



**294-295 High Holborn**

**Planning Statement**

**March 2017**

DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ

Tel: 020 7004 1700  
Fax: 020 7004 1790

## **CONTENTS**

- 1.0 INTRODUCTION
- 2.0 EXECUTIVE SUMMARY: THE PLANNING BENEFITS OF THE PROPOSED DEVELOPMENT
- 3.0 SITE AND SURROUNDING CONTEXT
- 4.0 THE DEVELOPMENT PROPOSAL
- 5.0 CONSULTATIONS
- 6.0 PLANNING POLICY AND ASSESSMENT OF PLANNING ISSUES
- 7.0 CONCLUSION

## 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Ltd (DP9) on behalf of CHH London (the Applicant) in support of a planning application for the development of the site at 294-295 High Holborn, herein referred to as 'the Site'.

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

*"Erection on the site of a building up to 9 storeys in height, comprising office (use class B1) and retail (use classes A1-A3) uses, 10 residential units (use class C3), plant and associated works"*

1.3 The proposed redevelopment will maximise the development opportunities of the currently cleared site to deliver a high quality mixed-use scheme of significant architectural merit. This includes the provision of modern high quality Grade A office floorspace, attractive retail space and well-proportioned residential accommodation.

1.4 It is intended that the Applicant will occupy the proposed office accommodation to serve as its London headquarters building. The Applicant does not currently occupy accommodation within the Borough.

1.5 The submission of this application follows discussions with a wide range of stakeholders and statutory consultees, including planning, design and transport officers at the London Borough of Camden (LB Camden). In addition, the local conservation group and national heritage body, Historic England, have also been consulted accordingly.

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

- Planning Application Drawings prepared by Independent Architects;
- Design & Access Statement prepared by Independent Architects;
- Draft Construction Management Plan Pro-forma prepared by DP9 Ltd;
- Daylight and Sunlight Assessments prepared by Watts Associates Ltd;
- Air Quality Assessment prepared by Air Quality Consultants;
- Archaeological Assessment prepared by Mills Whipp;
- Energy Strategy prepared by Scotch Partners;
- Sustainability Statement Inc. BREEAM pre-assessment prepared by Scotch Partners;

- 
- Noise, Vibration and Ventilation Assessment prepared by Scotch Partners;
  - Basement Impact Assessment prepared by Michael Barclay Partnership (and others);
  - Transport Statement prepared by Motion; and
  - Travel Plan Statement prepared by Motion.

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

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

---

**2.0 EXECUTIVE SUMMARY: THE PLANNING BENEFITS OF THE PROPOSED DEVELOPMENT**

- 2.1 The key planning benefits arising as a result of the proposed development are summarised below:
- 2.2 The proposals will regenerate a cleared site which currently offers little to the architectural townscape or streetscape activity of High Holborn.
- 2.3 The proposals will maximise the development opportunities of the Site, thereby contributing to the regeneration and economic success of the wider Holborn Growth Area and the delivery of a minimum of 2,000 new jobs and 200 new homes in the area between 2001 and 2026, as required by planning policy.
- 2.4 Independent Architects have developed a high quality architectural design for the Site in order to maximise the development potential of the Site; optimising the provision of commercial and residential accommodation whilst providing a highly sustainable building.
- 2.5 The proposals represent a significant enhancement when compared to the existing planning permission for the Site, in particular land use and design grounds.
- 2.6 The existing condition of the Site currently detracts from the wider architectural townscape qualities of High Holborn. The proposals, through the use of a high quality palette of materials, will significantly enhance the local streetscape quality, reinforcing High Holborn as one of the borough's finest historic thoroughfares.
- 2.7 As a cleared site, the Site does not currently provide any jobs on-site. The proposed development will deliver 416 sqm GIA of high quality office floorspace, providing new high quality office floorspace for the Applicant's group in Camden. This will contribute significantly towards the promotion of Holborn as a thriving business location within the borough.
- 2.8 The provision of residential accommodation will help to significantly boost local housing supply, seeking to address increasing housing demand alongside creating a balanced local living and working population. The proposed residential accommodation is arranged to optimise internal living accommodation with the 10 units benefiting from well-proportioned accommodation and a good outlook. All units will be wheelchair accessible.
- 2.9 The proposals will promote mixed and inclusive communities and will contribute towards improving the residential mix in this part of the borough.

- 
- 2.10 The proposed development will improve the pedestrian streetscape environment along High Holborn through the introduction of active frontages and high quality architecture.
- 2.11 The Site is located within a highly accessible location and therefore is suitable for high density development. The Site is well served by public transport and is within close proximity of major London Underground connections.
- 2.12 In terms of sustainability, the proposed development will promote an exemplary level of energy efficiency and sustainable design. The proposed commercial areas will meet and exceed the level required for BREEAM 'excellent' standards and the proposed residential accommodation will achieve high energy efficiency and sustainability standards.

