



GERALDEVE

## Town Planning Statement

182-184 High Holborn, London, WC1V 7AP

On behalf of: Covent Garden Investment S.A.R.L

Date 3 November 2016



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# 1 Executive Summary

- 1.1 The proposals within this application, brought forward by Covent Garden Investment S.A.R.L, will provide an exciting opportunity to redevelop this site, creating a high quality sustainable mixed use office-led scheme.
- 1.2 The existing building detracts from the immediately surrounding area with inactive ground floor frontage and heavy external cladding material and it provides inefficient office floorspace which does not meet modern day office floorspace market demand.
- 1.3 The proposals offer the opportunity to deliver efficient, flexible office floorspace suitable for multiple businesses of varying sizes, allowing for a greater variety of enterprises to occupy Central London office space.
- 1.4 The proposals would also lead to the activation of the ground floor façade through the introduction of flexible retail and restaurant use on an important corner and thoroughfare in Camden and Central London between two of London’s most visited tourist destinations: Covent Garden and The British Museum.
- 1.5 The application site adjoins the Tottenham Court Road Opportunity Area, which the London Plan identifies and promotes as being capable of accommodating substantial development to provide new jobs or homes. Although not within the Opportunity Area, these proposals accord with and support the Opportunity Area’s objectives, representing an opportunity to create high quality employment space for the 21st Century. The scheme will provide 4,701 sqm of new and improved office floorspace generating new jobs which will complement the new retail and residential developments in the adjoining Tottenham Court Road Opportunity Area.
- 1.1 The scheme will deliver a number of planning benefits including:
- Contribute to the regeneration and transformation of the area;
  - Sustainable reuse and regeneration of a building which no longer meets modern office user demands;
  - Delivering high quality business floorspace that will contribute to sustainable economic development;
  - Delivering sustainable development through improvements in energy

efficiency;

- Improving accessibility to, and within, the boundary for all users;
- High quality design, contributing to the wider townscape setting; and
- Provision of new active public uses at ground and lower ground floor levels to reactivate street frontages.

1.6 In this context it is considered that the development will make a significant contribution to both Camden and London through maximising the potential opportunity of the site, providing appropriate links to and benefits for, the surrounding area and existing communities and according with the Council's aspirations and objections for the wider area.

1.7 The application proposals will achieve this and seek to comply with the Development Plan policies, guidance and standards contained therein.

## 2 Introduction

2.1 This Planning Statement is submitted in support of a detailed planning application made on behalf of Covent Garden Investment S.A.R.L ('the applicant') for the remodelling, refurbishment and extension in respect of 182-184 High Holborn. This statement sets out the town planning case in support of the application. It summarises the planning history of the site and assesses the development in the context of relevant planning policies and guidance.

2.2 The proposals are described in greater detail in the Development Proposals section of this statement. In summary, planning permission is sought for the:

**“Remodelling, refurbishment and extension of existing building including formation of private terraces, rooftop plant, new entrances and all other enabling works in connection with the use of the building as offices (Class B1) and flexible B1/A1/A3 floorspace.”**

2.3 The statement is structured as follows:

- Section 3 – description of the site and surroundings;
- Section 4 – details of the site’s background and planning history;
- Section 5 – details of the development proposals;
- Section 7 – relevant planning policy framework;
- Sections 8-14 – assessment of the material planning considerations arising from the application proposals; and
- Section 15 – summary and conclusions.

2.4 The proposed works are designed by SPPARC Architects ('SPPARC') and are described in Section 4 of this statement and within the submitted Design and Access Statement. This statement should be read in conjunction with the plans and drawings and the following documents which are submitted as part of this application:

- Design and Access Statement, prepared by SPPARC;
- Townscape, Heritage and Visual Impact Assessment, prepared by KMHeritage;
- Energy Strategy, prepared by SWECO;

- Sustainability Statement (including BREEAM), prepared by SWECO;
- Acoustic Planning Report, prepared by Sandy Brown Architects;
- Daylight and Sunlight Report, prepared by Lumina London;
- Transport Assessment (including Travel Plan, Delivery and Servicing), prepared by Curtins;
- Construction Management Plan, prepared by Quantem Consulting;
- Statement of Community Involvement, prepared by LCA;
- Community Infrastructure Levy forms; and
- Section 106 Heads of Terms.

2.5 This statement sets out the town planning assessment of the proposed scheme and assesses it in the context of national, regional and local planning policy and guidance

2.6 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act (2004), and therefore the development plan, against which development within the London Borough of Camden must be assessed comprises: the London Plan, being the Spatial Development Strategy for Greater London, adopted by the Mayor in July 2011, revised in 2016 and Camden's Local Development Framework (LDF). The LDF consists of the Core Strategy, Development Policies, Camden Planning Guidance, Site Allocations Supplementary Planning Documents (SPD) and the Proposals Map.

2.7 Section 3 of this statement goes on to consider the application site and its surrounding area in greater detail.

### 3 Site and Surroundings

- 3.1 The application site is located in the London Borough of Camden (LBC). The building fronts on to two streets: Smart's Place and High Holborn. High Holborn is a busy traffic route through the area.
- 3.2 The existing building is six storeys in height with one basement level. The site's lawful use is for Class B1 office. The building has been occupied by the Arab Press for a number of years.
- 3.3 The London Plan identifies the application site within the Central Activities Zone (CAZ). The site is not located within any protected views or viewing corridors within the London View Management Framework (2012).
- 3.4 Within the Camden Local Development Framework (LDF), the site is within an Archaeological Priority Area and has a Central London location.
- 3.5 The site is not located within a conservation area however the Seven Dials (Covent Garden) Conservation Area is located to the south of Smart's Place. The Bloomsbury Conservation Area is located directly to the northeast of the site. The site is therefore part of a small pocket of buildings surrounded by conservation areas.
- 3.6 The significance of the Seven Dials (Covent Garden) Conservation Area lies in its highly distinctive radiating street pattern. The Seven Dials area was laid out at the end of the 17th century.
- 3.7 Bloomsbury Conservation Area was designated in 1968. The special character of the area presents a distinctive rectangular street pattern incorporating open squares and terraced housing in the classical tradition encompassing the whole of the Georgian period. As home to the British Museum, much of the University of London and UCLH, the Bloomsbury area enjoys a reputation as a centre of cultural and historic importance.
- 3.8 To the west of the site, 181 High Holborn is a locally listed heritage asset. The building is not protected by legislation; nonetheless it is important that development

in its setting is sensitive to its significance.

- 3.9 The site has an excellent public transport accessibility level with the highest rating of PTAL 6b.
- 3.10 Buildings surrounding the site are of mixed scale.
- 3.11 Surrounding properties are primarily in commercial (B1 office) use. Larger residential communities are predominantly located to the north in Bloomsbury or to the south in Covent Garden.
- 3.12 The site is located close to many of London's major tourist attractions including The British Museum and University Area to the north; Covent Garden (market, theatres and retail) to the south west; and Oxford Street retail to the west.
- 3.13 The site is located in an area undergoing a period of significant investment and change. 21-31 New Oxford Street (ref: 2014/5946/P) and Commonwealth House (ref: 2014/4983/P) are schemes which demonstrate that the area is delivering mixed-use schemes and transforming to provide a destination in Camden where users can live, work and play.
- 3.14 The site is immediately adjacent to the London Plan designated Tottenham Court Road Opportunity Area. According to the Council, development in this area is expected to deliver a substantial majority of new business floorspace through the maximisation of a site's opportunity potential. This development therefore sits within the context of an area in transformation and will complement that change through the delivery of active ground floor uses and modern day office floorspace.

