 Intrusive works in the basement are limited, as illustrated on the plans and drawings; however, in accordance with adopted policy EN42 and emerging policy B8, an archaeological desk study has been prepared by MOLAS and is submitted in support of the application. The MOLAS report concludes that *“based upon information relating to the level of the existing basement within the entire footprint of the site, most archaeological remains will already have been removed by the basement construction, possibly with the exception of very deeply cut features.....it is recommended that any geotechnical work for engineering purposes should be monitored by a competent archaeological organisation.....the results of such an exercise will enable an appropriate mitigation strategy to be recommended by the local planning authority”*.

- 6.45 These actions are in accordance with the advice of UDP policy EN42 and emerging policy B8.

Transport and Servicing

- 6.46 The adopted UDP seeks to ensure that development which attracts a significant net increase in the number of trips is located in areas of the Borough with a high level of public transport accessibility (Policy TR1). The Council will oppose development which is demonstrably harmful to the objective of ensuring sustainable development (Policy TR2). Policy TR10 encourages measures to restrain the use of motor vehicles, especially commuting by car.
- 6.47 Travel by means other than the car is encouraged generally by transport policies. Adopted Policy states that in considering development proposals, the Council will

take into account the likely effect upon on-street parking and policy TR12 states that the Council will endeavour to deter non-essential vehicle trips by controlling supply of private non-residential parking space.

- 6.48 The adopted and emerging UDP set out maximum car parking standards which vary by type of use. Policy TR14 states that public off-street parking will only be allowed where it can be shown to meet an essential need and provided the applicant enters into an agreement for a management scheme and pricing structure, including annual reviews, to deter car commuter parking.
- 6.49 Emerging policy T1A states that the Council will grant planning permission for development that would encourage travel by walking, cycling and public transport. Additionally, emerging policy T3 states that the Council will only grant planning permission for development that it considers making satisfactory provision for pedestrians and cyclists. Additionally emerging policy T7 states that the Council will only grant planning permission for development that complies with the Council's Parking Standards.
- 6.50 The UDP seeks to reduce the volume of motor vehicles on Camden's roads (Policy TR10). This is reflected in the UDP parking standard which seeks a maximum of one space per 1,000 - 1,500 square metres in Central London Areas and a minimum of 5% of this for disabled parking bays to comply with Policy TR12. The emerging UDP sets a maximum of 1 space per 1,500 square metres for office development in the Central London Area.
- 6.51 The London Plan seeks to improve conditions for walking at Policy 3C.20. It requires boroughs to ensure that safe, convenient, accessible and direct pedestrian access is provided from new developments to public transport nodes and key land uses. The London Plan also seeks to improve conditions for cycling at Policy 3C.21. This policy encourages the provision of sufficient and secure cycle parking facilities within developments. The UDP seeks to improve conditions for the

convenience and safety of pedestrians, to reduce walking times and to enhance the pedestrian environment (adopted Policy TR21).

- 6.52 Adopted Policy TR22 requires developers to provide adequate facilities for cycle movement and parking, which is appropriate to the particular development. New developments are required to provide private parking spaces for cycles. The development standards in the UDP clarify that in B1 office developments one cycle space should be provided for every additional 500 square metres of office floorspace. The emerging UDP requires 1 cycle space per 250 square metres of office floorspace, plus additional for 10% of anticipated visitors.
- 6.53 The adopted UDP requires adequate provision for goods and service vehicles within all developments in line with development standards (SH14 and TR23).

Assessment

- 6.54 The application site is well served by mainline, London Underground services and bus routes.
- 6.55 The existing basement currently provides 36 car parking spaces, with 9 car parking spaces and 5 motorcycle spaces within the site boundary at street level. As part of the application it is proposed to reduce this to 5 spaces, one of which will be designated for disabled use, which accords with both the adopted and emerging policy. It is expected that the majority of visitors who would have travelled by car are likely to transfer to taxi or public transport.
- 6.56 In accordance with UDP policy the application proposals include provision for 44 cycle spaces, and associated shower facilities.
- 6.57 The site is constrained in servicing terms, and this refurbishment presents limited opportunities for improving the current situation. It is not proposed to alter the

servicing strategy to the building. The servicing activity will continue to take place with managed vehicle movements.

