



**TEMPLAR HOUSE**  
PLANNING STATEMENT  
JULY 2015

**NORTHWOOD**   
INVESTORS  
**ASTUDIO**



**TEMPLAR HOUSE**

**PLANNING STATEMENT**

**JULY 2015**

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## 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Ltd (DP9) on behalf of Northwood Investors in support of a planning application for the redevelopment of the site known as Templar House which is bound by High Holborn to the south and the Eagle Street to the north.

1.2 The redevelopment will provide a mix of office employment floorspace (Class B1), retail floorspace (Class A1-A3), residential units (Class C3) and public realm improvements. The description of development is set out below:

*“Demolition of existing buildings and redevelopment for mixed use development up to 15 storeys in height comprising 17,306 sqm GEA office floorspace (Use Class B1), 607 sqm GEA retail floorspace (Use Class A1-A3), 48 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works.”*

1.3 The proposed redevelopment will maximise the development opportunities of the site to deliver a high quality mixed-use scheme of significant architectural merit. This includes the provision of flexible Grade A office floorspace, attractive retail units and well-proportioned residential accommodation. The proposed development will also provide improvements to the public realm on High Holborn and improvements to the streetscape of Eagle Street.

1.4 The submission of this application follows discussions with a wide range of stakeholders and statutory consultees, including planning, design, transport and housing officers at the London Borough of Camden (LBC), ward councillors, local groups and local residents.

1.5 This statement should be read and considered in conjunction with the plans and drawings submitted as part of this planning application. The Council has confirmed that the following documents are required for the validation of the planning application:

- Completed Application Forms (Inc. CIL form) prepared by DP9 on behalf of Northwood Investors;
- Planning Application Drawings prepared by Astudio Architects;
- Design & Access Statement prepared by Astudio Architects;
- Construction Management Plan Pro-forma prepared by Astudio Architects;

- Townscape, Visual Impact and Heritage Assessment prepared by Peter Stewart Consultancy;
- Daylight and Sunlight Assessment prepared by Gordon Ingram Associates;
- Air Quality Statement prepared by Arup;
- Site Wide Energy Statement prepared by Arup;
- Acoustic Statement prepared by Arup;
- Site Wide Sustainability Statement (Inc. BREEAM pre-assessment) prepared by Arup;
- Transport Assessment (Inc. Travel Plans) prepared by Arup;
- Waste and Servicing Management Plan prepared by Arup;
- Basement Impact Assessment Screening Report prepared by Arup; and
- Statement of Community Involvement prepared by Thorncliffe.

1.6 This document provides an overview of the site and the development proposal and an evaluation of the proposed development against the relevant national, strategic and local planning policy and guidance. The Planning Statement is structured as follows:

- **Section 1** provides an introduction to the document;
- **Section 2** presents an executive summary identifying the planning benefits of the proposed development;
- **Section 3** describes the site and the context of the surrounding area;
- **Section 4** provides a description of the proposed development;
- **Section 5** summarises the planning consultations undertaken;
- **Section 6** sets out the relevant national, regional and local planning policies relevant to the planning application and provides an assessment of the proposed development against these policies; and
- **Section 7** sets out our conclusions.

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## **2.0 EXECUTIVE SUMMARY: THE PLANNING BENEFITS OF THE PROPOSED DEVELOPMENT**

- 2.1 The key planning benefits arising as a result of the proposed development are summarised below:
- 2.2 The proposals will maximise the development opportunities of the site, thereby contributing to the regeneration and economic success of the Holborn Growth Area and the delivery of a minimum of 2,000 new jobs and 200 new homes in the area between 2001 and 2026, as required by planning policy.
- 2.3 Astudio Architects have developed a high quality architectural design for the site in order to maximise the development potential of the site; optimising the provision of commercial and residential accommodation.
- 2.4 The existing buildings comprise 13,937 sqm of GEA office floorspace. This is compromised by an inefficient layout and inadequate access and servicing arrangements for modern office occupiers. The proposed development will deliver 17,306 sqm GEA of high quality office floorspace, designed and arranged efficiently to enable flexible tenancy options on the site. This will create capacity for 850+ full time jobs on the Site, supporting Holborn as a thriving business location within the borough.
- 2.5 The provision of residential accommodation will help to significantly boost local housing supply, thereby seeking to address increasing housing demand alongside creating a balanced local living and working population. The new housing is provided as a range of accommodation, including wheelchair accessible units and large family units, which seek to address the current housing pressures facing the local area.
- 2.6 A contribution to affordable housing in the borough will be defined.
- 2.7 The proposal will promote mixed and inclusive communities. The proposals will contribute towards improving the housing mix in this part of the borough.
- 2.8 The proposed development will improve the pedestrian streetscape environment along High Holborn and Eagle Street.
- 2.9 The site is located within a highly accessible location and therefore is suitable for high density development. The site is well served by public transport and is within close proximity of major London Underground connections.
- 2.10 In terms of sustainability, the proposed development will meet the requirements set at the regional and local level. The building will incorporate energy efficient measures

to minimise carbon emissions. The proposed employment space will exceed the level required for BREEAM 'excellent' standards and the residential accommodation will meet the equivalent standards previously required by Code for Sustainable Homes level 4.

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### 3.0 SITE & SURROUNDING AREA

#### The application site

- 3.1 The site is bound to the south by High Holborn and to the north by Eagle Street, and is recognised within the High Holborn area. The site covers an area of approximately 0.236 hectares.
- 3.2 The existing building, (constructed in 1959) on the site comprises 14,363 sqm GEA of office and retail floorspace up to 9 storeys (+ plant) in height and is laid out as two buildings with frontage to High Holborn and Eagle Street with a connecting block between. The building is served by two independent access cores.
- 3.3 The building is currently occupied by Transport for London (TfL).
- 3.4 The current building also contains 5 retail units with frontage onto High Holborn, providing 426 sqm of retail floorspace.
- 3.5 There is a slight level change from the south of the site on High Holborn, up to street level at the northern part of the site on Eagle Street.
- 3.6 The site is located within the Holborn Growth area.

