

Planning Statement

19 – 21 High Holborn

The Honourable Society of Gray's Inn

February 2015





Contents

1.	Introduction	1
2.	Context of the Proposal	5
3.	The Proposed Development	7
4.	Planning Policy Framework	9
5.	Planning Assessment	11
6.	Conclusions	25

Appendices

Appendix 1- Pre-application advice from London Borough of Camden

1. Introduction

- 1.1. This Planning Statement has been prepared by Savills and is submitted in support of a full planning application and Listed Building Consent made on behalf of the Honourable Society of Gray's Inn (the applicant) for the redevelopment of 19- 21 High Holborn (the site) within the administrative boundary of the London Borough of Camden (LBC).
- 1.2. The application site measures approximately 0.12 hectares (ha). The site currently comprises a retail unit (Use Class A1), offices (Use Class B1) and ancillary residential accommodation (Use Class C3) in two singular, four and seven storey (and basement) buildings which both front High Holborn. It also comprises a service yard which leads to an exit on Gray's Inn Road. The building located at number 21 High Holborn comprises a Grade II listed building (known as the Gray's Inn Gatehouse). The site is located partially within the Bloomsbury Conservation Area
- 1.3. The site's context is predominantly dominated by non-residential land uses, with some limited residential uses. The built form is varied in terms of its architecture, and ranges between four and eight storeys in height. The site is bound by Gray's Inn to the north, to the south by High Holborn, and to the east by a six storey retail and office block, and to the west by the Grade II listed Cittie of Yorke public house.

Application Submission

- 1.4. Full planning permission and listed building consent is sought for the following:

"Refurbishment, extension and part change of use of existing building to provide a mixture of uses including retail, office and ancillary uses, involving roof, rear and basement extensions comprising 937 sq m of additional floorspace and associated plant. As part of a land use swap with 12 Gray's Inn Square"
- 1.5. The application should be considered in conjunction with planning and listed building applications at 12 Grays Inn Square, where it is proposed to carry out a change of use from offices to residential flats.

The Applicant

- 1.6. The Honourable Society of Gray's Inn is one of the four Inns of Court which have the exclusive right to call men and women to the Bar of England and Wales. The Inn exists to support, educate and develop its student barrister members and to provide continuing professional development to its qualified barrister members in accordance with its historic traditions.
- 1.7. The Gray's Inn Estate comprises the "Hall", the "Treasury Office", a library, a chapel, commercial floorspace, residential units, parking and gardens.

Overview of the Development Proposals

- 1.8. The development proposals comprise three elements, detailed as follows:
- 19 High Holborn: The proposed scheme includes the erection of single storey (275 sq m) at the roof level at 19 High Holborn, overall the building will rise to eight storeys in height. In addition, at basement level the existing basement will be extended by 100 sq m and the rear of the building will be demolished and a new extension of 562 sq m up will be added rising to five storeys. Use Class A1 floorspace will be at ground floor and basement level, with Use Class B1a floorspace located from the first floor upwards.
 - 21 High Holborn: The facades of this building will be upgraded, works will include the restoration of the facade, including replacement window frames, new roof materials and thermal performance improvements to the facade. Roof top plant will be provided behind a screen. Roof top plant will be provided behind a 1.8 metres high screen and set back from the building edge by 3.4 meters (to the edge of the mansard) to the north and to the south.
 - Land Use Swap: As part of the internal conversion and reconfiguration works at 19 – 21 High Holborn, a change of use from two ancillary residential units to office (Use Class B1) is proposed. The replacement residential units will be provided at Number 12 Gray's Inn Square, London, WC1R 5JP. A separate application has been submitted in parallel to formalise this, and both applications should be considered alongside each other.
 - Other: the proposals seek improved landscaping (including soft landscaping) to the route between 19 - 21 High Holborn and the remainder of the Inn, and the Paddock. As part of these improvement, the porters accommodation and servicing area will be improved and a new covered integrated bin and cycle store. To unify the appearance brick cladding is proposed to the rear facades.
- 1.9. The proposals represent an exciting opportunity to deliver refurbished, high quality office accommodation in this key location. Once completed works will assist the applicant in meeting their specialist business requirements.

Pre-Application Consultation

- 1.10. The proposals have been developed in consultation with senior planning and design officers at LBC. This has included an initial pre-application meeting in June 2015 and formal written advice in October 2015. The formal advice received from LBC officers is provided at **Appendix 1**. In addition, accompanied site visits were carried out by officers in August and November 2015 and design workshops have been carried out between the Design Officer and RMA architects.
- 1.11. In summary, the formal written advice covered the following issues:
- summarised the policy position of the site and the relevant planning history;
 - advised that a mix of secondary uses should be provided on site;

- advised that a review of the proposed massing is undertaken and the proposed roof extension should be reduced in height by one storey, whilst the extension the existing sixth storey is pulled forward onto High Holborn. Officers felt these reductions would ensure no undue harm to the heritage context;
 - that enhancement to the facades of the buildings were welcomed; and
 - advised of the required supporting reports.
- 1.12. An exhibition was held on site on 28 January 2016 for neighbouring tenants and landlords to review the emerging proposal.
- 1.13. In addition to the above, the architect has consulted with heritage groups and local groups, including Historic England and the Bloomsbury Conservation Area Advisory Committee.

Supporting Information

- 1.14. The scope and content of the planning application submission was set out during formal pre-application advice. This Planning Statement should therefore be read in conjunction with the accompanying plans and drawings submitted as part of the application, as well as the following documents:
- Acoustic assessment (including Noise and Vibration Impact Assessment) prepared by Waterman;
 - Archaeological Desk Top Survey prepared by MOLA;
 - Civil and Structural Planning Report (including Drainage) prepared by AECOM;
 - Construction Management Plan (draft) prepared by Gleeds;
 - Design & Access and Heritage Statement (including View Corridor Management Assessment) prepared by RMA Architects;
 - Daylight and Sunlight Study prepared by Right of Light Consulting;
 - Energy Assessment prepared by Waterman;
 - External Lighting Design Strategy Report prepared by Waterman;
 - Site in Investigation and Basement Impact Assessment prepared by GEA;
 - Sustainability Assessment prepared by SWH; and
 - Framework Travel Plan (draft) prepared by Waterman.

Structure of this Planning Statement

- 1.15. The structure of this Planning Statement is set out as follows:

Planning Statement

19 – 21 High Holborn



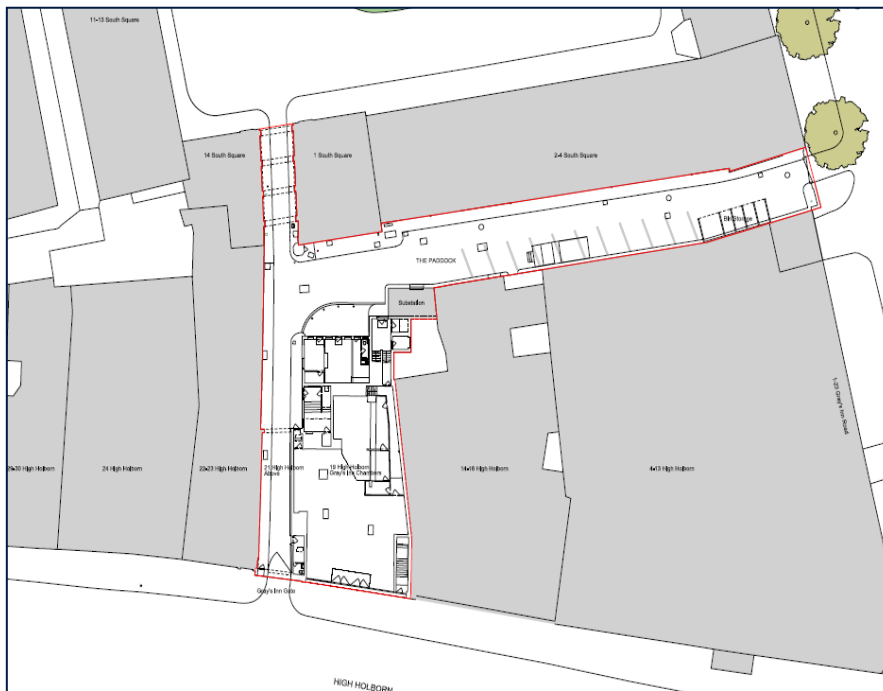
- Section 2 (Context of the Proposals) provides background to the proposal, including a description of the site and surrounding area;
- Section 3 (The Proposed Development) sets out details of the development proposal;
- Section 4 (Planning Policy Framework) sets out the relevant planning policy framework that the proposal is to be considered against;
- Section 5 (Planning Assessment) sets out discussion of the material planning considerations arising from the application proposals; and
- Section 6 (Conclusions) presents our conclusions.