### 3.0 SITE & SURROUNDING AREA

#### **The Application Site**

- 3.1 The Site is bound to the north by High Holborn and to the south by Lincoln's Inn Gardens. It is located within the Holborn Growth Area and within the Bloomsbury Conservation Area. The Site covers an area of approximately 324 sqm.
- 3.2 The Site is currently cleared following the demolition of a building that previously stood on the Site circa 2008. This was pursuant to the existing planning permission described overleaf.
- 3.3 The Site currently provides a gap in the townscape and contributes little towards promoting local activity at street level with only hoarding at ground floor level. To the rear there is a substantial wall between the Site and Lincoln's Inn gardens.

#### *Heritage and conservation*

- 3.4 The Site is located within the Bloomsbury Conservation Area.
- 3.5 Of note, it is also located within close proximity of the following heritage assets:
- Grade I listed Nos. 1-7 Stone Buildings located to the south east of the Site;
  - Grade II listed Western Boundary Wall, Gates and Porters Lodge within Lincoln's Inn Gardens; and
  - Grade II listed Nos. 24, 25, 26 and 28 Lincoln's Inn Fields.
- 3.6 There are also several buildings of townscape merit located nearby along High Holborn.

#### *Accessibility*

- 3.7 The Site is located within close proximity to the Chancery Lane and Holborn London Underground Stations providing excellent accessibility to the underground train network. In addition, a number of other stations are within walking distance of the Site and a number of buses serve the site along High Holborn.
- 3.8 The Site benefits from a Public Transport Accessibility Level (PTAL) of 6a 'Excellent', which represents one of the highest levels of accessibility attainable. This is discussed further in the Transport Statement prepared by Motion.

### *Planning History*

- 3.9 Of significance, planning permission was granted on the Site previously in September 2003 (ref. PSX0304010) for the

*‘redevelopment to provide basement, ground and 8 upper storeys with mixed retail (Class A1) and professional services (Class A2) use at ground floor and part basement and offices (Class B1) above’.*

- 3.10 The planning permission was granted subject to planning conditions and a S106 agreement.
- 3.11 The planning permission was subject to formal amendments granted in January, August, September and October 2007 (refs: 2006/5250/P; 2007/3660/P; 2007/3661/P; and 2007/3659/P). The amendments sought a variety of changes to the proposals including reconfigurations to the roof plant enclosure, changes to the building line at the rear and use of the basement for additional plant area.
- 3.12 The planning permission was lawfully implemented through the demolition of the previous building on the site. The existing consent is still live and therefore provides a material consideration for the proposals.
- 3.13 The accompanying Design and Access Statement prepared by Independent Architects includes a comparative analysis of the existing planning permission with the current proposals. The proposed building is broadly consistent with the physical envelope of the consented scheme. The new proposals however include significant enhancements to the architectural design and articulation, providing an improved and more appropriate contextual response to the local townscape.

### **The surrounding area**

- 3.14 The Site is located in the Holborn and Covent Garden ward and within the Holborn area, which is historically associated as a commercial location for business headquarters. Uses along High Holborn (and further afield along Holborn) are predominantly office buildings and supporting employment uses including retail, hotel and educational uses. Lincoln’s Inn Gardens to the rear provides a formal and historic open space for the enjoyment of workers, residents and visitors to the local area.
- 3.15 This part of the Holborn area has an evolving character where buildings have been redeveloped at various times throughout the last century to meet occupier/market



---

requirements. Architecturally therefore the local area contains a variety of modern and traditional building styles. This backdrop creates an interesting contrast of building typologies for an area recognised as a thriving business location.

- 3.16 The neighbouring buildings to the east and west are both commercial buildings which comprise ground + 6 storeys of accommodation and a further set back 7<sup>th</sup> storey. This provides a defined massing opportunity for the Site.
- 3.17 On the opposing side of High Holborn, the properties are of varying heights and architectural typologies. Further details of the neighbouring context are included within the accompanying Design and Access Statement.
- 3.18 Whilst there are no trees on or over overhanging the Site, Lincoln's Inn Gardens includes a rich variety of mature trees which defines the immediate character to the rear of the Site.
- 3.19 The design of the proposed development has been developed with consideration for the local built context including the setting of the nearby heritage assets.

## 4.0 DEVELOPMENT PROPOSAL

### Summary of overall concept

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

### The proposed scheme

- 4.5 The application seeks full planning permission for:

*“Erection on the site of a building up to 9 storeys in height, comprising office (use class B1) and retail (use classes A1-A3) uses, 10 residential units (use class C3), plant and associated works.”*

- 4.6 The proposed development includes the erection of a mixed-use commercial and residential development. The proposed new building will be up to 9 storeys in height, stepped back appropriately at the upper levels on High Holborn to complement the neighbouring building lines. The rear of the proposed building will be characterised by a series of terraces and planters providing a pleasant outlook towards Lincoln's Inn Gardens.

