

150 HOLBORN PLANNING STATEMENT

DAH REAL ESTATES SARL

APRIL 2016





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PLANNING STATEMENT

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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Ltd (DP9) on behalf of DAH Real Estates Sarl (the Applicant) in support of a planning application for the redevelopment of 150 Holborn which is bound by Holborn to the south, Gray's Inn Road to the west and Brooke Street to the east.

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

“Demolition of existing building and redevelopment for a mixed-use development up to 9 storeys in height comprising 14,604sqm GEA office floorspace (use class B1), 1,450sqm GEA retail floorspace (use class A1-A3), 13 residential units (use class C3), improvements to the public realm and all other necessary enabling works.”

1.3 The proposed redevelopment will maximise the development opportunities of the site to deliver a high quality mixed-use scheme of significant architectural merit. This includes the provision of modern high quality Grade A office floorspace, attractive retail units and well-proportioned residential accommodation. The proposed development will also provide improvements to the public realm on Holborn and Brooke Street and the creation of a new public route through the site from Gray's Inn Road.

1.4 It is intended that the Applicant will occupy the proposed building as its new headquarters building. The group operates in over 100 countries worldwide and employs over 17,000 staff, it specialises in a number of different entities including sustainable design and engineering disciplines.

1.5 Within London, the Applicant's entities are currently distributed across several boroughs. The proposals will enable the consolidation of the Applicant's London group creating a striking new headquarters building alongside significant job and networking opportunities.

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

1.7 This statement should be read and considered in conjunction with the plans and drawings submitted as part of this planning application. This includes the following supporting statements:

- Planning Application Drawings prepared by Perkins + Will;
- Design & Access Statement prepared by Perkins + Will;
- Draft Construction Management Plan Pro-forma prepared by Sir Robert McAlpine;
- Daylight and Sunlight Assessments (Internal and External) prepared by Gordon Ingram Associates;
- Air Quality Assessment prepared by Temple Group Ltd;
- Energy Strategy prepared by Elementa;
- BREEAM pre-assessment) prepared by DAH;
- Noise, Vibration and Ventilation Assessment prepared by Sandy Brown;
- Sustainability Statement prepared by DAH;
- Ecological Appraisal prepared by DAH;
- Arboricultural Impact Assessment prepared by Ian Keen Limited;
- Floodrisk Assessment prepared by Sanderson Associates;
- Structural Statement prepared by CNM;
- Townscape Analysis prepared by Perkins + Will;
- Transport Statement (inc. Travel Plan and Delivery and Servicing Plan) prepared by Steer Davies Gleave; and
- Statement of Community Involvement prepared by Thorncliffe.

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

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

2.0 EXECUTIVE SUMMARY: THE PLANNING BENEFITS OF THE PROPOSED DEVELOPMENT

- 2.1 The key planning benefits arising as a result of the proposed development are summarised below:
- 2.2 The proposals will maximise the development opportunities of the site, thereby contributing to the regeneration and economic success of the Holborn Growth Area and the delivery of a minimum of 2,000 new jobs and 200 new homes in the area between 2001 and 2026, as required by planning policy.
- 2.3 Perkins + Will have developed a high quality architectural design for the site in order to maximise the development potential of the site; optimising the provision of commercial and residential accommodation whilst providing a highly sustainable building.
- 2.4 The existing building comprises 10,023 sqm of GEA office floorspace. This is compromised by poor layouts and servicing arrangements. The proposed development will deliver 14,604 sqm GEA of high quality office floorspace, providing a new collaborative and innovative headquarters building for the Applicant's group in Camden. This will create a significant uplift in jobs on the site alongside providing networking and cross learning opportunities for employees of the Applicant, thereby promoting Holborn as a thriving business location within the borough.
- 2.5 The provision of residential accommodation will help to significantly boost local housing supply, seeking to address increasing housing demand alongside creating a balanced local living and working population. The new housing is provided as a range of accommodation, including wheelchair accessible and large family units, which seek to address the current housing pressures facing the local area.
- 2.6 The proposal will promote mixed and inclusive communities. The proposals will contribute towards improving the housing mix in this part of the borough.
- 2.7 The proposed development will improve the pedestrian streetscape environment along Holborn, Brooke Street and Gray's In Road. A new public route across the site from Brooke Street to Gray's In Road will also be created as part of the proposals.
- 2.8 The site is located within a highly accessible location and therefore is suitable for high density development. The site is well served by public transport and is within close proximity of major London Underground connections.
- 2.9 In terms of sustainability, the proposed development will promote an exemplary level of energy efficiency and sustainable design. The proposed commercial areas will

meet and exceed the level required for BREEAM 'excellent' standards and the residential accommodation will meet the equivalent standards previously required by Code for Sustainable Homes level 4.

3.0 SITE & SURROUNDING AREA

The application site

- 3.1 The site is bound to the south by Holborn, to the east by Brooke Street and to the west by Gray's Inn Road. It is recognised within the Holborn Growth Area. The site covers an area of approximately 0.29 hectares.
- 3.2 The existing building, (constructed in circa mid-1980s) on the site comprises 12,798sqm GEA of office and retail floorspace up to 7 storeys (+ plant) in height. The building also includes a caretakers flat and squash courts which are ancillary to the principal commercial use of the site. The site is serviced by a yard to the rear accessed from Brooke Street.
- 3.3 Currently, the office accommodation is vacant and the retail units are partially vacant.

