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# Planning Statement

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212-214 High Holborn

**Planning Application for the Refurbishment and Extension of a Listed Building to Provide New Class A1 / A3, and B1 Floorspace.**

Austringer Capital Limited

# Planning Statement

212-214 High Holborn, London

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## 1. Introduction

- 1.1 This Statement has been prepared by Savills (UK) Limited on behalf Austringer Capital Limited in respect of an application at 212-214 High Holborn in the London Borough of Camden. It is intended to assist the Local Planning Authority's (LPA) consideration of the suitability of the proposed development in relation to the local and national planning policies and all other material considerations.
- 1.2 The application seeks full planning permission and listed building consent for refurbishment and extension of a Grade II listed building. It will deliver 3,193 sq m (GIA) of new build and refurbished office floorspace in a highly sustainable and accessible location. In addition, a refurbished unit at basement, ground, and mezzanine level will be provided measuring 338 sq m for a Class A1 or Class A3 operator to maintain an active street frontage for the building.
- 1.3 The basement, ground, and mezzanine of the existing building is currently occupied by Natwest bank. The remaining floorspace at first, second, third, and fourth floor level has been vacant since the end of the previous decade, when the Environmental Council ceased occupation of this floorspace. After this time it was not possible to secure a new tenant due to the poor quality of the existing office floorspace. Accordingly, the majority of the building has not made a positive contribution to the economic generation of the local area for an extended period of time.
- 1.4 Proposals for the refurbishment and extension of the existing building have been the subject of detailed pre application discussions with the LPA. The scale, design and appearance of the development has been amended to reflect advice, guidance and comments provided by professional officers and other consultees.
- 1.5 In order to comprehensively assess the proposed development against the relevant planning policies, the remaining sections of this Report are structured as follows:
  - Section 2.0** Description of the Application Site and Surroundings
  - Section 3.0** Description of the Proposed Development
  - Section 4.0** Review of Relevant Planning Policy
  - Section 5.0** Planning Assessment
  - Section 6.0:** Assessment of Residential Considerations
  - Section 7.0:** Other Material Considerations
- 1.6 We finally set out in **Section 8.0** our Summary and Conclusions that the proposed development accords with the development plan and all other material considerations, in particular the overarching objective of the National Planning Policy Framework ('NPPF') to secure sustainable economic development.

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- 1.7 In the light of the above, the proposed development should benefit from the presumption in favour of sustainable development established in the NPPF and we conclude that the application should be approved and planning permission granted.

## 2. Description of the Application Site and Surroundings

### The Application Site

- 2.1 The application site is located at 212-214 High Holborn in the London Borough of Camden (the 'Site'). It is occupied by a Grade II listed building set out over basement, ground, mezzanine, and four upper floors. The Site is located within the Bloomsbury Conservation Area, as well as forming part of the defined Central London Area, a Central London Frontage, and adjoins the boundary of the Holborn Growth Area, as set out in the Camden Local Development Framework Policies Map. It is therefore a 'town centre' site for the purposes of assessing applications for 'main town centre' uses.
- 2.2 The basement, ground, and mezzanine of the existing building is currently occupied by Natwest bank. The remaining floorspace at first, second, third, and fourth floor level has been vacant since the end of the previous decade, when the Environmental Council ceased occupation of the site. After this time it was not possible to secure a new tenant due to the poor quality of the existing office floorspace. Accordingly, the majority of the building has not made a positive contribution to the economic generation of the local area for an extended period of time.
- 2.3 The Site is highly accessible by a range of sustainable transport modes, which is reflected in Site having the highest possible PTAL rating of 6b. The accessibility of the Site by sustainable modes of transport is summarised below:
- London Underground: The Site is located within 60m walking distance of Holborn Underground Station that is served by the Central and Piccadilly line;
  - Rail: Farringdon railway station is located a 15 min walk from the Site. The station is both an Underground and connected National Rail station, serving the Circle, Hammersmith & City, and Metropolitan lines. The station is anticipated to become a major interchange station on the completion of Thameslink and Crossrail, both of which will serve the station.
  - Bus: There is a bus stop directly adjoining the Site that provides regular services running through the City of London to Tottenham in the north. Located 60m to the east of the site is a further bus stop, with services running to London Bridge, Wood Green and Tottenham.
  - Bicycles – The Site is located opposite a Santander Cycle Scheme Station, with access to a dedicated bicycle trail along High Holborn, which connects the greater London Bicycle Network beyond.
  - Pedestrians – There are established pedestrian footways and crossings surrounding the site that connect it with other established land uses, facilities and services in the local area.

## Historical Significance of Building

- 2.4 A detailed review of the historical significance of the building is detailed in the Heritage Statement, prepared by the Heritage Collective. This confirms that the architectural interest of the building stems primarily from the grand Palladian front elevation due to its formal composition, classical detailing, materiality and clear hierarchy. The front elevation is relatively well preserved and its integrity is maintained although unsympathetic modern signage associated with its use and ATMs mounted into one of the window bays has diluted its significance. In addition, the property's roof line as viewed from the front elevation roofline are important elements in the townscape make a positive contribution to the character and appearance of the conservation area.
- 2.5 The rear elevation of the building is stylistically and architecturally subservient with a functional but traditional appearance. There is much less consistency in terms of building lines and the continual addition of rear extensions and alterations during the 20th century introducing visual inconsistencies that detract from the significance of the listed building. Large modern developments on all sides at the rear have totally enclosed the rear courtyard and it is difficult to experience the rear of the listed building as a whole.
- 2.6 Internally, whilst the basement and ground floor retains their original use, much of the original fabric in these areas have been removed in order to accommodate modern styles and finishes. The first and second floors retain much of the original plan form and decorative fabric although the floors above and the rear elevation and yard have been subject to unsympathetic alteration. These changes have, in places, eroded the significance of the listed building.

## Surroundings Land Uses

- 2.7 As noted above, the Site forms part of the defined Central London Area, a Central London Frontage, and adjoins the boundary of the Holborn Growth Area. The surrounding area is characterised by an urban form that is very diverse in terms of building scale, architecture and massing providing buildings catering for a wide range of commercial, retail and leisure uses.
- 2.8 The Site's eastern and southern boundaries are adjoined by Aviation House, a large mixed use office, retail, and leisure development rising to ten stores. On the Site's south / south east boundary lies the Aria House residential scheme, with a eight storey office building adjoining the Site's western boundary. As noted previously, Holborn London Underground Station is located 60m to the east of the Site.
- 2.9 The wider area provides an array of amenities that will be available to the new office occupiers. This includes a wide selection of retail stores, cafes, restaurants, public houses, and financial and professional services. Immediately north of the site lies the public Bloomsbury Square Gardens, which provides an important amenity space for local residents and office occupiers. The Site is also a short walk from Covent Garden Market that sits alongside the wider retail, leisure, and service offer of Covent Garden. The

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availability of goods, services, and amenities in close proximity to the Site will ensure that the new office is attractive to modern occupiers.