- 
- 4.7 The principal point of access for pedestrians will be from High Holborn with the retail use accessed directly from the shopfront and the office and residential accommodation from a lobby entrance. Cycle parking and refuse access will also be provided via the lobby. The Site will not provide any car parking.
- 4.8 Architecturally, the proposals will provide a striking and high quality building to the High Holborn streetscape. The design and materiality of the façade has been developed with input from planning and design officers at the Council. The proposals are therefore well considered and complement appropriately the neighbouring heritage assets whilst creating a distinctive and individual building of exemplary design. Further details can be found in the Design and Access Statement prepared by Independent Architects.
- 4.9 The retail accommodation is laid out at basement and ground level. This creates an opportunity to provide a high quality and vibrant shopfront to High Holborn promoting street level activity. To the rear, a ground floor rear courtyard provides a quiet external space for the new unit. The basement level also includes the refuse storage and cycle parking areas for the building alongside dedicated areas for mechanical and electrical plant.
- 4.10 The proposed new office accommodation will be provided on levels 1-2 as high quality modern floorplates for occupation by the Applicant. The office space will benefit from terraces to the rear providing both amenity and shade with a pleasant southern outlook towards Lincoln's Inn Gardens.
- 4.11 The proposed residential accommodation will be laid out on levels 3-8. The proposed units are well proportioned and provided as a mix of 1 and 2 bedroom units. The units benefit from good access to daylight and sunlight and the majority have access to a private amenity terrace. All of the new residential units will be wheelchair accessible and one of the units is arranged to facilitate easy adaption for a wheelchair dependent occupier.
- 4.12 Cycle parking for the proposed residential and commercial users will be provided at basement level (32 spaces). The parking will be accessed via a lift from the principal lobby, a shower/changing room is also provided at this level for cyclists.
- 4.13 As the Site benefits from a highly accessible location with numerous public transport opportunities it will be 'car-free'.
- 4.14 A plant screen at roof level is set back from the principal massing to screen plant required at roof level. The plant array will contain essential mechanical and engineering plant alongside an array of photovoltaic panels.

### Proposed floorspace schedule

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

*Table 1 – Proposed commercial floorspace*

Use Class	Proposed Floorspace (sqm GIA)
Class B1	415.7
Class A1-A3	250.7

*Table 2 – Proposed residential accommodation*

		Number of units and floorspace
Class C3 Housing	Studio	0
	1 bedroom	2
	2 bedroom	8
	TOTAL	10
Proposed residential floorspace (sqm GIA)		1,017.0

---

## 5.0 CONSULTATIONS

- 5.1 The application proposals have been developed through consultation with officers from LB Camden alongside other key stakeholders.

### **LB Camden**

- 5.2 The project team have met with LB Camden planning and design officers through a formal pre-application process.
- 5.3 The design of the proposals has evolved pursuant to these meetings and discussions inline with the advice and comments received, most notably in terms of the architectural form of the building and its appearance when viewed from High Holborn and the gardens to the rear.
- 5.4 In addition, discussions have also been held with policy and transport officers to discuss the development proposals.
- 5.5 Through these meetings officers have expressed the following:
- Officers are strongly supportive of the principle of increased employment provision on the site, including the delivery of modern office floorplates to provide a high quality headquarters building on Holborn;
  - Officers welcomed the proposals for a mix of uses on the site, including residential accommodation;
  - Agreement was reached with LB Camden regarding the design principles and materiality of the development proposals; and
  - Agreement was reached with officers in relation to the servicing, refuse and access (pedestrian and cyclist) strategy for the site.

A detailed analysis of the key comments and subsequent revisions to the proposed development during the pre-application stages is presented within the accompanying Design and Access Statement.

### **Other key stakeholders**

- 5.6 The proposals were also presented to Historic England who declared that they did not need to be involved further and were happy to let the local planning authority determine the application accordingly.

- 5.7 Discussions also took place with the head gardener from the Honourable Society of Lincoln's Inn in relation to on-going works to one of the trees at the rear of the site.

**Summary**

- 5.8 The consultation activities undertaken on the proposals has returned positive levels of support for the scheme. There is clear support to bring forward a high quality mixed use development on the Site.

---

## **6.0 PLANNING POLICY AND ASSESSMENT OF PLANNING ISSUES**

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

### **National planning policy**

- 6.2 The National Planning Policy Framework (NPPF) was adopted on 27 March 2012 and provides planning policy guidance at a national level and is a material consideration in the determination of planning applications.
- 6.3 At the heart of the NPPF is a presumption in favour of sustainable development, for both plan making and for decision taking. The NPPF directs local planning policies to approve development proposals that accord with the development plan without delay. The NPPF supports sustainable economic development, including the delivery of new business units, and seeks to significantly boost the supply of new housing.
- 6.4 The proposed development will use previously developed (brownfield) land within an area of good accessibility for the provision of new homes and enhanced business space. The NPPF supports mixed use developments, such as the proposed development, which seeks to respond positively to the opportunities for growth. The design has been informed by the principles of sustainability and is therefore compliant with the underlying principles of the NPPF.
- 6.5 The Government published National Planning Policy Guidance (NPPG) on 6 March 2014, which effectively displaces previous planning practice guidance documents. This online, up-to-date planning practice guidance is a material consideration in the determination of planning applications, and has been considered as part of our assessment of the development proposals considered within this section.