2. Context of the Proposal

Location and Land Use Context

- 2.1. The application site measures approximately 0.12 hectares (ha). A site location plan is provided below at Figure 2.1.

Figure 2.1: Site Location Plan



- 2.2. The site currently comprises a retail unit (Use Class A1), offices (Use Class B1) and ancillary residential accommodation (Use Class C3) in two singular, four and seven storey (and basement) buildings which both front High Holborn. It also comprises a service yard which leads to an exit on Gray's Inn Road. The building located at number 21 High Holborn comprises a Grade II listed building (known as the Gray's Inn Gatehouse). The upper floors of both the buildings are interconnecting, and presently are under-let and partially occupied. The ground floor retail unit is occupied.
- 2.3. The site's context is predominantly dominated by non-residential land uses. The built form is varied in terms of its architecture, and ranges between four and eight storeys in height. The site is bound by Gray's Inn to the north, to the south by High Holborn, and to the east by a six storey retail and office block, and to the west by the Grade II listed Cittie of Yorke public house.
- 2.4. The site is located approximately less than 60 meters west of Chancery Lane Underground Station (Central Line), in addition, there are multiple bus stops within close proximity of the site along High Holborn and Gray's Inn Road, offering services across London. Transport for London have identified the site as having a Public Transport Accessibility Level rating of 6b (excellent).

- 2.5. As set out above, the site comprise a Grade II Listed Building (21 High Holborn- known as the Gray's Inn Gatehouse) and lies partially within the Bloomsbury Conservation Area. The original building on this site was a gatehouse built in 1583, however, it was entirely rebuilt in 1965, over 10 years after it was listed, owing to its foundations slipping. A reproduction of the stucco facade was added in 1967 and the north side was rebuilt in brick.
- 2.6. In addition, to the west the site is bound by the Grade II listed Cittie of Yorke public house. The wider Gray's Inn Estate contains a number of Grade II and Grade II* listed buildings. No 1 South Square, which lies within Gray's Inn to the north of the site is also Grade II listed . Key consideration has been given to site's heritage setting in the supporting Heritage Statement (incorporated within the Design and Access Statement).
- 2.7. The site is situated within the Holborn Growth Area, Central London Area, Central Activities Zone (CAZ), Central London Frontage, an Archaeological Priority Area (London Suburbs) and a designated view corridor (4A.1 Primrose Hill Summit to St Paul's Cathedral- right lateral assessment area).

Planning History

- 2.8. A planning history search has not identified any comprehensive, recent or relevant development proposals for the site. However, of interest are the following applications:
- LPA Ref: 27470: The erection, at 19-20 High Holborn, Holborn, of a building comprising basement, ground mezzanine, and six floors over, for use as a shop in the basement, ground and mezzanine floors, offices on the first to fifth floors, and residential flats on the sixth floor. Planning permission was granted in August 1962;
 - LPA Ref: 27536: Installation of new shopfront (in conjunction with refurbishment of ground floor premises). Planning permission granted December 1978;
 - LPA Ref: 8700092: Installation of a new shopfront as shown on drawings numbered TPHH2D 3 4 and 5. Planning permission granted January 1987;
 - LPA Ref: 8780008: Display of fascia sign measuring 4700mm x 1200mm with illuminated letters (Built up from 3mm acrylic to a depth of 80mm) and a projecting sign measuring 500mm x 780mm internally illuminated as shown on drawings numbered TP-HH-2D and TP/13.Period of consent 1st May 1987 to 30th April 1992. Advertisement consent granted January 1987;
 - LPA Ref: 9180008: The display of an internally illuminated projecting sign measuring 1080 x 600 mm at fascia level (east end) as shown on drawing number DEV.684 issue B revised by letter on 15 May 1992. . Advertisement consent granted November 1991;
 - LPA Ref: PSX0204748: Alterations to north elevation at ground floor level. Planning permission granted July 2002.

3. The Proposed Development

3.1. This full planning and listed building consent application seeks permission for:

“Refurbishment, extension and part change of use of existing building to provide a mixture of uses including retail, office and ancillary uses, involving roof, rear and basement extensions comprising 937 sq m of additional floorspace and associated plant. As part of a land use swap with 12 Gray’s Inn Square”

3.2. A comprehensive description of the proposals for the site is set out in the accompanying Design and Access Statement prepared by RMA Architects. A brief summary of the proposals is also provided below.

3.3. In summary, the development proposals comprise three elements, detailed as follows:

- 19 High Holborn: The proposed scheme includes the erection of single storey (275 sq m) at the roof level at 19 High Holborn, overall the building will rise to eight storeys in height. In addition, at basement level the existing basement will be extended by 100 sq m and the rear of the building will be demolished and an extension of 562 sq m up will be added rising to five storeys. Use Class A1 floorspace will be at ground floor and basement level, with Use Class B1a floorspace located from the first floor upwards.
- 21 High Holborn: The facades of this building will be upgraded, works will include the restoration of the facade, including replacement window frames, new roof materials and thermal performance improvements to the facade. Roof top plant will be provided behind a 1.8 metres high screen and set back from the building edge by 3.4 meters (to the edge of the mansard) to the north and to the south.
- Land Use Swap: As part of the internal conversion and reconfiguration works at 19 – 21 High Holborn, a change of use from two ancillary residential units to office (Use Class B1) is proposed. The replacement residential units will be provided at Number 12 Gray’s Inn Square, London, WC1R 5JP. A separate application has been submitted in parallel to formalise this, and both applications should be considered alongside each other.
- Other: the proposals seek improved landscaping (including soft landscaping) to the route between 19 - 21 High Holborn and the remainder of the Inn, and the Paddock. As part of these improvement, the porters accommodation and servicing area will be improved and a new covered integrated bin and cycle store. To unify the appearance brick cladding is proposed to the rear facades.

Extensions

3.4. Overall the proposals seeks three extensions, one at roof level, one to the basement and one to the rear on 19 High Holborn.

3.5. At roof level, the additional floor at eighth storey will comprise 275 sq m of B1 floorspace. The additional floorspace has been designed to be set back from its frontages in the north and in the south. The existing sixth storey will be extended to the rear, but will be set back from the rear extension.

- 3.6. The basement extension will comprise UKPN Plant, Landlord Plant and additional retail floorspace.
- 3.7. The existing rear extension will be demolished and a new rear extension will be erected on the northern facade which will rise to sixth storey and will comprise 562 sq m of B1 floorspace.
- 3.8. Together the proposed extensions will comprise 782 sq m of B1 floorspace. It is noteworthy to highlight that 133 sq m of this B1 floorspace is relocated B1 floorspace from 12 Gray's Inn Square as part of the land use swap.

Change of Use

- 3.9. As part of the internal conversion and reconfiguration works at 19 – 21 High Holborn, a change of use from two ancillary residential units to office (Use Class B1) is proposed. The replacement residential units will be provided at Number 12 Gray's Inn Square, London, WC1R 5JP. A separate application has been submitted in parallel to formalise this land use swap, and both applications should be considered alongside each other.
- 3.10. In addition there will be a change in use at basement level of 236 Class B1 office floorspace to Class A1 retail. However, the B1 floorspace is being relocated as part of the proposed extensions.

External Alterations

- 3.11. The facades of number 19 will be replaced entirely. This approach will ensure the delivery of good energy efficient building, and an attractive office and retail environment. It is proposed that the materials on this facade compliment the listed building at 21 High Holborn.
- 3.12. The facades of 21 High Holborn will be sympathetically upgraded. The works will include the restoration of the facade through cleaning, the replacement of window frames, new roof materials and installation of internal fabric to enhance thermal performance improvements.
- 3.13. In addition, roof top plant will be provided behind a 1.8 metres high screen and set back from the building edge by 3.4 meters (to the edge of the mansard) to the north and to the south.