#### *Heritage and conservation*

- 3.7 The site is located within the Bloomsbury Conservation Area. None of the neighbouring sites are statutorily listed, however there are a number of listed buildings within the wider area.
- 3.8 The site is recognised within local heritage guidance as an unlisted building that makes a positive contribution to the Bloomsbury Conservation Area.
- 3.9 Further information regarding the heritage of the site and the location of listed buildings and their settings in the wider area surrounding the site can be found in the Townscape, Visual Impact and Heritage Assessment (TVIA) supporting application document prepared by Peter Stewart Consultancy

#### *Accessibility*

- 3.10 The site is located within close proximity to the High Holborn London Underground Station providing accessibility to the underground train network. In addition,



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Chancery Lane and Tottenham Court Road stations are within walking distance of the site and a number of buses serve the site along High Holborn.

- 3.11 The site benefits from a Public Transport Accessibility Level (PTAL) of 6b 'Excellent', which represents the highest level of accessibility attainable. This is discussed further in the Transport Assessment prepared by Arup.
- 3.12 With regards to planning history, there are no other recent, relevant planning applications associated with the site.

### **The surrounding area**

- 3.13 The site is located in the Holborn and Covent Garden ward and within the High Holborn area, which is historically associated as a commercial location for business headquarters. Uses along High Holborn are predominantly office buildings and supporting employment uses including retail, hotel and educational uses. The character of Eagle Street is generally subordinate to High Holborn and provides a distinctly quieter thoroughfare. Predominantly, Eagle Street contains servicing access to buildings along High Holborn alongside other commercial uses. There is however also a residential building located on the street as noted below.
- 3.14 This part of the High Holborn area has an evolving character where buildings have been redeveloped at various times throughout the last century to meet occupier/market requirements. Architecturally therefore the local area contains a variety of modern and traditional building styles. This backdrop creates an interesting contrast of building typologies for an area recognised as a thriving business location.
- 3.15 The neighbouring large site to the west was recently redeveloped to provide office accommodation for law firm Olswang LLP. The building, designed by Gensler, provides approximately 23,000 sqm of office floorspace over 10 storeys of accommodation behind a fully glazed façade.
- 3.16 The buildings immediately to the east of the site along High Holborn are typically mid-20<sup>th</sup> Century or earlier and up to 7 storeys in height, comprising retail uses along the ground floor with office uses above. A residential building is located at 79-80 High Holborn. The Old Red Lion public house flanks the block on the corner. The BPP Law School is located within the block and has entrances onto Red Lion Street and Eagle Street.

- 3.17 Further to the east along High Holborn is Mid City Place, a 13 storey building comprising 29,000 sqm of office accommodation designed by Kohn Pedersen Fox Associates and completed in 2001.
- 3.18 To the north of the site at 47-51 Eagle Street is a 6 storey mid 20<sup>th</sup> century residential building comprising residential accommodation with balconies overlooking Eagle Street.
- 3.19 To the south along High Holborn is the Grade II listed Pearl Assurance building which now accommodates the Rosewood London Hotel. In addition, the site is opposite 262-267 High Holborn where planning permission was granted in April 2014 for substantive works to enable the comprehensive refurbishment of and addition to the existing building (ref. 2013/3983/P).
- 3.20 Where appropriate an assessment of the impact of the proposals on the surrounding properties has been undertaken as part of this application.

## 4.0 APPLICATION PROPOSAL

### Summary of overall concept

- 4.1 A full assessment of the proposed development is contained within the Design and Access Statement prepared by Astudio Architects. This Planning Statement should be read in conjunction with the plans and drawings submitted as part of the application.
- 4.2 The concept behind the proposals is to provide a high quality mixed-use sustainable development that maximises the site's employment capacity to provide a new Grade A commercial building on the south part of the site fronting High Holborn alongside providing a well-proportioned residential building on the northern part of the site facing Eagle Street. The overall aspiration is to build on the economic success of the High Holborn area alongside introducing new homes to create a mixed and balanced community within the local area.
- 4.3 Architecturally, the aspiration is to deliver a building of significant quality which provides a vibrant addition to the townscape of the local area whilst preserving the character and enhancing the appearance of the conservation area and nearby heritage assets. At ground level, the brief is to enliven and improve the streetscape and pedestrian environment along both High Holborn and Eagle Street.

### The proposed scheme

- 4.4 The application seeks full planning permission for:

*“Demolition of existing buildings and redevelopment for mixed use development up to 15 storeys in height comprising 17,306 sqm GEA office floorspace (Use Class B1), 607 sqm GEA retail floorspace (Use Class A1-A3), 48 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works.”*

- 4.5 The proposed scheme seeks to demolish the existing building and construct a mixed-use commercial and residential development. The proposed Class B1 office and Class A1-A3 retail accommodation will be provided in a new 15 storey (14 storeys + plant) building to the south along High Holborn. The layout of the core, servicing and access provisions provides the opportunity to provide flexible office floorspace that can be let on a multi-floor or partial floor arrangement commensurate to the requirements of a future occupier. In accordance with the requirements of the office market for this location, the office accommodation has been designed to meet Grade A office standards.

