

Rolfe Judd

Planning

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On behalf of Rolfe Judd Planning Limited

193-197 High Holborn

London, WC1V 7BD

Planning Statement

RJP: P6575

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1.0 Introduction

1.1 Summary

1.1.1 This planning statement has been prepared by Rolfe Judd Planning on behalf of Mactaggart Inv Co Ltd. This explanatory statement accompanies the planning application for the erection of a roof extension at the fifth floor level of the building and air conditioning plant at Holborn Town Hall, 193-197 High Holborn, WC1A 1NU.

A plan showing the extent of the application site is included as Appendix 1

1.1.2 For the purposes of this application, the proposed description of development is as follows:

1.1.3 *'Extension and remodelling at rear roof level to provide additional commercial accommodation, as well as alterations associated with the provision of an air-cooling system to serve the existing and proposed commercial spaces'*.

1.1.4

1.2 Planning Statement

The purpose of this statement is to examine the planning issues raised by the current development proposal for the application site. In particular, this statement identifies and describes the key opportunities presented by the proposed erection of additional office floorspace in a primary area of the borough.

1.2.1 The statement also provides a comprehensive analysis of the relevant planning policy framework at national, strategic and local levels. As such, our planning statement is structured as follows:

Section 1: Introduction

Section 2: The Application Site and Surrounding Area – sets the context the current proposal and provides a detailed description of the application site and its previous uses;

Section 3: The Proposal – describes the proposed development;

Section 4: Policy Context – summarises the planning policy relevant to this proposal at national, strategic and local levels;

Section 5: Planning Considerations – reviews the proposal in terms of the relevant policy context and other material considerations; and

Section 6: Conclusion

1.3 Supporting Application Documents

1.3.1 This planning statement should be read in conjunction with the following additional documents, which accompany the application:

- Application Form;
- Site Location Plan;
- Full set of application drawings – prepared by Garnett & Partners LLP
- Design & Access Statement – prepared by Garnett & Partners LLP
- Heritage Statement prepared by Waterman Group
- Sustainability Statement prepared by Waterman Group
- Acoustic Report prepared by Hann Tucker Associates
- Daylight and Sunlight Report – prepared by Brooke Vincent & Partners
- Construction Method Statement – prepared by Blenheim House Construction Ltd

2.0 The Application Site and Surrounding Area

- 2.1.1 The site is located on the southern side of High Holborn, in close proximity with the junction at New Oxford Street. The building is the former Holborn Town Hall and Library, and is Grade II Listed. The property comprises of 4 storeys with a mansard roof storey and a basement. In addition to this, the building had a former part 3-4 rear wing which was extended in the early 2000s to form the current 5 storey rear wing on the south western side of the building. The building is in office use (B1) at ground – fourth floor levels apart from the ground/basement of the former Holborn Library at the east of the site which is in use as a restaurant. The building currently has no air conditioning system installed, which has resulted in a number of vacant units due to the heat within the building during warm weather.
- 2.1.2 The site is located within the Bloomsbury Conservation Area. The surrounding properties comprise a variety of buildings ranging from 4 to 11 storeys. The Victorian building directly to the east of the site at 199, 200 and 201 High Holborn is a Grade II Listed 5-storey building with a set-back roof extension. The building directly to the west of the site is a modern 9 storey office building with large roof level plant rooms and a 7 storey rear wing onto the Smarts Place frontage. Holborn Tower and Commonwealth House opposite the site are 10/11 storey buildings. To the rear of the site are connected modern 4-5 storey office buildings which front onto Dragon Lane and Stukeley Street. The closest residential properties are located at 19-33 Stukeley Street and Green Dragon House to the south east of the site. The buildings in the area are predominantly in use as offices at upper floor level, with retail/restaurant uses at ground floor. There are other listed buildings in the vicinity of the site including 127-129 and 207 High Holborn which are Grade II Listed and 208 which is Grade II* Listed.
- 2.1.3 The site is located in the Central London Area and Central London Frontage as designated on the Councils Policies Map (June 2018)
- 2.1.4 The site is located within 200 metres of Holborn underground station, and within 500 metres of Tottenham Court Road underground station. It is also in close proximity to multiple bus stops and routes. This gives the site a PTAL rating of 6b, indicating excellent public transport accessibility.