### **The development plan**

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

- The London Plan incorporating Amendments (2016)

- Camden Core Strategy (2010)
- Camden Development Policies (2010)
- Camden Planning Guidance documents (various).

6.7 The London Plan was originally published in July 2011. This document provides the overall strategic plan for London, setting out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. Subsequently, the London Plan has been updated to incorporate 'Revised Early Minor Alterations' (2013); 'Further Alterations to the London Plan' (FALP) (2015) and 'Minor Alterations to the London Plan' (MALP) (2016). The updates were incorporated to ensure consistency with the NPPF and address key housing and employment issues emerging from an analysis of recent census data.

6.8 The Greater London Authority (GLA) has produced a number of documents which provide more detailed strategic guidance regarding London Plan policies and are also relevant to the proposed development. These include:

- Sustainable Design and Construction SPG (April 2014)
- The Mayor's Transport Strategy (May 2010)
- Use of Planning Obligations in the Funding of Crossrail, and the Mayoral Community Infrastructure Levy (March 2016)
- Housing SPG (2016)

6.9 Where relevant within the supporting application documents these guidance notes have been referred to. They tend to relate to detailed technical or individual topic matters and have not all been directly referred to in this Planning Statement.

6.10 LB Camden's Planning Policies comprise a suite of planning policy documents to guide and inform development within the borough. The principal documents currently are the Core Strategy and the Development Policies documents which were both adopted in 2010. In order to reflect evolving local priorities, the Council have embarked on a review of the current principal policy documents and the publication of a draft Local Plan. The draft plan was submitted for examination in late 2016. As the policies in the plan are only in draft format, they are not referred to as material considerations however general themes and policy aspirations are considered where relevant.

6.11 LB Camden have also prepared a number of Camden Planning Guidance documents. Where relevant these documents have also been considered.



---

**Site designations**

6.12 The site is identified within the Camden Proposals Map (2010) for the following site designations:

- Central London Frontage;
- Central London Area;
- Holborn Growth Area;
- Archaeological Priority Area; and
- Bloomsbury Conservation Area

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

**Planning policy assessment**

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

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

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

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

- 6.16 Specific to the Holborn area, Core Strategy Policy CS2 identifies a targeted delivery of a minimum of 200 new homes and an indicative 2,000 jobs within the Holborn growth area from 2001 – 2026. This delivery target is maintained within the recent draft Local Plan for the period 2011 – 2026.
- 6.17 As noted, the site is identified as one of the London Plan’s areas for intensification. The plan supports ‘intensification through mixed-use redevelopment at higher densities’ within the Holborn area. In addition, a number of policies within the London Plan emphasise a requirement for mixed use development within highly accessible locations.
- 6.18 Redeveloping the Site to create a new headquarters site for the Applicant’s business alongside a high quality residential offer has always been central to the brief throughout the design and development process for the proposal. The proposed design for the new building will provide a striking new headquarters building for the Applicant alongside high quality new homes to create a mixed and balanced community within a central London location. With regards to addressing Policy DP1, the proposals provide in excess of 50% of the overall uplift of floorspace as residential floorspace. This position is in accordance with planning policy and supported in principle by LB Camden planning officers.
- 6.19 In comparison to the existing planning consent for the Site, the proposed introduction of residential uses as part of this application will contribute towards promoting vibrant living and working communities within this part of central London.
- 6.20 The proposals are therefore aligned to the strategic policy aspirations for delivering mixed-use developments within highly accessible locations in London.

***ii. Land use – commercial floorspace***

- 6.21 As outlined within the Core Strategy, the growth aspirations for Holborn are based on the redevelopment and intensification of existing and cleared sites, to provide new high density office floorspace.
- 6.22 Core Strategy Policy CS8 states that the Council will secure a strong economy in Camden. Further, the Camden Employment Land Review 2008 forecasts that the demand for offices will increase by 615,000 sqm between 2006 and 2026. To meet this demand the Council identify that they will direct new business towards the growth areas, including Holborn. This demand is recognised by subsequent iterations of the land review. Policy CS9 provides further support, stating that the growth areas (including Holborn) should contribute towards London’s economic role.