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- 4.6 The principal point of access for pedestrians accessing the new office building will be from High Holborn with cycle and disabled car parking access from Eagle Street. At levels 2, 7 and 10 of the office building, external terraces providing amenity space for tenants will be accessible.
- 4.7 Architecturally, the principal façade to the office building will be constructed from stone reflecting the previous building and other nearby sites. As described within the accompanying Design and Access Statement, the façade is designed to align contextually with the adjoining buildings and respond to established 'shoulder' heights within the immediate streetscape. The upper levels of accommodation will be defined architecturally within a distinctive fully glazed top to the building, providing an attractive and complementary feature to the more traditional lower aspects of the proposed building.
- 4.8 The Class C3 residential accommodation will be provided within a new 14 storey (13 storeys above ground + plant) building to the north of the site on Eagle Street. All residential accommodation will be accessed from an entrance at this point, including cycle access. The ground floor of the residential building will also incorporate a service access point for the entire development. A residential refuse collection point is accommodated at ground floor level to enable collection directly from Eagle Street.
- 4.9 The residential building will contain a residential concierge at ground floor level alongside access for servicing and back of house facilities. A core will then provide access to 11 floors of residential accommodation providing a mix as set out below of 48 residential units. The majority of units will benefit from private amenity space in the form of either balconies or terraced areas.
- 4.10 Architecturally, whilst the character of Eagle Street is subordinate to High Holborn, the design team have consistently aspired to deliver a high quality residential of significant aesthetic value in order to enhance the Eagle Street streetscape and the appearance of the site in local views. The proposals include a mix of stone and glazed terracotta for the façade to the residential mix in order to provide a striking high quality addition to street whilst complementing the heritage context of the local area and reflecting the materiality of the development as a whole. Further details can be found in the Design and Access Statement prepared by Astudio Architects.
- 4.11 The approach towards affordable housing is outlined within the accompanying Affordable Housing Statement prepared by DS2.
- 4.12 It is proposed to provide three new retail units with frontage along High Holborn. The units will benefit from independent access and a fully glazed frontage for maximum

visibility, they will be serviced from the proposed servicing route accessed from Eagle Street.

- 4.13 Between the two buildings, a separation distance will be maintained in order to provide good amenity for the proposed residential accommodation. At the lower level this will provide private amenity space for some of the proposed residential accommodation alongside a service corridor for servicing lower elements of the proposed commercial building.
- 4.14 Cycle parking for the proposed residential and commercial users will be provided at ground floor and accessed from Eagle Street. Additional residential cycle parking will also be provided within individual units. Dedicated changing and showering facilities for employees of the site will also be provided at ground floor level.
- 4.15 The development will be car free with two disabled parking spaces provided within the development for commercial users of the site.
- 4.16 The basement area, largely existing from the current building, will accommodate associated building plant. In addition, the scheme will be supported by renewables including Photo Voltaic panels at roof level.

**Proposed floorspace schedule**

- 4.17 A breakdown of the existing and proposed commercial floorspace is provided in Table 1 below. A breakdown of the proposed residential accommodation is provided in Table 2 below.

*Table 1 – Existing and proposed commercial floorspace*

Use Class	Existing Floorspace (sqm GIA)	Proposed Floorspace (sqm GIA)	Proposed Floorspace (sqm GEA)
Class B1	10,057	16,585	17,306
Class A1-A3	426	578	607

*Table 2 – Proposed residential accommodation*

		Number of units and floorspace
<b>Class C3 Housing</b>	<b>Studio</b>	5
	<b>1 bedroom</b>	18
	<b>2 bedroom</b>	16
	<b>3 bedroom</b>	9
	<b>TOTAL</b>	<b>48 units (6,236 sqm GIA)</b>

\*note that residential GIA figures include apportioned areas for residential entrances, cores, cycle store, waste and residential plant.

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## 5.0 CONSULTATIONS

5.1 The submission of this planning application follows extensive consultation undertaken over a period of more than 6 months. This process has seen the scheme develop through close consultation with LBC officers, as well as local residents, businesses, representative organisations and ward Members.

5.2 Full details of the pre-application consultation can be found in the Statement of Community Involvement prepared by Thorncliffe submitted as part of this application.

### **London Borough of Camden**

5.3 The project team have met with LBC officers on numerous occasions through formal pre-application meetings and meetings with officers to focus on individual disciplines.

5.4 The design has evolved as a result of these meetings with LBC's planning and design officers in line with the advice and comments received, most notably in terms of the reduction in the height of the residential development and amendments to the façade to enable the development to maximise the development potential of the site whilst complementing the surrounding built context and heritage of the local area.

5.5 In addition, discussions have also been held with housing, sustainability and transport officers to discuss the development proposals.

5.6 Through these meetings officers at the LBC have confirmed the following:

- Officers are strongly supportive of the principle of increased employment provision on the site, and providing a higher density employment use with flexible tenancy options to deliver a high quality commercial headquarters building on High Holborn;
- Officers welcomed the proposals for a mix of uses on the site, including residential;
- Agreement was reached with LBC regarding the design principles and materiality of the development proposals;
- Agreement was reached with transport and waste officers in relation to the servicing, waste and access (pedestrian, cyclist and vehicular) strategy for the site;

**Local Members**

- 5.7 The proposed development was discussed with Ward Councillor Awale Olad on 25 March 2015. The discussion was very productive and the Ward Councillor's comments were beneficial to help shape the massing and height elements of the proposed development.
- 5.8 Further discussions with councillors will be pursued throughout the period whilst the planning application is under consideration.

**Other key stakeholders**

- 5.9 In early 2015, a List of Stakeholders was prepared identifying the community groups and other key stakeholders with a vested interest in the site and its redevelopment.
- 5.10 During March and April 2015, the design team met with a number of these groups to discuss the initial proposals. At each of these meetings an outline of the proposals was presented and questions were asked and answered in order to gather feedback on the proposals.

**Public consultation**

- 5.11 A public exhibition was held at the nearby on Monday 22<sup>nd</sup> June and Tuesday 23<sup>rd</sup> June 2015 at the Citadines Hotel at 94-99 High Holborn. Invitations for the exhibitions were sent to all local residents, businesses and members. Approximately 1,500 invitations were sent out for the exhibition and personalised invitations issued to a number of Councillors.
- 5.12 The public exhibitions were held between 3pm and 8pm on 22<sup>nd</sup> June and between 11am and 3pm on 23<sup>rd</sup> June in the hotel. The exhibitions were attended by 23 visitors.
- 5.13 A wide variety of ways to respond to the public consultation were available. Feedback could be given by using the Freephone number, a Freepost address, and a dedicated email address. In total 11 feedback forms were returned, the content of such was discussed with the design and client team.
- 5.14 Following on from the public exhibition, the project team will continue to engage with the local residential and business community to keep them up to date regarding the progress of the development.



**Conclusions regarding pre-application consultation**

- 5.15 The consultation undertaken on the proposals has returned positive levels of support for the scheme. There is a desire from local residents, businesses and members to bring forward a high quality mixed use development on the site. Further consultation will continue during LBC's consideration of the application.
- 5.16 Further details are provided within the accompanying Statement of Community Involvement.