Access and Parking

- 3.14. The proposals do not seek to alter the existing access or current car parking arrangements. Within the Paddock a new covered cycle parking area will be provided for 22 cycles.

Energy and Sustainability

- 3.15. The proposed development will utilise sustainable and energy efficient building techniques in accordance with current building regulations. The commercial floorspace will achieve BREEAM UK Bespoke (2014) Non-domestic Refurbishment and Fit-out rating Very Good.
- 3.16. Full details of the energy and sustainability measures proposed are detailed in the enclosed Energy Assessment prepared by Waterman.

4. Planning Policy Framework

- 4.1. The redevelopment proposals have taken account of relevant national, regional and local planning policy. This section of the Planning Statement sets out a brief summary of the relevant planning policy documents and the following section demonstrates compliance with these policies.
- 4.2. In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.
- 4.3. The development plan comprises:
- National Planning Policy Framework (March 2012);
 - The London Plan (March 2015);
 - London Borough of Camden's Core Strategy (2010);
 - London Borough of Camden Development Policies (2010); and
 - Camden Planning Guidance.

National Planning Policy

- 4.4. At the national level, the Government published its National Planning Policy Framework (NPPF) on 27 March 2012. The NPPF provides an overarching framework for the production of local policy documents and at the heart of this document is a presumption in favour of sustainable development. In accordance with the NPPF, this should be seen as a 'golden thread' running through both plan-making and decision-taking.
- 4.5. Within the NPPF are a set of twelve core land-use planning principles which should underpin plan-making and decision-taking and which planning should achieve. In accordance with Paragraph 14 of the NPPF, for decision-taking, this means:
- Approving development proposals that accord with the development plan without delay; and
 - Where the development plan is absent, silent or where relevant policies are out-of-date, granting planning permission unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole; or
 - specific policies in the NPPF indicate that development should be restricted.
- 4.6. The NPPF sets out that the Government expects the planning system to deliver homes, businesses, and infrastructure and to improve local places whilst at the same time protecting and enhancing the natural and historic environment. Paragraph 19 sets out that the Government is wholly committed to ensuring that the planning system does everything it can to support sustainable economic growth, and places considerable weight on the need to support such growth through the planning system. In addition, paragraph 21 sets out that local planning authorities should support existing business sectors, regardless of whether they are expanding or contracting.

Regional Planning Policy

- 4.7. The Greater London Authority (GLA) formally adopted the Further Alterations to the London Plan in March 2015. This provides the spatial development strategy for Greater London and sets out the Mayor of London's overall strategic plan for the city.
- 4.8. The London Plan is supported by a number of Supplementary Planning Guidance (SPG) and Best Practice Guidance (BPG) documents which will be referred to in the following section of this Planning Statement as appropriate.

Local Planning Policy

- 4.9. LBC adopted its Core Strategy and its Development Policies in 2010. Where applicable Camden Planning Guidance notes are referenced below.

Site Specific Allocations

- 4.10. The site has the following designations as identified on the proposals map:
- **Archaeological Priority Area (London Suburbs):** Archaeological Priority Areas are identified areas where there is significant potential for archaeological remains. Development proposals within these areas will need to be assessed and may be required to be accompanied by an archaeological evaluation report.
 - **Central Activities Zone (CAZ):** The Mayor defines the CAZ as being “*the area where planning policy recognises the importance of strategic finance, specialist retail, tourist and cultural uses and activities, as well as residential and more local functions.*”
 - **Central London Area (CLA):** LBC's Central London Area, defines a number of key growth areas which they will support and promote as successful and vibrant parts of London to live in, work in and visit.
 - **Central London Frontage (CLF):** LBC will seek to promote and distribute retail uses in the identified CLF locations, whilst ensuring no negative impact on residential amenity.
 - **Designated View Corridor (4A.1 Primrose Hill Summit to St Paul's Cathedral- right lateral assessment area):** Within the London Plan the Mayor has identified protected vistas, which comprise significant buildings or urban landscapes that help define London at a Strategic level. As such new development within, adjacent to or behind them should not harm the protected view or landmark.
 - **Flood Zone:** The site lies within Flood Zone 1. As such the land is assessed as having a less than 1 in 1,000 annual probability of river or sea flooding.
 - **Holborn Growth Area:** LBC's aspirations for the area include, the provision of a mix of land uses, with offices and residential as the predominate uses, and appropriate retailing along the central London frontage. Amongst others, the growth area seeks high quality, sustainable design, which respects its supporting and preserves and enhances the historic environment.

Planning Statement

19 – 21 High Holborn



- 4.11. As set out above, the site comprise a Grade II Listed Building (21 High Holborn- known as the Gray's Inn Gatehouse) and lies partially within the Bloomsbury Conservation Area. In addition, to the west the site is bound by the Grade II listed Cittie of Yorke public house.

5. Planning Assessment

- 5.1. This section of the Planning Statement assesses the proposals against the national, regional and local planning policy framework as set out above.

Principle of Development

- 5.2. The proposed application site comprises an inefficient use of brownfield land in this key central location. The proposed development seeks to provide high quality office floorspace, which will contribute towards building a strong, competitive, and sustainable economy, as sought by the NPPF. Furthermore the proposal will optimise the potential of the site whilst improving the visual appearance to the benefit of the surrounding area and heritage context.
- 5.3. A presumption in favour of sustainable development is identified as the basis for every plan and every decision in the NPPF. The London Plan Policy 1.1 sets out that growth will be supported in across all parts of London to ensure it addresses the need for development, regeneration and social and economic convergence.
- 5.4. Core Strategy Strategic Policy 1 seeks sustainable development within the borough, and seeks to improve the places where people live and work to enable a better quality of life and respond to the needs of a growing population. The policy states that this will be achieved by encouraging regeneration and by making sure development maximises the site's potential.
- 5.5. In accordance with the aims of sustainable development, the proposed development has been designed to make the best use of the site through the delivery of new high quality office floorspace in keeping with the existing development pattern and local character. We consider the principle of the proposal complies with this aim as it will deliver a range of economic, social and environmental benefits, as detailed below.

Land Use

Non Residential Floorspace

- 5.6. Camden's Development policies seek to encourage mixed use development in the most accessible parts of the Borough. This includes the Central London area, where the site lies.
- 5.7. The main way in which the Council seeks to realise this objective is to require a mix of uses in development schemes where appropriate, and this is implemented through Policy DP1 of the Development Policies. This policy seeks to secure 50% of all additional floorspace (where more than 200 sq m is proposed) in the form of housing as a 'secondary use'. The policy seeks to provide secondary uses on the site, although where this is not appropriate or practical the Council may accept an off site contribution, or provision elsewhere.

5.8. The policy, and the supporting text, goes on to set out a series of criteria which will be taken into account in deciding whether a mix of uses should be sought, whether it is practical and appropriate, and the scale and nature of any contribution toward housing. These criteria include the ones set out below. The supporting text to policy DP1 helpfully provides some explanation as to how and when the criteria of the policy will be applied, and where exceptions will be made.

5.9. We have referred to the relevant supporting text below each criterion below:

- **The character of the development;**
- **Any constraints on including a mix of uses; and**
- **Whether secondary uses would be incompatible with the primary use.**

Comment: Any housing provided under this policy would need to be independent of other uses and have a separate access at street level (para 1.11). Para 1.19 acknowledges that the retention of an existing building (as in this case) may prevent the creation of new features such as entrances, staircases and lifts.

- **The economics and financial viability of the development.**

Comment: Developments which fall ‘significantly short’ of the Council’s expectations in terms of the contribution to secondary uses will be expected to be supported by a financial viability assessment, if development economics have a major impact on the scheme (para 1.21).

- **Whether an extension to the gross floorspace is needed for an existing user.**

Comment: Paragraph 1.23 makes it clear that secondary uses will not be sought where a development is required to accommodate an existing user (for example to provide for the expansion of a business or to consolidate a business’s activities to a single site).