## 4 Planning History

- 4.1 In this section the site's planning history is assessed from the original permission for the building on 24 March 1981. A full planning history table is attached at Appendix A of this Planning Statement.
- 4.2 On 24 March 1981 planning permission (ref: 31530/R2) was granted for: "Redevelopment of the site by the erection of a basement and six storey office building fronting Smart's Place & High Holborn, and a four storey light industrial building fronting Smart's Place & Stukeley Street."
- 4.3 On 30 September 1981 permission was granted for "erection of a basement and six storey office building fronting Smart's Place and High Holborn and a four storey light industrial building fronting Smart's Place and Stukeley Street" (reference: 32794/R2).
- 4.4 A change of use application (reference: 2005/0332/P) for the "change of use from office use (Class B1) to non-residential educational use (Class D1)" was submitted on 4 February 2005 and was subsequently withdrawn.
- 4.5 An application for the "erection of two additional floors for office use (Class B1), demolition of existing roof mounted plant room, and replacement with a new plant room together with roof mounted mechanical plant" (reference 2008/1257/P) was submitted on 5 March 2008, but later withdrawn.

## 5 Development Proposals

5.1 This application seeks planning permission for the following development:

**“Remodelling, refurbishment and extension of existing building including formation of private terraces, rooftop plant, new entrances and all other enabling works in connection with the use of the building as offices (Class B1) and flexible B1/A1/A3 floorspace.”**

5.2 The proposed development would see the retention and recladding of the existing building, with the addition of two storeys to create an eight storey building.

5.3 The scheme will deliver a number of planning benefits including:

- Delivering high quality business floorspace that will contribute to sustainable economic development;
- Delivering sustainable development through improvements in energy efficiency;
- Improving accessibility to, and within, the boundary for all users;
- High quality design, contributing to the wider townscape setting and role of this area a world class destination; and
- Delivering improved active frontages at ground floor level.

5.4 The development proposals are the result of extensive consultation with LBC planning and design officers. At all times, the team has sought to respond to the comments and incorporate them into the scheme.

## Land Use Summary

5.5 The proposed land use at the site is as follows:

Land Use	Existing (sqm GEA)	Proposed (sqm GEA)	Net Change (sqm GEA)
Office (Class B1)	4,179	4,701	522
Flexible Class A1/B1 Ground Floor	0	104	104
Flexible Class B1/A1/A3 Ground Floor	0	381	381
<b>TOTAL</b>	4,179	5,186	1,007

## 6 Consultation

- 6.1 The Localism Act 2011 emphasises the need for effective and meaningful pre-application consultation.
- 6.2 This is reiterated by the National Planning Policy Framework, March 2012, ('NPPF') which states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussions enable better coordination between public and private resources and improve outcomes for the community (paragraph 188).
- 6.3 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the preparation of this planning application.
- 6.4 Paragraph 190 reiterates that the more issues that can be resolved at the pre-application stage, the greater the benefits.
- 6.5 The proposals for the refurbishment and extension of 182-184 High Holborn have been subject to extensive consultation between November 2015 and August 2016. Those consulted include:
- The London Borough of Camden planning and design officers;
  - Seven Dials Trust;
  - Bloomsbury Association;
  - Covent Garden Community Association (CGCA);
  - Bloomsbury Conservation Area Advisory Committee (BCAAC);
  - New West End Company;
  - InMidtown;
  - Soho Society;
  - South Bloomsbury Tenants' and Residents' Association;
  - Holborn and Covent Garden ward councillors; and
  - Local residents and businesses.

### **Pre-Application Discussions**

- 6.6 Pre-application meetings in respect of these development proposals have been held on: 1 March 2016, 23 March 2016, 11 July 2016 and 18 August 2016.
- 6.7 The development proposals have evolved over the past 6 months to incorporate comments received in relation to design and to incorporate comments wherever possible.

### **Public Exhibition**

- 6.8 A public exhibition in respect of the proposals was held on 19 July and 20 July 2016.
- 6.9 The project team organised, publicised and staffed a two day public exhibition at two separate locations: the Green Room at Dragon Hall, in Stukeley Street, and the Upper Vestry Hall at St George's Church, in Bloomsbury Way. The locations were chosen because of their close proximity to the site as well as for their accessibility and nearby transport connections. The dates for the exhibition were strategically chosen so that it took place before the official beginning of London Borough of Camden's school summer holidays (20 July), when many local residents would have been on holiday and unable to attend.

### **Statement of Community Involvement**

- 6.10 The Statement of Community Involvement (SCI) submitted with this application, prepared by the London Communications Agency, demonstrates the thorough approach taken towards the consultation process.
- 6.11 Overall the SCI demonstrates that a meaningful engagement process was undertaken in respect of the proposals, which has resulted in the design team being able to capture consultee comments and evolve the scheme accordingly.

## 7 Planning Policy Context

7.1 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:

i. The London Plan. The London Plan presents the Mayor's spatial development strategy for London. This document has been consolidated with alterations since 2011. Hereinafter this will be referred to as the London Plan ("LP").

ii. The Camden Local Development Framework (LDF). The LDF is made up of Camden's Core Strategy, Development Policies and Site Allocations Document. These documents set out the Council's intentions for land use and development from 2010 to 2025. The Development Policies provide more detailed policies (from those in the Core Strategy) for assessing planning applications. The LDF documents are up to date and should be afforded full weight.

7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

### National Planning Guidance

#### The National Planning Policy Framework (NPPF) March, 2012.

7.3 The NPPF document sets out the Government's planning policies for England and how these are expected to be applied. It summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

7.4 The NPPF introduces the presumption in favour of sustainable development although it makes it clear that the Development Plan is still the starting point for decision making.

7.5 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce

their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

- 7.6 One of the core planning principles of the NPPF is that planning should not simply be about scrutiny but instead be “a creative exercise in finding ways to enhance and improve the places in which people live their lives”.
- 7.7 The Ministerial Statement, ‘Planning for Growth’, emphasises the importance of securing economic growth and employment. The document states that when considering planning applications, Local Planning Authorities should support enterprise and facilitate housing, economic and other forms of sustainable development.

### **Planning Practice Guidance, 2014**

- 7.8 The Planning Practice Guidance was produced and published by the Department of Communities and Local Government (DCLG) in March 2014. This resource makes Planning Practice Guidance available entirely online and allows users to link between the NPPF and relevant planning practice guidance, as well as other different categories of guidance.

### **Regional Planning Policy**

#### **The London Plan**

- 7.9 The London Plan (as amended, 2016) aims to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 years. The London Plan includes London-wide planning policy guidance and sets the relevant regional planning policy guidance for the London Borough of Camden and forms a component part of the statutory development plan.
- 7.10 The Mayor considers that the greatest challenge faced in London is to accommodate significant growth in ways that respect and improve London’s diverse heritage while delivering the vision for an exemplary, sustainable world city.