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## **6.0 PLANNING POLICY AND ASSESSMENT OF PLANNING ISSUES**

6.1 This section identifies the statutory development plan which is relevant to the application site, and provides an evaluation of the proposed development against the relevant planning policies. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level there is both planning policy and guidance which combine to provide the framework for the consideration of the proposed development.

### **National planning policy**

6.2 The National Planning Policy Framework (NPPF) was adopted on 27 March 2012 and provides planning policy guidance at a national level and is a material consideration in the determination of planning applications.

6.3 At the heart of the NPPF is a presumption in favour of sustainable development, for both plan making and for decision taking. The NPPF directs local planning policies to approve development proposals that accord with the development plan without delay. The NPPF supports sustainable economic development, including the delivery of new business units, and also seeks to significantly boost the supply of new housing.

6.4 The proposed development will use previously developed (brownfield) land within an area of good accessibility for the provision of new homes and enhanced business space. The NPPF supports mixed use developments, such as the proposed development, which seeks to respond positively to the opportunities for growth. The design has been informed by the principles of sustainability and is therefore compliant with the underlying principles of the NPPF.

6.5 The Government published National Planning Policy Guidance (NPPG) on 6 March 2014, which effectively cancels the majority of previous planning practice guidance documents. This online, up-to-date planning practice guidance is a material consideration in the determination of planning applications, and has been considered as part of our assessment of the development proposals considered within this section.

### **The development plan**

6.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan for the site is:

- The London Plan incorporating Amendments (2015)
- Camden Core Strategy (2010)
- Camden Development Policies (2010)
- Camden Planning Guidance documents (various).

6.7 The London Plan was originally published in July 2011. This document provides the overall strategic plan for London, setting out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. Subsequently, the London Plan has been updated to incorporate 'Revised Early Minor Alterations' (2013) and 'Further Alterations to the London Plan' (FALP) (2015). The updates were incorporated to ensure consistency with the NPPF and address key housing and employment issues emerging from an analysis of recent census data.

6.8 The Greater London Authority (GLA) has produced a number of documents which provide more detailed strategic guidance regarding London Plan policies and are also relevant to the proposed development. These include:

- London View Management Framework (March 2012)
- Sustainable Design and Construction SPG (April 2014)
- The Mayor's Climate Change Mitigation and Energy Strategy (2011)
- The Mayor's Transport Strategy (May 2010)
- The Mayor's Economic Strategy (October 2010)
- Use of Planning Obligations in the Funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)
- Housing SPG (2012)

6.9 Where relevant within the supporting application documents these guidance notes have been referred to. They tend to relate to detailed technical or individual topic matters and have not all been directly referred to in this Planning Statement.

6.10 The London Borough of Camden LDF comprises a suite of planning policy documents to guide and inform development within the borough. The principal documents within the LDF are the Core Strategy and the Development Policies documents which were both adopted in 2010. In order to reflect evolving local priorities, the Council have embarked on a review of the current LDF and the publication of a draft Local Plan. The draft plan was issued for consultation early in 2015, it is anticipated responses to the initial consultation will be considered and incorporated within a further draft for consultation later in the year. As the policies in the plan are only in an initial draft stage, they are not referred to as material considerations however general themes and policy aspirations are cited where relevant.

- 6.11 LBC have also prepared a number of Camden Planning Guidance documents. Where relevant these documents have also been considered.
- 6.12 Guidance in relation to the local Bloomsbury Conservation Area, namely the 'Bloomsbury Conservation Area Appraisal and Management Strategy' (2011) is also considered within this statement and the accompanying submission material.

### **Site designations**

- 6.13 The site is identified within the Camden Proposals Map for the following site designations:
- Archaeological Priority Area
  - Central London Frontage
  - Central London Area
  - Bloomsbury Conservation Area
  - Holborn Growth Area
- 6.14 In addition, Holborn is recognised as an area for intensification within the London Plan.

### **Planning policy assessment**

- 6.15 This section reviews all of the above policies which are relevant to the proposed development and provides an assessment of how the proposed development complies with planning policy in respect of the following:
- i. Land use - the principle of a mixed use development;
  - ii. Land use - commercial floorspace;
  - iii. Land use - residential
  - iv. Residential accommodation, unit mix and affordable housing;
  - v. Amenity;
  - vi. Design and conservation;
  - vii. Landscape, biodiversity and playspace;
  - viii. Energy and sustainability;
  - ix. Transport, servicing and parking; and
  - x. Accessibility.

#### ***i. Land use – the principle of a mixed use development***

- 6.16 Camden Core Strategy Policy CS1 promotes the most efficient use of land and buildings in Camden. The policy directs growth towards locations recognised for high accessibility including the Holborn area and encourages development to provide a mix of uses in these locations, including housing. Further, as required by Development Policies Policy DP1, sites within the designated Central London Area are required to provide up to 50% of all additional floorspace as housing.
- 6.17 Specific to the Holborn area, Core Strategy Policy CS2 identifies a targeted delivery of a minimum of 200 new homes and an indicative 2,000 jobs within the Holborn growth area from 2001 – 2026. This delivery target is maintained within the recent draft Local Plan for the period 2011 – 2026.
- 6.18 As noted, the site is identified as one of the London Plan’s areas for intensification. The plan supports ‘intensification through mixed-use redevelopment at higher densities’ within the Holborn area. In addition, a number of policies within the London Plan emphasise a requirement for mixed use development within highly accessible locations.
- 6.19 Redeveloping the site to create a high quality commercial and residential offer has always been central to the client’s brief throughout the design and development process for the proposals. Through intensification of the site and optimisation of office floorplates, the proposals will significantly increase the commercial floorspace and employment density on the site, providing flexible office tenancy options and enhancing opportunities in the local area for jobs and enterprise. In addition, the proposed residential building will provide high quality new homes to create a mixed and balanced community within a central London location. With regards to addressing Policy DP1, the proposals comply with requirements and provide more than 50% of the uplift of all built floorspace as housing.
- 6.20 The proposals are therefore consistent with the strategic policy aspirations for delivering mixed use developments within highly accessible locations in London.