- 6.58 As part of the proposals it is proposed to create a raised speed table along the length of Newton Street , to improve pedestrian safety around the building. This is discussed more fully in the Transportation Statement, prepared by WSP.

Noise

- 6.59 PPG24 provides national planning guidance regarding the impact of noise, which is identified as a material consideration in the determination of planning applications. It advises that wherever practicable, noise sensitive developments should be separated from major sources of noise. Where separation is not possible, local planning authorities should consider whether it is practicable to control or reduce noise levels or to mitigate the impact of noise through conditions and planning obligations (paragraph 2).
- 6.60 The London Plan seeks to reduce noise by, minimising the existing and potential adverse impacts of noise on, from, or in the vicinity of development proposals (Policy 4A.14).
- 6.61 Adopted UDP policy states that in assessing developments which will place noise generating uses adjacent to noise sensitive uses, or where such uses are proposed in areas that contain noise generating uses already, the Council will have regard to the likely impact on noise disturbance. Although complete elimination of all noise is impracticable, the Council will seek to ensure such disturbance is kept below the threshold levels set out in the Development Standards. Similarly, emerging policy considers noise and vibration levels at policy SD6.

Assessment

- 6.62 The application proposes replacement plant within the basement and at roof level. The acceptability of the noise from the development will depend on the existing levels of noise around the site. To assess this, an Acoustic Assessment has been carried out, by WSP Acoustics to enable an assessment of the impact of the proposals on the surrounding properties.

Microclimate and Amenity

- 6.63 At the strategic level, the London Plan states as Policy 4B.9 that “all large scale buildings....should be of the highest architectural quality design and in particular be sensitive to their impact on microclimates in terms of wind, sun, reflection and overshadowing”.
- 6.64 Policy EN19 of the adopted UDP, and policy SD6 of the emerging UDP both seek to take into account sunlight and daylight into and between properties when assessing the impact of the development. In respect of sunlight/daylight the UDP refers to the Building Research Establishment (BRE) standards.

Assessment

- 6.65 Drivers Jonas has reviewed the plans and drawings in relation to daylight and sunlight, and conclude that there will be no effect on daylighting and sunlighting to adjoining residential buildings from the proposed scheme.

Public Realm

- 6.66 The development of a coherent approach to the public realm is strongly advocated within the London Plan (Policy 4B.4) which states that applications will be assessed in terms of their contribution to the enhancement of the public realm.

Policy N4 of the emerging UDP requires proposals to contribute to the provision of public open space, where they are considered likely to increase the burden on existing provision,.

Assessment

- 6.67 The application proposes significant enhancements to the public realm, by providing a new landscaped area to the front of the building on the Great Queen Street. The design of this area provides both hard and soft landscaping, trees and tables and chairs that will encourage sitting and meeting. This space will provide an amenity space for workers and visitors, and will help delineate the space, redefining it and giving it a more definitive role. It is anticipated that it will be better utilised as a result.
- 6.68 The scheme also proposes to improve the public realm on Newton Street where it underpasses the building at ground level. The proposed lighting, and glazing will assist in activating this street and providing visual interest, which will encourage a more pleasant pedestrian experience. In addition it is proposed to upgrade the pavement around the building.
- 6.69 It is considered that the proposed improvements to the public realm would be seen to enhance public open space provision locally.

7.0 CONCLUSIONS

- 7.1 The existing building provides outdated office space, and this scheme proposes to upgrade and modernise the facilities of the building in order to secure a viable future for this prominent building.
- 7.2 As explained above, the development accords with national, regional and local plan policy. The reuse and upgrading of an existing building, is consistent with Central Government, the Mayor's and Camden's objectives for a sustainable approach to land use planning. The proposed development has been designed taking into account adopted and emerging UDP policies, including those on employment, sustainability, transport, design, amenity, archaeology and day-lighting and sun-lighting.
- 7.3 The application proposes a high quality design, which will enhance the Seven Dials Conservation Area.
- 7.4 The proposals improve the access into the building and within the building in accordance with DDA requirements.
- 7.5 The application proposes a reduction in car parking spaces and the introduction in cycle spaces and associated shower facilities.