Heritage and conservation

- 3.4 The Site is not located within a conservation area itself however it is between the Hatton Garden Conservation Area to the east, Chancery Lane Conservation Area to the south and the Bloomsbury Conservation Area to the west.
- 3.5 Of note, it is also located within close proximity of the following heritage assets:
- Grade II* listed Gray's Inn Park and Gardens (north west of the site);
 - Grade II listed Obelisks marking the north and south boundaries of the City (south of the site);
 - Grade II* listed 337-338 Holborn (south of the site);
 - Grade I listed 1-4 Holborn Bars (south of the site); and
 - Grade II* listed Prudential Assurance Building (immediately east of the site).

Accessibility

- 3.6 The site is located adjacent to the entrance of Chancery Lane London Underground Station providing accessibility to the underground train network. In addition, Farringdon and Holborn stations are within walking distance of the site and a number of buses serve the site along Holborn and Gray's Inn Road.

- 3.7 The site benefits from a Public Transport Accessibility Level (PTAL) of 6b 'Excellent', which represents the highest level of accessibility attainable. This is discussed further in the Transport Assessment prepared by Steer Davies Gleave.

Planning History

- 3.8 Of significance, planning permission was granted on the site in February 2002 (planning ref. 2011/4198/P) for:

"Refurbishment and alterations to the property, including extension to 5th and 6th floor and additional floor at 7th level for Class B1 offices on Holborn and Gray's Inn Road elevations, extension at 3rd, 4th and 5th floor level for Class B1 offices and Class C3 residential on Brooke Street elevation, creation of 5 new residential units with 1 x existing unit (Class C3) and new residential entrance core off Brooke Street and associated elevation alterations, replacement plant and enclosures at roof levels, recladding to exterior elevations, alterations to main entrance including associates partial change of use from shops (Class A1) to offices (Class B1) at ground floor, partial change of use from offices (Class B1) to financial and professional services (Class A2) at 1st floor level, creation of enclosed service yard to rear with amenity space above, green/brown roofs and cycle parking."

- 3.9 Broadly the planning permission permitted the extension and refurbishment of the existing building alongside the creation of 5 new residential units and change of use of some of the existing retail floorspace at ground floor level.
- 3.10 We further acknowledge that a Certificate of Lawfulness for Existing Use (planning ref. 2015/1442/P) was granted on 21 May 2015 to certify that the use permitted above had been formally implemented through the undertaking of works.
- 3.11 On this basis, the 2002 planning permission is still live and therefore a material consideration for the assessment of the proposed development on the site.

The surrounding area

- 3.12 The site is located in the Holborn and Covent Garden ward and within the Holborn area, which is historically associated as a commercial location for business headquarters. Uses along Holborn (and further afield along High Holborn) are predominantly office buildings and supporting employment uses including retail, hotel and educational uses. The character of Gray's Inn Road is generally subordinate to Holborn however the road still provides a principal thoroughfare to the northern

parts of the borough. Brooke Street provides a distinctly quieter thoroughfare providing secondary retail frontage on the site alongside containing servicing access to the site and neighbouring buildings. Beyond the site at the northern end of Brooke Street lies a small public square providing a calmer setting for a residential building, a church and several smaller office buildings.

- 3.13 This part of the Holborn area has an evolving character where buildings have been redeveloped at various times throughout the last century to meet occupier/market requirements. Architecturally therefore the local area contains a variety of modern and traditional building styles. This backdrop creates an interesting contrast of building typologies for an area recognised as a thriving business location.
- 3.14 The neighbouring Grade II* listed Prudential building to the east sets an impressive and defined architectural tone for the site along Holborn. The building rises up to 6/7 storeys although of relatively grand proportions. A modern extension to the Prudential building is experienced along Brooke Street. This rises up to 5/6 storeys however lacks the impressive architectural detailing and materiality that exists on the Holborn frontage.
- 3.15 The Grade I listed Nos. 1-4 Holborn Bars, a series of late 16th century timber framed buildings, are located on the southern side of Holborn, opposite the site. These provide a distinctive and unique type of architecture within the local context and are widely associated with the local area's identity.
- 3.16 The building to the west along Holborn and across Gray's Inn Road is a late 21st century addition and is not considered to be of any architectural merit.
- 3.17 To the rear of the Site along Gray's Inn Road and Brooke Street is 14 Fox Court. The building provides office accommodation and was granted planning permission in 2013 (ref. 2013/0786/P) for the provision of additional office and retail floorspace through an infill extension.
- 3.18 The Site is also bordered by several mature trees which define the local area's character.
- 3.19 The design of the proposed development has been developed with consideration for the local built context including the setting of the nearby heritage assets.

4.0 DEVELOPMENT PROPOSAL

Summary of overall concept

- 4.1 A full assessment of the proposed development is contained within the Design and Access Statement prepared by Perkins + Will. This Planning Statement should be read in conjunction with the plans and drawings submitted to support the application.
- 4.2 The concept behind the proposals is to provide a high quality mixed-use sustainable development that maximises the site's employment capacity to provide a new high quality and highly collaborative office building for the Applicant alongside a number of well-proportioned attractive residential units.
- 4.3 The overall aspiration is to build on the economic success of the Holborn area alongside introducing new homes to create a mixed and balanced community within the local area.
- 4.4 Architecturally, the aspiration is to deliver a building of significant quality which provides a vibrant addition to the townscape of the local area whilst preserving the character and enhancing the appearance of the nearby heritage assets. At ground level, the brief is to enliven and improve the streetscape and pedestrian environment along Holborn, Gray's Inn Road and Brooke Street.

The proposed scheme

- 4.5 The application seeks full planning permission for:

“Demolition of existing building and redevelopment for a mixed-use development up to 9 storeys in height comprising 14,604sqm GEA office floorspace (use class B1), 1,450sqm GEA retail floorspace (use class A1-A3), 13 residential units (use class C3), improvements to the public realm and all other necessary enabling works.”