2.1.5

Existing Front Elevation

2.2 Relevant Planning History

LPA Reference	Proposal	Decision	Decision Date
2016/4151/A	Installation of wall-mounted projecting sign and two metal signs in stone niches.	Granted	04/11/2016

2016/4165/L	Proposal to fix 3no signs relating to the business of 'Burger & Lobster' to the exterior of the building.	Granted	04/11/2016
2016/0942/L	Proposed restaurant refurbishment of a Grade 2 listed building.	Granted	23/05/2016
2005/3775/L	The display of street numbers to be carved into column bases either side of the office entrance.	Granted	17/10/2005
2004/0187/L	Removal of part of original internal walls and part of floor including structural support associate with works at basement, ground and mezzanine floor levels.	Granted	22/03/2004
2004/0814/L	Internal and external alterations at basement and ground floor level in association with a restaurant (Use Class A3) including the installation of air conditioning plant, replacement of windows with grilles, uplighters concealed behind window boxes and alterations to the front façade in connection with the display of advertisements.	Granted	23/06/2004
2004/0187/L	Removal of part of original internal walls and part of floor including structural support associated with works at basement, ground and mezzanine floor levels.	Granted	23/03/2004

2.3 Pre-application Discussions

- 2.3.1 As part of the pre-application process, the client, architect and planners met with the Council for pre-application advice on 2nd October 2017. The Council's comments included in their formal written response were as follows.
- 2.3.2 The principle of increasing the amount of office floorspace at the site was considered acceptable, as it would enhance the quality of the existing offices on the site.
- 2.3.3 With regard to the impact of the proposed extension on the special architectural and historic interest of the listed building. The Council stated that the proposed extension would match the layout and design of the existing fourth floor rear extension below and would be set away from the buildings principal mansard roof. They therefore confirmed that it would not involve alterations to the existing historic fabric of the listed building.
- 2.3.4 The Council confirmed that the existing rear wing of the building is not referred to in the buildings listing and its form is not considered to be highly significant to the listing. They also noted that the proposed extension would be constructed from matching materials and architectural details and the extension would be entirely shielded from street views by surrounding modern buildings. Overall they considered that the proposed extension would have no impact on the special architectural and historic interest of the listed building.

3.0 The Proposal

- 3.1.1 The proposal comprises the following elements:
- 3.1.2 A proposed fifth floor rear extension, located on the south western side of the building above the existing 5 storey rear wing. The extension will include minor alterations to the fourth floor including the demolition of a modern partition wall and fixed ladder, and further alterations to the fifth floor including the demolition of the existing roof, copings, and access ladders. This will make way for the fifth floor extension, including new stair access, office space and a roof terrace to the south.
- 3.1.3 The extension will provide 86sqm of additional office (B1a) floorspace to the building. The rear part of the proposed extension would measure approximately 12m depth by 10m width and would match the layout of the existing building below which wraps around the lightwell. This part of the extension would have a height of approximately 4 metres with a flat roof and would be constructed from materials and windows to match the existing building below, including replicating the existing bay windows.
- 3.1.4 The small rear terrace will provide 8sqm and will be provided above the existing rear service core to the rear of the extension.
- 3.1.5 The adjoining front section of the proposed extension will extend over the area presently occupied by the lift overrun to the rear of the existing mansard roof. This will measure approximately 6m depth, 7m width and 4m height with a flat roof. This will be constructed from materials to match the existing building.
- 3.1.6 Two new rooftop plant areas are also proposed. The first of these is to be located at the boundary to 198 High Holborn. Three new external heat pump units are proposed in this location.
- 3.1.7 The second will be adjacent to the new 5th floor extension. Five new external heat pump units are proposed in this location, which is an existing plant area.