***ii. Land use – commercial floorspace***

- 6.21 As outlined within the Core Strategy, the growth aspirations for Holborn are based on the redevelopment and intensification of existing properties, particularly offices, at higher densities.
- 6.22 Core Strategy Policy CS8 states that the Council will secure a strong economy in Camden. Further, the Camden Employment Land Review 2008 forecasts that the

demand for offices will increase by 615,000 sqm between 2006 and 2026. To meet this demand the Council identify that they will direct new business towards the growth areas, including Holborn. Policy CS9 provides further support, stating that the growth areas (including Holborn) should contribute towards London's economic role.

- 6.23 In addition, a key aspiration for policy is for development to provide flexible office floorplates that can be offered to a variety of occupiers with different floorspace needs. In particular, London Plan Policy 4.2, highlights a requirement for development to improve the quality and flexibility of office floorspace in viable locations.
- 6.24 With relevance to the existing site, Development Policy DP13 Part c) states that where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that the level of employment floorspace is maintained or increased. Part d) of the policy requires that redevelopment of existing employment sites provides other priority uses, including housing.
- 6.25 As part of a mixed commercial and residential redevelopment of the site, the proposals seek to deliver a high quality efficient office building which will provide a significant uplift in employment density on the site. This represents a provision of 850+ jobs on the site. Intrinsic to the proposed new building's design is its ability to provide flexible floorplates throughout, providing opportunities to let on a multi, single or partial floor arrangement. The proposed development therefore represents a significant contribution towards the Holborn growth area, the local office market and Camden's role within a wider London economy. For the purposes of analysis, the requirements of the policy will be successfully achieved.
- 6.26 In addition, as outlined within the Core Strategy, the Council will seek to increase the availability of ground floor retail uses at Holborn in order to create more active public spaces and a more cohesive local shopping and service area. This includes promoting the shopping and service character of the Central London frontage in Holborn.
- 6.27 Consistent with the retail aspirations of planning policy, the proposals provide 607 sqm GEA of ground floor retail floorspace with expansive glazing to increase visibility of the units and stimulate streetscape activity on the High Holborn frontage.

### ***iii. Land use – residential***

- 6.28 With regard to residential uses, the NPPF seeks to "boost significantly the supply of housing". Paragraph 49 states that applications should be considered in the context of sustainable development.

- 6.29 The London Plan, updated by the recent FALP, identifies the urgent need to increase housing supply in London to address the substantial population increase in the capital. The recently published FALP has proposed an increase in the annual housing target from c.32,000 new homes per annum to at least 42,000 new homes per annum. New housing starts for 2013 fell from the previous year to only 18,000 and when set against these increasing targets identifies the urgent need for new sustainable housing to come forward for early development as part of the mixed and sustainable planning strategies applicable. The proposed development would therefore contribute towards the provision of new housing, in line with the aspirations of the London Plan.
- 6.30 As stated above, all levels of policy support the delivery of housing on the site. Further, development should also seeks to optimise housing potential taking account local context and character, design principles and public transport accessibility in accordance with London Plan Policy 3.4. Overall the site is considered to provide an excellent opportunity to optimise housing potential within this location.
- 6.31 The overarching principle advocated in local Policy CS1 of the Core Strategy requires that developments promote the most efficient use of land and buildings in Camden. Policy CS1 also supports the development of a mix of uses in easily accessible locations in the borough to ensure that the most efficient and optimal use of land. The site is well served by public transport and is therefore capable of accommodating a larger scale, mixed use development.
- 6.32 Development Policy DP1 delivers Policy CS1 by setting out a detailed approach to mixed use development. DP1 states that the Council will require a mix of uses in development where appropriate, including a contribution towards the supply of housing.
- 6.33 As such, it is considered that the proposed redevelopment of Templar House is fully compliant with Policies CS1 and DP1 as it provides mixed use development in a highly accessible location and helps the Council meet their key planning policy objectives.
- 6.34 Core Strategy Policy CS6 seeks to provide quality homes and maximised the supply of housing in Camden to meet local housing need. The proposed development complies with the overall aim of CS6 by providing a site which will contribute towards the Council's housing targets and the local Holborn targets for residential intensification.
- 6.35 Camden Development Policies DP2 seeks to maximise the supply of additional homes in the borough. The development scheme will provide a significant contribution to

the supply of housing on an underused site and therefore the proposal also accords with Policy DP2.

- 6.36 The provision of residential uses on site is therefore considered to be acceptable in principle.

***iv. Residential accommodation, unit mix and affordable housing***

- 6.37 In line with Policy CS6, the development will bring a diverse range of housing products to the market and will provide accommodation of different sizes as can be seen in the Design and Access Statement. All the proposed housing will achieve Lifetimes Homes Standards and 10% have been designed to be wheelchair accessible or easily adaptable for wheelchair users.

- 6.38 The scheme also complies with Policy DP2 which seeks to maximise the supply of additional homes in the borough, especially homes for people unable to access market housing by maximising the use of an underused site and providing on-site affordable housing.

- 6.39 Core Strategy Policy CS6 also aims to secure high quality affordable housing is secured through negotiations to ensure that the affordable housing proposed represents the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development.

- 6.40 An Affordable Housing Statement has been prepared by DS2. This is provided to enable further discussions with officers regarding affordable housing.

- 6.41 In accordance with London Plan Policy 3.5, the proposed development has been designed to meet the Mayor's minimum space standard for new development.

***v. Amenity***

- 6.42 Camden's Development Policy DP26 'Managing the impact of development on occupiers and neighbours' states that the Council will only grant permission for development that protects the amenity of occupiers and neighbours. Assessments have therefore been prepared to assess the impacts arising from the proposed development on daylight and sunlight, acoustics and air quality.

- 6.43 The Daylight and Sunlight assessment was undertaken by Gordon Ingram Associates. The report includes an assessment of the impact of the proposed development upon the existing residential properties surrounding the site, in particular 47-51 Eagle Street, 79-80 High Holborn and 71 Red Lion Street.