- 4.6 The proposed scheme seeks to demolish the existing building and construct a mixed-use commercial and residential development. The proposed Class B1 office and Class A1-A3 retail accommodation will be provided in a new building up to 9 storeys in height, stepped back appropriately from the existing building line on Holborn and Brooke Street. The existing location of the service yard will be maintained however enhanced to create a new shared area of public realm. In addition a new route through the site from Gray's Inn Road will restore a historic east-west route that ran

through the site, enabling greater permeability with the public access route through the neighbouring Prudential building.

- 4.7 The principal point of access for pedestrians accessing the new office building will be from Holborn with cycle and disabled car parking access from Brooke Street. At levels 6 and 8 of the office building, accessible external terraces are provided for users of the building. These will benefit from views to the south alongside a variety of formal and informal seating arrangements and attractive landscaping.
- 4.8 Architecturally, the proposals will provide a striking new addition to the Holborn streetscape. The design and materiality of the façade has been developed with extensive input from planning and design officers at the Council. The proposals are therefore well considered and complement appropriately the neighbouring heritage assets whilst creating a distinctive and individual building of exemplar design.
- 4.9 The proposed new office accommodation will be provided as high quality modern floorplates centred around a shared atrium. The office space will be activated by a series of shared spaces. The proposals will encourage a collaborative and innovative working environment providing opportunities for individuals to share ideas and socialise.
- 4.10 The Class C3 residential accommodation will be provided within a new building up to 7 storeys in height to the north of the site on Brooke Street. All residential accommodation will be accessed from an entrance at this point, including cycle access. A residential refuse collection point is accommodated at ground floor level to enable collection directly from Brooke Street.
- 4.11 The proposed flats are laid out well and as such a number are dual aspect. Importantly none of flats have a single northerly aspect.
- 4.12 A number of the proposed residential units will benefit from private amenity space in the form of either balconies or terraced areas.
- 4.13 Architecturally, whilst the character of Brooke Street is subordinate to Holborn, the design team have consistently aspired to deliver a high quality residential building of aesthetic value in order to enhance the Brooke Street streetscape and the appearance of the site in local views. The proposals include a high quality palette of materials for the residential building in order to complement the heritage context of the local area and make appropriate reference to the proposed architectural styling of the new office building. Further details can be found in the Design and Access Statement prepared by Perkins + Will.

- 4.14 It is proposed to provide new retail units with active frontage along Holborn, Gray's Inn Road and Brooke Street. The units will benefit from independent access and have been designed to provide the retail units with high levels of visibility so they can enliven the street frontage and create vibrancy in the local area. The units will be serviced from the proposed servicing route accessed from Brooke Street.
- 4.15 Cycle parking for the proposed residential and commercial users will be provided at ground (28 spaces) and basement level (192 spaces) and accessed from Brooke Street. Dedicated changing, showering and locker facilities for employees of the site will be provided on the site. A further 10 cycle parking spaces will be provided within the public realm.
- 4.16 The development will be car free with only 2 disabled parking spaces provided within the development for users of the site. New residents will not be entitled to apply for a parking permit in the local area.
- 4.17 The basement area, largely existing from the current building, will accommodate associated building plant. In addition, the scheme will be supported by renewable energy technologies including Photo Voltaic panels at roof level.

Proposed floorspace schedule

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

Table 1 – Existing and proposed commercial floorspace

Use Class	Existing Floorspace (sqm GIA)	Proposed Floorspace (sqm GIA)	Existing Floorspace (sqm GEA)	Proposed Floorspace (sqm GEA)
Class B1	9140	12960	10023	14604
Class A1-A3	2775	1388	2843	1450

Table 2 – Proposed residential accommodation

		Number of units and floorspace
Class C3 Housing	Studio	3
	1 bedroom	3
	2 bedroom	5
	3 bedroom	2
	TOTAL	13

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

5.0 CONSULTATIONS

- 5.1 The submission of this planning application follows extensive consultation undertaken over a period of more than 6 months. This process has seen the scheme develop through close consultation with London Borough of Camden (LBC) planning and design officers, as well as local residents, businesses, representative organisations and elected figures.
- 5.2 Full details of the pre-application consultation can be found in the Statement of Community Involvement prepared by Thorncliffe submitted as part of this application.

London Borough of Camden

- 5.3 The project team have met with LBC officers on numerous occasions through formal pre-application meetings and meetings with officers to focus on individual disciplines.
- 5.4 The design has evolved as a result of these meetings with LBC's officers in line with the advice and comments received, most notably in terms of the architectural form of the building and its façade, in order to complement the local historic context appropriately.
- 5.5 In addition, discussions have also been held with policy, sustainability and transport officers to discuss the development proposals.
- 5.6 Through these meetings officers at the LBC have confirmed the following:
- Officers are strongly supportive of the principle of increased employment provision on the site, including the delivery of modern office floorplates and shared spaces to provide a high quality headquarters building on Holborn;
 - Officers welcomed the proposals for a mix of uses on the site, including residential accommodation;
 - Agreement was reached with LBC regarding the design principles and materiality of the development proposals; and
 - Agreement was reached with transport and waste officers in relation to the servicing, waste and access (pedestrian, cyclist and vehicular) strategy for the site.

Local Members

- 5.7 The proposed development was discussed with Cabinet Members in early 2016. This included discussing the benefits that the Applicant can bring to the borough and the positive benefits in the local area arising from the proposed development.
- 5.8 The proposals have also been discussed with local Ward Members.
- 5.9 Further discussions with councillors will be pursued throughout the period whilst the planning application is under consideration.