- 6.23 Development Policy DP13 Part d) requires that redevelopment of existing and former employment sites provides other priority uses, including housing.
- 6.24 As part of a mixed commercial and residential redevelopment of a cleared site, the proposals seek to deliver high quality office floorspace which will provide a significant uplift in employment density on the Site. Intrinsic to the proposed new building's design is its ability to provide a new exemplary headquarters building for the Applicant in Camden. The proposed development therefore represents a significant contribution towards the Holborn growth area, the local office market and Camden's role within a wider London economy. For the purposes of analysis, the requirements of the policy will be successfully achieved.
- 6.25 Consistent with the retail aspirations of planning policy, the proposals provide new ground and basement level retail floorspace. Along High Holborn a new glazed shopfront will provide excellent visibility into the retail unit and will promote streetscape activity along High Holborn.
- 6.26 As discussed with officers, the proposals will enliven the streetscape alongside providing a new amenity to the local area.

***iii. Land use – residential***

- 6.27 With regards to residential uses, the NPPF seeks to '*boost significantly the supply of housing*'. Paragraph 49 states that applications should be considered in the context of sustainable development.
- 6.28 The London Plan, incorporating updates, identifies the urgent need to increase housing supply in London to address the substantial population increase in the capital.
- 6.29 in accordance with London Plan Policy 3.4, development should also seek to optimise housing potential taking account local context and character, design principles and public transport accessibility. The Site is considered to provide an excellent opportunity to optimise housing potential within this location. The proposed development would therefore contribute towards the provision of new housing, in line with the aspirations of the London Plan and NPPF.
- 6.30 The overarching principle advocated in local Policy CS1 of the Core Strategy requires that developments promote the most efficient use of land and buildings in Camden. Policy CS1 also supports the development of a mix of uses in easily accessible locations in the borough to ensure that the most efficient and optimal use of land.

The site is well served by public transport and is therefore capable of accommodating a mixed-use development.

- 6.31 Development Policy DP1 delivers Policy CS1 by setting out a detailed approach to mixed use development. DP1 states that the Council will require a mix of uses in development where appropriate, including a contribution towards the supply of housing.
- 6.32 As such, it is considered that the proposed redevelopment of Site complies with Policies CS1 and DP1 as it provides mixed use development in a highly accessible location and helps the Council meet their key planning policy objectives.
- 6.33 Core Strategy Policy CS6 seeks to promote the delivery of high quality homes that contributes towards increasing housing supply in the borough to meet local housing need. The proposed development complies with the overall aim of CS6 by providing a development which will contribute towards the Council's housing targets and the local Holborn targets for residential intensification.
- 6.34 Camden Development Policies DP2 seeks to maximise the supply of additional homes in the borough. The development scheme will provide a significant contribution to the supply of housing on an underused site and therefore the proposal also accords with Policy DP2.
- 6.35 The provision of residential uses on site is therefore considered to be acceptable in principle.

***iv. Residential accommodation, unit mix and affordable housing***

- 6.36 In line with Policy CS6, the proposed development is arranged as a mix of well-proportioned 1 and 2 bedroom homes. All the proposed housing will achieve Lifetimes Homes Standards and 1 unit (10%) has been designed to allow for easy adaption for occupancy by a wheelchair dependent occupant. Further details are enclosed within the accompanying Design and Access Statement.
- 6.37 Core Strategy Policy CS6 seeks to ensure that the maximum reasonable contribution towards affordable housing is secured as part of qualifying residential developments.
- 6.38 Development Policy DP3 requires that all developments with a capacity for 10 or more additional dwellings (or 1,000+ sqm gross of floorspace) to contribute to the supply of affordable housing. The policy states that in considering whether an affordable housing contribution should be sought (including whether this should be provided on-site), the Council will consider a number of factors, this includes the

physical constraints of the site or premises and factors which would lead to difficulties for housing providers or occupiers to fund or manage the accommodation (if provided on-site).

- 6.39 Supporting text for Policy DP3 states that the Council accepts that off-site solutions may be necessary where it is not practical to include affordable housing within a market housing development, for example where the development is relatively small (up to 3,500 sqm gross).
- 6.40 Due to the size of the proposed development and the constraints of the plot width, the delivery of a small quantum of affordable residential floorspace is likely to be unfeasible. An off-site contribution towards the provision of affordable housing in the borough will optimise the quantum of affordable housing floorspace that can be provided from the development. As per policy requirements, a financial contribution towards off-site delivery will demonstrate the maximum and reasonable delivery of affordable housing from the development of the Site. This will be pursued with officers.
- 6.41 In accordance with London Plan Policies and the Housing SPG, the proposed development has been designed to meet the Mayor's standards and requirements for new residential development.

#### **v. *Amenity***

- 6.42 LB Camden Development Policy DP26 'Managing the impact of development on occupiers and neighbours' states that the Council will only grant permission for development that protects the amenity of occupiers and neighbours. Assessments have therefore been prepared to assess the impacts arising from the proposed development on daylight and sunlight, noise and vibration and air quality.
- 6.43 A Daylight and Sunlight Assessment has been undertaken by Watts Associates. The report determines that there are no nearby residential uses which are sensitive to daylight/sunlight impacts as a result of the development of the Site.
- 6.44 Watts have also assessed the proposed residential accommodation for quality in relation to exposure to daylight and sunlight. Watts concludes that the Average Daylight Factor levels arising from the proposed development of a site within a city centre context will provide adequate levels of amenity and should not be a reason to refuse planning permission.