- 6.44 Gordon Ingram Associates conclude that whilst there are some transgressions to daylight levels of surrounding properties arising from the proposals, these are minor and further when considering the urban context of the site, the proposed development will not materially affect the enjoyment or use of the surrounding properties.
- 6.45 An Acoustic Report has been prepared by Arup to determine the prevailing noise climate and likely noise levels resulting from the completed development. The report has also been used to undertake an assessment of the acoustic requirements for the external building fabric.
- 6.46 The report concludes that the use of high performance acoustic double glazing in combination with mechanical ventilation will ensure that the relevant internal noise limits in bedrooms and living spaces can be achieved.
- 6.47 The Acoustic Report assesses the likely vibration impact arising on the site as a result of the London Underground's Central Line which runs in close proximity to the site. The report concludes that the tactile vibration will not be an issue for the proposed residential accommodation on the site.
- 6.48 In addition, the report establishes the limiting noise levels for the building's proposed plant. It is considered that these levels can sufficiently be achieved within the proposed plant required for the proposed development.
- 6.49 As required by Camden's Development Policy DP32, an Air Quality Assessment has been undertaken by Arup. Following assessment, the accompanying report concludes that during construction, providing suitable mitigation measures are instigated, there will be a negligible impact on dust generating activities within the local area. For the operational stage of the development, the report concludes that the operation of the proposed development is expected to have an overall negligible impact to the surrounding area and air quality is considered of minor significance in the planning process.
- 6.50 In summary, the proposed development will not have an adverse effect on the amenity of existing occupiers and neighbours. The proposed development therefore fully complies with planning policy requirements.

**vi. Design and conservation**

- 6.51 A full evaluation of the design and the proposed development and its relationship to the surrounding urban and historic context is set out within the Design and Access

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Statement and the TVIA which have been submitted as part of the planning application.

- 6.52 The Government attaches great importance to the design of the built environment. The NPPF states that planning decisions should not attempt to impose architectural styles and should not stifle innovation, originality or initiative (paragraph 60). The NPPF recognises that although visual appearance and the architecture of individual buildings are very important factors, high quality design should also address the connections between people and places and the integration of new development into the natural, built and historic environment (paragraph 61).
- 6.53 In determining planning applications, the NPPF directs that great weight should be given to outstanding or innovative designs which raise the standard of design more generally in the area (paragraph 63). The London Plan Policy 3.5 also advocates quality and design in housing developments.
- 6.54 Camden's Core Strategy Policy CS14 seeks to promote high quality places and conserve heritage assets. The policy requires proposals to be of the highest standard of design that respects local context and character. Development Policy DP24 seeks to secure high quality design.
- 6.55 With regards to heritage considerations, the principal NPPF policy considerations relate to an appreciation for the contribution of the existing building to the significance of the Bloomsbury Conservation Area and the level of harm, if any, that its loss and the redevelopment of the Site would cause to the significance of the designated heritage asset, i.e. the Bloomsbury Conservation Area
- 6.56 Locally, Camden Development Policy DP25 seeks to conserve Camden's heritage by preserving conservation areas, listed buildings and other heritage assets. With specific reference to unlisted buildings that are recognised as positive contributions within conservation areas, the policy resists the demolition of these buildings where the character or appearance of the conservation area is harmed by the proposals.
- 6.57 As the building is located within the Bloomsbury Conservation Area and in close proximity to listed buildings, local views and townscape impacts have been assessed and considered from an early stage in the design process. Additionally, the views of LBC design officers have been influential in the evolution of the design for the proposed massing and architectural form on the site.
- 6.58 The TVIA prepared by Peter Stewart Consultancy states that whilst associated Conservation Area guidance identifies the building graphically as a 'positive building' in the conservation area, it has been cited negatively in other publications as located

within a group of 'uninspired mammoth frontages which are partly war-damage replacements' (Pevsner Guide, London 4: North, 2002, P304), and specifically as '...stone faced, with little Neo-Georgian motifs, by Richardson and McLaughlin, completed in 1959'.

- 6.59 The TVIA also considers an assessment against Historic England's Criteria for assessing unlisted buildings and concludes that the existing building does not make a significant contribution to the Conservation Area. Further, the TVIA analysis of the existing building concludes that whilst the existing building is a 'decent, well-mannered commercial building', it is not considered to be 'architecturally remarkable' and contributes little to the heritage significance of the Bloomsbury Conservation Area. It is therefore considered that there is scope to improve the contribution of the building to the Conservation Area through the construction of a building of greater architectural ambition on the site which would preserve the character of the conservation area, in respect of its historic street pattern, and enhance its appearance.
- 6.60 With regards to the proposed demolition of the existing building, it is considered that the proposals for a replacement building of high architectural quality will preserve key aspects of the Bloomsbury Conservation Area whilst enhancing the local townscape of the building. Further, the Design and Access Statement robustly demonstrates why the retention of existing building would wholly remove the opportunity to meet policy requirements for delivering this high quality mixed use development on the site.
- 6.61 The TVIA concludes that 'the form, scale and architectural approach of the Proposed Development will be appropriate to the character and appearance and significance of this part of the Bloomsbury Conservation Area, and the different street frontages'...'development will enhance the quality of the townscape of the area and the character and appearance and significance of the Bloomsbury Conservation Area'. The demolition of the existing building and its replacement with a high quality mixed use development is therefore considered to be fully justified and in accordance with planning policies and guidance.
- 6.62 The development proposes a very high quality design which will maximise the potential of the site whilst complementing the built context and heritage of the surrounding area. Particular care and attention has been given to the bulk, height and massing of the scheme to avoid any adverse impact on neighbouring properties. It is considered that the proposed design solution is of an appropriate scale and massing.