Other key stakeholders

- 5.10 In late 2015, a List of Stakeholders was prepared identifying the community groups and other key stakeholders with a vested interest in the site and its redevelopment.
- 5.11 Since then, the team has communicated with a number of these groups to discuss the initial proposals. At each of these meetings an outline of the proposals was presented and questions were asked and answered in order to gather feedback on the proposals.

Public consultation

- 5.12 Public exhibitions were held on the site on 26th and 27th November 2015 and subsequently on 24th March 2016. Invitations for the exhibitions were sent to all local residents, businesses and members. Approximately 2,500 invitations were sent out for each exhibition and personalised invitations issued to a number of Councillors.
- 5.13 The public exhibitions provided good opportunities for the public to view and discuss the proposals with members of the team.
- 5.14 A wide variety of ways to respond to the public consultation were available. Feedback could be given by using the Freephone number, a Freepost address, and a dedicated email address. The content of the feedback was later discussed with the design and Applicant team.
- 5.15 Details of the feedback received is provided within the accompanying Statement of Community Involvement.
- 5.16 The project team will continue to engage with the local residential and business community to keep them up to date regarding the progress of the development.

Conclusions regarding pre-application consultation

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

6.0 PLANNING POLICY AND ASSESSMENT OF PLANNING ISSUES

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

National planning policy

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

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

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

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

The development plan

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

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

- 6.7 The London Plan was originally published in July 2011. This document provides the overall strategic plan for London, setting out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. Subsequently, the London Plan has been updated to incorporate 'Revised Early Minor Alterations' (2013) and 'Further Alterations to the London Plan' (FALP) (2015). The updates were incorporated to ensure consistency with the NPPF and address key housing and employment issues emerging from an analysis of recent census data.
- 6.8 The Greater London Authority (GLA) has produced a number of documents which provide more detailed strategic guidance regarding London Plan policies and are also relevant to the proposed development. These include:
- London View Management Framework (March 2012)
 - Sustainable Design and Construction SPG (April 2014)
 - The Mayor's Transport Strategy (May 2010)
 - Use of Planning Obligations in the Funding of Crossrail, and the Mayoral Community Infrastructure Levy (March 2016)
 - Housing SPG (2016)
- 6.9 Where relevant within the supporting application documents these guidance notes have been referred to. They tend to relate to detailed technical or individual topic matters and have not all been directly referred to in this Planning Statement.
- 6.10 LBC's Planning Policies comprise a suite of planning policy documents to guide and inform development within the borough. The principal documents currently are the Core Strategy and the Development Policies documents which were both adopted in 2010. In order to reflect evolving local priorities, the Council have embarked on a review of the current principal policy documents and the publication of a draft Local Plan. The draft plan was issued for consultation early in 2016. As the policies in the plan are only in an initial draft stage, they are not referred to as material considerations however general themes and policy aspirations are cited where relevant.
- 6.11 LBC have also prepared a number of Camden Planning Guidance documents. Where relevant these documents have also been considered.

Site designations

6.12 The site is identified within the Camden Proposals Map for the following site designations:

- Central London Frontage
- Central London Area
- Holborn Growth Area

6.13 In addition, Holborn is recognised as an area for intensification within the London Plan.

Planning policy assessment

6.14 This section reviews all of the above policies which are relevant to the proposed development and provides an assessment of how the proposed development complies with planning policy in respect of the following:

- i. Land use - the principle of a mixed use development;
- ii. Land use - commercial floorspace;
- iii. Land use – residential;
- iv. Residential accommodation, unit mix and affordable housing;
- v. Amenity;
- vi. Design and conservation;
- vii. Landscape, biodiversity and playspace;
- viii. Energy and sustainability;
- ix. Transport, servicing and parking; and
- x. Accessibility.

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

6.15 Camden Core Strategy Policy CS1 promotes the most efficient use of land and buildings in Camden. The policy directs growth towards locations recognised for high accessibility including the Holborn area and encourages development to provide a mix of uses in these locations, including housing. Further, as required by Development Policies Policy DP1, sites within the designated Central London Area are required to provide up to 50% of all additional floorspace as housing.

6.16 Specific to the Holborn area, Core Strategy Policy CS2 identifies a targeted delivery of a minimum of 200 new homes and an indicative 2,000 jobs within the Holborn

growth area from 2001 – 2026. This delivery target is maintained within the recent draft Local Plan for the period 2011 – 2026.

- 6.17 As noted, the site is identified as one of the London Plan's areas for intensification. The plan supports 'intensification through mixed-use redevelopment at higher densities' within the Holborn area. In addition, a number of policies within the London Plan emphasise a requirement for mixed use development within highly accessible locations.
- 6.18 Redeveloping the site to create a new home for the Applicant alongside a high quality residential offer has always been central to the brief throughout the design and development process for the proposals. Through the intensification of the site and optimisation of office floorplates, the proposals will significantly increase the commercial floorspace and employment density on the site, providing a striking new headquarters building for the Applicant alongside enhancing opportunities in the local area for jobs and enterprise. In addition, the proposed residential building will provide high quality new homes to create a mixed and balanced community within a central London location. With regards to addressing Policy DP1, the proposals seek to provide the maximum quantum of residential floorspace achievable on the site, in light of the brief to deliver a new headquarters building for the Applicant and the built constraints of the site (namely heritage considerations and rights of light). Further details of the commercial requirements of the Applicant are included within the accompanying Design and Access Statement prepared by Perkins + Will. This position has been discussed and agreed in principle with LBC planning, policy and housing officers.
- 6.19 The proposals are therefore aligned to the strategic policy aspirations for delivering mixed use developments within highly accessible locations in London.