- **Any other planning objectives considered to be a priority for the site**

Comment: The Council recognises that where it seeks other planning benefits from a development, this may limit the potential of a site to provide a mix of uses generally, or housing in particular. Examples may include the need to prioritise uses such as business uses in certain parts of Central London.

5.10. It is therefore clear that the Council seeks a mix of uses where it is appropriate to do so; not in every case. This is confirmed by para 1.8 of the explanatory text which states:

“The need for secondary uses and the precise mix and proportion appropriate will vary in different locations and will be a matter for negotiation, taking into account all the criteria set out in policy DP1.”

5.11. Having regard to DP1, the key issues are therefore whether or not this is a case where a mixture of uses should be sought, and if so what mix and proportion that mix should take.

- 5.12. The application proposes to reuse the building for a mixture of uses. It is proposed to introduce a new retail use into the basement of the building, which is currently used for independent B1 offices, and to absorb the basement office floorspace into the upper floors of the building. There will also be an expansion of the existing porters accommodation which supports the function of Grays Inn.
- 5.13. Some of the proposed office floorspace (133 sq m) will be relocated from number 12 Grays Inn Square, and in turn the existing residential accommodation at upper floor level in 19-21 High Holborn will be 'swapped' to 12 Grays Inn Square.
- 5.14. The changes in the floorspace areas at 19-21 High Holborn are set out in **Table 5.1**, as follows:

Table 5.1- Existing and Proposed Floorspace Schedule

	Existing	Proposed	Change (GEA SQ M)
B1 Office	2119	2901	+ 782 sq m (133 sq m relocated from 12 Grays Inn Square)
Retail	446	646	+ 200 sq m
Ancillary	47	120	+ 73 sq m
Residential	194	0	- 194 sq m (relocated to 12 Grays Inn Square)
Plant	30	106	+76
Total	2,836	3,773	+937

- 5.15. Therefore, the application proposes a total of 937 sq m of additional floorspace. Of this, some floorspace will be allocated to plant and ancillary uses. Some 200 sq m will be additional retail use at basement and ground floor level, 73 sq m will be ancillary accommodation including porters' offices, and 76 sq m will be for plant. There will be an additional 782 sq m of B1 office floorspace, although about 133 sq m of this will be relocated from 12 Grays Inn Square so this will not be new floorspace, leaving a net increase in office space of about 649 sq m.
- 5.16. Therefore the proposal will involve a good mixture of uses, and the net total of new floorspace is set out in **Table 5.2** below.

Table 5.2- Net Floorspace Uplift

	Net New Floorspace (SQ M)
B1 Office	649 sq m
Retail	200 sq m
Ancillary	73 sq m
Plant	76 sq m

- 5.17. This is an excellent mix of uses for this commercial town centre location. We consider the proposal satisfies policy DP1, which seeks to secure a mixture of uses where appropriate, and which seeks to agree a mix and proportion of different uses which takes account of the criteria in the policy. The reasons we say this are set out below.

1. Policy DP1 recognises that other planning benefits may limit the potential to provide a mix of uses. Examples given in the policy include the need to prioritise uses such as business uses in central parts of London. In this case the Core Strategy seeks to protect and encourage employment uses in the central area (policy CS8), and to encourage a mix of employment facilities and types. Furthermore paragraph 8.5 of the Core Strategy seeks to direct new business development to the growth areas, including the Holborn growth area within which this site is located.

The Core Strategy also seeks to encourage new retail development within the Central London Frontage in the Holborn growth area, and to improve the environment generally (policy CS2). The proposal will deliver substantial benefits in the form of additional office and retail floorspace which will help to realise these objectives. At the same time the overall number of residential units will be preserved, as the proposals will relocate the existing flats into 12 Grays Inn Square.

In this respect it can be seen that the proposal will meet the objectives of the Core Strategy by delivering other significant benefits.

2. The policy approach also seeks to take account of the character of the development, any constraints and whether secondary uses would be compatible with a primary user (in this case, offices). Housing should be provided with an independent access (DM policies, para 1.11). In this case the application proposes an extensive refurbishment to the existing building, together with extensions at the roof and rear of the building. The structural frame of the building will be retained, which means that the existing floors, columns and the stair and lift core cannot be moved or changed. By definition the basic layout of the building and particularly the access arrangements cannot be changed. There is only a single access, lift and stair core to the upper floors, which means that it would be impossible to provide a separate access to any residential accommodation on the upper floors.

By contrast the proposal to relocate the existing flats in the building, which share an access with the existing offices, to number 12 High Holborn, involve an improvement over the existing position. At this location the flats will benefit from an access which is shared with other flats in the normal manner. The two units will also be dual aspect whereas the existing units are largely north facing. Overall, therefore, the proposals offer the opportunity to deliver a substantial qualitative improvement to residential accommodation in the area.

3. A further criterion in policy DP1 is whether the extension to the floorspace is needed for an existing user. In this case the building is within the ownership of Grays Inn and the offices have historically been occupied by barristers and legal firms. It is this intention that this connection will be maintained and the offices will continue to be occupied in connection with the character and function of Grays Inn. This important character is recognised in the Core Strategy (section 3). Any attempt to include residential uses on the upper floors would compromise the function of the offices, and the character of the use, which would undermine the connection with the Inn.

4. Lastly, policy DP1 seeks to take account of viability issues whenever a development is considered to fall 'significantly short' of expectations in terms of secondary uses. In our view the development cannot be said to fall significantly short of the policy requirements in this regard. It provides an excellent mix of uses which themselves deliver the objectives of the core strategy, and it will result in improved quality residential accommodation (at 12 Gray's Inn). It will also deliver significant further environmental benefits in terms of improvements to the public realm.

Overall therefore we do not believe that the development should be required to demonstrate a viability case, as it clearly complies with policy objectives. Nevertheless we are of the view that any attempt to secure payments to provide even greater public benefits would inevitably impact negatively on the economics of the development, and we reserve the right to demonstrate a viability case in the event that the Council does not agree with the planning balance as set out above.

- 5.18. Overall it is clear that the development provides a good mix of uses and that it complies with policy DP1. Whilst the policy initially seeks 50% of the uplift in floorspace to be provided as housing, the supporting text makes it clear that the approach is to be applied flexibly and that *the precise mix and proportion will vary in different locations and will be a matter for negotiation, taking into account all the criteria set out in policy DP1 (para 1.8, DM policies)*. In this case the retail and ancillary uses (349 sq m) will represent almost 37% of the total additional floorspace (937 sq m). Having regard to the criteria and the flexible approach which the policy advocates, we believe that the proposed mix of uses satisfies policy DP1.

Residential

- 5.19. The need for new housing in London is well-documented and the provision of new residential accommodation is supported by national, regional and local planning policy. The NPPF sets out a number of measures to "boost significantly the supply of housing" and in accordance with Paragraph 49 of the NPPF, housing applications should be considered in the context of the presumption in favour of sustainable development.
- 5.20. At the regional level, the requirement for additional homes is a key priority of the Further Alterations to the London Plan, which sets an overall housing provision target between 2015 and 2025 of 8,892 new homes in LBC (889 new dwellings per year). Within LBC's Core Strategy, Policy CS6 seeks the provision of new homes within the borough, whilst minimising the net loss of existing homes.
- 5.21. To ensure no loss of residential units within the borough, the proposal will deliver two replacement dwellings locally (at Number 12 Gray's Inn Square) as part of a land swap. A separate planning application (and listed buildings consent application) has been submitted simultaneously in this regard and should be considered alongside this application. We consider that the proposed land use swap can be linked via an appropriately worded clause in the Section 106 agreements for each development.
- 5.22. To enable the creation of the new units, it is proposed that offices located at first and second floor level at number 12 (Grade II* Listed Building) will be converted. As set out above, when considering both the applications together there overall will be a net increase in office floorspace.

- 5.23. The replacement dwellings will comprise two, two bedroom units, albeit marginally below the London Plan minimum space standards the proposals provide an improvement in residential quality to those existing. Full details of the two proposed units are set out in the supporting drawings and Design and Access Statement for the other planning application.
- 5.24. In summary, the proposed land use swap is considered appropriate and the replacement dwellings are of a higher quality.