- 6.45 A Noise, Vibration and Ventilation Assessment has been prepared by Scotch Partners to determine the likely noise levels resulting from the completed development and any ground-borne vibration which could affect the completed development.
- 6.46 The report makes references to standard guidance and LBC Development Policy DP28, which details the specific acoustic requirements for developments in the borough. In order to assess the acoustic requirements of Development Policy DP28, noise and vibration surveys have been completed on the Site and surrounding area.
- 6.47 Based on the attenuation measures incorporated within the design of the plant area, LB Camden's noise limits at each of the neighbouring noise-sensitive properties are expected to be readily achieved. It is understood that the assessment represents a worst-case scenario and the plant will typically operate below its maximum duty. As such, the levels experienced at the neighbouring properties are expected to be even lower than those calculated and presented in the report.
- 6.48 As required by Camden's Development Policy DP32, an Air Quality Assessment has been undertaken by Air Quality Consultants. Following assessment, the report concludes that the building and transport related emissions associated with the proposed development are both below the relevant benchmarks. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral.
- 6.49 In summary, the proposed development will not have an adverse effect on the amenity of existing occupiers and neighbours. The proposed development therefore fully complies with planning policy requirements.

**vi. Design and conservation**

- 6.50 A full evaluation of the design and the proposed development and its relationship to the surrounding urban and historic context is set out within the Design and Access Statement.
- 6.51 The Government attaches great importance to the design of the built environment. The NPPF states that planning decisions should not attempt to impose architectural styles and should not stifle innovation, originality or initiative (paragraph 60). The NPPF recognises that although visual appearance and the architecture of individual buildings are very important factors, high quality design should also address the connections between people and places and the integration of new development into the natural, built and historic environment (paragraph 61).

- 
- 6.52 In determining planning applications, the NPPF directs that great weight should be given to outstanding or innovative designs which raise the standard of design more generally in the area (paragraph 63). The London Plan Policy 3.5 also advocates quality and design in housing developments.
- 6.53 Camden's Core Strategy Policy CS14 seeks to promote high quality places and conserve heritage assets. The policy requires proposals to be of the highest standard of design that respects local context and character. Development Policy DP24 seeks to secure high quality design.
- 6.54 Camden Development Policy DP25 seeks to conserve Camden's heritage by preserving conservation areas, listed buildings and other heritage assets. The policy resists development that is seen as harmful to such assets.
- 6.55 As the existing Site is cleared and currently provides an unattractive gap in the townscape, the delivery of a high quality building on the Site that will significantly enhance the local built context is acceptable.
- 6.56 As the site is located within the Bloomsbury Conservation Area and within close proximity to a number of listed buildings, impacts on the local townscape have been assessed and considered from an early stage in the design process. Additionally, the views of LB Camden design officers have been influential in the evolution of the design for the proposed architectural form on the Site.
- 6.57 As shown within the accompanying Design and Access Statement, the development proposes a very high quality design which will maximise the potential of the Site whilst complementing the built context and heritage of the surrounding area. Particular care and attention has been given to the materiality and architectural appearance of the proposal to ensure it complements the existing townscape of High Holborn and the mature greenery of Lincoln's Inn Gardens. It is therefore considered that the proposed design solution is appropriate.
- 6.58 The design of the proposed scheme has responded to reflect pre-application discussions with the Council's planning and design officers and feedback received from the consultation activities. The application proposal is considered to be of a very high standard of design and architectural quality which will make a significant contribution to improving the townscape quality of the Site.
- 6.59 In accordance with Development Policy DP24, high quality materials will be used to provide prominent and visually interesting frontages. Detailing to the Portland stone on the rear façade will enliven a blank facade. The Design and Access Statement

submitted as part of this application provides more detail regarding precedent materials and finishes.

- 6.60 The user experience at ground level has been intrinsic to shaping proposals. On High Holborn this involves providing a glazed retail frontage to maximise visibility and stimulate streetscape activity from the new retail unit. On the upper levels, the high quality Portland stone and window framing system will provide a complementary aesthetic to neighbouring buildings; enhancing the wider streetscape of the Holborn area and the local Bloomsbury Conservation Area.
- 6.61 With regards to the impact on views and the setting of nearby listed buildings, the enclosed imagery demonstrates that the proposals will have a beneficial impact on the local townscape.
- 6.62 The Site lies within an Archaeological Priority Area. An Archaeological Desk-Based Assessment has been prepared by Mills Whipp on this basis and is submitted to support the application. English Heritage (now Historic England) advised LB Camden in 2003 pursuant to the existing planning permission that no archaeological works would be necessary on the subject site as excavation for the existing basement will have removed any buried remains (quoted in the Officer's report dated 3rd Jan 2003). Mills Whipp conclude that under these circumstances it is suggested that the development is permitted to proceed without any archaeological constraints.
- 6.63 Overall the proposals are consistent with the design aims of the development plan and relevant urban design and historic built environment guidance.