ii. Land use – commercial floorspace

- 6.20 As outlined within the Core Strategy, the growth aspirations for Holborn are based on the redevelopment and intensification of existing properties, particularly offices, at higher densities.
- 6.21 Core Strategy Policy CS8 states that the Council will secure a strong economy in Camden. Further, the Camden Employment Land Review 2008 forecasts that the demand for offices will increase by 615,000 sqm between 2006 and 2026. To meet this demand the Council identify that they will direct new business towards the growth areas, including Holborn. This demand is recognised by subsequent iterations

of the land review. Policy CS9 provides further support, stating that the growth areas (including Holborn) should contribute towards London's economic role.

- 6.22 With relevance to the existing site, Development Policy DP13 Part c) states that where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that the level of employment floorspace is maintained or increased. Part d) of the policy requires that redevelopment of existing employment sites provides other priority uses, including housing.
- 6.23 As part of a mixed commercial and residential redevelopment of the site, the proposals seek to deliver a high quality efficient office building which will provide a significant uplift in employment density on the site. Intrinsic to the proposed new building's design is its ability to provide a new exemplary headquarters building for the Applicant in Camden, providing opportunities across the building for networking. The proposed development therefore represents a significant contribution towards the Holborn growth area, the local office market and Camden's role within a wider London economy. For the purposes of analysis, the requirements of the policy will be successfully achieved.
- 6.24 Consistent with the retail aspirations of planning policy, the proposals provide 1,450 sqm GEA of ground floor retail floorspace with expansive glazing to increase visibility of the units and stimulate streetscape activity on the Holborn, Gray's Inn Road and Brooke Street frontages.
- 6.25 Whilst this represents a reduced quantum of retail floorspace compared to the existing building, this is offset by the proposed additional public realm to Holborn, the creation of a new public route through the site from Brooke Street to Gray's Inn Road and the creation of a large vibrant office entrance to activate Holborn.
- 6.26 In addition and of note, the existing retail floorspace provision includes ancillary offices which provide no retail or public benefit.
- 6.27 As discussed with officers, the proposals will enliven the streetscape alongside providing a variety of new amenities to the local area. In light of the amount of public benefit arising from the proposals, the reduced quantum of retail floorspace in this instance is therefore acceptable.

iii. Land use – residential

- 6.28 With regard to residential uses, the NPPF seeks to *'boost significantly the supply of housing'*. Paragraph 49 states that applications should be considered in the context of sustainable development.
- 6.29 The London Plan, incorporating updates, identifies the urgent need to increase housing supply in London to address the substantial population increase in the capital. This includes a recent increase in the annual housing target from c.32,000 new homes per annum to at least 42,000 new homes per annum. New housing starts for 2013 fell from the previous year to only 18,000 and when set against these increasing targets identifies the urgent need for new sustainable housing to come forward for early development as part of the mixed and sustainable planning strategies applicable. The proposed development would therefore contribute towards the provision of new housing, in line with the aspirations of the London Plan.
- 6.30 As stated above, all levels of policy support the delivery of housing on the site. Further, development should also seeks to optimise housing potential taking account local context and character, design principles and public transport accessibility in accordance with London Plan Policy 3.4. Overall the site is considered to provide an excellent opportunity to optimise housing potential within this location.
- 6.31 The overarching principle advocated in local Policy CS1 of the Core Strategy requires that developments promote the most efficient use of land and buildings in Camden. Policy CS1 also supports the development of a mix of uses in easily accessible locations in the borough to ensure that the most efficient and optimal use of land. The site is well served by public transport and is therefore capable of accommodating a larger scale, mixed use development.
- 6.32 Development Policy DP1 delivers Policy CS1 by setting out a detailed approach to mixed use development. DP1 states that the Council will require a mix of uses in development where appropriate, including a contribution towards the supply of housing.
- 6.33 As such, it is considered that the proposed redevelopment of site complies with Policies CS1 and DP1 as it provides mixed use development in a highly accessible location and helps the Council meet their key planning policy objectives.
- 6.34 Core Strategy Policy CS6 seeks to provide quality homes and maximised the supply of housing in Camden to meet local housing need. The proposed development complies

with the overall aim of CS6 by providing a site which will contribute towards the Council's housing targets and the local Holborn targets for residential intensification.

- 6.35 Camden Development Policies DP2 seeks to maximise the supply of additional homes in the borough. The development scheme will provide a significant contribution to the supply of housing on an underused site and therefore the proposal also accords with Policy DP2.
- 6.36 The provision of residential uses on site is therefore considered to be acceptable in principle.

iv. Residential accommodation, unit mix and affordable housing

- 6.37 In line with Policy CS6, the development will bring a diverse range of housing products to the market and will provide accommodation of different sizes as set out in the Design and Access Statement. All the proposed housing will achieve Lifetimes Homes Standards and 10% have been designed to be wheelchair accessible or easily adaptable for wheelchair users.
- 6.38 Core Strategy Policy CS6 aims to secure high quality affordable housing is secured through negotiations to ensure that the affordable housing proposed represents the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development.
- 6.39 Development Policy DP3 requires that all developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing. The policy states that in considering whether an affordable housing contribution should be sought, the Council will take into account a number of factors, this includes the economics and financial viability of the development including any particular costs associated with it.
- 6.40 An Affordable Housing Statement has been prepared by DS2. This is provided to enable further discussions with officers regarding affordable housing.
- 6.41 In accordance with London Plan Policies and the Housing SPG, the proposed development has been designed to meet the Mayor's standards and requirements for new residential development.

v. Amenity

- 6.42 LBC Development Policy DP26 'Managing the impact of development on occupiers and neighbours' states that the Council will only grant permission for development

that protects the amenity of occupiers and neighbours. Assessments have therefore been prepared to assess the impacts arising from the proposed development on daylight and sunlight, noise and vibration and air quality.