- 6.63 The design of the proposed scheme has responded to reflect pre-application discussions with the Council's planning and design officers and feedback received from the consultation activities. The application proposal is considered to be of a very high standard of design and architectural quality which will make a significant contribution to improving the townscape quality of the site and its significance within the Conservation Area.
- 6.64 In accordance with Development Policy DP24, high quality materials will be used to provide visually interesting frontages with subtle brickwork detailing. The Design and Access Statement submitted as part of this application provides more detail regarding precedent materials and finishes.
- 6.65 The context of the site has directly influenced the architectural form of the proposals, in particular the 'shoulder' heights of neighbouring buildings have been incorporated into the edges of the proposed facades on both High Holborn and Eagle Street, in order to create a harmonised streetscape. In addition, the proposed chamfering of the office façade reflects a townscape transfer between the neighbouring buildings to the east and west.
- 6.66 The user experience at ground level has been intrinsic to shaping proposals. At High Holborn this involves providing a contemporary double height glazed frontage to maximise visibility and stimulate streetscape activity from the new retail units. Through amendments to the existing building, the proposals introduce new public realm to High Holborn for the benefit of users and passers-by to the site enhancing the wider streetscape of the Holborn area.
- 6.67 With regards to the impact on views and the setting of nearby listed buildings, the TVIA concludes that there will be no harmful effect on the setting of any heritage asset in the surrounding area, including the Bloomsbury Square, Lincoln's Inn Fields and Gray's Inn Registered Parks or Gardens of Special Historic Interest; and the listed buildings identified within the TVIA report.
- 6.68 Overall the proposals are considered to be consistent with the design aims of the development plan and relevant urban design and historic built environment guidance.

**vii. Landscape, biodiversity and amenity space**

- 6.69 London Plan Policy 7.5 seeks to ensure that proposed developments make the public realm comprehensible at a human scale, using gateways and focal points. Landscape treatment and infrastructure should be of the highest quality.

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- 6.70 Core Strategy Policy CS15 states that where development proposals create additional demand for open space, opportunities should be secured for improvements to open spaces including the facilities provided for play, access arrangements and connections between spaces. The policy encourages biodiversity in the borough through the provision of biodiverse green or brown roofs and new trees and vegetation.
- 6.71 Core Strategy Policy CS15 aims to protect and improve open spaces and encourage biodiversity by creating the provision of new or enhanced habitat through green areas etc and by protecting trees and promoting the provision of new trees and vegetation.
- 6.72 Development Policy DP24 seeks to ensure the developments consider existing natural features, provision of appropriate hard and soft landscaping including boundary treatments and the provision of appropriate amenity space.
- 6.73 The site does not currently benefit from any landscaped or green areas and therefore provides no current ecological value. The adjacent tree however along High Holborn provides some ecological value and amenity to the public realm. The existing tree will be retained and protected appropriately throughout the demolition and construction processes. This will be detailed within the full construction management plan which will be provided pursuant to planning conditions.
- 6.74 The proposed development will provide large areas of brown roof at roof level of each building. This will provide a habitat to native varieties of grass, herbs and flowers. Bird and bat boxes will also be integrated into the new building facades to provide ecological benefit. Further details can be found within the accompanying Site Wide Sustainability Statement.
- 6.75 In relation to residential amenity, the majority of residential units will have access to their own private balconies or gardens. In addition, a 66 sqm roof terrace will also be provided as communal amenity space for the enjoyment of all future residents. Playspace for children will be provided for accordingly.
- 6.76 For the office tenants, subject to the arrangement of tenancy occupation, users of the proposed office building will have access to a terraced area of 178 sqm on level 2 between the two buildings. Office tenants on the 7<sup>th</sup> and 10<sup>th</sup> floors will also benefit from access to terraced amenity areas of 63 sqm and 255 sqm respectively.
- 6.77 Where appropriate on the terraces, it is anticipated subtle planting will be introduced to the amenity areas for the benefit of users and the ecological value of the site.

6.78 Overall it is considered that the development proposals are in accordance with the aims of the LDF policies.

**viii. Energy and sustainability**

6.79 Core Strategy Policy CS13 and Development Policy DP22 promote sustainable design and construction in all new developments across Camden. Care has been taken to ensure the design of the scheme has evolved to incorporate sustainable credentials.

6.80 A Site Wide Energy Statement has been prepared by Arup in relation to the proposed development. In accordance with the London Plan and Mayors Sustainable Design and Construction SPG (2014), the regulated carbon dioxide emissions of the proposed scheme have been reduced by 35% from a Part L 2013 compliant baseline by maximising the contribution of be lean, be clean and be green steps of the Mayor Energy Hierarchy.

6.81 The proposals achieve a 6.4% and 13.1% reduction in carbon emissions through passive design features for the residential and commercial buildings respectively. This is achieved through the incorporation of highly efficient glazing within the residential building and LED lighting within the commercial building.

6.82 To further reduce the carbon dioxide emissions, an assessment of potential low and zero carbon technologies has been undertaken which provides a further 8.2% and 1% reduction in carbon emissions for the residential and commercial buildings respectively.

6.83 In addition, a renewable energy feasibility study has been undertaken as part of Arup's assessment. It is proposed that photovoltaics are provided at roof level to achieve further reductions in carbon emissions.

6.84 Whilst there is no district heating network located within the vicinity of the site, the development is futureproofed to enable a connection in the event that it could be connected to a district heating network in the future should a network be developed nearby. Further detail is provided within the accompanying Site Wide Energy Statement.

6.85 Overall the proposed development is compliant with GLA guidance and is considered to be acceptable in principle.

6.86 Arup has also prepared a Site Wide Sustainability Statement in relation to the proposed development which includes a BREEAM Pre-Assessment.

- 6.87 The report concludes that the scheme will achieve BREEAM New Construction 2011 rating 'excellent' for the B1 employment element of the scheme, achieving a total score of 76%. This BREEAM rating is over and above the requirement required under Camden Development Policy DP22, which requires developments to achieve BREEAM 'very good' rating up to 2016.
- 6.88 With regards to recognising the sustainability attainment for the residential building, despite the Code for Sustainable Homes Assessment having been withdrawn, the development has been designed to achieve an equivalent level of Code for Sustainable Homes Level 4.
- 6.89 Overall the proposed development at Templar House achieves excellent levels of sustainability and is considered to be in accordance with planning policy requirements.