## Local Planning Policy: Camden Core Strategy, 2010

- 7.11 At the local level, Camden's (LBC) Core Strategy (2010) sets out strategic policies. Development control policies are set out within the Development Control Document (2010).
- 7.12 Camden Council is undertaking a review of its current planning policy documents. Consultation on the Local Plan Submission Draft ran for 8 weeks from 8th February to the 4th April 2016. On 24th June 2016 the Council submitted the Camden Local Plan and supporting documents to the Secretary of State for independent examination. As the replacement Local Plan is still under examination it has limited weight.

## Supplementary Planning Guidance

- 7.13 Other relevant LBC Supplementary and Design Guidance of relevance to this application includes:
- Camden Planning Guidance 1 (CPG1) – Design;
  - Camden Planning Guidance 2 (CPG2) – Housing;
  - Camden Planning Guidance 3 (CPG3) – Sustainability;
  - Camden Planning Guidance 5 (CPG5) – Town centres, retail and employment;
  - Camden Planning Guidance 6 (CPG6) – Amenity;
  - Camden Planning Guidance 7 (CPG7) – Transport; and
  - Camden Planning Guidance 8 (CPG8) – Planning Obligations.

## Site Specific Allocations

- 7.14 Within the LP, the site is located in the Central Activities Zone ("CAZ"). The LP notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London's financial and globally-orientated business services sector and the offices

of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media. The LP identifies that the Mayor and boroughs should inter alia recognise that the CAZ is the heart of London's world city offer and promote and coordinate development so that together they provide a competitive, integrated and varied global business location.

- 7.15 On the LDF proposals map to the Core Strategy the application site is located in the Central London Area. The site is also is designated as an Archaeological Priority Area.

### **Principal Planning Issues**

- 7.16 The proposals have been assessed against several key planning issues.
- 7.17 The key considerations associated with the proposals are examined in the next chapter:
- Land Use
    - Office
    - Retail/Restaurant
    - Mixed Use
  - Design
  - Townscape and Heritage
    - Conservation Areas and Listed Buildings
    - Views
  - Environment
  - Amenity
    - Daylight and Sunlight
    - Noise
  - Transport
    - Car and cycle parking
    - Servicing
    - Construction Traffic Management

## 8 Land Use

- 8.1 This section assesses the proposals against relevant national, regional and local land use policies.
- 8.2 One of the aims set out in the NPPF is to ensure that developments optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks (paragraph 58). It is therefore important to ensure that a range of needs can be met through a new development.
- 8.3 The site is located within the London Plan defined CAZ and Camden's Central London Area.
- 8.4 The London Plan states that the Mayor is committed to protecting the unique character of the CAZ which covers London's geographic, economic and administrative core. The Mayor's strategic priorities for the CAZ are set out in Policy 2.10 of the London Plan and include:-
- Enhance and promote the unique international, national and London wide roles of the CAZ, supporting the distinct offer of the Zone;
  - In appropriate quarters, bring forward development capacity and supporting infrastructure and services without compromising residential neighbourhoods;
  - Sustain and enhance the distinctive environment and heritage of the CAZ;
  - In appropriate parts of the CAZ ensure that development of offices is not strategically constrained and that provision is made for a range of occupiers; and
  - Improve infrastructure for public transport, cycling and walking and optimise the development and regeneration benefits they can support.

## Office

- 8.5 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century.
- 8.6 The Ministerial Planning for Growth Statement, March 2011, notes the importance of securing economic growth and employment. The guidance considers that Local Planning Authorities should consider the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession and consider the range of likely economic, environmental and social benefits of proposals; including long term indirect benefits such as increased consumer choice, more viable communities and more robust local economies.
- 8.7 The LP notes that the CAZ contains a unique cluster of vitally important activities including central government offices, headquarters and embassies, the largest concentration of London's financial and globally-orientated business services sector and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media.
- 8.8 The supporting text of LP policy 4.2 acknowledges that in the CAZ, there remains a strong long-term office demand and a substantial development pipeline which is partly subject to the implementation of Crossrail (para 4.14). Environmental improvements in these locations continue to be needed to enhance its attraction as a global business destination.
- 8.9 LBC policy CS8 of the Core Strategy explains that a concentration of office growth should be promoted across growth areas and Central London. Part c) states that LBC will expect a mix of employment facilities and types.
- 8.10 LBC policy CS9 supports growth in homes, offices, hotels, shops and other uses within Central London. LBC will inter alia:
- i. recognise its unique role, character and challenges;
  - ii. support Central London as a focus for Camden's future growth in homes,

offices, shops, hotels and other uses;

- iii. seek to ensure that development in Central London, in the growth areas of King's Cross, Euston, Tottenham Court Road and Holborn and beyond, contributes to London's economic, social and cultural role while meeting the needs of local residents and respecting their quality of life;
- iv. support residential communities within Central London by protecting amenity and supporting community facilities;
- v. seek to secure additional housing and affordable homes, including as part of appropriate mixed use developments.

- 8.11 LBC development control policy DP13 states that where sites are suitable for continued business use, LBC will consider redevelopment proposals for mixed use schemes provided that, the level of employment floorspace is maintained or increased; and they include other priority uses, such as housing.
- 8.12 The proposals for 182-184 High Holborn involve the refurbishment and extension of the existing building to provide 4,701 sqm (GEA) of flexible office floorspace. The existing building is currently in office use and was developed to be used by the Arab Press House.
- 8.13 The proposals intend to create an office building which has been designed to provide flexible internal floorspace. The open floor plate can then be subdivided as required.
- 8.14 Currently the site has only been able to accommodate one occupier. Therefore the proposals will lead to a vast increase in the type of company that can operate here and increase the variety of the job provision in the area, significantly contributing towards meeting the targets set out in the LP.
- 8.15 The proposals will facilitate modern occupier demands and are therefore in accordance with the aspirations of the LP which seeks renovation/renewal of office stock to increase and enhance the quality and flexibility of London's office market.
- 8.16 The proposal therefore accords with Policies 2.13 and 4.2 of the London Plan and Policies CS8 and CS9 of the Camden Core Strategy.

## Retail/Restaurant

- 8.17 At a national planning policy level, paragraph 23 of the NPPF states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the Plan period.
- 8.18 The guidance makes clear that local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.
- 8.19 The NPPF requires that Local Planning Authorities should apply a sequential approach when considering the most appropriate location for retail uses i.e. focusing large scale retail in High Order Centres.
- 8.20 Paragraph 23 goes on to state that it is important that needs for retail and other town centre uses are met in full and are not compromised by limited site availability.
- 8.21 At a regional level, the LP sets out a number of policies relating to town centres and retail development. 182-184 High Holborn is located within the CAZ.
- 8.22 Within the CAZ, the LP seeks to support and improve the retail offer for resident, workers and visitors especially within the West End as a global shopping destination (Policy 2.10). In addition, the LP acknowledges one of the CAZ's strategic functions is to ensure that development provides for a mix of uses (Policy 2.11).
- 8.23 LP policy 2.15 sets out the requirements for development proposals within town centres. They should aim to:-
- i. Sustain and enhance the vitality and viability of the centre
  - ii. Accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations
  - iii. Support and enhance the competitiveness, quality and diversity of town centre retail, leisure and other consumer services
  - iv. Be in scale with the centre

- v. Promote access by public transport, walking and cycling
- vi. Promote safety, security and 'lifetime neighbourhoods'
- vii. Contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure
- viii. Reduce delivery, servicing and road users' conflict.