- 6.43 The Daylight and Sunlight assessment was undertaken by Gordon Ingram Associates. The report includes an assessment of the impact of the proposed development upon the existing residential properties surrounding the site, in this instance this is 1-23 Gray's Inn Road.
- 6.44 Gordon Ingram Associates conclude that in terms of impact on daylight provision there is a high level of VSC compliance for 1-23 Gray's Inn Road. Where impacts do occur, this is because the top floor windows are deeply recessed and as such have very low existing VSC values. The sunlight results show full BRE compliance. As such Gordon Ingram Associates are of the opinion that the potential impacts are more attributable to the layout and design of 1-23 Gray's Inn Road rather than the change in massing on the site. The proposed development will therefore not materially affect the enjoyment or use of the surrounding properties.
- 6.45 Gordon Ingram Associates have also prepared a report on the quality of daylight and sunlight for the proposed residential accommodation. This reports that, despite the orientation and urban nature of the site, daylight and sunlight amenity has been maximised.
- 6.46 A Noise, Vibration and Ventilation Assessment has been prepared by Sandy Brown to determine the likely noise levels resulting from the completed development and any ground-borne vibration from the underground train tunnels which could affect the completed development.
- 6.47 The report makes references to standard guidance and LBC Development Policy DP28, which details the specific acoustic requirements for developments in the borough. In order to assess the acoustic requirements of Development Policy DP28, noise and vibration surveys have been completed within the building and surrounding area.
- 6.48 In terms of noise, the results from the noise measurements have been used to confirm that the proposed location of the residential accommodation forming part of the development is located in a suitable location, where planning permission will normally be granted. The design of the residential units will need to consider attenuation measures in order to achieve suitable internal noise conditions. Guidance is provided on how these can be achieved.

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- 6.49 With regards to vibration, the report concludes that the results indicate that neither the levels of tactile vibration nor re-radiated noise are likely to be such that further vibration mitigation is required.
- 6.50 As required by Camden's Development Policy DP32, an Air Quality Assessment has been undertaken by Temple Group Ltd. Following assessment, the accompanying report concludes that during construction, providing suitable mitigation measures are instigated, there will be a negligible impact on dust generating activities within the local area. For the operational stage of the development, the report concludes that the operation of the proposed development is expected to have an overall negligible impact on local air quality.
- 6.51 In summary, the proposed development will not have an adverse effect on the amenity of existing occupiers and neighbours. The proposed development therefore fully complies with planning policy requirements.

vi. Design and conservation

- 6.52 A full evaluation of the design and the proposed development and its relationship to the surrounding urban and historic context is set out within the Design and Access Statement and the accompanying Townscape Analysis which have been submitted as part of the planning application.
- 6.53 The Government attaches great importance to the design of the built environment. The NPPF states that planning decisions should not attempt to impose architectural styles and should not stifle innovation, originality or initiative (paragraph 60). The NPPF recognises that although visual appearance and the architecture of individual buildings are very important factors, high quality design should also address the connections between people and places and the integration of new development into the natural, built and historic environment (paragraph 61).
- 6.54 In determining planning applications, the NPPF directs that great weight should be given to outstanding or innovative designs which raise the standard of design more generally in the area (paragraph 63). The London Plan Policy 3.5 also advocates quality and design in housing developments.
- 6.55 Camden's Core Strategy Policy CS14 seeks to promote high quality places and conserve heritage assets. The policy requires proposals to be of the highest standard of design that respects local context and character. Development Policy DP24 seeks to secure high quality design.

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- 6.56 Locally, Camden Development Policy DP25 seeks to conserve Camden's heritage by preserving conservation areas, listed buildings and other heritage assets. The policy resists development that is seen as harmful to such assets.
- 6.57 The existing building does not have any architectural merit or significance and therefore its demolition to enable proposals to come forward that will significantly enhance the local built context is acceptable.
- 6.58 As the site is located in close proximity to conservation areas and listed buildings, local views and townscape impacts have been assessed and considered from an early stage in the design process. Additionally, the views of LBC design officers have been influential in the evolution of the design for the proposed massing and architectural form on the site.
- 6.59 As shown within the accompanying Design and Access Statement, the development proposes a very high quality design which will maximise the potential of the site whilst complementing the built context and heritage of the surrounding area. Particular care and attention has been given to the bulk, height and massing of the scheme to avoid any adverse impact on neighbouring properties, including the adjacent Prudential building. Rather, the proportions and materiality of the neighbouring building have been assessed to develop a proposal that is complementary to the Prudential building whilst creating its own distinctive architectural identity. It is therefore considered that the proposed design solution is of an appropriate scale and massing.
- 6.60 The design of the proposed scheme has responded to reflect pre-application discussions with the Council's planning and design officers and feedback received from the consultation activities. The application proposal is considered to be of a very high standard of design and architectural quality which will make a significant contribution to improving the townscape quality of the site.
- 6.61 In accordance with Development Policy DP24, high quality materials will be used to provide visually interesting frontages with subtle brickwork detailing. The Design and Access Statement submitted as part of this application provides more detail regarding precedent materials and finishes.
- 6.62 The user experience at ground level has been intrinsic to shaping proposals. In Holborn this involves providing a contemporary double height glazed frontage to maximise visibility and stimulate streetscape activity from the new retail units. Through amendments to the existing building line, the proposals introduce new public realm to Holborn for the benefit of users and passers-by to the site enhancing the wider streetscape of the Holborn area.

