



TEMPLAR HOUSE

PLANNING STATEMENT ADDENDUM

MARCH 2016

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Tel: 020 7004 1700
Fax: 020 7004 1790

CONTENTS

- 1.0 INTRODUCTION
- 2.0 AMENDMENTS TO THE DEVELOPMENT PROPOSAL
- 3.0 PLANNING POLICY AND ASSESSMENT
- 4.0 RESPONSE TO GLA COMMENTS
- 5.0 CONCLUSION

1.0 INTRODUCTION

- 1.1 This Planning Statement Addendum has been prepared by DP9 Ltd (DP9) on behalf of Northwood Investors in support of amendments to the planning application (ref. 2015/4407/P) submitted in July 2015 for the redevelopment of the site known as Templar House ('the Site').
- 1.2 The proposed amendments seek to respond to comments from officers from the London Borough of Camden alongside comments from statutory and non-statutory consultees.
- 1.3 The amendments principally seek changes to the proposed massing and layout of residential and office accommodation on the Site. There are also enhancements proposed to the materiality and design of the facades.
- 1.4 The redevelopment of the Site will provide a mix of office employment floorspace (Class B1), retail floorspace (Class A1-A3), residential units (Class C3) and public realm improvements.
- 1.5 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.
- 1.6 This addendum statement should be read and considered in conjunction with the design and technical information submitted in support of the proposed amendments. This comprises an assessment of the proposed amendments in architectural; townscape and heritage; daylight and sunlight; and engineering terms.
- 1.7 This addendum planning statement also seeks to respond to comments raised by the Greater London Authority (GLA) in their Stage 1 Report dated 21st December 2015 (Section 4).

2.0 AMENDMENTS TO THE APPLICATION PROPOSAL

2.1 A full assessment of the amendments to the proposed development is contained within the Design Amendment Document compiled by Astudio Architects.

2.2 The amendments seek to respond to comments in respect of the application and have been developed with input from planning and design officers at the London Borough of Camden. The amendments maintain the principal design concept to provide a high quality mixed-use sustainable development. This comprises maximising the Site's employment capacity to provide a new Grade A office building on the southern part of the Site fronting High Holborn alongside providing well-proportioned residential accommodation on the northern part of the Site facing Eagle Street. The aspiration 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 is also maintained within the proposed amendments.

2.3 Architecturally, the amended proposals will maintain the delivery 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 local conservation area. At ground level, the proposals continue to enliven and improve the streetscape and pedestrian environment along both High Holborn and Eagle Street.

2.4 The amended description of development is as follows:

“Demolition of existing buildings and redevelopment for mixed use development up to 13 storeys in height comprising 15,346 sqm GEA office floorspace (Use Class B1), 607 sqm GEA retail floorspace (Use Class A1-A3), 64 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works.”

2.5 The proposed amendments to the scheme include:

- Reduction in the massing of the proposed office building by 2 storeys;
- Creation of new terrace and roof pavilion for use by staff in the proposed office building;
- Revisions to the principal High Holborn façade to convey additional solidity;
- Realignment of the residential accommodation resulting in an increased number of units on the Site;
- Revisions to the residential façade on Eagle Street to improve the amenity value of the proposed new homes; and

- Revisions to the residential mix in order to align more with the borough’s residential targets.

2.6 A detailed explanation of the proposed amendments is included within the accompanying Design Amendment Document.

2.7 The proposed amendments have been discussed and agreed with officers and maintain the delivery of high quality commercial and residential floorspace on the Site whilst ensuring the proposed development complements the character and appearance of the local conservation area.

Revised floorspace schedule

2.8 A breakdown of the existing and proposed (and amended) 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 (July 2015 and March 2016)

Use Class	Existing Floorspace (sqm GIA)	Proposed Floorspace (July 2015) (sqm GIA)	Proposed Floorspace Inc. Amendments (March 2016) (sqm GIA)
Class B1	9,946	15,971	13,944
Class A1-A3	528	607	607

Table 2 – Proposed residential accommodation (July 2015 and March 2016)

		Number of units (July 2015)	Number of units (March 2016)
Class C3 Housing	Studio	5	7
	1 bedroom	18	25
	2 bedroom	16	24
	3 bedroom	9	8
	TOTAL	48 units	64 units

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

2.9 As highlighted above, the overall change in quantum of floorspace delivery is minimal. There is an increase of 16 residential units which will contribute towards delivering new homes within the Holborn area. In accordance with the Council’s priorities the revised residential mix includes a higher proportion 2 bedroom units.