**vii. Landscape, biodiversity and amenity space**

- 6.64 London Plan Policy 7.5 seeks to ensure that proposed developments make the public realm comprehensible at a human scale, using gateways and focal points. Landscape treatment and infrastructure should be of the highest quality.
- 6.65 Core Strategy Policy CS15 states that where development proposals create additional demand for open space, opportunities should be secured for improvements to open spaces including the facilities provided for play, access arrangements and connections between spaces. The policy encourages biodiversity in the borough through the provision of biodiverse green or brown roofs and new trees and vegetation.
- 6.66 Core Strategy Policy CS15 aims to protect and improve open spaces and encourage biodiversity by creating the provision of new or enhanced habitat through promoting the provision of new trees and vegetation.



- 6.67 Development Policy DP24 seeks to ensure that developments consider existing natural features, provision of appropriate hard and soft landscaping including boundary treatments and the provision of appropriate amenity space.
- 6.68 The Site currently provides little ecological contribution. The nearby trees within Lincoln's Inn Gardens to the rear provide significant ecological value and amenity to the local area. Whilst no trees can be introduced on the Site because of physical constraints, it is proposed to introduce a series of planters to the new terraced spaces created at the rear of the development.
- 6.69 In relation to residential amenity, the majority of residential units will have access to their own private terrace.
- 6.70 The office tenants will also benefit from access to terraced spaces with views to the south over Lincoln's Inn Gardens.
- 6.71 Overall it is considered that the development proposals are in accordance with the aims of the relevant LB Camden and London Plan planning policies.

**viii. Energy and sustainability**

- 6.72 Core Strategy Policy CS13 and Development Policy DP22 promote sustainable design and construction in all new developments across Camden. Care has been taken to ensure the design of the scheme has evolved to incorporate sustainable credentials.
- 6.73 An Energy Statement has been prepared by Scotch Partners in relation to the proposed development. In accordance with the London Plan, the regulated carbon dioxide emissions of the proposed scheme have been reduced by 38.3% from a Part L 2013 compliant baseline by maximising the contribution of be lean, be clean and be green steps of the Mayor Energy Hierarchy.
- 6.74 Under the GLA's requirement for new homes to achieve a zero-carbon status, the proposed development will be accompanied by a financial contribution to offset the departure from this requirement. The calculation of this is set out in the Energy Statement accordingly.
- 6.75 The proposals achieve a reduction in carbon emissions through passive design features for the residential and commercial elements respectively. This is achieved through the incorporation of highly efficient glazing and shading features.

- 6.76 To further reduce the carbon dioxide emissions, an assessment of potential low and zero carbon technologies has been undertaken which provides a further reduction in carbon emissions for the proposed development. As described in the accompanying Energy Statement, the proposals include the use of Air Source Heat Pumps and Photovoltaic Panels to generate renewable energy on the Site.
- 6.77 As evidenced in the Energy Statement, the design team have sought to engage with LB Camden officers in relation to the availability of district heating networks in the local area including those emerging in the Council's plan. At the time of writing, officers had not responded. Nonetheless, the development will be designed to accommodate a future connection to a heat network should one become available in the future.
- 6.78 Overall, the proposed development is compliant with GLA guidance and LB Camden's policies concerning energy and is therefore considered to be acceptable in principle.
- 6.79 A Sustainability Statement has been prepared by Scotch Partners in relation to the proposed development which includes a BREEAM Pre-Assessment.
- 6.80 The report concludes that the proposed retail and office floorspace will achieve a BREEAM New Construction 2014 rating of 'excellent', achieving a total score above 70%. This BREEAM rating is in accordance with the requirements required under Camden Development Policy DP22.
- 6.81 Overall the proposed development for the Site achieves excellent levels of sustainability and is considered to be in accordance with planning policy requirements.

***ix. Transport, servicing and parking***

- 6.82 A full evaluation of the proposed development from a transport perspective is provided within the Transport Statement prepared by Motion. The Site is very well served by public transport and provides opportunities for residents, workers and visitors to the Site to use sustainable travel options. The principles of transport, servicing and parking have been discussed previously with the Council's transport officers.
- 6.83 An assessment of the existing public transport accessibility has been undertaken which concludes that the site has a PTAL rating of 6a, this identifies the Site as having excellent levels of public transport accessibility.