## 3. Description of the Proposed Development

- 3.1 The application seeks full planning permission and listed building consent for refurbishment and extension of a Grade II listed building. The proposal will deliver 3,193 sq m (GIA) of new build and refurbished office floorspace in a highly sustainable and accessible location. In addition, a 338 sq m refurbished unit at basement, ground, and mezzanine level will be provided for a Class A1 or Class A3 operator to maintain an active street frontage for the building.
- 3.2 The basement, ground, and mezzanine of the existing building is currently occupied by Natwest bank. The remaining floorspace at first, second, third, and fourth floor level has been vacant since the end of the previous decade, when the Environmental Council ceased occupation of this floorspace. After this time it was not possible to secure a new tenant due to the poor quality of the existing office floorspace. Accordingly, the majority of the building has not made a positive contribution to the economic generation of the local area for an extended period of time.
- 3.3 A detailed review of the proposed physical works is included in the Design and Access Statement and the Heritage Statement. In summary however; the proposed physical works are as follows:
- Partial demolition of listed building at basement and ground floor level;
  - Demolition and removal of modern additions at mezzanine, first, second, third, and fourth floor levels;
  - Removal of modern internal partitions at basement and ground floor level;
  - Removal of internal partitions at second and third floor level with the retention of nibs and downstands;
  - Construction of new rear interlinked extension at basement, ground, and seven rear upper floors;
  - Refurbishment of grand Palladian front elevation, and retention of front pitch of existing hipped roof and chimneys;
  - Removal of unsympathetic ATM installation to reinstate the historical significance of the street level elevation;
  - Creation of a new lobby facility to attract high quality Class B1 office occupiers. Provision of space at basement and ground floor level for occupiers to incorporate client café, meeting rooms, staff changing facilities, and ancillary health and fitness suite;
  - Creation of new lifts, stairs, and toilet facilities on all levels;
  - Provision of new external terraces at fifth and seventh floor levels; and
  - Creation of a 338 sq m Class A1 / A3 unit at basement, ground, and mezzanine level.
- 3.4 The overall Gross Internal Area (GIA) of the proposal will be 3,531 sq m, comprising 338 sq m of Class A1 / A3 floorspace and 3,193 sq m of Class B1 office floorspace. The existing GIA of the building is 1,396 sq m therefore, the proposal will provide 2,135 sq m of net additional floorspace.



- 3.5 Proposals for the refurbishment and extension of the existing building have been the subject of extensive pre-application discussions with the LPA. A pre application meeting was held on 8 July 2015 in respect of a residential led mixed use development. A formal written response was not issued by the LPA however; we understand that concerns were expressed in respect of the loss of employment floorspace and the scale of internal amendments required to create the new residential units.
- 3.6 On 4 February 2016, an additional pre application meeting was held at the LPA's offices in respect of a new hotel led development. The built form of the rear extension previously discussed with the LPA was of a similar nature to that currently proposed. In addition to the rear extension, the hotel scheme proposed the replacement of the existing slate roof with a two storey extension and widescale internal alterations to the listed building. The LPA's formal written advice was issued on 12 April 2016<sup>1</sup> and in summary stated:
- The conversion of the employment floorspace to a hotel use was contrary to Policy DP13 of the Camden Development Policies document;
  - The creation of a rear extension of the building was acceptable due to the poor state of the rear elevation;
  - The replacement of the existing slate roof and chimney stacks with a two storey roof extension was considered unacceptable. It was noted that the existing slate roof appeared original and in good repair, with great emphasis placed on its retention; and
  - Any alternations to the internal layout of the listed building would require a full assessment by a heritage consultant.
- 3.7 Following receipt of the LPA's April 2016 written advice, the applicant revised the proposals to a policy compliant office led mixed use development. In addition, the proposal now incorporates:
- Omission of the two storey roof extension from the proposal. The retention front pitch of existing hipped roof will ensure that the front elevation will retain its full historic significance;
  - Retention of existing chimney stacks from front hipped roof; and
  - Detailed assessment of proposed internal alterations within the Heritage Statement to allow the LPA to fully consider the changes.
- 3.8 In addition to pre application discussions with the LPA, initial consultations have been undertaken with Transport for London and Crossrail due to the proximity of the existing Central Line tunnel and the new Crossrail westbound tunnel. Further discussions will be undertaken once the detailed design of the scheme is progressed to ensure that there is no risk to underground infrastructure.
- 3.9 It follows that proposals for the refurbishment and extension of the existing building have been the subject of extensive pre-application discussions with the LPA. In addition, initial discussions have been undertaken with both TFL and Crossrail in respect of underground infrastructure. The proposal will protect the historical

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<sup>1</sup> See **Appendix 3**

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significance of the listed building while delivering a long term sustainable use of the property. It will create new modern employment floorspace in a highly sustainable location and assist Camden in meeting its growth objectives.

## 4. Review of Relevant Planning Policy

4.1 The starting point for the consideration of the acceptability of a development proposed in a planning application is the assessment of it against the development plan. If a development is in accordance with the plan, and the plan is up-to-date, then the decision should be to grant planning permission unless material considerations indicate otherwise.

4.2 The development plan relevant to the consideration of this proposal are as follows:

- London Plan (inc. Minor Alterations, 2016); and
- The Camden Local Plan, comprising:
  - Core Planning Strategy (November 2010); and
  - Development Policies (November 2010).

4.3 A decision on a proposed development must be made in accordance with the development plan unless material considerations indicate otherwise<sup>2</sup>. LPA should have proper regard to such statements and must give clear and convincing reasons if they elect not to follow them. Emerging development plan policies are material considerations, although the weight to be attached to them varies according to their current status. Material considerations for the purposes of assessing the proposed development are set out in the following national and local policy documents:

- National Planning Policy Framework (NPPF);
- Planning Practice Guidance (PPG);
- Adopted Mayor of London Supplementary Planning Guidance;
- Adopted Camden Supplementary Planning Guidance/ Documents; and
- Emerging planning policies and guidance.

4.4 Sections 5 and 6 of this Statement provide a detailed review of the proposal against an array of local, regional, and national planning policies. For ease of reference, these policies are as follows:

### Camden Core Strategy

- Policy CS1 'Distribution of Growth'
- Policy CS2 'Growth Areas'
- Policy CS5 'Managing the Impact of Growth and Development'
- Policy CS6 'Providing Quality Homes'
- Policy CS8 'Promoting a Successful and Inclusive Camden Economy'
- Policy CS9 'Achieving a Successful Central London'
- Policy CS14 'Promoting High Quality Places and Conserving our Heritage'

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<sup>2</sup> See Paragraphs 11 and 12 of NPPF

## Camden Development Policies

- Policy DP1 'Mixed Use Development'
- Policy DP2 'Making Full Use of Camden's Capacity for Housing'
- Policy DP13 'Employment Sites and Premises'
- Policy DP16 'The Transport Implications of Development'
- Policy DP22 'Promoting Sustainable Design and Construction'
- Policy DP23 'Water'
- Policy DP24 'Securing High Quality Design'
- Policy DP25 'Conserving Camden's Heritage' of the Camden Development Policies'
- Policy DP27 'Basements and Lightwells'