8.24 Policy 4.7 relates to retail and town centre development in relation to the LP strategic direction and planning decisions. The policy seeks to support a strong approach to assessing need and bringing forward capacity for retail development in town centres. The scale of retail should be related to the size, role and function of a town centre and its catchment.

8.25 In addition, LP Policy 4.8 seeks to support a successful and diverse retail sector.

8.26 At a local level, Policy CS1 sets out the distribution of growth within the Borough. The policy seeks sustainable development which makes the most efficient use of limited land and buildings.

8.27 Policy CS7 states that retail growth can be provided in town centres where opportunities emerge.

8.28 LBC will promote successful centres for residents, visitors and workers by:

- i. Seeking to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre;
- ii. Providing for and maintaining a range of shops, services, food, drink and other suitable uses to provide variety, vibrancy and choice;
- iii. Protecting and promoting small and independent shops, and resisting the loss of shops where it would cause harm to the character and function of a centre;
- iv. Making sure that food, drink, and entertainment uses do not have a harmful impact on residents and the local area, and focusing such uses in Camden's Central London Frontages, Town Centres;
- v. Supporting and protecting Camden's local shops, markets and areas of specialist shopping;
- vi. Pursuing the individual planning objectives for each centre.

- 8.29 Paragraph 7.17 sets out LBC's vision for small shops. LBC will promote the provision of small units where appropriate and independent shops where possible.
- 8.30 Specifically, the Council will consider the need for the provision of small units for schemes involving over 1,000sqm of retail and generally expect such provision for schemes of 5,000sqm of retail or more (para 10.4). Small units are considered to be those that are less than 100sqm gross floorspace. The Council will take in to account the character and size of the shops in the local area when assessing the appropriate scale of new premises.
- 8.31 The development site lies within Central London and therefore should be promoted as part of a competitive town centre which provides customer choice and a diverse retail offer in line with the NPPF, London Plan and LDF aspirations.
- 8.32 The proposal involves the provision of 485 sqm of active public uses with a flexible A1/B1 unit of 104 sqm and a flexible A1/A3/B1 unit of 381 sqm, both of which will activate the street frontages in this area of central London. The proposals support the LP and LBC objectives for the CAZ by providing an enhanced retail offer in an internationally recognised shopping location.
- 8.33 At the present time the area around 182-184 High Holborn offers a very poor ground floor experience considering its Central London location. The aim is to create a ground floor offer that generates 'a sense of place' with good synergy between the upper floor commercial uses and the active uses at lower floors. The proposals have the opportunity to activate the frontages at ground floor with uses that respond to the location and the local users.
- 8.34 It is considered that the active uses should offer convenience to the local user and tourist and offer a reflection of the very central location between the two major cultural and historical centres of Bloomsbury and Covent Garden.
- 8.35 A strict operational and management policy would be put in place, dealing with such considerations as refuse handling, good deliveries, maintenance and cleaning of any extract duct and use of external seating areas.
- 8.36 It is considered that this is an opportunity that will activate the ground floor frontages

in accordance with planning policy and guidance.

### **Mixed Use**

- 8.1 Policies 2.11 and 4.3 states that the Mayor and Boroughs should ensure that development proposals to increase office floorspace within the CAZ include a mix of uses including housing. This has, however, been supplemented by the recently adopted CAZ SPD. The emphasis of this SPD is to encourage the provision of office and business floorspace within the CAZ and the document sees a shift towards greater weight being placed on the provision of offices and other CAZ strategic functions relative to new residential. In this particular location it states that offices and other CAZ strategic functions should be given greater weight relative to new residential.
- 8.2 At a local level, policy DP1 contained within the Camden Development Policies, 2010 (adopted prior to the recent CAZ SPG) considers that where a proposal will increase the total gross floorspace of a site in the Central London area or within a Town Centre by more than 200 sqm, the Council will expect a contribution to the supply of housing. Where appropriate, the Council will negotiate up to 50% of additional gross floorspace (GEA) as housing. The Council will require any secondary uses to be provided on site, particularly where 1,000 sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is triggered by policy but cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally, a payment in lieu.
- 8.3 DP1 states that in considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:
- a) The character of the development, the site and the area;
  - b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;
  - c) the need for an active street frontages and natural surveillance;
  - d) the economics and financial viability of the development including any particular

costs associated with it;

e) whether the sole or primary use proposed is housing;

f) whether secondary uses would be incompatible with the character of the primary use;

g) whether an extension to the gross floorspace is needed for an existing user;

h) whether the development is publicly funded;

i) any other planning objectives considered to be a priority for the site.

8.4 The policy continues to state that where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area or exceptionally a payment in lieu.

8.5 The proposals result in a gross uplift of 1007 sqm. Under DP1, a total of 504 sqm of on-site residential would be required.

8.6 As acknowledged in the Core Strategy, the Council gives priority to housing but not to the extent that this priority should override the need to protect some non-residential uses across the borough. It is also noted that priority for housing needs to be considered in the context of the characteristics of specific areas, sites and properties. The supporting text to Policy DP1 recognises that there are a number of circumstances where a mix of uses may not be sought.

8.7 The project team examined the potential for housing to be provided on site in accordance with Policy DP1 and concluded that in this instance, it is not feasible to introduce residential floorspace as part of the proposals. The following paragraphs respond to the Policy DP1 criteria, where applicable.

**a) The character of the development, the site and the area;**

8.8 There is limited capacity to accommodate additional residential development on the site. The proposed development is a refurbishment and extension of an existing office building, accordingly, the opportunity to provide any additional floorspace, to accommodate residential floorspace, is limited.

8.9 Furthermore, the site is in the CAZ where office use is given greater weight to residential use in the recently adopted CAZ SPG. The site is also located in close proximity to the new Crossrail station at Tottenham Court Road which is due to open in 2018. As a result of the new Crossrail station there will be an increased demand, in the area, for office floorspace. Employment floorspace in this location is therefore protected and promoted.

**b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;**

8.10 The existing floorplates are designed for commercial use and are not readily adaptable for residential use having regard to London Housing SPG standards. The proposals are for the refurbishment of an existing commercial building which covers the entire existing building footprint.

8.11 The project team has investigated the potential to provide residential accommodation and has concluded that any housing created would fail to meet the Housing Standards SPG in terms of being single aspect units (and in many cases, north facing), lack of natural light to corridors, poor levels of internal sunlight and daylight and lack of private amenity space. The plant area and drainage systems would also become inefficient due to the increased number of cores. Furthermore, the office floorspace on the floors below would be compromised due the introduction of a residential core. With a residential target of 503 sqm, all of the housing would also be private housing and would not trigger and affordable housing requirement.