3.1.8

Existing 5th Floor View



3.1.9

Figure 1, Proposed 5th Floor View

4.0 Relevant Planning Policies

- 4.1.1 The legal framework for determining planning applications is set out in section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. These state that a local planning authority must have regard to the provisions of the development plan and other relevant material considerations when considering an application for planning permission; and that determination of the application must be in accordance with the development plan unless material considerations indicate otherwise.
- 4.1.2 The proposed development has been developed in accordance with the relevant national, regional and local planning policy. This section sets out the relevant adopted and emerging planning policy framework, against which the proposals are considered in Section 5 of this Planning Statement.
- 4.1.3 The relevant adopted development plan for this site comprises the London Borough of Wandsworth's Core Strategy (2016), Development Management Policies Document (2016), and Site Specific Allocations Document (2016), the London Plan (2016) and certain policies of the Draft London Plan (2017)
- 4.1.4 In considering the redevelopment proposals, other relevant documents will form material considerations in the determination of the planning application including the National Planning Policy Framework (NPPF) (published July 2018) and the Council's Supplementary Planning Documents (SPD).

4.2 The National Planning Policy Framework (NPPF) 2018

- 4.2.1 On 24th July 2018, the Government published the revised National Planning Policy Framework. The scheme has been therefore assessed against National Guidance in the form of the National Planning Policy Framework which was adopted in July 2018. At the heart of the new NPPF remains the presumption in favour of sustainable development which should be seen as "a golden thread running through both plan making and decision making".
- 4.2.2 The NPPF recognises that there are three overarching objectives to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles, which are mutually dependent and should not be undertaken in isolation (para 8):
- An Economic Role - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - A Social Role - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - An Environmental Role - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources

prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.2.3 The NPPF states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as peoples quality of life, including:

- Making it easier for jobs to be created in cities towns and villages;
- Moving from a net loss of bio-diversity to achieving net gains for nature;
- Replacing poor design with better design;
- Improving the conditions in which people live, work, travel and take leisure; and
- Widening the choice of high quality homes.

4.2.4 Para 39 encourages early engagement with the LPA and to take maximum advantage of pre-application services. Para 41 highlights that the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.

4.2.5 Para 80 stresses that 'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future'.

4.2.6 Para 81 states that Planning policies should:

1. a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
2. b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
3. c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
4. d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

- 4.2.7 Para 82 seeks that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 4.2.8 Para 124 states 'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'.

4.3 The London Plan

- 4.3.1 The London Plan (consolidated with amendments in 2016) is the strategic development plan for London. All London boroughs are required to adopt local development documents that are in general conformity with the London Plan.
- 4.3.2 The site at High Holborn is defined in the London Plan as being within inner London. Policy 2.9, which is a strategic policy, sets out the general requirements for development in inner London. It requires that development must sustain and enhance inner London's economic and demographic growth, supporting and sustaining existing and new communities.
- 4.3.3 Policy 4.1 provides the basis for success of all kinds and sizes of enterprise. The Mayor wishes to encourage broad-based growth, and will help to build the conditions for new sectors to emerge, such as the technology, media and telecommunications (TMT) sectors. The Plan seeks to ensure there are the workspaces, environments, skilled workforces and infrastructures that enterprises of all kinds and sizes need to develop and innovate.
- 4.3.4 Policies 7.14 & 7.15 require that new development should be sustainable and seek to reduce pollutant emissions and minimise public exposure to pollution. Development should also seek to: minimise the existing and potential impact of noise on/from development proposals; reduce noise by separating noise sensitive uses; and promote new technologies and practices to reduce noise.