- 6.84 As required by both local and London wide planning policy, the proposed development will be car free. The predominant method of travel for workers, residents and visitors to and from the development is likely to be by public transport, walking or cycling.
- 6.85 The scheme has been designed to encourage sustainable travel and provides attractive and easy to use cycling facilities including cycle parking and a dedicated shower and changing area. In total the scheme will provide 32 cycle parking spaces. This level of provision meets the recently published London Plan requirements for long and short stay cycle parking.
- 6.86 The proposed development scheme is not dependent on travel by motor vehicles but will encourage opportunities for users of the Site to travel by sustainable means. A detailed Travel Plan Framework has been prepared and is submitted as part of this application accordingly. Overall therefore the scheme is in accordance with Core Strategy Policy CS11 and Development Policies DP16 and DP17 which promote sustainable and efficient travel.
- 6.87 As permitted for the previous planning permission, all servicing for the development will take place from High Holborn. The on-site management team will be responsible for collating refuse for collection from High Holborn. This will be managed efficiently to ensure refuse is not left out on the public footway for sustained periods.
- 6.88 Further details relating to the proposed transport and servicing strategy for the Site are included within the Transport Statement, Travel Plan Statement and Design and Access Statement.
- 6.89 A draft Construction Management Plan Pro-forma relating to the proposed development has also been provided as part of the submission. This has been prepared to accompany this application. Further details, relating to provisions to be undertaken by a contractor, will be submitted subsequently as part of a more detailed Construction Management Plan following the formal appointment of a contractor.

**x.      *Accessibility***

- 6.90 London Plan Policy 3.8 and Camden Development Policy DP6 refer to lifetime homes and wheelchair housing and require that all housing development should be built to a Lifetime Homes standard. In addition, 10% of homes developed should either meet wheelchair housing standards or be capable of easy adaption. The development proposals include a one bed unit which could be easily adapted to meet LB Camden's

wheelchair housing standards. Further details regarding the scheme's accessibility credentials can be found in the Design and Access Statement.

- 6.91 Policies DP29 and CS14 promote sites to achieve the highest standards of access in all buildings and places. Further, they require schemes to be designed to be inclusive and accessible and seek to promote fair access and remove barriers that prevent people from accessing facilities and opportunities.
- 6.92 The development proposal has been designed to ensure that the building and space around it is inclusive and accessible to all. As detailed further within the Design and Access Statement, the design of both the commercial and residential buildings incorporate design measures to ensure that inclusive accessibility is maintained across the Site.
- 6.93 It is therefore considered that the proposals are consistent with the aims of the London Plan and LDF Policies CS14, DP6 and DP29.

***xi. Basement development.***

- 6.94 Development Policy DP27 sets out the Council's approach towards basement development within the borough. Specifically, it states that in determining proposals for basement and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. Basement development will only be permitted by the Council where it does not cause harm to the natural and built environment and local amenity.
- 6.95 Precedent for basement development on the Site is already established through the existing planning permission which has been lawfully implemented and includes a basement design which could be built out. Nonetheless, the application is accompanied by a full Basement Impact Assessment prepared by consultants Michael Barclay Partnership alongside supporting consultants. The proposed extent of basement excavation is minimal and accordingly the assessment concludes that the proposed development will not harm the natural or built environment or local amenity.
- 6.96 The proposed basement development is therefore in accordance with Policy DP27.

---

## 7.0 CONCLUSIONS

- 7.1 The application provides an opportunity to create a vibrant mixed use scheme on a cleared site. The proposed development will secure important economic, social and environmental benefits whilst achieving the essential objectives of sustainable development. It will provide a new headquarters building for the Applicant alongside high quality new homes within the borough.
- 7.2 The uplift and enhancement of commercial floorspace on the Site will make a significant contribution to the quantum and quality of office space within the Holborn area. The creation of a new retail offer on High Holborn will enliven the local streetscape and provide valuable amenity for the local area.
- 7.3 The provision of residential uses as part of the mixed use redevelopment of the Site will positively contribute towards optimising the development potential of the Site and towards meeting the Council's housing targets. The introduction of residential accommodation on the Site will add vibrancy to the local area and contribute towards achieving a balanced living and working population within Holborn.
- 7.4 The proposed development has been informed following a series of meetings and discussions with officers from LB Camden alongside officers from Historic England. During this process, feedback has been incorporated into the design and development of the proposals and alterations have been pursued appropriately.
- 7.5 Independent Architects have designed a development of significant architectural quality which relates positively and sensitively to the setting of the site including the surrounding Bloomsbury Conservation Area and neighbouring listed buildings.
- 7.6 The scheme has been designed to meet sustainability requirements at national, London and local levels. The building will combine energy efficient and renewable energy measures to minimise carbon emissions. The proposed commercial floorspace will meet BREEAM 'excellent' standards.
- 7.7 The Transport Statement demonstrates that the site has excellent levels of public accessibility to meet the scale of the development proposed. The proposed development will be car free and will encourage users of the site to use sustainable methods of transport.
- 7.8 Overall the development proposals for the site are fully compliant with planning policies at the national, regional and local level.

- 7.9 The proposals for a high quality mixed use development on the Site represents an enhancement of the current planning permission and will secure significant benefits in a highly accessible location. The application should be supported on the Site.