***ix. Transport, servicing and parking***

- 6.90 A full evaluation of the proposed development in terms of traffic and transport is provided within the Transport Assessment prepared by Arup. The site is very well served by public transport and provides an opportunity for a sustainable development in transport terms. The principles of transport, servicing and parking have been discussed previously with the Council's transport officers.
- 6.91 A comprehensive assessment of the existing public transport accessibility has been undertaken by Arup which concludes that the site has a PTAL rating of 6b, this identifies the site as having excellent levels of public transport accessibility.
- 6.92 As required by both local and London wide planning policy, the proposed development will be car free, with the exception of two disabled car parking spaces designated for the commercial uses and accessed from the service entrance on Eagle Street. This represents a substantial reduction of 31 car parking spaces currently on site. The predominant method of travel for workers, residents and visitors to and from the development is likely to be by public transport, walking or cycling.
- 6.93 The scheme has been designed to encourage sustainable travel and provides attractive and easy to use cycling facilities including cycle parking and dedicated showers, changing areas and lockers for occupants of the commercial building. In total the scheme will provide 236 cycle parking spaces which will be located in internal secure areas. This level of provision meets the recently published London Plan requirements and BREEAM standards.

- 6.94 The proposed development scheme is not dependent on travel by public motor vehicles but will encourage opportunities for users of the site to travel by sustainable means. Detailed Travel Plans for both residential and commercial users of the site have been prepared by Arup and accompany this application. Overall therefore the scheme is considered to be in accordance with Core Strategy Policy CS11 and Development Policy DP16 and DP17 which promote sustainable and efficient travel.
- 6.95 The proposals are also in accordance with Development Policy DP18 which seeks to limit the availability of car parking spaces and ensure that development provides the minimum necessary car parking provision. As stated above, the development is only seeking to provide 2 disabled car parking spaces, representing a significant reduction on the existing quantum of car parking spaces and therefore the scheme is considered to comply with this policy requirement.
- 6.96 A Delivery, Servicing and Management Plan has been prepared by Arup as part of this application. This sets out the refuse and servicing strategy for the site, of which has been discussed and agreed with the LBC's transport and waste officers.
- 6.97 All commercial servicing for the development will take place from the servicing bay accessed from Eagle Street. Vehicles associated with servicing the commercial building will be a maximum of 8m in length and will leave in turn around within the site, leaving in forward gear as required by the Council's guidance.
- 6.98 Residential deliveries will be serviced from within the site. Residential waste will be collected by the Council's refuse vehicle from a roadside drop off point.
- 6.99 Further details relating to the servicing of the site are provided within Arup's report.
- 6.100 It was agreed with the LBC transport officer that a Construction Management Plan Pro-forma relating to the proposed development would be provided as part of the submission. This has been prepared by Astudio Architects to accompany this application. Further details, relating to provisions to be undertaken by a contractor, will be submitted subsequently as part of a more detailed Construction Management Plan following the formal appointment of a contractor.

**x.      *Accessibility***

- 6.101 London Plan Policy 3.8 and Camden Development Policy DP6 refers to lifetime homes and wheelchair housing and requires that all housing development should be built to Lifetime Homes standard. In addition 10% of homes developed should either meet wheelchair housing standards or be easily adapted to them. As stated early in this section, the development proposals include 10% of units to meet Camden wheelchair



housing standards. Further details regarding the scheme accessibility can be found in the Design and Access Statement.

- 6.102 Policies DP29 and CS14 promote achieving the highest standards of access in all buildings and places, require schemes to be designed to be inclusive and accessible and seek to promote fair access and remove barriers that prevent people from accessing facilities and opportunities.
- 6.103 The development proposal has been designed to ensure that the building and space around it is inclusive and accessible to all through the provision of two disabled car parking spaces for the commercial building. As detailed further within the Design and Access Statement, the design of both the commercial and residential buildings incorporate design measures to ensure that inclusive accessibility is maintained across the site.
- 6.104 It is therefore considered that the proposals are consistent with the aims of the London Plan and LDF Policies CS14, DP6 and DP29.

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## 7.0 CONCLUSIONS

- 7.1 The application provides an opportunity to develop a vibrant mixed use scheme to secure important economic, social and environmental benefits whilst achieving the essential objectives of sustainable development.
- 7.2 The uplift and enhancement of commercial floorspace on the site will make a significant contribution to the quantum and quality of office space within the Holborn area. The proposed internal layout of the office floorplates will enable the building to provide an array of flexible tenancy options; providing additional jobs and supporting the business needs of Camden and the wider London economy.
- 7.3 The provision of residential uses as part of the mixed use redevelopment of the site will seek to ensure the proposals positively contribute towards optimising the potential of the site and towards meeting the Council's housing targets. The introduction of residential accommodation on the site will add vibrancy to the local area and contribute towards achieving a balanced living and working population within Holborn.
- 7.4 The proposed development has been informed following a series of meetings, discussions and public exhibitions with officers from the London Borough of Camden, local groups, local residents and members. During this process, feedback has been incorporated into the design and development of the proposals and alterations have been pursued appropriately.
- 7.5 Astudio Architects have designed a development of significant architectural quality which relates positively and sensitively to the setting of the site and the surrounding Conservation Area. The Design and Access Statement outlines the proposals in further detail.
- 7.6 The scheme has been designed to meet sustainability requirements at national, regional and local level. The building will combine energy efficient measures and renewable energy measures to minimise carbon emissions. The proposed employment space will meet BREEAM 'excellent' and the residential accommodation will achieve equivalent standards to the previous Code for Sustainable Homes level 4.
- 7.7 The Transport Assessment demonstrates that the site has excellent levels of public accessibility to meet the scale of the development proposed. The proposed development will be car free and will encourage users of the site to use sustainable methods of transport.

- 7.8 Overall the development proposals for Templar House are considered to be fully compliant with planning policies at the national, regional and local level.
- 7.9 The proposals for a high quality mixed use development on the site will secure significant benefits in a highly accessible location and should therefore be supported.