Townscape, Heritage and Design

- 5.25. The NPPF attaches great importance to the design of the built environment. Good design is stated as being a key aspect of sustainable development and is indivisible from good planning. CABE's guidance, *By Design (Urban Design in the Planning System: Towards Better Practice)* (2000) also lists seven criteria by which to assess urban design principles, as follows: character, continuity and enclosure, quality of the public realm, ease of movement, legibility, adaptability and diversity.
- 5.26. The NPPF Paragraph 56 sets out that good design is a key aspect of sustainable development, and is indivisible from good planning. Furthermore Paragraph 58 requires proposals to function well and add to the overall quality of the area, establish a strong sense of place, and respond to local character and history without stifling appropriate innovation.
- 5.27. NPPF Paragraph 126 require local planning authorities to conserve heritage assets in a manner which is appropriate to their significance. As such they should take into account:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with the conservation;
 - the wider social, cultural, economic, and environmental benefits that conservation of the historic environment can bring;
 - the desirability of new development making a positive contribution to local character and distinctiveness; and
 - opportunities to draw on the contribution made by the historic environment to the character of a place.
- 5.28. Paragraph 132 sets out that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation. In addition, the NPPF (paragraph 137) states that proposals within conservation areas, that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 5.29. At the regional level, London Plan Policy 7.1 states that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 5.30. London Plan Policy 7.2 further states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. The principles of inclusive design which seek to ensure that developments achieve the following are supported by this Policy and have been addressed throughout the evolution of the development proposals for the site:

- developments that can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances;
 - developments that are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;
 - developments that are flexible and responsive, taking account of what different people say they need and want, so people can use them in different ways; and
 - developments that are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.
- 5.31. London Plan Policy 7.4 goes on to state that developments should have regard to the form, function and structure of an area, including the scale, mass and orientation of surrounding buildings. The Policy further states that buildings should provide contemporary architectural responses that:
- have regard to the pattern and grain of existing spaces and streets in orientation, scale, proportion and mass;
 - contribute to a positive relationship between the urban structure and local natural landscape features;
 - are human in scale;
 - allow existing buildings and structures that make a positive contribution to the character of a place to influence the existing character of the area; and
 - are informed by the surrounding historic environment.
- 5.32. London Plan Policy 7.6 further states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to its context.
- 5.33. London Plan Policy 7.8 considers heritage assets and archaeology. The policy requires heritage assets to be identified, sustained and enhanced, to ensure that their significance and role in place making area taken account of. Furthermore, the policy sets out that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. In addition, development should make provision for the protection of archaeological assets and landscapes.
- 5.34. Core Strategy Policy CS14 requires developments to achieve the highest possible design to ensure buildings are attractive, safe and easy to use, by
- a) requiring development to be of the highest standard of design that respects the local context and character;
 - b) preserving and enhancing the borough's heritage assets and their settings, including listed buildings, conservation areas, and archaeological remains amongst others;
 - c) promoting high quality landscaping and works to the street and public spaces;
 - d) seeking the highest standards of access in all building and places, in terms of inclusivity and accessibility; and
 - e) protecting important views from sites in and outside of the borough.
- 5.35. In addition, Development Management Policy DP25 seeks to maintain the character of the borough's conservation area, preserve listed buildings, and protect archaeological remains.

- 5.36. The supporting Design and Access Statement prepared by RMA Architects and the follow sections fully explains the design rational for the development. In addition, a Heritage Statement (incorporated into the Design and Access Statement) has been submitted in support of the application.

Massing

- 5.37. The proposals have developed following careful and detailed contextual analysis. They comprise a unique and attractive design solution which responds effectively to the site's location; its shape and capacity; and the character and proximity of the existing buildings and surrounding area. The proposed development will generate a significant number of urban design benefits and it is considered that the development represents an appropriate and positive response to its location.
- 5.38. During pre-application discussions and the subsequent site visit, officers recommended that the originally proposed two storey roof extension is reduced in to one additional storey and the massing at other floors is reviewed. In light of this feedback, the roof extension will comprise a singular additional floor at eighth storey and the massing at seventh storey has been set back. During further discussions with the design officer, it was agreed that the reduced massing resulted in an extension of an appropriate scale.
- 5.39. Overall, it is considered that the proposed roof and rear extension to 19 High Holborn, in terms of scale and massing is wholly appropriate in the context and will create a visually interesting scheme that will significantly improve the appearance of the site and accords with the requirements of the London Plan and the Council's local planning policy framework. The proposals are therefore of a scale and character which respects and responds to the site's context and is in accordance with the advice given by LBC officers.

Basement

- 5.40. At the local level Development Management Policy DM27 considers basements and lightwell. The policy sets out that in considering proposals for basements officers will assess the impact on drainage, flooding, groundwater conditions, and structural stability. LBC will only grant planning permission, where there will be no hard to the built and natural environment, local amenity, and does not result in flooding or ground instability. Developers are therefore required to demonstrate through appropriate methodologies, the following:
- Maintain the structural stability of the building and neighbouring properties;
 - avoid adversely affecting drainage and run-off or causing other damage to the water environment;
 - avoid cumulative impacts upon structural stability or the water environment in the local area;
 - hard the amenity of neighbours;
 - lead to the loss of the open space or trees of townscape or amenity value;
 - provide satisfactory landscaping, including adequate soil depth;
 - harm the appearance or setting of the property or the established character of the surrounding area; and
 - protect important archaeological remains.
- 5.41. A Basement Impact Assessment has been prepared by GEA, which concludes that the proposed development is unlikely to result in any specific land or slope stability, groundwater or surface water issues. As such no impact is expected to near by sites.

Elevational Treatment

- 5.42. The facades of number 19 will be replaced entirely. This approach will ensure the delivery of good energy efficient building, and an attractive office and retail environment. It is proposed that the materials on this facade compliment the listed building at 21 High Holborn. Overall it is felt that the replacement facade makes a positive contribution to the public realm and wider streetscape in accordance with Policy 7.6 of the London Plan and Core Strategy Policy CS14.
- 5.43. The facades of 21 High Holborn will be sympathetically upgraded, the proposed works will enhance this heritage asset as required by London Plan Policy 7.8. The works will include the restoration of the facade through cleaning, the replacement of window frames, new roof materials and installation of internal fabric to enhance thermal performance improvements. In addition, roof top plant will be provided behind a screen and set back from the building edge to ensure no adverse impacts on the character of the listed building.

Design Summary

- 5.44. The design of the proposals has sought to reflect the unique context in which the site is located.
- 5.45. The extensions in terms of the height, scale and massing have been designed to respond to the site's context and the nearby heritage assets. The proposals seeks to utilise high quality contemporary yet traditional materials on the extensions to ensure that the heritage setting of the Grade II listed buildings to the west (within the application site and adjacent to the application site) are conserved. In addition, the facade works to the listed building enhance and preserve the significance of the building. Therefore the proposed development is in accordance with guidance set out at the national, regional and local level. Full details of the proposal are detailed in the supporting Heritage Statement and Design and Access Statement.
- 5.46. In summary, the proposed development provides the opportunity to deliver a high quality sustainable scheme which will significantly enhance the appearance of the site and surrounding area. The scheme has been design-led and has fully responded to the detailed design comments made by officers during pre-application discussions and the site's context. The proposals are therefore in accordance with the design principles set out in national, regional and local policy guidance.

Transport and Access

- 5.47. In accordance with the NPPF, all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should be made on the basis of whether:
- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
 - safe and suitable access to the site can be achieved for all people; and
 - improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

- 5.48. At the regional level, London Plan Policy 6.3 requires the impacts of new developments on the transport network to be fully assessed and states that developments should not adversely impact the safety of the transport network. At the local level, Saved Policy 5.2 states that permissions will only be granted for developments unless:
- There is an adverse impact on transport networks for example through significant increases in traffic or pollution; and/or
 - Adequate provision has not been made for servicing, circulation and access to, from and through the site; and/or
 - Consideration has not been given to impacts of development on the Bus Priority Network and the Transport for London Road Network.
- 5.49. Given the site's excellent PTAL rating of 6b, the application does not propose any changes to the existing transport strategy for the site or means of access or the site's servicing strategy.
- 5.50. A total of 22 cycle parking spaces are proposed within the development. This provision accords with the London Plan standards. and will actively encourage alternative modes of transport to be utilised. Further details of the parking provision are outlined in the draft Travel Plan.

