

BJC/HPM

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Dear Elaine,

PLANNING APPLICATION (REF 2016/2094/P) AT 150 HOLBORN, LONDON, EC1N 2NS

RESPONSE TO OFFICER COMMENTS

We write in support of the application for the site at 150 Holborn ('the Site') and further to comments received in emails dated circa 20 June 2016 in light of proposals for the site. We have set out below the comments as received and seek to respond them, enclosing supporting reports where relevant.

TREES

Impact on the street trees

With regard to trees, the submitted documents fail to address the impact of the building beyond the basement and ground floor. Given the projection beyond the existing footprint at 2nd floor level, it seems optimistic to describe the pruning that would be required to give a clearance of 2m as minor

RESPONSE: A further note is enclosed which has been prepared by Ian Keen Limited, the appointed tree consultant for the proposals. The note highlights that the level of pruning required by this application is typical of urban situations, including the current situation where these same trees are maintained by pruning to provide clearance

Landscaping

With regard to the landscape details, this is all fairly high level at present. It all looks fairly inoffensive, if a little bland. There is a disparity between the comments in the arboricultural report, which states that rowan tree should be removed and replaced, and the Design and Access Statement which shows the existing tree to be retained.

RESPONSE: The proposals will enhance the site through the delivery of a comprehensive high quality landscaping scheme. This detail is still being developed and will be provided pursuant to a planning condition at a later stage.



We clarify that in Section 3.4 the arboricultural report advises simply there is an “*opportunity, afforded by this development, exists to replace the tree with a specimen of greater merit*”. It is not proposed at this time to replace this tree.

Additionally, there is a preference towards biodiverse roofs instead of sedum blankets, and biosolar solutions as opposed to segregated PV/Green roof areas.

RESPONSE: We are happy to provide a brown biodiverse roof in lieu of sedum blanket to the area in question.

ENERGY AND SUSTAINABILITY

In light of the comments received below, Clarke Nicholls Marcel (CNM) have prepared and collated the following information in accordance with the Council’s queries:

- Drainage Statement
- Drainage Proforma
- Proposed Drainage Specification for Cell
- Drainage Technical Manual
- Drainage Proposals Basement Plan
- Drainage Proposals Service Yard
- Drainage Existing Drainage Discoveries
- Drainage Existing Site Surface Water Catchment Area
- Drainage Proposals Upper Floor Attenuation Volumes
- Drainage Proposals Ground Floor Attenuation Volumes

In addition, please note the responses from CNM to the queries below.

Proposed SuDS:

No information submitted.

RESPONSE: The proposed suds scheme will comprise of blue roofs under the brown roofs. There will be an 85mm thick “permavoid” crate located under the brown or green roofs. Making a volume of storage on the roof of 93m³ similarly there will be the same for the Residential roof at 10.5m³. neither of the above takes into account any storage capacity with the green or brown roof. There will also be 16.5M³ in a crate in the ground within the service yard. That give a total storage volume of 120M³

Flow control devices will be set up within the permavoid and provided with relevant access for future cleaning

Greenfield, Existing and Proposed Run off rates:

No change in impermeable area. No further information submitted.

RESPONSE: The greenfield run off rate could be considered as being 5.0 l/ha/s, in our instance with the site being less than 0.3 ha the run-off pro rata would be 1.5 l/sec This is far too small for this application indeed the EA recognise that anything less than a discharge of 5.0L/S is liable to blockage

However we are working to the mayors essential standard of reducing the SW run-off by 50%, that seems fair and reasonable bearing in mind the site has been fully developed and discharging

to sewer for many many years. The existing flow rate is calculated as 41.0l/s using the Modified Rational Method based on a site area of 2922m² and a rainfall intensity of 50mm/hr. The proposed run off is therefore calculated as 50% of 41.0 L/sec and we have taken this as 20 l/sec.

Proposed volume of water attenuated
No information submitted.

Our quick Win-des software calculations to meet the 50% reduction in SW discharge to suit a 1:100year storm + 30% would require an attenuation volume of between 73-120M³ depending upon layout. This will probably come down to around 100m³ as the design develops.

However, in terms of moving the design on we will work on the basis of the worst case scenario and look to retain 120m³

Policy compliance and Further information required

Submit an FRA if >1ha

Comment: Site is <1ha. FRA submitted. Flood risk deemed low. Mitigation measures proposed (as outlined below)

Major developments to achieve greenfield run-off rates wherever feasible and as a minimum 50% reduction in run off rates.