- 6.63 With regards to the impact on views and the setting of nearby listed buildings, the townscape analysis shows that the proposals will have a beneficial impact on the local townscape.
- 6.64 Overall the proposals are considered to be consistent with the design aims of the development plan and relevant urban design and historic built environment guidance.

vii. Landscape, biodiversity and amenity space

- 6.65 London Plan Policy 7.5 seeks to ensure that proposed developments make the public realm comprehensible at a human scale, using gateways and focal points. Landscape treatment and infrastructure should be of the highest quality.
- 6.66 Core Strategy Policy CS15 states that where development proposals create additional demand for open space, opportunities should be secured for improvements to open spaces including the facilities provided for play, access arrangements and connections between spaces. The policy encourages biodiversity in the borough through the provision of biodiverse green or brown roofs and new trees and vegetation.
- 6.67 Core Strategy Policy CS15 aims to protect and improve open spaces and encourage biodiversity by creating the provision of new or enhanced habitat through green areas etc and by protecting trees and promoting the provision of new trees and vegetation.
- 6.68 Development Policy DP24 seeks to ensure that developments consider existing natural features, provision of appropriate hard and soft landscaping including boundary treatments and the provision of appropriate amenity space.
- 6.69 The site does not currently benefit from any landscaped or green areas and therefore it provides little ecological value. The adjacent trees however along Holborn and Gray's Inn Road provides some ecological value and amenity to the public realm. The existing trees will be retained and protected appropriately throughout the demolition and construction processes. This will be detailed within the full construction management plan which will be provided pursuant to planning conditions. In addition, the proposed development will include new features to promote ecological activity, as recommended by the accompanying Ecological Strategy prepared by DAH.
- 6.70 In relation to residential amenity, the majority of residential units will have access to their own private balconies or gardens.

- 6.71 For the office tenants, users of the proposed office building will have access to terraces at levels 6 and 8 of the building. The terraces will include an array of seated and garden areas providing pleasant breakaway spaces which benefit from panoramic views of London. The proposed terrace on Level 8 will be complemented by facilities to allow it to be used for functions. Use of the terraces will be encouraged to support a highly collaborative and efficient working environment.
- 6.72 Overall it is considered that the development proposals are in accordance with the aims of the relevant LBC planning policies.

viii. Energy and sustainability

- 6.73 Core Strategy Policy CS13 and Development Policy DP22 promote sustainable design and construction in all new developments across Camden. Care has been taken to ensure the design of the scheme has evolved to incorporate sustainable credentials.
- 6.74 An Energy Statement has been prepared by Elementa in relation to the proposed development. In accordance with the London Plan and Mayors Sustainable Design and Construction SPG (2014), the regulated carbon dioxide emissions of the proposed scheme have been reduced by 21.8% from a Part L 2013 compliant baseline by maximising the contribution of be lean, be clean and be green steps of the Mayor Energy Hierarchy.
- 6.75 The proposals achieve a reduction in carbon emissions through passive design features for the residential and commercial buildings respectively. This is achieved through the incorporation of highly efficient glazing within the residential building and LED lighting within the commercial building.
- 6.76 To further reduce the carbon dioxide emissions, an assessment of potential low and zero carbon technologies has been undertaken which provides a further reduction in carbon emissions for development. During pre-application discussions, it was understood from discussions with Camden Council, it is preferable that accessible roof spaces are utilised as roof terraces, with inaccessible unshaded roof spaces to be utilised for PVs and inaccessible shaded roof spaces be used as green roofs. In line with this guidance, the majority of the roof space will be an accessible green roof terrace.
- 6.77 Whilst there is no district heating network located within the vicinity of the site, the development is futureproofed to enable a connection in the event that it could be connected to a district heating network in the future should a network be developed nearby. Further detail is provided within the accompanying Energy Statement.

- 6.78 Overall the proposed development is compliant with GLA guidance and is considered to be acceptable in principle.
- 6.79 A Sustainability Statement has been prepared by DAH in relation to the proposed development which includes a BREEAM Pre-Assessment.
- 6.80 The report concludes that the scheme will achieve BREEAM New Construction 2014 rating 'excellent' for the commercial element of the scheme, achieving a total score above 80%. This BREEAM rating is over and above the requirement required under Camden Development Policy DP22, which requires developments to achieve BREEAM 'very good' rating up to 2016.
- 6.81 With regards to recognising the sustainability attainment for the residential building, despite the Code for Sustainable Homes Assessment having been withdrawn, the development has been designed to achieve an equivalent level of Code for Sustainable Homes Level 4.
- 6.82 Overall the proposed development for the site achieves excellent levels of sustainability and is considered to be in accordance with planning policy requirements.

ix. Transport, servicing and parking

- 6.83 A full evaluation of the proposed development in terms of traffic and transport is provided within the Transport Statement prepared by Steer Davies Gleave. The site is very well served by public transport and provides an opportunity for a sustainable development in transport terms. The principles of transport, servicing and parking have been discussed previously with the Council's transport officers.
- 6.84 A comprehensive assessment of the existing public transport accessibility has been undertaken which concludes that the site has a PTAL rating of 6b, this identifies the site as having excellent levels of public transport accessibility.
- 6.85 As required by both local and London wide planning policy, the proposed development will be car free, with the exception of two disabled car parking spaces designated for the commercial uses and accessed from the service entrance on Brooke Street. The predominant method of travel for workers, residents and visitors to and from the development is likely to be by public transport, walking or cycling.
- 6.86 The proposals include the creation of a new public route through the site. This will be of significant benefit for local area, enhancing local pedestrian permeability and activity. Part of this access is through the proposed service yard, where appropriate

landscaping and other measures will be used to ensure pedestrians can cross the service yard safely when a vehicle is entering the service bay.