Sustainability and Energy

- 5.51. The NPPF encourages local planning authorities to adopt proactive strategies to mitigate and adapt to climate change.
- 5.52. The London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy set out at Policy 5.2:
- Be Lean: use less energy;
 - Be Clean: supply energy efficiently;
 - Be Green: use renewable energy.
- 5.53. In accordance with the London Plan, developments are expected deliver a 40% carbon dioxide emissions reduction improvement on 2010 Building Regulations and in accordance with London Plan Policy 5.7, the Mayor seeks to increase the proportion of energy generated from renewable sources. London Plan Policy 5.2 further requires major development proposals to provide a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction are to be within the framework of the energy hierarchy.
- 5.54. London Plan Policy 5.3 further states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Policy 5.4 promotes the retrofitting of buildings to bring existing buildings up to the Mayor's standards.
- 5.55. At the local level Core Strategy Policy CS13 seeks to tackle climate change through the promotion of highest environmental standards through construction and occupation. LBC wish to achieve this through promotion effective patterns of land use, effective use of buildings and land, minimising the need to travel,

ensuring developments use less energy, using decentralised energy sources, and using/generating renewable.

- 5.56. The proposed development will utilise sustainable and energy efficient building techniques to accord with the Council's Building Regulations, and will accord with the Mayor's energy hierarchy. The development will achieve a rating of Very Good when considering the requirements of BREEAM UK Bespoke (2014) Non-domestic Refurbishment and Fit-out.
- 5.57. Overall, the proposed development will achieve a carbon dioxide reduction of 44%, which exceeds the Part L 2013 target of 35% by 9%. This is to be achieved by improvements to building fabric, technology and renewable air source. The forecast energy achievements are considered to be wholly appropriate and proportionate to the nature of the proposal.
- 5.58. The proposals have therefore been demonstrated to fully accord with the relevant planning policy guidance as summarised above. Further details of the applicant's proposals are set out in the accompanying statement, prepared by Waterman.

Daylight and Sunlight

- 5.59. A Daylight and Sunlight Assessment has been prepared by Right of Light Consulting in support of the application and assesses the effects of the proposed development on surrounding residential properties.
- 5.60. Guidelines relating to daylight and sunlight are contained within the Building Research Establishment (BRE) Handbook – Site Layout Planning for Daylight and Sunlight (1991). This guidance includes discussion on how to protect the daylighting and sunlighting of existing buildings when new developments are proposed.
- 5.61. London Plan Policy 7.6 requires new buildings and structures to ensure that they do not cause unacceptable harm to the amenity of surrounding land and buildings in relation to a number of factors, including overshadowing. The policy makes reference to this being particularly important for residential buildings.
- 5.62. Development Policy DM26 sets out guidance regarding the impact of development on occupiers and neighbours. The policy considers the impacts of sunlight, daylight and artificial light to ensure there is no undue harm to amenity. The subtext to the policy sets out that officers will take into account BRE guidance.
- 5.63. In accordance with policy a comprehensive Daylight and Sunlight Study has been prepared in support of the planning application by Right of Light Consulting. The study has assessed the impact of the development of 1,2-4, and 14 South Square and 14-18, 22, 23 High Holborn, in accordance with BRE guidance. The report concludes that "*there is no daylight or sunlight related reason why planning permission should not be granted for this scheme.*"
- 5.64. Overall, in accordance with planning policy set at the national, regional and local level, it is considered that the proposal will not present unacceptable harm to the amenity of surrounding land or buildings and the necessary studies have been carried out.

Flood Risk and Drainage

- 5.65. Paragraph 100 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. It further states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change by applying the Sequential Test.
- 5.66. Core Strategy Policy DP27 states that basement proposals would be assessed in terms of drainage, flooding and ground water conditions (amongst others).
- 5.67. The According to the EA flood map, the proposed development is wholly located in Flood Zone 1, indicating a comparatively low probability of flooding.
- 5.68. As set out above, the supporting Basement Impact Assessment and Drainage Report by GEA concludes that the proposed development is unlikely to result in any specific land or slope stability, groundwater or surface water issues. As such no impact is expected to near by sites.

Archaeology

- 5.69. The site is located within an Archaeological Priority Zone and so relevant national, regional and local planning policies apply.
- 5.70. The NPPF states that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 5.71. The London Plan sets out guidance relating to archaeology at Policy 7.8, which states that “development should incorporate measures that identify record, interpret, protect and, where appropriate, present the site’s archaeology”.
- 5.72. Locally, Development Policy DP25 sets out that LBC will protect remains of archaeological importance by ensuring acceptable measure are taken to preserve them and their setting, including physical preservation, where appropriate. As set out above, the site is located within the ‘London Suburbs’ archaeological priority area on the Council’s Policy Map.
- 5.73. In accordance with policy, a Desktop Archaeological Assessment has been carried out by Museum of London Archaeology (MOLA) and is submitted as part of the planning application. The assessment concludes that there could be archaeological potential on the application site, and in the first instance recommend archaeological evaluation trenches and pits to assess the presence, nature and significance of any remains.

Planning Obligations and Community Infrastructure Levy (CIL)

- 5.74. Paragraph B5 of Circular 05/2005: Planning Obligations states that in order to be sought, a planning obligation must be:
- relevant to planning;
 - necessary to make the proposed development acceptable in planning terms;
 - directly related to the proposed development;
 - fairly and reasonably related in scale and kind to the proposed development; and
 - reasonable in all other aspects.
- 5.75. Camden's Planning Guidance 8 (July 2015) sets out an indication as to what planning obligations they will seek to address any development impacts alongside CIL.

Community Infrastructure Levy

- 5.76. The Mayor of London agreed his Charging Schedule in February 2012 and Mayoral Community Infrastructure Levy (CIL) payments came into force on all developments from 1 April 2012 onwards. The redevelopment proposals for the site are therefore subject to CIL.
- 5.77. The Mayor of London's Community Infrastructure Levy Charging Schedule states that the London Borough of Camden is within Charging Zone 1 where developments are required to pay CIL at a rate of £50 per sq m.
- 5.78. In addition, LBC adopted its Borough CIL Charging Schedule in April 2015. This sets a levy for site's with Zone A of:
- £500 per sq m for residential developments below 10 units or 1,000 sq m;
 - £25 per sq m for retail floorspace; and
 - £45 per sq m for office floorspace.
- 5.79. These charges are to be calculated in accordance with Regulation 40 of The Community Infrastructure Levy Regulations 2010 (as amended) ('the CIL Regulations') which in summary is payable on the proposed uplift in floorspace (GIA).
- 5.80. The relevant CIL forms have been completed and are submitted as part of this planning application.

6. Conclusions

6.1. This Planning Statement has been prepared by Savills and is submitted in support of a full planning application and Listed Building Consent made on behalf of the Honourable Society of Gray's Inn (the applicant) for the redevelopment of 19- 21 High Holborn (the site) within the administrative boundary of the London Borough of Camden (LBC).

“Refurbishment, extension and part change of use of existing building to provide a mixture of uses including retail, office and ancillary uses, involving roof, rear and basement extensions comprising 937 sq m of additional floorspace and associated plant. As part of a land use swap with 12 Gray's Inn Square”

6.2. The proposals have been developed following pre-application discussions, which have informed the design process and overall design and layout of the scheme. The proposals will provide a wide range of planning benefits for the site and surrounding area, as set out below:

- the proposal will redevelop these underused buildings by bringing them into beneficial use by providing high quality, modern office and retail floorspace. The mix of new floorspace will contribute toward the function of the CAZ, Central London Area and the Holborn Growth area.
- alongside which, the development will enhance the retail floorspace provision in this part of the Central London Frontage;
- as part of the proposed land use swap the proposals will deliver two replacement dwellings, which provide a better quality of residential accommodation;
- the proposals are design-led and have evolved through contextual analysis and detailed pre-application discussions with officers to ensure a high architectural design quality, which responds to the prevailing urban form and unique heritage context;
- the proposals enhance and preserved 21 High Holborn a Grade II Listed building;
- the proposed development will utilise sustainable and energy efficient building techniques and will reduce carbon dioxide emissions. The retail unit will achieve a BREEAM UK Bespoke (2014) Non-domestic Refurbishment and Fit-out rating of Very Good.