**c)The need for active street frontages and natural surveillance**

8.12 The proposal seeks to provide active street frontages and natural surveillance through the introduction of Class A1/A3 uses at ground floor level. If residential accommodation was provided, an additional core would be required which would inevitably reduce the level of active street frontage around the perimeter of the building.

**i) any other planning objectives considered to be a priority for the site.**

8.13 The Core Strategy sets out the need to protect and enhance existing employment sites. The site is extremely well connected in terms of public transport accessibility. Core Strategy policy CS1 seeks to focus Camden's growth in the most suitable

locations, and manage it to make sure that Camden delivers its opportunities and benefits and achieves sustainable development, while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.

- 8.14 Core Strategy policy CS8 considers that the Council will secure a strong economy in Camden through safeguarding existing employment sites and premises in the Borough that meet the needs of modern industry and other employers; safeguarding the borough's main Industry Area; encouraging a mix of employment facilities and types including the provision of facilities suitable for a mix of small and medium sized enterprises; support local enterprise development, employment and training schemes for Camden residents; recognise and encourage the concentrations of creative and cultural businesses in the Borough
- 8.15 Policy DP13 seeks to encourage and protect employment sites and an Article 4 direction seeks to ensure that the existing building cannot be converted into residential under Permitted Development rights.
- 8.16 Turning to the second cascade criteria within policy DP1, paragraph 1.16 states
- 8.17 'In the Central London Area (excluding Hatton Garden) and the specified town centres, if an off-site contribution to housing is appropriate, the Council will take into account all related sites when assessing the level of housing provided. The Council will seek additional housing floorspace to match the net addition to non-residential floorspace across all sites, taking into account any non-residential floorspace removed in conjunction with the off-site housing contribution'.
- 8.18 The Applicant does not own any alternative sites within the Borough which could be used to accommodate the residential requirement.
- 8.19 The third criteria of the policy is contained within paragraph 1.17 where it states that in exceptional circumstances, the Council may accept a Payment in Lieu. The Applicant is willing to pay a Payment in Lieu of £352,450 which is the policy compliant amount having regard to the formula contained in CPG8. This is a payment in lieu which can be used towards the provision of affordable housing

## 9 Design

- 9.1 This section reviews the proposals against relevant national, regional and local planning policy in term of design.
- 9.2 The NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes (Paragraph 57).
- 9.3 It identifies that securing high quality and inclusive design goes beyond aesthetic considerations. Therefore planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment (Paragraph 61).
- 9.4 Policies 5.3 and 7.2 of the LP seek development to meet the highest standards of sustainable and accessible design and construction, to improve the environmental performance of new development and to adapt to the effects of climate change over their lifetime.
- 9.5 Policy 7.3 advises that design should encourage a level of human activity that is appropriate to the location, to maximise activity throughout the day and night, creating a reduced risk of crime and sense of safety at all time.
- 9.6 Policies 7.4, 7.5 and 7.6 seek to ensure that development respects the local character of the area; promotes high quality public realm; and ensures that the architecture makes a positive contribution to a coherent public realm, streetscape and wider cityscape.
- 9.7 LP Policy 7.6 sets out a series of overarching design principles for development in London and advises that large scale buildings should be of the highest quality design, including inter alia:
- i. Optimise the potential of sites;
  - ii. Promote high quality inclusive design;
  - iii. Incorporate the best practice in resource management and climate change

mitigation;

iv. Comprise materials and details which complement local architectural character;  
and

v. Be of a proportion, composition, scale and orientation that enhances, activates  
and appropriately defines the public realm.

9.8 At a local level, Core Strategy Policy CS14 seeks to ensure that new developments are attractive, safe and easy to use.

9.9 The aim of Development Policy DP24 is to require all developments to be of the highest standard of design. This policy reflects the LP design and principles and goes on to state that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- i. The character, setting, context and form and scale of neighbouring buildings;
- ii. The character and proportion of the existing building;
- iii. The quality of materials to be used;
- iv. The provision of visually interesting frontages at street level;
- v. The appropriate location for building services equipment;
- vi. The provision of appropriate hard and soft landscaping; and
- vii. The provision of appropriate amenity space.

9.10 Camden has also published a Planning Guidance SPD, April 2011 which establishes design principles to be used in the assessment of development proposals. The document reinforces or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape. The key messages are to consider:

- i. The context of a development and its surrounding area;
- ii. The design of the building itself;
- iii. The use of the building;
- iv. The materials used; and
- v. Public spaces.

- 9.11 The project architects, SPPARC, have designed a scheme which will be coherent and legible and respect the surrounding area and provide an enhanced frontage to both the busy High Holborn and quieter Smart's Place.
- 9.12 A detailed Design and Access Statement has been submitted to accompany the planning application. This sets out in detail the key design issues which have been considered as part of the proposals.
- 9.13 The proposal seeks to enhance the external appearance of the 1980's existing office building. The remodelling of the proposal has been designed to replace the primary facades fronting High Holborn and Smarts Place and create a high quality building which will enhance and preserve the setting of the neighbouring non-designated heritage asset.
- 9.14 The proposal seeks to retain and extend the existing built form and create two additional office floors.
- 9.15 The proposal has been carefully designed following detailed pre-application discussions with Camden Council officers. During the pre application process, the proposal has been reduced in height; the elevations simplified to create a strong corner at the junction of High Holborn and Smarts Place and a vertical rhythm to the façade has been introduced to reference the surrounding street pattern. The proposed materials have been selected to create a texture and richness to the area. It is considered that the proposal meets National and Regional Guidance and Design Policies CS14 and DP24 contained in the Camden LDF.

## 10 Townscape and Heritage

### Conservation Areas and Listed Buildings

- 10.1 Under paragraph 128 of the NPPF, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting.
- 10.2 Paragraph 131 states that in determining planning applications, local planning authorities should take account of;
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
  - The desirability of new development making a positive contribution to local character and distinctiveness.
- 10.3 When considering the proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional (paragraph 132).
- 10.4 Where a development proposal will lead to a less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).
- 10.5 Policy CS14 contained within LBC's Core Strategy, sets out the requirements to safeguard Camden's heritage. The overall strategy is to sustainably manage growth in Camden in a way that conserves and enhances the heritage and valued places that give the borough its unique character.

10.6 Development policy DP25 indicates that to maintain the character of Camden's conservation areas, the Council will:

- a) Take account of conservation area statements, appraisal and management plans when assessing applications within conservation areas;
- b) Only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) Prevent the total or substantial demolition of an unlisted building that makes positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention.

10.7 The refurbishment and extension of the building has been carefully designed to both react to, and reflect, the heritage of the site and the surrounding area.

10.8 The accompanying Heritage and Townscape Appraisal prepared by KM Heritage, demonstrates that the proposal has been carefully considered to provide a sensitive and improved setting to the adjacent locally listed 181 High Holborn. The effect on the non-designated heritage asset (181 High Holborn) was given full consideration as per paragraph 135 and the design specifically tailored to ensure its setting was not harmed – but positively enhanced - by the proposals.

10.9 The report concludes that the scheme would preserve and enhance the setting of the nearby conservation areas and enhance the setting of the adjacent locally listed building, thus complying with National and Local guidance.

## Views

10.10 A full analysis of the key views has been undertaken and reported within the accompanying Heritage and Townscape Appraisal, prepared by KM Heritage.