Appendix 1

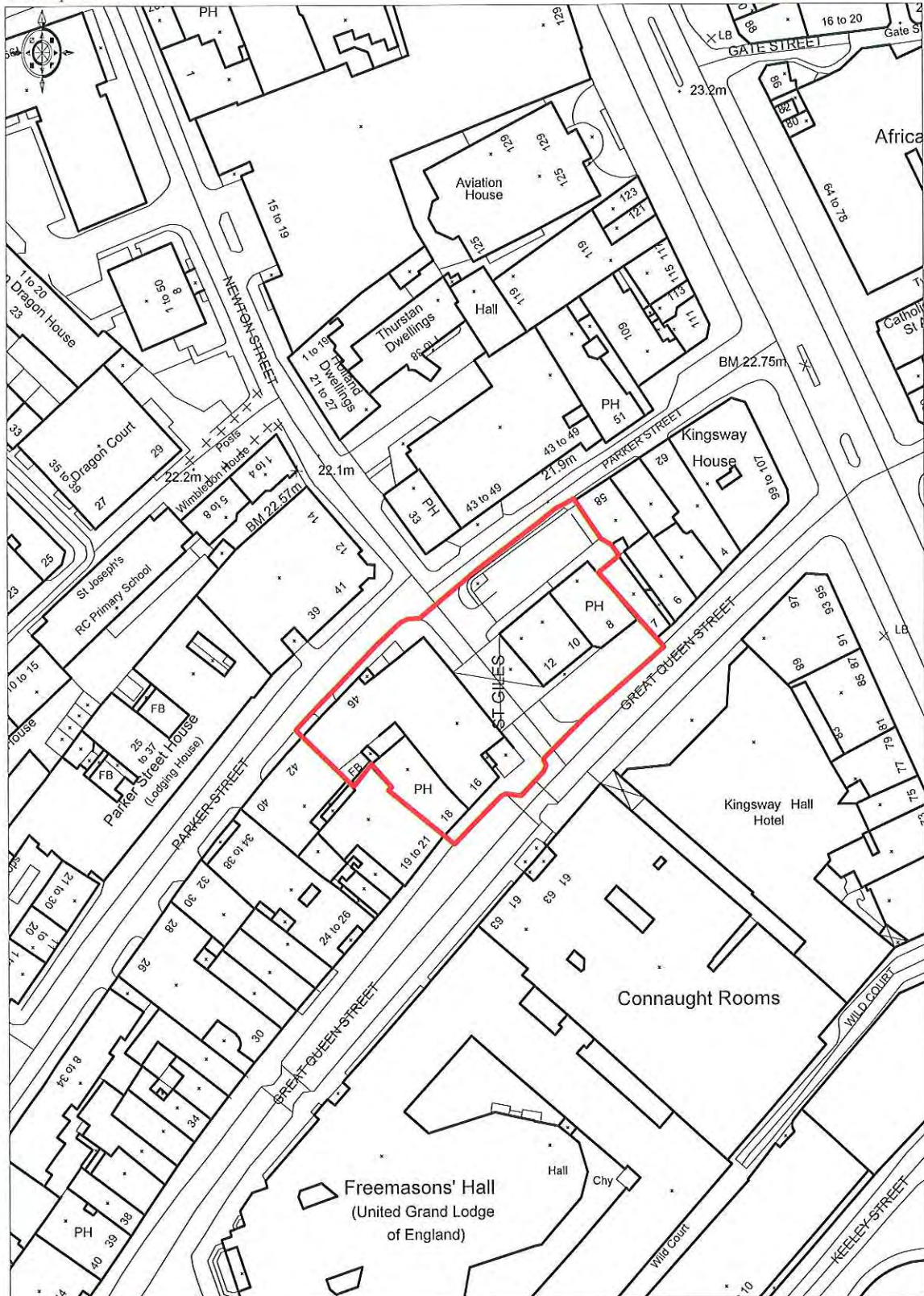
Site Location Plan

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DP9 (1) SITE LOCATION PLAN



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