6.3. This Planning Statement has demonstrated that the application proposals accord with the aims and objectives of the NPPF, the London Plan and local planning policy.

6.4. The application proposals represent an exciting opportunity to deliver the sustainable regeneration of a brownfield site to provide high quality new mixed commercial accommodation. Accordingly, we respectfully request that full planning permission is granted.



Appendix 1 – Pre-Application Advice received from London Borough of Camden

Date: 12/10/2015
Our ref: 2015/2679/PRE
Contact: Tessa Craig
Direct line: 020 7974 6750
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Dear Mr Green,

PRE-APPLICATION PLANNING ADVICE
PROPOSAL: COMPREHENSIVE REDEVELOPMENT OF 19 AND 21 HIGH HOLBORN
INCLUDING 2 STOREY ROOF EXTENSION AND REAR 7 STOREY REPLACEMENT

Thank you for submitting a request for pre-application advice for 19 and 21 High Holborn Road, WC1V 6BS. This advice is based on your cover letter dated 1 May 2015, 'Pre-Planning Application Supporting Information' (01.05.2015), 'Draft Conservation Statement', and a site visit carried out on 10th August 2015.

Site description

The site is located on the north side of High Holborn next to Gray's Inn Chamber in the Bloomsbury Conservation Area. It accommodates a seven storey 1960s building (No.19), a five storey grade II listed gatehouse joint to it (No. 21) and access routes from High Holborn to Gray's Inn Chambers and Holborn Square, servicing route off Gray's Inn Road and storage and servicing facilities around the access routes. The Gatehouse was originally built in 1583 and reconstructed in 1965.

19 High Holborn is seven storeys in height with an existing basement level. The ground and basement are currently in retail use and the upper floors are office use. The top floor includes two residential units, one which is used on a short term basis and the other which was occupied more permanently. 21 High Holborn is five storeys high and contains office space. 21 High Holborn is located within the Bloomsbury Conservation Area. The site has a PTAL rating of 6a indicating excellent public transport links.

The site's immediate context is heritage sensitive, particularly to the north, where Gray's Inn comprises a significant number of listed buildings of all grades and the open spaces of South Square, Gray's Inn square and Gray's Inn Gardens are included on the Register of Historic Parks and Gardens. The Cittie of Yorke pub immediately to the west of the site at 22-23 High Holborn is also listed at Grade II.

The gatehouse at no. 21 and the adjacent Cittie of Yorke pub are narrow in width and 5 storeys in height, and the lowest buildings within this part of High Holborn. The predominant character of High Holborn is of large, mostly C20 purpose-built office accommodation of between 7 and 9 storeys. The building to the south of the site across High Holborn lies within the City of London, and is a large, 9 storey office block with an additional storey of plant on the High Holborn elevation, which can be seen in views from Gray's Inn looking south.

Proposal

The proposed comprehensive redevelopment of 19 High Holborn includes:

- Partial demolition of rear four storeys to be rebuilt to include seven storeys;
- New facades at front and rear;

- Roof terraces at front and rear of sixth, seventh and rear of fifth and eighth floor;
- New security and porter's accommodation;
- Landscaping of rear access areas and alleyway;
- New cycle storage, bin storage and parking at rear;
- 2,751sqm of replacement office accommodation;
- 873sqm of replacement retail accommodation at ground and basement level.

The redevelopment of listed building, 21 High Holborn will involve:

- Retaining listed façade, refurbishment works;

The cover letter includes reference to an additional storey to be added to 21 High Holborn, but on site it was discussed that this would no longer form part of the proposal. Given 21 High Holborn already includes a mansard roof, an additional floor would not be supported. The additional floorspace totals 2,750sqm.

Relevant planning history

19-20 High Holborn: Planning permission was granted on August 1962 for the erection of seven storey building with basement level to be used as shop at basement, ground and mezzanine floors, offices on 1st - 5th floor levels and residential flats at 6th floor level (ref: 27470).

Relevant policies

The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents), the London Plan, the NPPF and the Camden Planning Guidance (CPG).

The proposal would be assessed against policies CS1 (Distribution of growth), CS5 (Managing the impact of growth and development), CS6 (Providing quality homes), CS14 (Promoting high quality places and conserving our heritage), DP6 (Lifetime homes and wheelchair homes), DP16 (Transport implications of development), DP17 (Walking, cycling and public transport), DP19 (Managing the impact of parking), DP20 Movement of goods and materials), DP21 (Development connecting to the highway network), DP22 (Promoting sustainable design and construction), DP23 (Water), DP24 (Securing high quality design), DP25 (Conserving Camden's heritage), DP26 (Managing the impact of development on occupiers and neighbours), DP28 (Noise and vibration), DP32 (Air quality and Camden's Clear Zone) of Camden's Local Development Framework, Camden's Planning Guidance (CPG1, CPG4) 2011/2013 and the Bloomsbury Conservation Area Appraisal and Management Strategy (2011).

Site specific constraints:

19 High Holborn

- London View Management Corridor: Primrose Hill summit to St Paul's Cathedral, Greenwich Park Wolfe statue to St Paul's Cathedral, Blackheath Point to St Paul's Cathedral;
- Archaeological Priority Area;
- Central London Area;
- Central London Frontage;
- Growth area (Holborn);
- Central Activities Zone (CAZ).

21 High Holborn

- Grade II Listed;
- Bloomsbury Conservation Area;

- London View Management Corridor: Greenwich Park Wolfe statue to St Paul's Cathedral;
- Archaeological Priority Area;
- Central London Area;
- Central London Frontage;
- Growth area (Holborn);
- Central Activities Zone (CAZ).

Comments on proposal

The main considerations are:

- Land use (mixed use development and loss of two residential units);
- Design;
- Transport;
- Sustainability;
- Amenity; and
- Other Matters.

Land Use

Mixed use development

DP1 (Mixed use development) states that in the Central London Area where more than 200 sqm (gross) additional floorspace is provided, the Council will require up to 50% of all additional floorspace to be housing.

Policy DP1 seeks to provide a mix of uses within developments in order to facilitate sustainable development and reduce the need to travel between homes, services and jobs. In the Central London Area where more than 200 sqm (gross) additional floorspace is provided, we will require up to 50% of all additional floorspace to be housing such that additional floorspace in residential use matches all the additional floorspace in non-residential use.

The Council will require any secondary uses to be provided on site, particularly where 1,000sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment-in-lieu.

In terms of potential off-site provision if you do not have a suitable alternate site, a detailed assessment should be submitted demonstrating no other suitable sites within the ward (or adjoining wards) are capable of providing new residential/secondary uses accommodation, typically by way of a change of use.

Should it be demonstrated to the Council's satisfaction that suitable residential/secondary uses accommodation cannot be provided on site or that no alternative site is available in the area, we may accept a payment in lieu of provision, directly related in scale and kind to the development proposed.

Affordable housing will be sought in line with policy CS6 and DP3. When considering the appropriateness of any affordable housing contribution in the context of a mixed use development, the Council will take into account the other criteria included in policy DP3, with particular regard to the economics and financial viability of the development.

In summary, your letter dated 1st May 2015 does not consider a mixed use development including housing as a secondary use to be appropriate for this site as the site forms part of Gray's Inn which provides chambers for barristers, the low quality of existing office space and impractically of

providing a separate access and core to a potential residential use. As the site would be completely redeveloped the special office use associated with Gray's Inn Chambers and the poor quality of the existing office space are not considered to be adequate for the exclusion of housing as a secondary use from the proposed development. You need to demonstrate why residential use is not practical to be included in the proposed development to address policy DP1 which requires from developments that add more than 200 sqm additional floorspace in the Central London Area to provide 50% of all additional floorspace as housing. Policy DP1 also provides criteria to consider the practicality of the secondary uses (<http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/local-development-framework/development-policies.en>). There is also discrepancy between the letter and pre-application supporting document concerning the additional floor area. For your information I considered the additional floor area as being 2,751 sqm.