4.4 Draft London Plan

- 4.4.1 The Draft London Plan was issued for consultation in December 2017. The current 2016 Plan is the adopted Development Plan. However the Draft London Plan is a material consideration in planning decisions albeit currently with very limited weight. The plan gains more weight as it moves through the process to adoption; however the weight given to it is a matter for the decision maker. At this stage, the first round of consultation for the draft London Plan 2017 is still ongoing and the Mayor has not had the opportunity to respond to outstanding objections. Accordingly very minimal weight should be afforded to the policies contained within this draft plan.

4.4.2

4.5 Camden Local Plan (2017)

4.5.1 The Local Plan was adopted by the Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.

4.5.2 The relevant policies for this proposal are as follows:

- E1 Economic Development;
- E2 Employment premises and sites;
- A1 Managing the impact of development;
- A4 Noise and vibration
- D1 Design;
- D2 Heritage;

5.0 Planning Considerations

5.1 Economic Development

- 5.1.1 Local Policy E1 (Economic development) states that the Council will secure a successful and inclusive economy by creating the conditions for economic growth and harnessing benefits for local businesses. In particular they will support businesses of all sizes, and maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes.
- 5.1.2 Local Plan Policy E2 highlights that having a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility is vital to maintaining and developing Camden's successful economy. The Council will seek to ensure that existing and future employment uses can operate effectively without being in conflict with other sensitive uses. They will also support proposals which increase the level of employment floorspace.
- 5.1.3 Local Plan Policy G1 further states that growth in Camden will be expected to help contribute towards achieving the strategic objectives of the Local Plan and help deliver the Council's priorities. One of these objectives is to meet Camden's objectively assessed need for 695,000sqm of office floorspace, in key growth areas. One of these growth areas is Holborn.
- 5.1.4 The proposal will provide an additional 86sqm of high quality office floorspace within a Central London Area, and contribute to the identified need for office floorspace within the Holborn area. The uplift in floorspace will facilitate the enhancement of the space for existing tenants and create high quality new office space, creating additional and improved commercial floorspace in this important location in line with Camden's policy. The scheme clearly brings benefit in the form of the increased and improved commercial accommodation to reflect current demand and provide a more healthy work environment for the businesses occupying the building.
- 5.1.5 The main aim of the proposed development is to provide air conditioning for each floor of the building, which has recently been granted permission to be used as offices. Given the nature of the building and its suitability to be let to SME style businesses it is considered necessary to provide each floor with their own independent air conditioning system. This will facilitate the letting of the building on a floor by floor basis, and will ensure that this historic building will be used efficiently and in a way which allows for its continued and sustained use in the modern marketplace. This would be fully in accordance with the aims of the NPPF and particularly paragraph 126.

5.2 Heritage

- 5.2.1 Local Plan Policy D1 (Design) states that the Council will seek to secure high quality design in development and will require that development respects local context and character and comprises details and materials that are of high quality and complement the local character.

- 5.2.2 Local Plan Policy D2 (Heritage) states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings. The Council will require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. The Council will also resist proposals for alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building. The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal outweigh that harm.
- 5.2.3 The heritage statement considers that the proposals will not have any detrimental impact upon the heritage value of the floors or the overall building. Nor will they affect the significance of nearby heritage assets through impact on their setting. The proposed alterations to the fourth floor are minimal, and will not affect any existing historic fabric of the building. The work includes the removal of an existing partition wall and door, and access ladder beyond, which are modern features and therefore not of heritage value. The new staircase to the proposed fifth floor extension will be in keeping with the existing plan form and sympathetic to the character of the building.
- 5.2.4 The Council's pre-application advice stated that the proposed extension would match the layout and design of the existing fourth floor rear extension below and would be set away from the building's principal mansard roof. It would therefore not involve alterations to the existing historic fabric of the listed building. The existing rear wing of the building is not referred to in the building's listing and its form is not considered to be highly significant to the listing. The proposed extension would also be constructed from matching materials and architectural details and the extension would be entirely shielded from street views by surrounding modern buildings.
- 5.2.5 As such, the proposal would result in very limited impact on the special architectural and historic interest of the listed building of the character and appearance of the conservation area, and the benefits derived from providing enhanced commercial floorspace fit for modern purposes should be considered to outweigh this very limited harm.