Comment: No information submitted

Action for applicant: Submit required information as detailed on this page. SuDS are a requirement for all major planning applications, unless demonstrated to be inappropriate. The applicant should submit a Surface Water Drainage Statement, alongside the completed SuDS Proforma. They should also include drawings showing details of SuDS extent and position (including invert levels and site exceedance flows), as well as details on maintenance requirements and arrangements.

RESPONSE: See response above and enclosed reports.

Developments to include SuDS unless inappropriate

Development should follow the drainage hierarchy in policy 5.13 of the London Plan

Comment: Infiltration SuDS not deemed suitable. No further information submitted.

Action for applicant: See above.

RESPONSE: We believe that we are fulfilling item no 4 in the hierarchy, we could guarantee the volume being available if storing the RW for later use, infiltration will not work generally in London, and there are no areas available for ponds or open waters.

Developments in areas known to be at risk of surface water flooding are designed to cope with being flooded.

Comment: The site falls within Flood Zone 1. BGS borehole records confirm presence of groundwater in one of the boreholes at 2.0m below ground level and 3.5m below ground level in another. Exposed water did not rise. Site is not considered to be in an area which is susceptible to flooding from groundwater flooding – no recorded incidents of groundwater flooding. Confirmation that the development will not increase risk of groundwater flooding should be assessed in the BIA.



There is low risk of surface water flooding and there have been no incidents of sewer flooding. However the SFRA indicates that the site lies within a critical drainage area therefore SuDS should be considered.

To protect occupants from flood risk the development is incorporating the following measures:

- 1. Raised finished floor levels*
- 2. Graded external hard standing areas, to fall away from entrance*
- 3. Regular maintenance and inspection of drains on site.*
- 4. Raised electrical circuits (at least 450mm above the finished floor level, in accordance with Part M of the Building Regulations 2000).*

RESPONSE: Noted. Mitigation measures can be incorporated accordingly.

AIR QUALITY

Construction impacts:

Mitigation measures to control construction related air quality impacts should be secured within the CMP as per the standard CMP pro-forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included. Air quality monitoring should also be implemented on site with the following condition wording:

"Air quality monitoring should be implemented on site. No development shall take place until full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance and have been in place for 3 months prior to the proposed implementation date. The monitors shall be retained and maintained on site for the duration of the development in accordance with the details thus approved.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 (Managing the impact of growth and development) and CS16 (Improving Camden's health and wellbeing) of the London Borough of Camden Local Development Framework Core Strategy and policies DP32 (Air quality and Camden's Clear Zone)"

RESPONSE: The terms of this condition and provisions are considered to be acceptable.

Impact of the development – AQ Neutral:

The 3 proposed boilers servicing the development will have a NOX rating of <40mgNOX/kWh, in line with the GLAs SPG. Emissions have been calculated based on emission rates for the boilers (power output of 600kW with an expected loading of 45 per cent, operating 10 hours per day). The calculated emissions for the proposed scheme (284.4) are below the emission benchmarks (462.6) meaning that the development meets air quality neutral requirements. There is negligible impact from traffic as a result of the development - the development will be 'car-free' with only two disabled parking bays (one with an electric charging point), therefore Transport Emissions Benchmarks (TEBs) have not been calculated for the development.

The applicant should clarify if servicing, delivery vehicles and taxis have been considered in their modelling.

RESPONSE: As stated, the proposed development will be car free and will benefit from excellent access to public transport options alongside a high quality substantial cycle strategy. Servicing will also be minimised where possible. On this basis, as stated in the report there will

be a negligible air quality impact from local traffic movements as a result of the proposed development.

Impact on occupants:

NO₂ levels are shown to be consistently over the legal limit (including for all locations in the dispersion modelling). There are also some breaches of the national air quality objectives for PM₁₀. Some mitigation proposed in that residential units have been positioned away from the main road. The applicant's Energy and Sustainability Statements both reference proposed MVHR in response to the poor outdoor air quality, however the Air Quality Assessment includes no reference to this mitigation measure.