3.0 PLANNING POLICY ASSESSMENT

- 3.1 The principal Planning Statement prepared in July 2015 provides an assessment of the proposed development against planning policy at national, London-wide and local levels. The statement concluded that the development proposals for the Site were considered to be fully compliant with planning policies at national, regional and local levels.
- 3.2 Since the original statement was prepared there have not been any planning policy changes upon which the conclusions previously stated would vary. The conclusions of the original Planning Statement therefore remain valid.

4.0 RESPONSE TO GLA COMMENTS

- 4.1 The GLA provided comments on the submitted planning application in their Stage 1 Report dated 21st December 2015. A summary of the comments is provided below alongside a response, referencing consultants' input where relevant.

"The current proposal is well in excess of the density guidelines. The development must meet the "Good Practice" standards stated in the Housing SPG. Further work needs to be undertaken before the proposed residential density can be deemed acceptable in strategic planning terms."

- 4.2 RESPONSE: The Site represents a highly sustainable urban brownfield location in a locality which is identified for intensification for new jobs and homes. The proposals are high quality and demonstrate exemplary design standards. They seek to introduce a mixed and balanced typology of new homes to the local neighbourhood complemented by accessible and pleasant amenity spaces.

- 4.3 As stated within relevant guidance, higher density residential developments are acceptable in locations which benefit from excellent public transport accessibility. As a car-free site within close proximity from an extensive London Underground network the Site presents an excellent opportunity for delivering a high density residential development. Furthermore, the proposed residential element of the development complies with all the 'good practice' standards required within the 2015 Draft Interim Housing SPG.

"Further details required regarding child playspace provision."

- 4.4 RESPONSE: The development generates a requirement for playspace. An area of playspace will be provided on the communal terrace on the sixth floor of the residential building. Details will be provided via planning condition. In addition, the proposed development will provide a significant contribution towards the local Community Infrastructure Levy which targets the upgrading of sports and leisure facilities in the borough.

"Further details required regarding affordable housing"

- 4.5 RESPONSE: As set out within the Planning Statement submitted in July 2015, a Financial Viability Assessment has been provided to assess the viability of the scheme's position with regards to contributing towards affordable housing (on-site or

off-site through a payment in lieu). This assessment is currently being reviewed by the Council's appointed viability consultants.

"GLA Officers would like to see a design solution that incorporates retention of the façade, adapting it to suit the new floor to ceiling heights."

- 4.6 RESPONSE: As set out within the accompanying Design Amendment Document prepared by Astudio Architects (and previously in detail with the planning application), the retention of the existing façade is not a feasible option in this instance. The proposals therefore incorporate a new high quality façade which will enhance the character and appearance of the local conservation area whilst complementing the evolving streetscape of Holborn.

"GLA Officers require further detailed plans to assess the appropriateness of this proposal. Plans showing the context of the surrounding area including adjacent development illustrating adjacent land uses and window locations should be provided. Floor plans showing both office and resi should be included."

- 4.7 RESPONSE: The accompanying Design Amendment Document includes a plan to identify surrounding land uses. The amendments proposed seek to revise the arrangement of proposed residential accommodation to provide high quality amenity value for prospective residents. As requested, plans showing both the office and residential areas have been provided.

"The frontage along Eagle Street is largely inactive. The applicant should revisit this element and try to maximise active frontage along Eagle Street. This could be achieved through reducing the entrances for refuse and parking an increasing the space given to the resi lobby."

- 4.8 RESPONSE: There is currently no active frontage on the Site along Eagle Street. As required by local planning policy, the Site encompasses off-site servicing. This requires a certain width of entrance and as such the Eagle Street servicing entrance represents the minimum size required in order to accommodate this provision. The quantum of active frontage on Eagle Street has therefore been maximised.

"The applicant should provide Average Daylight Factor (ADF) readings to the GLA prior to the application being referred back to the Mayor."

- 4.9 RESPONSE: ADF results will be provided.

"In the northern most units there will be privacy issues resulting from overlooking from the north western units of the north eastern units."

- 4.10 RESPONSE: The amended proposals incorporate a re-arrangement of residential accommodation to mitigate against any potential overlooking issues.

"Compliance with national minimum housing standards is required"

- 4.11 RESPONSE: The new homes will fully comply with the adopted standards.

"Further details should be provided regarding the use and access of the residential shared amenity space."

- 4.12 RESPONSE: All residents within the development will have access to the communal terrace. The hours of use of the terrace will be subject to planning condition.

"Info regarding the widths, surface materials, and how disabled people are segregated from traffic and turning vehicles should also be provided."

- 4.13 RESPONSE: Details of the proposed design and materiality of the proposed shared service entrance along Eagle Street will be provided by planning condition.

"Provision of a policy compliant level of inclusive access flats."

