

Planning and Development
London Borough of Camden
2nd Floor, 5 Pancras Square
London
N1C 4AG

31 August 2017
Your ref: 2017/1827/P

Dear Sir/Madam,

Town and Country Planning Act 1990 (as amended)
294-295 High Holborn London WC1V 7JG, Planning Application Ref: 2017/1827/P

1. Aberdeen Asset Management are the investment managers for Maizelands Limited & Arringford Limited, the freehold owners of Lincoln House, 296-302 High Holborn.
2. I previously wrote to register Aberdeen's objection, on 27 June 2017, in respect of the current proposals (Reference 2017/1827/P) relating to 294-295 High Holborn.
3. As suggested by LB Camden officers, we are continuing to seek direct discussions with the Applicant in order to resolve the principal concerns arising from the proposals for the redevelopment of this site. Our planning agents have approached the applicant's agents to seek a meeting and we remain keen to meet.
4. We have reviewed the response to our letter from Mr Dove-Seymour of CHH London Ltd. dated 25 July 2017, to which we considered it would be helpful to provide an interim response, in advance of any direct discussions with the applicant.

Standard of residential development

5. We note that CHH's response has not addressed a principal area of concern raised by our initial letter. Specifically, the sunlight and daylight analysis relied upon in the application has not included an allowance for the effects of the louvers proposed on the windows on the side elevation to the residential bedrooms.
6. These louvers will further reduce the levels of daylight received by the proposed bedrooms. Consequently, the application has not demonstrated that the proposed residential accommodation will enjoy satisfactory standards of residential amenity, complying with Local Plan Policy A1. Whilst CHH states that the development will achieve a high standard of

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Impact and effect upon Lincoln House's own future development opportunities.

7. The potential prejudicial effect of the proposed development upon achieving broader town planning and public policy aspirations, including the intensification of development in this area, is clearly capable of being a material planning issue. Resolving potentially conflicting proposals for the development and use of land is a fundamental purpose of the planning system and goes to the heart of sustainable development. Case law clearly demonstrates that it is for the planning decision maker to decide the weight to be placed upon material planning considerations.
8. CHH refers to the extant, implemented, permission for the development of the site, to which it considers any development at Lincoln House should have regard. **The fundamental point of difference, however, is that the extant permission is for commercial office development.** This is material for two reasons:
 - i. Development plan policy does not seek to protect the amenity (such as sunlight and daylight) of existing commercial office occupiers, whereas it does for residential occupiers. Consequently, commercial development of the massing permitted would not have a prejudicial effect upon the potential development of the adjacent site; and
 - ii. Development plan policy does not set minimum standards for the amenity of new office occupiers. It is not, therefore, necessary to show that new commercial development would achieve a certain standard of amenity. Conversely, it is necessary to demonstrate this where residential development is proposed.
9. CHH maintain that the 2003 permission establishes the principle of this form and massing. This form and massing may be acceptable only where coupled with a commercial land use; it does not establish the principle of this being an acceptable form and massing for a residential, or partially residential, development. The characteristics and amenity requirements of the two uses are quite different.
10. This is clear from the officers' report on application 2006/5250/P, referred to in my previous letter, which acknowledges that the relationship would have been "**more sensitive**" if one of the buildings was in / to be in residential use.

Impact of the development upon the wider area

11. Camden's local plan sets out ambitious targets for both housing and employment growth. Policy G1 sets out targets for both housing and employment growth and specifically seeks to resist development that would make inefficient use of Camden's scarce land (Policy G1(b)). Development proposals should seek to enable, rather than constrain, the development of the wider area.
12. CHH's letter suggests that the proposed development equates to 5% of Camden's housing supply to 2031. This is incorrect and is a significant overstatement. Policy H1 establishes a need for 16,800 homes over the plan period to 2031. The ten flats proposed would represent 0.05% of this requirement, or less than 1% of the annualised housing requirement. A modest increase in Camden's dwelling stock should not come at the cost of compromising other development that could also contribute to the good planning and design of the area. There may be other design solutions that would achieve similar benefits without preventing the efficient use of other sites. These should be explored.

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Conclusion

13. As set out in our original letter, and as amplified above, the proposed development should be amended by the applicant to address these matters before any planning permission is granted.

14. We remain keen to engage with the applicant to address these matters and are actively seeking to meet with them.

15. If it would be helpful to discuss this letter further, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Briggs', written in a cursive style.

Mark Briggs
Senior Asset Manager