150 HOLBORN

PLANNING AMENDMENTS

PLANNING STATEMENT ADDENDUM

JULY 2017





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1.0 INTRODUCTION

- 1.1 This Planning Statement Addendum has been prepared by DP9 Ltd (DP9) on behalf of DAH Real Estate Sarl in support of minor revisions to the planning application (ref. 2016/2094/P) submitted in April 2016 for the redevelopment of the site at 150 Holborn ('the Site').
- 1.2 The proposed minor revisions respond positively to comments from officers from the London Borough of Camden. Specifically, the revisions have been progressed with the support of officers to a point where officers now consider they are acceptable in the context of the current planning application.
- 1.3 The minor revisions are related to the building's appearance, principally the appearance and materiality of the proposed façade for the new building. The revisions are not related to the proposed land uses or massing of the new building; these elements are currently supported by the London Borough of Camden ('LB Camden' or 'the Council') and other stakeholders.
- 1.4 The proposed revisions also include some minor internal reconfigurations. These are a result of design progression since submission of the application and are non-material in their nature.
- 1.5 The redevelopment of the Site will provide a mix of office employment floorspace (Class B1), retail floorspace (Class A1-A3), residential units (Class C3) and public realm improvements.
- 1.6 The proposed redevelopment will maximise the development opportunities of the Site to deliver a high quality mixed-use scheme of significant architectural merit. This includes the provision of flexible Grade A office floorspace, attractive retail units and well-proportioned residential accommodation. The proposed development will also provide enhancements to the surrounding public realm including vibrant and active frontages along Holborn, Gray's Inn Road and Brooke Street.
- 1.7 The new office accommodation on the Site will provide a new European head-quarters building for the applicant's business. This will bring together a number of business units which are currently dispersed across London into one building in the borough. This will provide significant and collaborative employment benefits for Camden.
- 1.8 This addendum statement should be read and considered in conjunction with the design and technical information submitted in support of the proposed revisions. This

comprises an assessment of the revisions and their relative impact on the supporting technical assessments.

2.0 REVISIONS TO THE APPLICATION PROPOSAL

- 2.1 A full assessment of the revisions to the proposed development is contained within the addendum Design and Access statement compiled by Perkins + Will. A number of independent supporting reports are also provided.
- 2.2 The revisions respond positively to comments in respect of the application and have been developed with the support of planning and design officers from LB Camden. The revisions are predominantly related to the appearance of the building, notably its façade and do not affect the principle of land uses or the general massing of the building which has been agreed with officers previously.
- 2.3 The revisions maintain the principal design concept to provide a high quality mixed-use sustainable development. This includes maximising the Site's employment capacity to provide a new Grade A office headquarters building for the applicant alongside providing well-proportioned residential accommodation on Brooke Street. The aspiration 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 is therefore unchanged.
- 2.4 Architecturally, the revisions to the proposals will ensure the delivery a building of significant quality which provides a vibrant addition to the townscape of the local area whilst preserving the character and enhancing the appearance of nearby conservation areas and listed buildings. At ground level, the proposals continue their ambition to enliven and improve the streetscape and pedestrian environment along Holborn, Gray's Inn Road and Brooke Street.
- 2.5 The amended description of development is as follows:

"Demolition of existing buildings and redevelopment for mixed use development up to nine storeys in height comprising 12,862 sqm GIA office floorspace (Use Class B1), 1,480 sqm GIA retail floorspace (Use Class A1-A3), 13 residential units (Use Class C3), improvements to the public realm and all other necessary enabling works."

2.6 The proposed amendments to the scheme include:

- Development of a highly engineered and high quality façade for the building incorporating deep GRC fins and expressed parapet lines;
- Redefined shopfronts;
- An enhanced public café unit on the corner of Gray's Inn Road and Holborn;
- Revisions to the roof and associated pavilion structure; and

- A revised approach to the materiality of the residential façade and balconies.
- 2.7 A detailed explanation of the proposed amendments is included within the accompanying addendum Design and Access statement.