- 4.14 RESPONSE: As required by planning policy, 6 wheelchair adaptable flats (10%) will be provided as part of the proposed development.

"Further information should be provided on how (if at all) the benefits of using water to water heat pumps to recover heat rejected have been included in the carbon savings calculation."

- 4.15 RESPONSE: IES software has been used to calculate available heat rejection from the commercial cooling plant on an hourly basis. This was then compared with an estimate of hourly domestic water consumption for the residential building (based on data provided by the 'Institute of Plumbing Engineering Services Design Guide'). Over a year, it was calculated that site-wide heat recovery systems could account for 22% of the total domestic water load, with an average COP of 4. This information was inputted into NHER. The remaining domestic water load was met by a combination of air source heat pumps and gas fired condensing boilers. Baseline domestic water heating carbon emissions were calculated using gas fired boilers meeting 100% of the residential building's domestic water load.

“For the residential accommodation dynamic thermal modelling is recommended to demonstrate that overheating risk has been addressed.”

- 4.16 RESPONSE: A TM52 overheating assessment was undertaken on a selection of apartments that were deemed to be susceptible to overheating due to their orientation, elevation and spatial planning. The TM52 assessment procedure sets the minimum performance criteria of shading elements, glazing, ventilation and permeability that meet CIBSE best practice guidelines and establishes a performance benchmark that is inherently low in energy use. These design criteria were then incorporated into the ‘Lean’ compliance energy model that was issued as part of the Energy Statement.
- 4.17 A revised dynamic thermal model based TM52 and TM49 methodologies will be produced to inform shading provision and façade performances of the revised apartment layouts.
- 4.18 Active cooling is provided to each of the apartments because it is a market expectation. However, cooling systems are expected to be used infrequently, when any one of the TM52 overheating criteria are exceeded.
- 4.19 Energy for cooling is provided by highly efficient air-source heat pumps. It is therefore expected that cooling to residential apartments will have a marginal impact on the scheme’s carbon footprint.

“The applicant should also provide DER and TER sheets after efficiency measures alone for the domestic component (instead of SAP sheets that were provided).”

- 4.20 RESPONSE: DER/TER sheets for each of the lean, green and clean residential energy models have been provided accordingly.

“The applicant should explain how a future connection to district heating will be achieved in practice including an explanation of the distribution system and how this will be served by heat pumps now but suitable for connection later.”

- 4.21 RESPONSE: In order to futureproof the Templar House scheme, capped pipe work will be installed to the either the Eagle Street or the High Holborn boundary of the Site to facilitate connection to any future, low carbon district heating source. The capped connections and associated district heating pumps will be located at the Site boundary adjacent to district heating mains connections to rationalise pipework routes into both the domestic and commercial LTHW loops. Pipework distributions are to be sized and configured to avoid the need for extensive retrofit works once

district heating is made available and the existing plant reaches the end of its serviceable life.

“The applicant should clarify how the savings from ASHPs have been derived and if they are included in this tier of the energy hierarchy.”

4.22 RESPONSE: Carbon savings are derived from ASHP technology by providing 100% of the residential building’s space heating demand. The ASHPs will also connect to the domestic water circuit to preheat thermal stores prior circulation and top up by the condensing boilers. It is estimated that up to 38% of the residential domestic water demand is served by ASHPs.

4.23 It is understood that the Greater London Authority recognises air source heat pumps as a renewable energy source, as these systems operate by receiving and rejecting heat from the surrounding air. ASHP technologies were therefore included in the ‘be clean’, energy generation tier of the Mayor’s hierarchy for reducing carbon emissions.

“The on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. The applicant should address the comments above and clarify how the heat pump savings were derived. Any shortfall in carbon savings should be met off-site.”

4.24 RESPONSE: Carbon emission savings derived from air and water source heat pump technology are described above. It is noted that there is a shortfall in carbon savings below the 35%.

“There is a shortfall of commercial cycle parking spaces.”

4.25 RESPONSE: The approach towards the required long stay cycle parking provision for the commercial aspects of the proposed development was calculated based on the total usable floor space for these land uses; calculations excluded ancillary floor space which would support but not be used directly for these land uses e.g. basement and mezzanine areas. This approach was agreed with LBC officers at the pre-application meeting. There is no shortfall based on the agreed approach taken.

5.0 CONCLUSION

- 5.1 The proposed amendments maintain and further enhance the key planning benefits of the proposed development. Importantly they seek to ensure that 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.
- 5.2 The application as amended 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.
- 5.3 The conclusions previously stated are therefore still applicable. Furthermore, the amendments satisfy to the GLA's comments.
- 5.4 The amendments ensure that 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.