## London Plan

- Policy 2.15 'Town Centres'
- Policy 3.3 'Increasing Housing Supply'
- Policy 3.4 'Optimising Housing Potential'
- Policy 3.5 'Quality and Design of Housing Developments'
- Policy 3.8 'Housing Choice'
- Policy 3.12 'Negotiating Affordable Housing on Individual Private and Mixed Use Schemes'
- Policy 4.7 'Retail and Town Centre Development'
- Policy 5.1 'Climate Change Mitigation'
- Policy 5.2 'Minimising Carbon Dioxide Emissions'
- Policy 5.3 'Sustainable Design and Construction'
- Policy 6.1 'Strategic Approach'
- Policy 6.9 'Cycling'
- Policy 6.13 'Parking'
- Policy 7.1 'Lifetime Neighbourhoods'
- Policy 7.2 'An Inclusive Environment'
- Policy 7.3 'Designing Out Crime'
- Policy 7.4 'Local Character'
- Policy 7.6 'Architecture'
- Policy 7.13 'Safety, Security and Resilience to Emergency'
- Policy 7.14 'Improving Air Quality'
- Policy 7.15 'Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes'

4.5 In addition to the adopted planning policies listed above, the Camden Local Plan Submission Draft was published in June 2016, with the Examination in Public commencing in October 2016. While the new Local

Plan has not been adopted, its policies will be afforded some weight in development management due to its progressed nature.

- Policy G1 'Delivery and Location of Growth';
- Policy H1 'Maximising housing supply';
- Policy H2 'Maximising the supply of self-contained housing from mixed-use schemes
- Policy H3 'Protecting existing homes
- Policy E1 'Economic Development
- Policy E2 'Employment Premises and Sites
- Policy A1 'Managing the Impact of Development
- Policy A4 'Noise and Vibration
- Policy A5 'Basements'
- Policy D1 'Design'
- Policy D2 'Heritage'
- Policy CC1 'Climate Change'
- Policy CC2 'Adapting to Climate Change'
- Policy CC3 'Water and Flooding'
- Policy CC4 'Air Quality'
- Policy CC5 'Waste'
- Policy TC2 'Camden's Centres and Other Shopping Areas'
- Policy TC4 'Town centres uses'
- Policy T1 'Prioritising walking, cycling and public transport'
- Policy T2 'Parking and car-free development'
- Policy T4 'Sustainable movement of goods and materials'

## 5. Planning Assessment

### Introduction

- 5.1 This Section sets out a detailed assessment of the proposed development against local policy and guidance, as well as the London Plan and national planning policy.
- 5.2 As detailed in Section 3, the current application follows previous proposals for residential and hotel schemes at the Site. Following comments by the LPA in respect of some physical works proposed, as well as concerns over the loss of employment floorspace, the scheme was amended to ensure compliance with adopted local planning policy. Below we assess the principle of development in respect of Camden and London level adopted planning policy.

### Principle of the Development

- 5.3 The Site is located within the Central London Area, a Central London Frontage, and adjoins the boundary of the Holborn Growth Area, as defined by the Local Development Framework Policies Map. It is therefore a 'town centre' site for the purposes of assessing applications proposing 'main town centre' uses. The Site is highly accessible by a range of public transportation means, with the provision of new high quality office floorspace in such locations supported by a range of local planning policies. In accordance with Core Strategy **Policy CS1 'Distribution of Growth'**, the proposal will:
- Concentrate new development in a highly accessible location adjoining the Holborn Growth Area;
  - Make full use of the Site while taking in to account a wide array of other policy aspirations;
  - Comprise an efficient use of land in an area well served by public transport; and
  - Make provision for the delivery of new housing units in the Borough.
- 5.4 **Policy CS2 'Growth Areas'** identifies Holborn as one of the five areas for intensification in the Borough. It seeks the delivery of 2,000 additional jobs in the period to 2026 through relatively small scale private sector led schemes. While the Site adjoins the western boundary of the Holborn Growth Area, it benefits from the same high levels of accessibility as well as forming part of a Central London Frontage. Policy CS2 confirms that development should seek to maximise the provision of new commercial and residential floorspace to meet future requirements for growth in Camden. Similarly, **Policy CS3 'Other Highly Accessible Areas'** states the Council will promote appropriate development in highly accessible locations including Holborn.
- 5.5 **Policy CS5 'Managing the Impact of Growth and Development'** seeks to ensure that sustainable forms of development are delivered to the Borough. In accordance with the requirements of Policy CS5, the proposal will:
- Provide high quality office floorspace to meet London's growing worker population;
  - Create a newly refurbished Class A1 / A3 use on the ground floor to serve the surrounding area;

- Enhance the environmental performance of a historic building and provide a new highly energy efficient rear extension;
  - Protect and enhance the existing historic building and provide a viable long term use of the floorspace; and
  - Minimise its impact on nearby residential land uses while making efficient use of land.
- 5.6 The proposal will also assist with the delivery of the aspirations of **Policy CS6 'Providing Quality Homes'** by making a financial contribution to the delivery of new homes in Camden. For the reasons set out in Section 6, it is not possible to accommodate any residential units at the Site. The Payment in Lieu that would be made by the applicant will assist the Council in meeting its housing delivery targets in more suitable locations.
- 5.7 The proposal is also in accordance with **Policy CS8 'Promoting a Successful and Inclusive Camden Economy'** as it will deliver 3,193 sq m (GIA) of new and refurbished office floorspace. The development will make a positive contribution to the 615,000 sq m of new office floorspace required in Central London in the period to 2026<sup>3</sup>. In light of this, the scheme is also fully in line with the **London Plan Policy 4.2 and 4.3. Policy CS9 'Achieving a Successful Central London'** and **Policy 2.15 'Town Centres'** of the London Plan seeks to support and promote the Central London Area of Camden as a successful and vibrant part of the capital. In accordance with these policy aspirations, the proposal will support Central London as a focus for Camden's future growth in office, retail, and leisure floorspace. In addition, it will preserve and enhance the area's historic environment.
- 5.8 The emerging Camden Local Plan reinforces many of these aspirations by seeking to promote high quality development and encourage the most efficient use of land and buildings in Camden. It follows that the proposal is also in accordance with **Policies G1, H1, H2, H3, E1, and E2** of the emerging Camden Local Plan.
- 5.9 It follows that the principle of the proposal is supported by an array of policies in Camden's adopted development plan, emerging Local Plan, and the London Plan. It will intensify a policy compliant land use in a highly accessible location, delivering opportunities for new jobs and wider spin off benefits. Accordingly, the proposal benefits from the presumption in favour of sustainable development, as set out in the NPPF

## Design of the Proposal

- 5.10 As briefly set out in Section 3, the design and appearance of the building has been carefully considered due to the historic nature of the existing building, both in respect of its formal listing designation and position within a Conservation Area.
- 5.11 The Design and Access Statement, produced by Cassidy and Ashton, provides a full description of the context for the development and the principles that have been adopted as part of the building's design. In

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<sup>3</sup> See Policy CS8 of the Camden Core Strategy

accordance with **Policy DP24 ‘Securing High Quality Design’** of the Core Strategy and **Policy D1 ‘Design’** of the emerging Local Plan however, the proposal:

- Is commensurate with the scale and form of the surrounding buildings, with many adjoining structures exceeding the height of the proposed development. The rear extension proposes a contemporary and attractive elevational design of a similar character to neighbouring buildings;
- Carefully merges the existing listed building with a new modern extension that respects the character and proportion of the existing building. The rear extension has been limited in height to ensure that does not adversely affect the historic significance of the listed building. In addition, the majority of the historical internal layout has been maintained, while less sympathetic amendments undertaken in the last 20-30 years have been repaired;
- Uses a complementary palate of materials in the rear extension while maintaining the prominence of the existing building;
- Ensures visually interesting features of the building from street level are maintained and enhanced through the refurbishment of the front elevation. It will also enhance the appearance of the building and vitality of the area by the removal of unsympathetic ATM installation at ground floor level and by bringing the secondary entrance back in to active use;
- Has set back the additional height created by the extension to ensure that it reads as a modern building to the rear. This ensures that there is no adverse visual impact from the conservation area; and
- Significantly enhances the accessibility of the building by the provision of new lifts to all floors; accessible toilets, showers, and changing facilities; and level floorplates across the majority of the building.

5.12 **Camden Planning Guidance 1 ‘Design’ (CPG1)** document provides further detail on the application of the LPA’s design policies. The applicant has sought to follow best practice in respect of the proposed development, which includes:

- Refurbishment of the existing windows where possible, with any replacement or amendments in consultation with the LPA;
- Retention of external and internal doors and doorways of significance within the building;
- Inclusion of elevational materials to complement the existing building; and
- Proposing a scale of development that will assist in bringing the wider site back in to productive economic use while not detracting from the historic importance of the existing building.

5.13 **Policy 7.6 ‘Architecture’** of the London Plan reinforces many of the aspirations and requirements of Camden’s design policies. In particular, the proposal complies with the London Plan requirement that *‘architecture should contribute to the creation of a cohesive built environment that enhances the experience of living, working or visiting in the city’*. It will deliver high quality office accommodation in a highly



sustainable location, while respecting and enhancing the historical significance of the existing building. We conclude that the proposal is in accordance with Policy DP24, CPG1, and London Plan Policy 7.6.

## Heritage Assessment

5.14 A detailed review of the building's historical significance and any impact of the proposal is set out in the Heritage Statement, prepared by the Heritage Collective. The physical elements of the proposed development have been amended in response to the pre application comments by the LPA dated 12 April 2016. The revisions to the physical works include:

- Removal of two storey roof extension from the proposal. Retention of the front pitch of existing hipped roof will ensure that the front elevation will retain its full historic significance;
- Retention of existing chimney stacks from front hipped roof; and
- Detailed assessment of proposed internal alterations within the Heritage Statement to allow the LPA to fully consider the changes.

5.15 The applicant has also incorporated significant amendments to the proposal to ensure that the principal elements of historic interest are retained while ensuring that an office scheme that meets modern occupier requirements can be created. In summary, the works to the existing building will include:

- Refurbishment of grand Palladian front elevation;
- Removal of unsympathetic ATM installation to reinstate the historical significance of the street level elevation;
- Retention of front pitch of existing hipped roof and chimneys;
- Removal of 20<sup>th</sup> century layout alterations in the bank at basement and ground floor level;
- Infilling unsympathetic opening created in original spiral staircase to reinstate its architectural significance;
- Retention of first floor historic layout and detailing, with nibs and downstands at second and third floor level also retained;
- Retention of window openings on rear elevation at first and second floor level to maintain their significance; and
- Removal of unsympathetic lift and toilet block installations on first, second, and third floor levels.

5.16 The above works to the listed building and reinstatement of historic features is also supported by **CPG1 'Design'**. Paragraph 3.23 of CPG1 states that that historic features should be retained and proposals should seek to respond to the special historic and architectural constraints of the listed building. Furthermore, in compliance with Paragraph 5.13 of CG1, the proposal seeks to strengthen the building's historic features and work alongside them where possible.

5.17 The NPPF places great importance on retaining the historical significance of heritage assets, while seeking appropriate uses that ensure their long term viable uses. The proposal seeks to meet these aspirations in a

a building that has been unable to make a positive contribution to the economic generation of the local area for an extended period of time.

5.18 The proposals has been designed in accordance with the aspirations of **Policy CS14 ‘Promoting High Quality Places and Conserving our Heritage’** of the Core Strategy and **Policy D2 ‘Heritage’** of the emerging Local Plan. It will preserve and enhance the principal elements of heritage significance of the existing building. Importantly, it will provide a long term viable use of the building to ensure that it does not suffer from neglect. Furthermore, in accordance with **Policy DP25 ‘Conserving Camden’s Heritage’** of the Camden Development Policies document, the proposal:

- Includes a Heritage Statement that includes a review of any impact on the conservation area;
- Preserves the appearance of the conservation area by retaining the existing roof line of the building, refurbishing the grand Palladian front elevation, and brings the building back in to productive economic use;
- Does not propose the total or substantial demolition of the existing building;
- Proposes a use (Class B1 offices) of the floorspace that accords with its historic operation and accords with local policy aspirations; and
- Has sought to maintain the setting of the existing building. This includes the retention of the existing roof line, setting back the rear extension to maintain the appearance of the existing building, and the refurbishment of the front elevation.

5.19 The detailed assessment undertaken in the Heritage Statement confirms that the proposal offer sympathetic and informed changes that will improve the listed building and conservation area. Accordingly, the proposal accords with Policies CS14 and DP25 of the adopted development plan; Policy D2 of the emerging Local Plan; the Bloomsbury Conservation Area Appraisal; Policies 7.4 and 7.6 of the London Plan; and the NPPF.

## Sustainability and Energy

5.20 The proposed development has been designed to ‘Be Lean’, ‘Be Clean’ and ‘Be Green’ in terms of its energy efficiency, energy demand and other carbon reduction measures. In accordance with the requirements of **Policies DP22 ‘Promoting Sustainable Design and Construction’** and **DP23 ‘Water’** of the Camden Development Policies document, and **Policies CC1 ‘Climate Change Mitigation’**, **CC2 ‘Adapting to Climate Change’**, and **CC3 ‘Water and Flooding’** of the emerging Local Plan, the application is supported by a Sustainability and Energy Statement. The Statement considers the proposal against national and local policies, including assessments of the potential BREEAM rating and carbon emissions for the development. In summary, the Sustainability and Energy Statement confirms that:

- The proposed scheme will be designed in accordance with the BREEAM criteria and achieve the required ‘Excellent’ rating;

- Water management for the development will be minimised; water management for the will target a 40% improvement upon the BREEAM 2014 baseline case further reducing the developments internal water demand;
- Waste arising during construction and occupation/operation will be minimised. A site waste management plan will be adopted during construction, with the operational building providing adequate waste and recycling facilities that will form part of a comprehensive waste management plan for the site; and
- Construction site management procedures will minimise adverse impacts on the environment and control pollution generated during the construction phase. These include a waste management strategy to reduce the quantity of waste generated, and to increase re-use and recycling of materials.