10.11 In views along Smart's Place, the scale of the building will predominantly remain as existing with the new 6<sup>th</sup> and 7<sup>th</sup> floors stepping back away from Smart's Place.

10.12 In views along High Holborn from the west, the building makes an appropriate

transition between 181 and 190 High Holborn.

- 10.13 When viewed in the context of 181 High Holborn, the proposed extension at roof level ensures that the silhouette of the locally listed building remains undiminished and better appreciated than the current situation.
- 10.14 It is also considered that the extended height sits comfortably alongside the other taller buildings to the east.
- 10.15 Overall it is considered that the proposals enhance the setting of the adjacent conservation areas. It is also considered that the proposal provides a better setting to the locally listed building at 181 High Holborn.
- 10.16 It is therefore considered that overall the design of the proposal is consistent with the relevant national, regional and local policy requirements.

## 11 Environment

- 11.1 The NPPF sets out the Government's overarching planning policies regarding the delivery of sustainable development through the planning system. Section 10 of the document identifies the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 11.2 In accordance with National level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 11.3 In accordance with National level objectives, the London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 11.4 Policy 5.2 requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:
- a. Be lean – use less energy;
  - b. Be clean - supply energy efficiently;
  - c. Be green – use renewable energy.
- 11.5 At a local level, Core Strategy Policy CS13 requires all development to adapt to climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 11.6 Development Policy DP22 requires development to incorporate sustainable design and construction measures. The Council expects that schemes must demonstrate sustainable development principles and that non-domestic development of 500sqm or above should achieve "excellent" in BREEAM assessments from 2016.

- 11.7 Development Policy DP23 requires development to reduce their water consumption, the pressure of the existing sewer network and the risk of flooding.
- 11.8 Development Policy DP32 requires development to provide air quality assessments where the proposed scheme could potentially cause significant harm to air quality.
- 11.9 On 6 April 2011 LBC adopted the Camden Planning Guidance 3 'Sustainability' document to support the Local Development Framework in ensuring that the Council's commitment to reducing carbon emissions is achieved.

### **Assessment**

- 11.10 The Energy and Sustainable Design Statement, prepared by SWECO, in support of this application outlines the energy measures and low and zero carbon (LZC) applications which will be incorporated into the proposals design.
- 11.11 The proposals have been assessed against LP Policy 5.2 which requires new development to make the fullest contribution to minimising carbon dioxide emissions in accordance the energy hierarchy.

### Be lean – Use Less Energy

- 11.12 The proposals will reduce the demand for energy at the site by employing both passive and active design technologies to regulate energy use in terms of improve u values, air tightness, thermal bridging and low energy lighting.
- 11.13 Based on the design parameters the 'be lean' energy efficient measures described in the report are calculated to reduce overall carbon dioxide emissions at the site by 19.6%.

### Be clean – supply energy efficiently

- 11.14 Following careful consideration in respect of servicing strategies and plant selection, the energy demand of the development is to be met using a low-carbon supply.
- 11.15 The development is located within the opportunities area of 'Decentralised Energy

Potential' but it is understood that there is no current imminent potential to connect to an existing DH network, although the potential District Heating Network will expand adjacent to the site.

11.16 The introduction of a Combined Heat and Power network was considered but rejected on the basis that the proposal includes sealed facades and limited shower provision.

Be green – use renewable energy

11.17 The suitability of renewable technologies at the site have been investigated in order to establish their feasibility.

11.18 The LZC Technologies considered were: biomass, photovoltaics, wind turbines, solar hot water and ground source/aquifer heat pumps.

11.19 As a result of these investigations, photovoltaics are the technology which is to be considered for installation at the site.

11.20 The Energy and Sustainability Statement finds that the proposals meet the targets for new development set by national, regional and local planning policy.

11.21 The proposal seeks to achieve BREEAM 'Excellent'.

11.22 Therefore the proposals are compliant with national, regional and local planning policy regarding energy and sustainability.

## 12 Amenity

- 12.1 This section assesses the proposals against policy relating to the amenity of nearby existing residents in terms of daylight and sunlight and overlooking.

### **Daylight and Sunlight**

- 12.2 At a local level, Development Policies DP26 states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The supporting text, specifically paragraph 26.3, advises that to assess whether acceptable level of daylight and sunlight are available to habitable spaces, the Council will take into account the standards recommended in the British Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2011).
- 12.3 The daylight and sunlight affecting the proposed development and surrounding properties is considered within the Daylight and Sunlight Report, prepared by Lumina London, submitted alongside this application.
- 12.4 The Daylight and Sunlight Report shows that the performance of the proposed development satisfies the BRE Guidelines.
- 12.5 So as to ensure that the proposed development will not result in any material impact on the amenity enjoyed by existing and future neighbouring residents, the report assesses the impact of the proposed development on the existing daylight and sunlight levels at the existing neighbouring residential buildings in accordance with the standards in the BRE guidelines.
- 12.6 The report concludes that the results demonstrate that none of the existing residential properties (including the yet-to-be-built residential development at 21-31 New Oxford Street) will 'experience a material or noticeable loss of daylight or sunlight' meaning that there will be no material impact on the existing levels of daylight or sunlight amenity.
- 12.7 Therefore in terms of sunlight and daylight, the proposed development accords with

Development Policy DP26.

## Noise

- 12.8 Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by:
- a. Minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals;
  - b. Separate new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation;
  - c. Promoting new technologies and improved practices to reduce noise at source.
- 12.9 Policy DP28 of Camden's Development Policies states that the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for:
- a. Development likely to generate noise pollution; or
  - b. Development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided.
- 12.10 DP28 states that development that exceeds Camden's noise and vibration thresholders will not be permitted. The Council will only grant permission for plant or machinery if it can be operated without causing harm to amenity and does not exceed their noise thresholds.
- 12.11 DP28 also states that the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Where these phases are likely to cause harm, conditions and planning obligations may be used to minimise the impact.
- 12.12 The Acoustic Report, prepared by Sandy Brown Associates, submitted as part of this application has determined the existing background sound levels in the vicinity

of the site and surrounding noise sensitive premises.

12.13 Noise sensitive premises identified adjacent to the site are:

- 16 Stukeley Street - Language School;
- 10 Stukeley Street – residential;
- 185, 187, 189 and 191 Drury Lane – residential; and
- Parker Place Travelodge – hotel.

12.14 At the site the existing dominant noise sources observed included road traffic and construction works. Lesser noise sources included pedestrians and car door slamming.

12.15 The proposed plant's noise effects are assessed within the Acoustic Planning Report. The report concludes that the predicted noise emissions from the proposed plant items at the most affected residential window (10 Stukeley Street) meets the required criteria for day, evening and night time. However the predicted noise levels from the proposed plant items at the most affected office building (190 High Holborn) exceed the criteria by 7dB.

12.16 The mitigation measures proposed in order to ensure that the LBC daytime noise egress criteria are achieved are:

- Localised solid screen no more than 1 metre from the plant unit arrays and at least 2.3 metres high from rooftop level;
- re-selection of the proposed units for quieter option; and
- Provide an acoustic enclosure capable of reducing noise egress to some units.