5.3 Amenity

- 5.3.1 Local Policy A1 (Managing the impact of development) states that the Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. The Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected and will require mitigation measures where necessary. The factors we will consider include: visual privacy, outlook; sunlight, daylight and overshadowing; transport impacts, noise and vibration levels and odour, fumes and dust.
- 5.3.2 Under Local Plan Policy A4, the Council seek to ensure that noise and vibration is controlled and managed. Development should have regard to Camden's Noise and Vibration Thresholds. Planning permission for noise generating development, such as plant and machinery, will only be granted if it can be operated without causing harm to amenity. The proposed plant items have all been discretely located, either on the roof of the property or concealed within the joinery of the existing building. As such they will not be visible from public view. The application is also supported by an acoustic report, which confirms that the proposal is within the relevant noise guidelines.

5.3.3 Local Plan Policy D1 notes that development should carefully integrate building services equipment. The Council will also resist development of poor design which fails to take the opportunities available for improving the character and quality of an area and the way it functions. As previously stated the units are to be discretely located to the rear of the property and will be largely shielded from view by the parapet wall. A hardwood 'hit and miss' screen is to be erected around units in plant area 1, and will therefore minimise visual impact.

5.4 Daylight and Sunlight

5.4.1 Under Local Policy A1, the Council will seek to ensure the quality of occupiers and neighbours and prevent loss of amenity. This includes issues relating to sunlight, daylight and overshadowing. Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent BRE guidance.

5.4.2 The proposed fifth floor rear extension would be located on the south western side of the building above the existing 5 storey rear wing. It would project by approximately 10 metres to the rear of the adjacent office building at 190 High Holborn and would be located approximately 3 metres to the office building to the rear at Dragon Hall on Stukeley Street.

5.4.3 The accompanying daylight sunlight report confirms that the amenity values of daylight and sunlight to the neighbouring properties would be retained to a level that satisfies BRE criteria. It demonstrates that the development would not result in a material loss of light to these offices. In summary, the scheme has been designed to respect BRE's criteria and therefore the relevant policy within Camden's Local Plan.

6.0 Conclusion

6.1.1 This application seeks planning permission for the erection a roof extension at the fifth floor of Holborn Town Hall to provide additional B1 office floorspace for the building. This is accompanied by additional plant which will provide air conditioning for the offices. The proposal will facilitate the enhancement of the building for prospective tenants and will create high quality improved office floorspace in the CAZ in line with Camden's policy. The scheme clearly brings benefit in the form of the increased and improved commercial accommodation to reflect current demand and provide a more healthy work environment for the businesses occupying the building.

6.1.2 The proposal has been sympathetically designed to respond to the existing local character and context of those neighbouring buildings and the surrounding conservation area whilst providing an enhancement to the building's existing office function. The proposal will not result in any detrimental impact upon the architectural or historic value of the listed building.

6.1.3 In summary we consider that this proposal should be considered favourably for the following reasons:

- In line with paragraph 126 of the NPPF the proposal will increase the ability of this heritage asset to be put to a viable use and will allow it to compete in the modern marketplace. It will also facilitate its use as an employment generator and as a home for potential SME businesses.
- The proposals will not result in any loss of historic fabric of the existing listed building.
- The external plant will not impact upon the appearance of the building nor will it cause any noise impact upon residential amenities.

6.1.4 We trust that the submitted documents and supporting information is sufficient for the Council to validate the application and we look forward to a swift and positive outcome. However, should the Council require any further information or would like to arrange a site visit, please do not hesitate to contact us

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