Development with Planning and Design Officers

- 2.8 The proposed revisions have been discussed and agreed with LB Camden officers during a series of meetings from late 2016 to early 2017. The revisions ensure the proposals maintain the delivery of high quality commercial and residential floorspace on the Site whilst ensuring the proposed development complements the character and appearance of the nearby conservation areas and listed buildings.
- 2.9 In summary, the proposed revisions to the current application respond to the following comments from officers:

"Design changes to increase the solidity of the building and address the lack of definition to the shopfront units at ground floor."

As shown in the supporting design information, the proposals incorporate a maximum façade depth of 450mm to achieve a greater sense of solidity and robustness. The translucent vertical panels have been replaced by solid GRC panels to add more solidity, improving the energy performance of the facade. New horizontal panels have been incorporated to emphasize the horizontal parapet lines.

At ground floor, the translucent panels have been replaced by GRC vertical fins to add more solidity and robustness to the lower bay and express the structure at ground floor.

"Amendments to the design and layout to ensure that the uses within the ground floor are clearly read as being publicly accessible rather than for the employees of the building only."

The design team have explored a number of internal layout options for the retail unit on the ground floor fronting both Holborn and Gray's Inn Road. As a corner unit, it benefits from visibility and exposure to two sides and as such will provide a significant contribution to the vibrancy of the local streetscape. The intention is for the unit to also provide a valuable amenity for the new building's staff and visitors.

As shown in the supporting design information, the revised proposal now includes a door onto Gray's Inn Road. In addition, a separate signage strategy document will be

agreed via way of S106 with the Council to ensure future signage is appropriate for the new building.

"Design changes to the residential façade treatment including materials and balconies."

Following discussions with officers, the principal materiality for the residential façade will be a concrete panel façade incorporating solid black anodised panels and louvres to complement the adjoining commercial façade.

The design team have explored different design ideas for the residential balconies in order to agree an appropriate design solution with the Council. It has been determined that a mixture of solid balconies and open railings provides an appropriate and complementary aesthetic for the character of Brooke Street. Officers agreed that the final details could be submitted and discharged via way of planning condition.

2.10 As shown in the supporting design information, there are some very minor changes in floorspace quantum. These are attributed to the continuation of the design and development stages, importantly they do not affect the planning principles or operation of the building.

3.0 PLANNING POLICY ASSESSMENT

- 3.1 The principal Planning Statement prepared in April 2016 provides an assessment of the proposed development against planning policy at national, London-wide and local levels. The statement concluded that the development proposals for the Site were considered to be fully compliant with planning policies at national, regional and local levels.
- 3.2 Since the original statement was prepared LB Camden have adopted their new Local Plan in July 2017. An assessment of the document and its policies has been undertaken pursuant to this addendum submission. The following key policies are noted with regards to the design revisions proposed:
 - Policy G1 Policy G1 Delivery and location of growth
- 3.3 The Site falls within the Holborn Growth area, it is therefore appropriate for a high density mixed use development. Furthermore, the revisions ensure the development is in accordance with Policy G1 as they seek to secure high quality development and promote the most efficient use of land and buildings in Camden.
 - Policy H1 Maximising housing supply and Policy H2 Maximising the supply of selfcontained housing from mixed-use scheme
- 3.4 The policy seeks to maximise the provision of housing on-site from mixed-use developments. As discussed with officers during both pre-application and application stages, there is a commercial requirement to deliver sufficient office floorspace on the Site for our client's operational needs and therefore the proposed quantum of residential floorspace represents the maximum that can be achieved on-site alongside the commercial offer. The proposals are therefore in accordance with the objectives of the planning policies.

Policy H4 Maximising the supply of affordable housing

3.5 The new Local Plan introduces a new methodology for determining the size of contribution towards affordable housing; the eligible threshold now being just the provision of a single residential unit. The policy preference for on-site affordable housing provision applies as per the previous planning policy within the Development Management Policies document. In addition, as per the previous position, the new policy is applied subject to circumstances including development viability. An addendum to the original viability statement has been submitted separately accordingly. This has been provided for further review by LB Camden and its advisors.

Policy E1 Promoting a successful and inclusive Camden economy

3.6 The policy themes for promoting economic development remain strong as set out in the previous LB Camden policy position. Importantly, the proposed development will provide a significant opportunity for creating new jobs and enterprise in the borough. The proposals are therefore fully in accordance with the new policy.