12.17 There is currently no acoustic information available for the rooftop emergency plant.

12.18 Façade sound emission levels have also been assessed. Sandy Brown Associates identify that the performance required by each element is dependent on the following factors:

- The construction of solid elements
- The glazing specification;

- The relative areas of the solid elements; and
- The ventilation strategy.

12.19 Sandy Brown Associates recommend that as the design progresses, a more detailed faced sound insulation assessment may need to be performed to ensure that overall requirements are met.

12.20 Therefore alongside a noise survey to determine existing background levels and surrounding noise sensitive premises at the site, an initial assessment of plant noise emissions has been undertaken and appropriate mitigation measures outlined. An assessment of the likely required facade sound insulation has also been undertaken.

## 13 Transport and Servicing

### Transport

- 13.1 Paragraph 29 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
- 13.2 Paragraph 30 of the NPPF states that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 13.3 Further to this, paragraph 34 states that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 13.4 At a regional level, LP Policy 6.3 states that “development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed”. The policy also indicates that transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice guidance for major planning applications.
- 13.5 Policy 6.9 states that “the Mayor will work with all relevant partners to bring about a significant increase in cycling in London”.
- 13.6 Policy 6.10 indicates that “the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle promoting simplified streetscape, de-cluttering and access for all”.
- 13.7 The Mayor’s Transport Strategy (2010) sets out policies and proposals to achieve the goals set out in the LP providing a vision of London as an exemplary sustainable world city.
- 13.8 At a local level, Core Strategy Policy CS11 seeks to promote the delivery of transport infrastructure and the availability of sustainable transport choices, to

support Camden's growth, reduce the environmental impact of travel and relieve pressure on the borough's transport network.

- 13.9 Development Policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links.
- 13.10 Development Policy DP17 seeks to promote walking, cycling and public transport use, and as such, development should make suitable provision for pedestrians, cyclists and public transport.
- 13.11 Development Policy DP18 states that development should provide the minimum necessary car parking provision. In the Central London Area the Council will expect development to be car free.
- 13.12 The Council will strongly encourage contributions to car clubs and pool car schemes in place of private parking in new developments across the borough, and will seek the provision of electric charging points as part of any car parking provision.
- 13.13 To assess the overall implications of developments LBC, under policy DP16, expects the submission of a Transport Assessment where the implications of proposals are significant.
- 13.14 The site is extremely well connected in terms of public transport with a PTAL rating of 6b (with 1a being the lowest accessibility and 6b being the highest accessibility). The site is within walking distance of Tottenham Court Road and Holborn underground stations and the new proposed Crossrail station at Tottenham Court Road, and 19 bus stops are within a short walk of the site.
- 13.15 The accompanying Transport Statement, prepared by Curtins, assesses the potential traffic, transport and highway implications associated with the occupation and use of the development proposals. The assessment parameters of the report were previously agreed with LBC highway officers and have been incorporated with the report accordingly.
- 13.16 In accordance with the NPPF the proposed development is situated in a highly

accessible location, thereby maximising the opportunities for sustainable transport modes to be used.

13.17 The proposals will incorporate the provision of 74 cycle spaces which is above the minimum standards required by the LP. The development has been designed to be car free and as result no car parking has been provided within the proposals.

13.18 The trip generation assessment estimates that the proposed development will generate an increase of 14 and 13 two-way trips during the AM and PM peak hours respectively. Given the vast array of underground and rail services available from stations at Holborn, Covent Garden, Tottenham Court Road and Farringdon, it is considered that the minor increase in trips generated by the development will have a negligible effect on services.

13.19 It should be noted that the introduction of Crossrail at Tottenham Court Road will provide an alternative form of transport, thus increasing the transport capacity of the area.

13.20 The Transport Statement demonstrates that the proposals can be accommodated within the existing traffic and transport infrastructure in the area surrounding the site. This is because the site is well served by public transport and there will be a negligible increase in person trips following the redevelopment of the site.

13.21 The Interim Travel Plan (ITP), prepared by Curtins, submitted in support of this planning application is intended to demonstrate the commitment to sustainable travel by the site operator and help the development achieve a BREEAM rating of excellent. It has been developed based on Travel Plan guidance produced by Transport for London (TfL) and the London Borough of Camden. The report considers the following aspects:

- The location of the development;
- Parking and cyclist facilities;
- Access to public transport and local amenities; and
- Implementation of Travel Plans.

13.22 Responsibility of the ITP will initially lie with the developer. Subsequent to full

occupation of the development the ITP will need to be updated to a full Travel Plan (TP) and a Travel Plan Coordinator (TPC) identified. Once the site is occupied an iTRACE site audit will be undertaken and staff travel surveys will be completed. This is proposed to take place three months after development occupation.

- 13.23 When the full TP is produced the day to day responsibility for the TP, its publicity and operation will lie with an appointed Travel Plan Coordinator (TPC) although the overall responsibility of the TP will lie with the operators of the development. Once initial travel surveys have been undertaken and a TPC appointed it will be necessary to agree suitable targets for the development discussed in consultation with the London Borough of Camden.
- 13.24 The proposals can be seen to comply with national, regional and local transport planning policy; it is therefore considered that the impact of the proposed development is acceptable in transport terms.

### **Servicing**

- 13.25 At a national level, paragraph 35 of the NPPF states that developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies.
- 13.26 At a local level Policy DP20 deals with servicing and deliveries and states that the Council will expect development that would generate significant movement of goods or materials by road, both during construction and in operation, to be located close to the Transport for London Road Network or other Major Roads, accommodate goods vehicles on site and seek opportunities to minimise disruption for local communities through effective management.
- 13.27 The Transport Statement, prepared by Curtins, demonstrates that the servicing and deliveries at the proposed development will be managed to ensure that their impacts are minimised. Goods and refuse will be stored within the confines of the site and as per the existing arrangement, delivery activity will occur on surrounding streets within dedicated loading areas.
- 13.28 A swept-path analysis included in the report confirms that the existing arrangements

form a suitable basis to accommodate the future servicing requirements of the proposals.

13.29 The only vehicular movements generated by the Proposed Development will relate to delivery and service vehicles movements.

13.30 The estimated number of delivery vehicles generated as a result of the Proposed Development and the net increase in service vehicle movements has been calculated using service vehicle trips rates detailed below:

- 0.20 vehicles per 100 sqm GIA per day for B1 land uses;
- 0.53 vehicles per 100 sqm GIA per day for A1 retail; and
- 1.36 vehicles per 100 sqm GIA per day for A3 retail.

13.31 The service vehicle forecast shown above indicates that the proposed development will result in an additional seven service vehicles per day, resulting in a negligible increase of one in peak hour movements. As the proposed development seeks a flexible A1/A3/B1 space this has been assumed to be A1 Retail as this represents an absolute worst case.

13.32 On the basis of calculations presented above, it is considered that the proposed development will not materially impact on the capacity of loading areas in the vicinity of the site.

13.33 The service vehicle forecast indicates that the proposed development will result in an additional seven service vehicles per day, resulting in a negligible increase of one in peak hour movements. As the proposed development seeks a flexible A1/A3/B1 space this has been assumed to be A1 Retail as this represents an absolute worst case. On the basis of calculations presented within the Transport Statement, it is considered that the proposed development will not materially impact on the capacity of loading areas in the vicinity of the site.