## Occupier and Neighbour Amenity

5.21 The proposed rear extension of the building has been designed to minimise impact on neighbouring amenity while ensuring a viable development that meets occupier demand can be delivered. Below we provide an assessment of matters relevant to the consideration of the tests set out in **Policy DP26 'Managing the Impact of Development on Occupiers and Neighbours'** of the Camden Development Policies document.

### Visual Privacy and Outlook

5.22 The buildings adjoining the Site are almost exclusively used for Class B1 offices, with mutual overlooking already experienced by occupiers. Any additional overlooking generated by the development on adjoining office occupiers does not give rise material concerns from a planning perspective.

5.23 The rear extension has been design to reduce overlooking of the residential units in Aria House. It is not proposed to incorporate glazing on the majority of the rear elevation to significantly reduce overlooking from the proposed development to Aria House. In addition, the following matters are relevant to the consideration any potential overlooking:

- Aria House experiences direct overlooking from existing office buildings, particularly in respect of occupiers in 210 High Holborn;
- In light of the requirement to increase building densities in highly sustainable locations, it may not always be possible to achieve optimum amenity levels for all occupiers; and
- The area to the rear of the application site is fully enclosed on all sides by tall buildings, restricting views from the rear of Aria House.

5.24 It follows that the proposed development has been designed to maximise compliance with the requirements of **DP26(a) and (b)** of the Camden Development Policies document. The visual privacy of residential occupiers will be protected, while the requirement to deliver new office floorspace necessitates changes to the outlook of surrounding properties.

## Daylight and Sunlight

- 5.25 The proposal includes a new eight storey rear extension of the building to provide new high quality office floorspace to meet the requirements of modern occupiers. The proposed rear envelope was reviewed by the LPA as part of the pre application discussions and confirmed as acceptable in principle. Irrespective of this, the application incorporates a review of any impact on the amenity of nearby occupiers.
- 5.26 The Daylight and Sunlight Study, prepared by Rights of Light Consulting, assesses the impact of the development on the light receivable on nearby occupiers. It confirms that all habitable rooms pass both the total annual sunlight hours test and the winter sunlight hours test. The proposed development therefore satisfies the BRE direct sunlight to windows requirements.
- 5.27 The Study by Rights of Light Consulting also incorporates an assessment of neighbouring daylight to windows. It confirms that following redevelopment, a number of windows which fall short of the BRE recommendations including some of the residential units in Aria House. It is important to note however; that the BRE Guidance does not require the refusal of planning permission if schemes do meet recommended levels. Material considerations must be taken in to account in the balance of planning matters, of which the following are of relevance to the current proposal:
- The BRE Guidance is clear that in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings;
  - Existing buildings to the rear rise to comparable building heights as the proposal. The buildings, including Aria House, have also been constructed to and adjoin their site boundaries making future obstructive of some form unavoidable; and
  - The BRE guide explains that the numerical guidelines should be interpreted flexibly since natural lighting is only one of many factors in site layout design.
- 5.28 In light of the material considerations listed above, the reduction in daylight levels is considered acceptable to allow the delivery of new high quality office floorspace. It follows that there is no conflict with Policy **DP26(c)** of the Camden Development Policies document.

## Noise, Vibration and Odours

- 5.29 The application is supported by a Construction Management Plan (CMP), prepared by Inn8v Development Solutions. The CMP assessed the potential environmental impacts of works at the application site and how these impacts may be reduced by the implementation of best practice management strategies and practices. It includes measures to minimise the impacts on adjoining occupiers from noise, dust, vibration, light, and odour. The CMP confirms that the application of industry best practices will ensure the impacts from the construction process can be minimised in accordance with **Policy DP26(d) and (e)**.

5.30 The application proposed a flexible Class A1 / A3 use for the ground floor commercial unit to maximise operator demand and ensure an active frontage along High Holborn. Should planning permission be granted, a suitably worded condition could be attached requiring submission of any extraction equipment associated with a Class A3 operator. This will ensure that the LPA maintains control over impacts on neighbouring amenity through odour or fumes in accordance with **Policy DP26(e)**.

## Occupier Amenity

5.31 The proposed development has been designed to meet modern requirements and maximise the potential of occupation. While the internal arrangement of the Class B1 office floorspace is somewhat indicative, it confirms that provision has been made for staff facilities such as an ancillary health and fitness centre, bicycle store, male and female changing areas, and drying room all accessible by lift or stairs. It also includes a ground floor lobby, meeting rooms, and client café to attract a wide array of occupiers in accordance with **Policy DP26(h) and (j)**. The individual office floors will provide open plan space where possible, as well as maintaining a number of attractive historic layout and design elements in the existing building. Finally, in accordance with **Policy DP26(k)** the proposal incorporates a large 144 sq m terrace at sixth floor level of the rear extension to provide opportunities for staff and client entertaining.

5.32 The Transport Statement prepared by Mouchel confirms that sufficient provisions are in place to allow the Class A1 / A3 and wider Class B1 office building to be serviced in accordance with **Policy DP26 (i)**. High Holborn is a one-way street in the vicinity of the proposed development (west-bound), with two wide lanes. There are lay-bys available on either side of the street to allow passing vehicles, while restrictions currently in operation ensure deliveries and servicing are outside of peak hours. Furthermore, there are a number of retail / food outlets opposite and adjacent, setting a precedent for the acceptability of servicing and loading.

5.33 We conclude that the proposal will provide a high level of occupier amenity and accords with the requirements of Policy therefore that the proposed development accords with the requirements of Policy DP26 (h), (i), (j), (k) of the Camden Development Policies document.

## **Basement Works**

5.34 The proposed development incorporates the demolition of the rear elements of the listed building at basement and ground floor level. Works within the remaining elements of the basement will only involve the removal of partitions created for operation of the existing bank. The proposed development will not involve the creation of any additional basement levels or the potential create ongoing harm to the amenity of adjoining occupiers.

5.35 It follows that there is no conflict with **Policy DP27 'Basements and Lightwells'** of the Camden Development Policies document or **Policy A5 'Basements'** of the emerging Local Plan. Additionally **CPG 4 'Basements and Lightwells'** provides guidance on the suitability of various aspects of basement

development. As the proposal will simply replace an existing basement, there is no conflict with the requirements of CPG 4.

## Summary and Conclusion

5.36 The assessment undertaken in this section confirms that the proposed development accords with an array of Camden's adopted and emerging policies and guidance, London Plan policies, and national planning policy and guidance. The proposal will protect the historical significance of the listed building while delivering a long term sustainable use of the property. It will create new modern employment floorspace in a highly sustainable location and assist Camden in meeting its growth requirements. It follows that the proposal benefits from the presumption in favour of sustainable development, as set out in the NPPF.

## 6. Assessment of Residential Obligations

6.1 This section provides an assessment of the suitability of the Site to accommodate the residential floorspace required under Policy DP1. In addition, it considers the loss of the residential unit at the Site against the requirements of the development plan.