Policy D1 Design and Policy D2 Heritage

- 3.7 The new Local Plan requires development to be of the highest architectural and urban design quality which improve the function, appearance, and character of the area. With regards to heritage assets, the Council requires development that will preserve and where appropriate, enhance Camden's heritage assets and their settings.
- 3.8 As described within this statement and the accompanying Perkins + Will addendum document, the design revisions have been developed pursuant to officer advice to ensure they are appropriate for the Site and its wider setting including local conservation areas and neighbouring listed buildings. This detailed process has ensured that the overall proposed design for the redevelopment of the Site is of the highest quality that will enhance the setting of the conservation areas and the nearby listed buildings. The proposals are therefore fully in accordance with the new Local Plan policies concerning design and heritage.
- 3.9 Of note, where applicable the accompanying supporting statements also make reference to planning policies from the new Local Plan.
- 3.10 The proposed development and the revisions are fully compliant with the planning policies contained within the local development plan. The conclusions of the original Planning Statement therefore remain valid.

4.0 SUPPORTING STATEMENTS

4.1 The planning submission in April 2016 was accompanied a series of supporting statements prepared by specialist consultants. In such an event where changes are incorporated to the proposals it is necessary to revisit conclusions to ensure the findings within the supporting statements are still relevant. This submission is therefore accompanied by information/reports prepared by supporting disciplines accordingly. A number of these are contained within the Perkins + Will addendum statement. Commentary on the relevant conclusions is provided below:

Noise Vibration and Ventilation

4.2 Sandy Brown have reviewed the design revisions in context of their previous conclusions and confirmed that 'there are no changes to the assessment criteria, the acoustic environment or the development design that would necessitate modifications' to the original report.

Flood risk

4.3 Sanderson Associates have reviewed the proposed design revisions and consider that these would not have a significant bearing on the proposed flood risk assessment.

Air Quality

4.4 Temple Group have reviewed the proposed changes and confirmed that they 'will not affect the assessment conclusions, which identified that significant effects were not likely'.

Ecology

4.5 Dar have confirmed that 'the Ecology Report provided in the original Planning Submission for 150 Holborn has not been affected by the change in the facade design and therefore the original Ecology Report is still valid for this Planning Amendment'.

Energy, Sustainability and BREEAM

4.6 Dar and Elementa have produced new Sustainability and Energy reports accordingly. The Sustainability Report also includes an updated BREEAM Assessment. As stated within the reports, the proposals are very high quality and will demonstrate high standards of energy efficiency and sustainability. The proposed development will also achieve a BREEAM score of 'Excellent' which represents a very high attainment score for energy efficiency and sustainability.

Daylight and Sunlight

4.7 GIA have reviewed the proposed revisions in light of their previous conclusions. Overall, GIA conclude that 'the design of the proposed scheme has made the most of the daylight available on site and the proposed accommodation will offer acceptable daylight amenity overall, which is a good result for a building located within such a dense urban environment'.

Arboriculture

4.8 Ian Keen Limited has undertaken a review of the proposed revisions and confirmed that 'if the provisions of this arboricultural method statement are complied with in full, the proposed works will be able to proceed without detrimental impact to retained trees'.

Transport

- 4.9 Of note, as the arrangement of uses has not changed and the floorspace is consistent within the proposed changes, the transport and servicing strategy for the Site remains as submitted in April 2016.
- 4.10 The revisions do not change the proposed cycle parking arrangement for the Site which will provide 230 cycle parking spaces.

5.0 CONCLUSION

- 5.1 The proposed revisions maintain and further enhance the key planning benefits of the proposed development. Importantly they seek to ensure that the proposals will maximise the development opportunities of the Site, thereby contributing to the regeneration and economic success of the Holborn Growth Area and the delivery of a minimum of 2,000 new jobs and 200 new homes in the area between 2011 and 2031, as required by the new Camden Local Plan.
- 5.2 The application as revised provides an opportunity to develop a vibrant mixed-use scheme to secure important economic, social and environmental benefits whilst achieving the essential objectives of sustainable development.
- 5.3 The conclusions previously stated are therefore still applicable. Furthermore, the design revisions have been developed alongside and are fully supported by LB Camden planning officers.
- 5.4 The revisions ensure that the proposals for a high quality mixed use development on the Site will secure significant benefits in a highly accessible location.