Loss of residential units

According to the planning history records two self-contained flats on the top floor level were approved as residential flats on August 1962 (planning ref: 27470). During the site meeting the applicants confirmed that one these flats were used on a short-let basis. However the Council has no records for the authorised use of the flat being short-stay accommodation. In the absence of evidence to justify the authorised use of the flats as short-stay accommodation, the proposed loss of residential floor space would be contrary to policy CS6 of Camden Core Strategies and policy DP2 of Camden Development Policies. Please note that paragraph 2.5 of policy DP2 considers residential accommodation that is ancillary to another use, such as living areas for managers, caretakers and other staff as a form of housing and protects housing against development for a non-residential use. In order to address policies CS6 and DP2 evidence demonstrating the short-let use of the existing flats for the last 10 years is required.

Design

The Council's policy position on promoting high quality places which ensures Camden's places are safe, healthy and easy to use is set out in Policies CS14 ('Promoting high quality places and conserving our heritage') and DP24 ('Securing high quality design') DP25 (Conserving Camden's Heritage).

Policy DP24 of the LDF expects all developments to be of the highest standard and to consider the character, the setting and context of neighbouring buildings. Policy DP24 also expects developments to consider the quality of materials that are used. Policy DP25 expects developments to only permit developments that preserve and enhance the character and appearance of the conservation area.

The most significant design aspect of the proposal is the proposed additional floorspace at roof level, and the impact that this will have upon the open adjacent heritage assets, particularly upon the planned open spaces of Gray's Inn Square and South Square to the north. No. 19 High Holborn is currently 7 storeys in height with a small plant room positioned centrally in the plan. It is proposed to add another two storeys of office accommodation at roof level, which will be set back in depth from both the front and the rear elevations.

In the longer views from the north across Gray's Inn Gardens from Theobald's Road, the proposed additional height may be subsumed into the wider commercial backdrop, particularly as the building to the south of High Holborn is ten storeys including its plant room. However, the impact of the additional height will be greater from Gray's Inn Square and South Square, and there is a concern that the top storey will have a significant and potentially harmful visual impact upon these squares, and the setting of the listed buildings within.

The additional height impact won't significantly affect the setting of the listed buildings at 21 and 22-23 High Holborn, as their setting is already that of a busy, commercial street with much larger blocks adjacent. However, we must be mindful of the general townscape impact, and the two

storey addition will be particularly visible in views from the east and west along High Holborn, given that the site sits on a curve in the road and with lower buildings immediately adjacent, affording clear views of the side elevation of any additional floors.

With this in mind, it would be beneficial to explore an alternative approach which instead seeks one additional storey of floor space, so that the impact of this element can be further assessed. It may also be worth exploring the potential to pull the existing set back sixth floor forward on the High Holborn elevation to match the floors below, which will provide a small amount of additional floorspace here but may also help to better balance the impact of any additional roof storeys against the scale of the buildings main elevation, and to simplify the two-step profile.

We welcome the opportunity to clean, repair and enhance the building's elevations and improve the rear access lane.

Transport

DP17 (Walking, cycling and public transport) seeks to promote sustainable travel options and Policy DP18 (Parking standards and limiting the availability of car parking) expects new developments to be car free. The site has a PTAL rating of 6b which is considered to be an excellent accessibility level.

The development proposes cycle storage at the rear of the site in 'The Paddock'. Specific detailing including compliance with CPG7 demonstrating secure, covered cycle storage will be required to be submitted at application stage. See section of CPG 7 Transport for further details of cycle parking:

<http://camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance/>

DP21 seeks to protect the safety and operation of the highway network. The proposal includes substantial alterations to the facades of the building as well as a two storey roof extension. The construction is likely to result in disruption to the local highway network and may require skips or equipment to be placed on the highway. As such, a Construction Management Plan would be required. A draft (based on the Camden pro-forma found online) should be submitted with the application. More information on CMPs can be found [here](#). This would be secured through a S106 legal agreement.

To ensure the development does not have an adverse impact on the transport system and to aid traffic reduction and improve air quality a Travel Plan is required. This is considered necessary for the commercial use. A draft Travel Plan should be submitted with the application and a full Travel Plan, with achievable and measurable targets, prior to occupation.

The Council would be likely to secure a S106 financial contribution for resurfacing the footway adjacent to the site. This would mitigate any harm caused to this part of the site during the construction stage and tie the development into the surrounding streetscape.

Sustainability

Policy DP22 (Promoting sustainable design and construction) states that the Council will require development to incorporate sustainable design and construction measures. All developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy (be lean, be clean and be green) to reduce energy consumption. Policy DP22 expects all developments of more than 500 sqm of commercial floorspace or above to achieve 'very good' in a BREEAM assessment. In accordance with CPG3 – Sustainability, 60% of the un-weighted credits should be achieved in Energy and Water categories and 40% in Materials category. A sustainability and BREEAM assessment report will be required to accompany the application. Post construction compliance would likely be secured by s106 agreement.

Impact on Amenity

Core Strategy policy CS5 and Development Policy DP26 seek to ensure that the existing sensitive residential amenities of neighbouring properties are protected, particularly with regard to visual privacy, outlook, daylight and sunlight, noise and air quality.

CPG6 Amenity states: "Development should be designed to protect the privacy of both new and existing dwellings to a reasonable degree. Spaces that are overlooked lack privacy. Therefore, new buildings, extensions, roof terraces, balconies and the location of new windows should be carefully designed to avoid overlooking. The degree of overlooking depends on the distance and the horizontal and vertical angles of view.

The proposed development would include two additional floors and roof terraces at both front and rear elevations. The nearest windows are not residential in nature and given there are already high level terraces and windows the proposal does not generally increase overlooking beyond the existing situation.

A daylight and sunlight report should accompany the application to assess any loss of light to neighbouring properties.

A noise assessment report should accompany the application for any proposed plant. Any plant or mechanical equipment would need to be assessed by the Council in order to ensure that it would not harm the amenity of occupiers of the nearest residential and office buildings. As such, the application should include a condition requiring the submission of plant details and an acoustic report to demonstrate compliance with the Council's noise standards.

CIL

This proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL as the additional floorspace exceeds 100sqm. Based on the Mayor's CIL charging schedule the CIL charge is £50 per additional sqm and for Camden CIL the site is within Zone A (£45 per sqm for office use and £25 per sqm for retail use). This will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index. More information can be found [here](#).

View Corridors

The site is located within a number of view management corridors. Assessment of the impact on these views will be required to be submitted with the planning application.

Conclusion

Justification for the loss of two residential units and lack of additional residential floor space/ mixed use development would need to be provided and proven unviable for the proposal to be supported.

The proposed roof level extension should be carefully considered and in particular the impact of additional height viewed from Gray's Inn Square and South Square. It is recommended the top floor be excluded from the proposal to minimise the height of the development. Refurbishment on the elevations and improvements to the rear access lane are supported.

For a valid planning application, I would advise you to submit the following:

- Completed form – full planning permission;
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';

- Design and Access Statement;
- Heritage Statement;
- View Corridor Assessment;
- Acoustic Report for plant equipment;
- Daylight and Sunlight Assessment;
- Sustainability Assessment;
- Draft Construction Management Plan;
- Travel Plan;
- The appropriate fee.

Please see [supporting information](#) for planning applications for more information.

We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by letter, put up a notice on or near the site and, advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received.

It is likely that that a proposal of this size would be determined at Development Control Committee as it involves more than 1,000m² additional floor space. More information is available [here](#).

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

Once you submit an application, please let me know the planning portal reference number so that I can process the application. If you have any queries about the advice please do not hesitate to contact Tessa Craig on 020 7974 6750.

Thank you for using Camden's pre-application advice service.

Regards,

Tessa Craig
Planning Officer

Telephone: 020 7974 6750

Please note that the information contained in this email represents an officer's opinion and is without prejudice to further consideration of this matter by the Development Management section or to the Council's formal decision.