Before any conditions can be proposed the applicant should include details of the MVHR system and any proposed filters to bring indoor air quality to an acceptable standard as an addendum to their AQA. This should include the efficiency of the system, predicted indoor air pollution level after treatment and any maintenance requirements. Once this is accepted the following condition may be applied (might need to be reworded depending on their response).

"Prior to commencement of development (excluding demolition and site preparation works) on site, full details of the mechanical ventilation including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from roads and the boiler stack to protect internal air quality. Reason: To protect the amenity of residents in accordance with DP26, London Plan policy 7.14. To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and policies DP12, DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies."

It would be necessary to attach a condition relating to the maintenance of the system.

RESPONSE: The accompanying note prepared by Elementa (dated 05 July 2016) provides details of the dedicated MVHR units for each individual apartment. The proposed planning condition terms are acceptable however the requirement should be 'prior to occupation'. This will ensure that a high quality internal residential environment is provided for future occupants.

NATURE CONSERVATION AND BIODIVERSITY

The ecological appraisal, its methodology, timings and conclusions are considered acceptable. However, in line with best practice and Camden Guideline we would like to see a more biodiverse living roof (preferably a brown roof) rather than a sedum mat. Also, there appears to be further roof space at the top level. Please clarify if there is a particular reason why this space is not being considered for green roof space?

RESPONSE: It has been confirmed that a brown biodiverse roof can easily replace the sedum roof. The roof space is optimised to provide sufficient space for plant and to provide amenity for users of the building in the form of a glass roof to the atrium and a landscaped garden terrace for the benefit of users/visitors to the buildings and local ecological conditions. In addition, the top roof to the pavilion, i.e. the solid portion, is ringfenced for PV panels. These details can be reserved via planning condition.

Subject to answers to these questions, the following conditions would be applied if permission is granted:

Precautionary Approach to demolition

"Prior to implementation a method statement for a precautionary working approach to demolition and construction should be submitted to the Local Authority and approved in writing. This shall include approaches to mitigate the impact on bats and breeding birds in line with DEFRA guidelines for the removal of feral pigeons, as recommended in the Ecological Appraisal. All site operatives must be made aware of the possible presence of protected species



during works. If any protected species or signs of protected species are found, works should stop immediately and an ecologist should be contacted. The applicant may need to apply for a protected species licence from Natural England, evidence of which should be submitted to the Local Authority.

Reason: To ensure the development contributes towards the protection of habitats and species, ensuring compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended) and in accordance with policy CS15 (Protecting and improving our parks and open spaces and encouraging biodiversity) of the London Borough of Camden Local Development Framework Core Strategy."

RESPONSE: It is proposed to submit this alongside the formal demolition and management construction management plans and we would ask therefore that it is consolidated within these planning conditions accordingly.

Bird and bat boxes

"Prior to first occupation of the development a plan showing details of bird and bat box locations and types (preferably integrated into the building fabric) and indication of species to be accommodated (to include black redstart) shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.

Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan (Consolidated with Alterations Since 2004) and Camden Planning Guidance 2006 and policy CS15 of the London Borough of Camden Local Development Framework Core Strategy."

RESPONSE: This terms and principle of the proposed planning condition is acceptable.

Green roof details and installation:

"Full details in respect of living roof(s) shall be submitted to and approved by the local planning authority before the relevant part of the development commences. The details shall include species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. The living roof(s) shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme of maintenance.

Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies."

RESPONSE: This terms and principle of the proposed planning condition is acceptable.

Landscape: details to be submitted, including biodiversity enhancements:

"No development shall take place until full details of hard and soft landscaping have been submitted to and approved by the local planning authority in writing. Such details shall include details of roof terrace gardens and vertical gardens and shall include planting for the enhancement of biodiversity. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policy CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies."

RESPONSE: This general principle of the proposed planning condition is acceptable. As the design is evolving for the hard and soft landscaping areas and a period of officer review and comment is likely to be required, we would propose that the requirement for these details is triggered 'before the relevant part of the development commences' in the condition wording.

Landscape: to be carried out in accordance with approved details:

"All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any

case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policy CS14 of the London Borough of Camden Local."

RESPONSE: This terms and principle of the proposed planning condition is acceptable.

We trust the response above satisfy the comments received from officers. If you have any queries or require the provision of further information, please do not hesitate to contact Barnaby Collins or Harry Manley of this office.

Yours sincerely



DP9 Ltd

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