### Mixed Use Developments

- 6.2 **Policy DP1** of the Camden Development Policies document and **Policy H2** of the emerging Camden Local Plan states that in the Central London Area, where more than 200 sq m (gross) additional floorspace is provided, up to 50% of all additional floorspace should be allocated to residential use. It also states that where a development proposes over 1,000 sq m of additional floorspace, the residential floorspace required under Policy DP1 should be provided on site unless this cannot be practically achieved.
- 6.3 The overall GIA of the proposal will be 3,531 sq m, comprising 338 sq m of Class A1 / A3 floorspace and 3,193 sq m of Class B1 office floorspace. The existing GIA of the building is 1,396 sq m therefore, the proposal will provide 2,135 sq m of net additional floorspace. It follows that there is a requirement to make provision of new residential floorspace on-site or elsewhere in the Borough.
- 6.4 Adopted Policy DP1, emerging Policy H2, and Camden guidance document **CPG2 'Housing'** acknowledge that the provision of on-site residential floorspace will not always be practical or achievable. Policy DP1 sets a number of criteria by which proposals for the provision of residential floorspace would be considered acceptable.
- 6.5 Policy DP1 confirms that any *'housing provided as part of a mixed use scheme should be independent of other uses and have a separate access at street level'*. This is not achievable at the Site as it is only accessible from the two projecting entrance bays on High Holborn, with no access available from the rear. As the proposed Class A1 / A3 unit will utilise one entrance bay for customers, the entrance adjoining 210 High Holborn provides the only access to the remaining elements of the Site. In light of the historical significance of the grand Palladian front elevation, an additional entrance cannot be created from High Holborn. It follows, that to accommodate a mixed residential and office scheme, occupiers would need to access the Site from the same entrance. Such an arrangement would not be favoured by residential and office occupiers, nor would it accord with local planning policy.
- 6.6 It is important to note that the applicant previously sought to deliver a residential led mixed use development at the Site. Following receipt of the LPA's pre application response, the applicant considered alternative employment generating schemes including a mixed residential and office scheme in accordance with Policy DP1. It was concluded that a shared entrance for the residential and office occupiers would be prejudicial to securing suitable occupiers.

6.7 We confirm that the applicant does not own any additional properties or land in the London Borough of Camden. In addition, due to the intensively developed nature of the surrounding area, as well the number of listed buildings, we have been unable to identify an alternative delivery sites locally. It follows that the most appropriate means of providing the housing required under Policy DP1 is by way of a payment-in-lieu. This would comply with the exceptional circumstances set out in the Camden Development Policies and CPG2 documents.

## Loss of Residential Floorspace

6.8 The Site accommodates a historic residential use at part of the third floor and fourth floor extension. As detailed subsequently, this floorspace has not been occupied for residential purposes for a significant period and was last being utilised as office floorspace. For the purposes of clarity however; this 80 sq m of floorspace has been listed under Class C3 (Residential) on the application form. As the proposed development does not seek to provide any on-site residential floorspace, we provide an assessment of the proposal against Policies CS6 and DP2 of the adopted development plan, and Policy H3 of the emerging Local Plan.

6.9 Council tax records for the Site confirm that the residential use of this floorspace ceased 19 years ago in 1998<sup>4</sup>. At that time a sub-lease was agreed between Natwest and the Environment Council for the entire first, second, third, and fourth floors. The lease agreement stated that all floors should be used as Class B1 offices with the exception of the fourth floor that was only permitted for storage. **Appendix 2** provides Council tax records for the office use of the floorspace during this period for ease of reference. Inspection of the third and fourth floors confirms that the area identified as a lounge (Room Ref: 2.62) on the existing floorplans has been altered to provide power and internet access to accommodate a number of office deskspaces. In addition, a large quantum of documentation belonging to the Environment Council remains in cupboards on the fourth floors confirming its use as ancillary storage.

6.10 We understand that the Environment Council occupied the floorspace for approximately ten years after which, the upper floors of the Site have remained vacant. We are not aware of any planning permission granted to allow the change of use of the residential floorspace to offices. It follows that the period of occupation by the Environment Council may have been sufficient to effect a change of use in the floorspace to Class B1 offices.

6.11 Furthermore, we understand that the residential unit was originally provided as an ancillary accommodation to the wider office occupier, as opposed to an 'open market' unit. The former residential unit is only accessible through the communal entrance at ground floor level adjoining 210 High Holborn. Within the building itself, there is no dedicated access arrangements for this floorspace. Access to the third floor was via shared lift and stairs, with entry to the residential unit provided from the shared corridor at third floor level.

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<sup>4</sup> See **Appendix 1**



Accordingly, the residential unit is likely to have been provided as ancillary accommodation for manager of the ground floor bank or upper office occupier.

6.12 We conclude that the current application is not contrary to Policies CS6 and DP2 of the adopted development plan or Policy H3 of the emerging Local Plan. The application will not result in a reduction in available open market residential floorspace in the Borough. Furthermore, the occupation by an office occupier for a period of approximately ten years may have resulted in a change of use of this floorspace to Class B1 offices.

## Summary and Conclusion

6.13 Policy DP1 and emerging Policy H2 confirm that in certain circumstances, a payment-in-lieu can be made to ensure that all development contributes to the delivery of additional residential floorspace in the Borough. The assessment undertaken in this section confirms that Site is unable to accommodate a mixed office and residential scheme due to access limitations.

6.14 In addition, this section assesses the compliance of the proposed development against Policies CS6 and DP2 of the adopted development plan or Policy H3 of the emerging Local Plan. It concludes that the application will not result in a reduction in available open market residential floorspace in the Borough.

## 7. Other Material Considerations

- 7.1 The NPPF constitutes formal guidance for a LPA and is an important “material consideration” in determining applications<sup>5</sup>. It makes it clear that “development plans” ought to be consistent with the objectives, principles and policies set out at national level and in particular reflect the presumption in favour of sustainable development.
- 7.2 The objective of the simplification of national planning policy is to reduce the bureaucracy associated with the planning process and help promote development and economic growth. The NPPF includes an explicit presumption in favour of sustainable development<sup>6</sup>. The Government expects that this presumption should run as a “golden thread” through all plan making and decisions on planning applications.
- 7.3 The NPPF constitutes formal guidance for a LPA and is an important “material consideration” in determining applications<sup>7</sup>. It makes it clear that “development plans” ought to be consistent with the objectives, principles and policies set out at national level and in particular reflect the presumption in favour of sustainable development.
- 7.4 The objective of the simplification of national planning policy is to reduce the bureaucracy associated with the planning process and help promote development and economic growth. The NPPF includes an explicit presumption in favour of sustainable development<sup>8</sup>. The Government expects that this presumption should run as a “golden thread” through all plan making and decisions on planning applications.

### **Impact of the Development on Economic and Physical Regeneration**

- 7.5 The proposal is a positive sign of investor confidence at a time when the UK is entering a period of economic uncertainty following the EU Referendum. The refurbishment and extension of the Site will require significant private sector investment by the applicant and encourage investment elsewhere in the locality. This will create an array of new jobs during the construction process and as set out subsequently, a significant number of new Class B1 office jobs.
- 7.6 The proposed development will deliver 3,193 sq m (GIA) of new and refurbished office floorspace. The development will make a positive contribution to the 615,000 sq m of new office floorspace required in Central London in the period to 2026. It will also support the Central London Area of Camden as a successful and vibrant part of the capital through the provision of a high quality development that makes the most efficient use of land and buildings in Camden.