- 6.87 The scheme has been designed to encourage sustainable travel and provides attractive and easy to use cycling facilities including cycle parking and dedicated showers, changing areas and lockers for occupants of the commercial building. In total the scheme will provide 230 cycle parking spaces which will be located in across the site. This level of provision meets the recently published London Plan requirements and BREEAM standards.
- 6.88 The proposed development scheme is not dependent on travel by public motor vehicles but will encourage opportunities for users of the site to travel by sustainable means. A detailed Travel Plan Framework has been prepared and is appended to the Transport Statement. Overall therefore the scheme is considered to be in accordance with Core Strategy Policy CS11 and Development Policies DP16 and DP17 which promote sustainable and efficient travel.
- 6.89 The proposals are also in accordance with Development Policy DP18 which seeks to limit the availability of car parking spaces and ensure that development provides the minimum necessary car parking provision. As stated above, the development is only seeking to provide 2 disabled car parking spaces and therefore the scheme is considered to comply with this policy requirement.
- 6.90 All commercial servicing for the development will take place from the servicing bay accessed from Brooke Street. Vehicles associated with servicing the commercial building will turn around within the site, leaving in forward gear as required by the Council's guidance.
- 6.91 Residential deliveries will be serviced from within the site. Residential waste will be collected by the Council's refuse vehicle from a roadside drop off point.
- 6.92 Further details relating to the servicing of the site are provided within Steer Davies Gleave's report.
- 6.93 It was agreed with the LBC transport officer that a Construction Management Plan Pro-forma relating to the proposed development would be provided as part of the submission. This has been prepared by Sir Robert McAlpine to accompany this application. Further details, relating to provisions to be undertaken by a contractor, will be submitted subsequently as part of a more detailed Construction Management Plan following the formal appointment of a contractor.

x. *Accessibility*

- 6.94 London Plan Policy 3.8 and Camden Development Policy DP6 refers to lifetime homes and wheelchair housing and requires that all housing development should be built to Lifetime Homes standard. In addition 10% of homes developed should either meet wheelchair housing standards or be easily adapted to them. The development proposals include one two bed unit which is designed to meet LBC's wheelchair housing standards. Further details regarding the scheme accessibility can be found in the Design and Access Statement.
- 6.95 Policies DP29 and CS14 promote achieving the highest standards of access in all buildings and places, require schemes to be designed to be inclusive and accessible and seek to promote fair access and remove barriers that prevent people from accessing facilities and opportunities.
- 6.96 The development proposal has been designed to ensure that the building and space around it is inclusive and accessible to all through the provision of two disabled car parking spaces for the commercial building. As detailed further within the Design and Access Statement, the design of both the commercial and residential buildings incorporate design measures to ensure that inclusive accessibility is maintained across the site.
- 6.97 It is therefore considered that the proposals are consistent with the aims of the London Plan and LDF Policies CS14, DP6 and DP29.

7.0 CONCLUSIONS

- 7.1 The application provides an opportunity to develop a vibrant mixed use scheme to secure important economic, social and environmental benefits whilst achieving the essential objectives of sustainable development. It will provide a new headquarters building for the Applicant, promoting a highly collaborative and innovative working environment. This will create significant public benefits for the borough.
- 7.2 In principal, the uplift and enhancement of commercial floorspace on the site will make a significant contribution to the quantum and quality of office space within the Holborn area. The proposed internal layout of the office floorplates and atrium will allow the commercial elements to flourish; providing additional networking and learning opportunities alongside promoting the local and wider London economy.
- 7.3 The provision of residential uses as part of the mixed use redevelopment of the site will seek to ensure the proposals positively contribute towards optimising the potential of the site and towards meeting the Council's housing targets. The introduction of residential accommodation on the site will add vibrancy to the local area and contribute towards achieving a balanced living and working population within Holborn.
- 7.4 The provision of a new public route through the site will promote pedestrian permeability and activity through the area. The enhancements to the site's retail offer and the provision of additional public realm to Holborn will enliven the local streetscape and provide valuable amenity in the local area.
- 7.5 The proposed development has been informed following a series of meetings, discussions and public exhibitions with officers from the London Borough of Camden, local groups, local residents and members. During this process, feedback has been incorporated into the design and development of the proposals and alterations have been pursued appropriately.
- 7.6 Perkins + Will have designed a development of significant architectural quality which relates positively and sensitively to the setting of the site including the local conservation areas and neighbouring listed buildings. The Design and Access Statement outlines the proposals in further detail.
- 7.7 The scheme has been designed to meet sustainability requirements at national, regional and local level. The building will combine energy efficient and renewable energy measures to minimise carbon emissions. The proposed employment space

will meet BREEAM 'excellent' and the residential accommodation will achieve equivalent standards to the previous Code for Sustainable Homes level 4.

- 7.8 The Transport Assessment demonstrates that the site has excellent levels of public accessibility to meet the scale of the development proposed. The proposed development will be car free and will encourage users of the site to use sustainable methods of transport.
- 7.9 Overall the development proposals for the site are considered to be fully compliant with planning policies at the national, regional and local level.
- 7.10 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.