13.34 Therefore the proposals are fully compliant with both national and local planning policy regarding servicing.

## Construction Traffic Management

13.35 Development Management Policy DP20 seeks to minimise the impact of the movement of goods and materials by road. In order to achieve this LBC will:

- a) expect development that would generate significant movement of goods or materials both during construction and in operation to minimise the movement of goods and materials by road, and consider the use of more sustainable alternatives such as rail and canal links;
- b) promote the development and use of freight consolidation facilities and other initiatives with potential to reduce the impact of goods vehicles, and encourage the use of cycle courier services for local deliveries; and
- c) seek to promote and protect facilities for the movement of goods by rail and water, including facilities for transfer between road, rail and canal.

13.36 Moreover, Policy DP20 demonstrates that LBC expects development which generates significant movement of goods or materials by road, both during construction and operation, to:

- d) be located close to the Transport for London Road Network or other Major Roads;
- e) avoid any additional need for movement of vehicles over 7.5 tonnes in predominantly residential areas;
- f) accommodate goods vehicles on site; and
- g) seek opportunities to minimise disruption for local communities through effective management, including through the optimisation of collection and delivery timings and the use of low emission vehicles for deliveries.

13.37 The supporting Construction Management Plan, prepared by Quantem Consulting LLP, submitted with this application describes the following and analyses their effects on transport and servicing in the site's surrounding area:

- Working Hours;
- Construction Programme;

- Traffic management;
- Materials deliveries;
- Tower crane and fixed lifting beam;
- Scaffold, hoarding and pedestrian access;
- Security; and
- Waste Management.

13.38 The proposed working hours during the construction period are:

Monday to Friday: 7.30am to 6.00pm

Saturday: 7.30am to 1.00pm

Sunday: No working

13.39 Given that there are two major developments directly opposite the site, the construction of which will be in progress at the same time as 182 – 184 High Holborn, our contractor will liaise with the two contractors opposite (Mace and Laing O'Rourke) to produce a coordinated traffic management plan which will be agreed with LB Camden Highways Department.

13.40 There are three lanes of one-way traffic along High Holborn. Throughout the construction period it will be ensured that two lanes are always clear for general traffic during rush hour periods (8.00 – 9.30am and 4.30 – 6.00pm). It will be ensured that one lane is always kept clear for general traffic during off-peak periods so two lanes may be used by the three contractors during these times, provided they strictly adhere to the detailed traffic management measures agreed with LBC.

13.41 It is proposed that the three contractors' Site Managers will meet weekly to coordinate weekly look-ahead delivery plans. LBC Highways Officers will have an open invitation to attend these meetings and formal weekly plans will be submitted to LBC Highways Officer. The three Site Managers will also meet at the beginning of every day to confirm their scheduled deliveries for the day ensuring the agreed coordinated plans are adhered to.

13.42 Proposed construction vehicle routes and offloading areas are illustrated within the CMP document.

- 13.43 During construction, two-way traffic movement is to be maintained along Smart's Place. A construction vehicle lane will be located on the western side of the carriageway. This is illustrated in the CMP document. The eastern side of Smart's Place would be maintained as a two-way vehicle link between High Holborn and Stukeley Street. Footways would be maintained. All proposed arrangements will be agreed with LBC Highways prior to implementation.
- 13.44 All materials deliveries will be planned with an allocated date and time slot. No unplanned deliveries will be allowed. Concrete lorries will be located in the loading/unloading area during agreed periods. There will be a logistics attendance gang with qualified banksmen to receive and manage all delivery vehicles.
- 13.45 A tower crane is required to offload heavy materials. For the crane's installation it is necessary for two road closures to take place. These will be agreed through consultation with LBC Highways and TfL.
- 13.46 Pedestrian access along the street will be maintained throughout the construction of the proposed development.
- 13.47 It is proposed that waste will be removed from the site via the first floor gantry into covered waste vehicles using purpose-made waste chutes. The waste vehicles will be located into the agreed delivery zone in High Holborn Site waste will be placed in a central location on each floor. The contractor will then transport the bagged up waste down to the first floor gantry using the platform hoist. The waste will be safely stored on the first floor gantry until the allotted time for waste removal vehicles. The outside line of the gantry at kerb edge will be fully sheeted out providing total protection to pedestrians passing under the gantry at pavement level.
- 13.48 All mitigation opportunities have been taken in order to ensure that the construction of these development proposals does not adversely impact on the area's existing residents.
- 13.49 Therefore the proposals are in accordance with local Development Management Policy DP20.

## 14 Planning Obligations

- 14.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 14.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 204 of the NPPF, a planning obligation should only be sought where they meet all of the following tests:
- a) Necessary to make the proposed development acceptable in planning terms;
  - b) Directly related to the proposed development; and
  - c) Fairly and reasonably related in scale and kind to the proposed development.
- 14.3 Paragraph 203 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 14.4 Under paragraph 205 of the NPPF, where obligations are being sought, local authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.
- 14.5 Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (Paragraph 206 NPPF).
- 14.6 Under Policy 8.2 of the LP 'Planning Obligations', boroughs should include appropriate strategic as well as local needs in their policies for planning obligations.
- 14.7 Policy 8.2 states that negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and kind to the proposed development and its impact on a wider area.

- 14.8 As set out in Camden Planning Guidance 8 (CPG 8) 'Planning Obligations', the use of planning obligations is an important tool in ensuring the delivery of necessary infrastructure to support the Local Development Framework.
- 14.9 The use of planning obligations is specifically required through Core Strategy policy CS19 'delivering and monitoring the core strategy' although a whole range of individual development policies may be used to justify an obligation.
- 14.10 Core Strategy policy CS19 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.
- 14.11 The anticipated planning obligations for this development are:
- Off-site affordable housing payment in lieu;
  - Car free;
  - Construction management plan;
  - Energy;
  - Highways contribution for highway works;
  - Employment;
  - Local procurement;
  - Public realm;
  - Service management plan;
  - Sustainability; and
  - Travel plan.

### **Community Infrastructure Levy (CIL)**

- 14.12 LBC adopted its Community Infrastructure Levy in April 2015.
- 14.13 The site is located within CIL Charging Zone A (Central). Therefore the development will be liable to pay the following:
- Office - £45/sqm

- Retail (including bar/restaurant/entertainment and other town centre uses) - £25.

14.14 A completed CIL form, dated 19 August, 2016, has been submitted with this application.

## 15 Summary and Conclusions

- 15.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 15.2 This Planning Statement has assessed the proposals against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 15.3 The application presents an exciting opportunity to deliver a building of the highest architectural quality which provides efficient fit-for-purpose modern-day office floorspace to meet modern day demand, whilst contributing to improving the public realm by activating existing 'dead' frontages along a key Central London thoroughfare.
- 15.4 The proposals have been developed to reflect and respect the surrounding area.
- 15.5 The proposal demonstrates that it satisfies and exceeds planning policies at national, regional and local levels.
- 15.6 The application accords with national, regional and local policy objectives to deliver sustainable, mixed use and balanced communities.