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<sup>5</sup> See paragraph 13 of the NPPF

<sup>6</sup> See Paragraph 14 of the NPPF

<sup>7</sup> See paragraph 13 of the NPPF

<sup>8</sup> See Paragraph 14 of the NPPF

## Impact of the Development on Local Employment

- 7.7 The proposed development will result in a significant increase in new Full Time Equivalent (FTE) employment positions in the London Borough of Camden. While the Class A1 / A3 employment is likely to be comparable with the existing Class A2 use at the Site, the 3,193 sq m of office floorspace will create entirely new employment positions due to the existing floorspace being unfit for modern occupier requirements.
- 7.8 As an occupier for the office floorspace has not yet been secured, Table 7.1 provides an estimate of the FTE generation based on the Employment Density Guide by the Homes and Community Agency. Based on a range of Class B1 office occupiers, the proposed development will generate between **163-264 new FTE positions** in the Borough. These new employment positions will assist in reducing unemployment in the Borough and contribute to local growth aspirations for Holborn.

**Table 7.1: Proposed Employment Creation**

Occupier Type	GIA Sq m	NIA Sq m	FTE per sq m	FTE Jobs
Corporate Occupier	3,193	2,113	13	<b>163</b>
Finance and Insurance			10	<b>211</b>
Call Centres			8	<b>264</b>

**Notes:**

NIA from application drawings.

Employment Density Guide 3<sup>rd</sup> Edition from Homes and Community Agency(November 2015).

- 7.9 Table 7.2 estimates the increase in earnings following the delivery of the new office floorspace. This has been calculated using average UK gross pay from the latest ONS and therefore is likely to underestimate new earnings given higher salaries for employees in London. Irrespective of this, the new office floorspace will generate between **£6-£8.5m of new gross earnings per annum**. The increase in earnings is likely to have associated benefits for the local economy through increased spending power of residents, which in turn will help support other local businesses.

**Table 7.2: Proposed Employment Creation**

Occupier Type	FTE Jobs	Average UK Pay (£)	Earnings (£m/annum)
Corporate Occupier	163	42,342	<b>£6.9m</b>
Finance and Insurance	211	40,074	<b>£8.46m</b>
Call Centres	264	22,699	<b>£5.99m</b>

**Source:**

Average UK Gross Pay from ONS Annual Survey of Hours and Earning: 2016 Provisional Results

## Core Planning Principles

7.10 The NPPF sets out a number of Core Planning Principles that should underpin decision making in applications for economic development<sup>9</sup>. Below we assess the proposed development against the relevant Core Planning Principles:

- The proposal **proactively drives and supports sustainable economic development** by meeting demand from a high quality office and retail space. The proposal will allow the applicant to **respond positively to wider opportunities for growth** at the Site thereby creating wider spin off benefits for the Borough through additional jobs and investment;
- The proposal will secure **a good standard of amenity for all existing and future occupants of the building** by providing new and refurbished office floorspace that can meet modern occupier requirements;
- The proposal has been designed to **take account of the character** of the Listed Building and Conservation Area, and **promotes the vitality of a main urban centre** through the creation of a new Class A1 / A3 unit and a large quantum of new office floorspace;
- It **supports the transition to a low carbon future** by creating a highly energy efficient extension to the existing building and an enhancement in the energy performance of the listed building;
- The development proposes an **effective use of land by reusing land that has been previously developed** in a central and highly accessible location;
- It **conserves a heritage asset** of Camden and ensures a long term viable use in created at the Site; and
- The Site is highly accessible location by a range of public transportation modes. In addition, the availability of an array of amenities in close proximity will reduce the need for employees to travel to meet their daily service needs. Accordingly, the proposal will **make the fullest possible use of public transport, walking and cycling, and focuses development in a sustainable location.**

## Summary and Conclusion

7.11 The assessment undertaken as part of this Section confirms that the proposal accords with various material considerations for town centre uses. The delivery of new and refurbished office floorspace will have a significant positive impact on the local economy through the creation of **163-264 new FTE positions** and **£6-8.5m of new earnings**. It will also assist in meeting local growth aspirations and enhance the vitality of Holborn as a commercial centre. Finally, the proposed development accords with an array of Core Planning Principles of the NPPF and benefits from the presumption in favour of sustainable economic development required under the NPPF.

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<sup>9</sup> See Paragraph 17 of the NPPF

## 8. Summary and Conclusions

- 8.1 The application seeks full planning permission and listed building consent for refurbishment and extension of a Grade II listed building. It will deliver 3,193 sq m (GIA) of new and refurbished office floorspace in a highly sustainable and accessible location. In addition, a refurbished unit at basement, ground, and mezzanine level will be provided for a Class A1 or Class A3 operator to maintain an active street frontage for the building.
- 8.2 The basement, ground, and mezzanine of the existing building is currently occupied by Natwest bank. The remaining floorspace at first, second, third, and fourth floor level has been vacant since the end of the previous decade, when the Environmental Council ceased occupation of this floorspace. After this time it was not possible to secure a subsequent tenant due to the poor quality of the existing office floorspace. Accordingly, the majority of the building has not made a positive contribution to the economic generation of the local area for an extended period of time.
- 8.3 Proposals for the refurbishment and extension of the existing building have been the subject of detailed pre application discussions with the LPA. The scale, design and appearance of the development has been amended to reflect advice provided by professional officers and other consultees. In addition, initial discussions have been undertaken with both TFL and Crossrail in respect of underground infrastructure.
- 8.4 The proposed development has been assessed against the relevant policies and overall objectives of the development plan and the NPPF.
- 8.5 The development will make a positive contribution to the 615,000 sq m of new office floorspace required in Central London in the period to 2026. On a local level, it will assist in meeting the Camden Core Strategy target of 2,000 additional jobs in the period to 2026 through relatively small scale private sector led schemes.
- 8.6 The physical elements of the proposed development have been amended in response to the pre application comments by the LPA dated 12 April 2016. The revisions to the physical works include:
- Removal of two storey roof extension from the proposal. Retention of the front pitch of existing hipped roof will ensure that the front elevation will retain its full historic significance;
  - Retention of existing chimney stacks from front hipped roof; and
  - Detailed assessment of proposed internal alterations within the Heritage Statement to allow the LPA to fully consider the changes.
- 8.7 The detailed assessment undertaken in the Heritage Statement confirm that the proposal offer sympathetic and informed changes that will improve the listed building and conservation area. The proposal will preserve and enhance the principal elements of heritage significance of the existing building. Importantly, it will provide a long term viable use of the building to ensure that it does not suffer from neglect.

- 8.8 Detailed assessments of impact in respect of neighbouring visual privacy and outlook; daylight and sunlight; noise, vibration, and odours have been undertaken to support the application. In addition to the assessment undertaken in this Statement, the application is supported by a comprehensive Construction Management Plan and BRE Daylight and Sunlight assessment. The design of the proposal also seeks to maximise occupier amenity of the new development to ensure that it attracts good quality tenants and delivers the anticipated level of new employment positions.
- 8.9 The proposed scheme will be designed in accordance with the BREEAM criteria and achieve the required 'Excellent' rating. The new rear extension will create highly energy efficient Class B1 floorspace that will contribute to achieving aspirations for a low carbon future. In addition, the energy efficiency of the existing listed building will be enhanced where possible, taking in to account the need to maintain the historical significance of the built form.
- 8.10 The proposed development will have a series of positive impacts which are material considerations and weigh heavily in favour of the grant of planning permission. These include:
- Meeting the identified need for new modern office floorspace in Holborn to encourage new companies to establish or expand their operations in the Borough;
  - Provision of a long term viable use of a listed the building to ensure that it does not suffer from ongoing neglect;
  - Creation of **163-264 new FTE positions** and **£6-8.5m of new earnings** within the office floorspace, in addition to the short term jobs in the demolition and construction phases of the development; and
  - Assisting in the delivery of new housing units in more appropriate locations in the Borough through a payment-in-lieu.
- 8.11 The assessment of the proposed development undertaken as part of the application has demonstrated that:
1. It accords with the relevant policies and objectives of the development plan;
  2. It accords with the policies contained within the NPPF; and
  3. There are no other material considerations that should outweigh the presumption in favour of granting planning permission for sustainable economic development.
- 8.12 In particular, the proposed development accords with the overarching objective of the NPPF to deliver sustainable development and the relevant core planning principles relating to economic growth.
- 8.13 We conclude that the application accords with the development plan and respectfully request that the application is approved in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

**Appendix 1 – Council Tax Records for Residential Use**

## Search the Council Tax valuation list

### Council Tax band details

FLAT 3RD FLR 212, HIGH HOLBORN, LONDON, WC1V 7BW

Last update on 03/05/2016

Local authority reference number	Council Tax band	Improvement indicator	With effect from	Mixed use property	Court code
01175021210036	Deleted		09/03/1998	Yes	

[View previous Council Tax bands for this property](#)

Council Tax is no longer being paid on this property (for example, because it's been demolished). If you wanted to challenge the Council Tax band for this property, contact the Valuation Office Agency for further advice.

#### Key to the table

**Council Tax band** - this determines how much Council Tax you pay.

[Show help](#)

**Improvement indicator** - this shows that improvements have been made to the property that might result in the Council Tax band changing if a "relevant transaction" takes place, for example, if the property is sold.

**Mixed use property** - a property can have a domestic or mixed use - "yes" identifies a mixed use property.

**Court code** - a court code shows the Council Tax band has been reviewed by a Valuation Tribunal or the High Court.

[Show help](#)

X Close

← Previous

Search again



**Appendix 2 – Council Tax Records for Office Use**

Valuation history [Back to search results](#)

**Current valuation - 2010 rating list (1st April 2010 - 31st March 2017)**

Billing authority reference	Address of property	Description	Special category code	Composite property	With effect from	List alteration date	Appealed	Settle. code	Total area	£ / m2	RV	TC	
01175021200244	<a href="#">2ND - 4TH FLRS 212 HIGH HOLBORN, LONDON, WC1V 7BW</a>	OFFICES AND PREMISES	203	N	01 Apr 2010		1		267.8	350.0	£ 91,000	N	
								<a href="#">View valuation</a>	<a href="#">Appeal</a>				

**Most recent valuation from the 2005 rating list (1st April 2005 - 31st March 2010)**

Billing authority reference	Address of property	Description	Special category code	Composite property	With effect from	List alteration date	Appealed	Settle. code	Total area	£ / m2	RV	TC	
01175021200244	<a href="#">2ND - 4TH FLRS 212 HIGH HOLBORN, LONDON, WC1V 7BW</a>	OFFICES AND PREMISES	203	N	23 Jun 2009	15 Sep 2009	0		267.8	250.0	£ 65,000	N/A	
								<a href="#">View valuation</a>	<a href="#">Appeal</a>				

## **Appendix 3 – Pre Application Advice from the London Borough of Camden**



**Development Management  
Regeneration and Planning**  
Culture & Environment Directorate  
London Borough of Camden  
2<sup>nd</sup> Floor, 5 Pancras Square  
London  
N1C 4AG

Tel: 020 7974 3270  
Fax: 020 7974 1680  
[planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Date: 12/04/2016  
Our ref: 2015/3095/PRE  
Contact: Zenab Haji-Ismael  
Direct line: 020 7974 3270  
Email: Zenab.haji-ismail@camden.gov.uk

Email: Philipd@rolfe-judd.co.uk

Dear Mr Dunphy,

**Town and Country Planning Act 1990 (as amended)**  
**Re: 212 - 214 High Holborn, London, WC1V 7BF**

Thank you for your follow up enquiry with regards to the proposal at 212-214 High Holborn.

This letter represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

### **Follow Up Advice**

A follow up meeting was held at the Council's offices where two hotel proposals were presented. The first proposal was for a boutique hotel with potential A1/A3 uses at ground and first floor levels and approximately 22 en-suite hotel rooms. The second option is for a small room option which would include approximately 40 plus en-suite rooms.

This was later taken to major case conference where it was discussed with senior officers at the London Borough of Camden.

This follow up advice will focus on two key issues.

### **Land Use**

The key concern expressed by senior officers is in relation to the justification for the loss of office. The Council is unwilling to accept or support any application unless it can be demonstrated, in accordance with policy DP13 that there is no longer a demand for the existing employment floorspace. The Council would expect marketing evidence to be submitted with any application should the applicant wish to consider the change of use of the existing building.

### **Design**

In terms of design, the conservation officer does not object to the use of this listed building as a boutique hotel. It is felt that a hotel would bring life and vitality to this rather underused grand and sombre building.

There are three areas of the scheme which need to be addressed

- 1) The bulk of the proposed rear extension is not overly concerning. The back area is currently in a very poor state. The proposed extension is to be of a high quality and there is no objection to the principle of the extension. The sensitive part of this scheme is the link between the historic and the new build where the historic stair and landings will physically connect. This requires considerable thought and design input. The proposed introduction of a roof terrace along with balconies will be an attractive alternative.
- 2) The proposed two storey roof extension is also of concern. The existing slate covered roof from the front looks to be original. It is handsome and appears in good repair with two large chimney stacks at either end. There is not a strong enough justification for the removal of this historic feature. To the back the roof is a 20<sup>th</sup> century construction and there is no objection in principal to changes to this part of the structure.
- 3) The third consideration relate to internal changes. At ground floor level, the removal of the entrance hall wall to create an enlarged hotel reception could be problematic in terms of losing historic floor plan, character and fabric. There are no details relating to this area and this will require greater thought. The first floor looks positive as do the upper floors however the proposed reordering of the second floor involves the removal of what appears to be all the internal walls and associated floor plan/details and character. We will require more detail to assess the level of harm but currently this does not appear to be acceptable.

In its current form, officers are unable to support the proposed application as issues relating to land use and design remain outstanding. The applicant is advised to consider the points set out in this letter and undertake follow up pre-application advice once there is further information, particularly in relation to land use.

If you have any queries about the advice contained in this letter please contact Zenab Haji-Ismael on **020 7974 3270**.

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

Yours sincerely,

Zenab Haji-Ismael