

Planning Statement



High Holborn Estate, 18 - 23 Hand Court

Planning Statement

(incl. Employment and Training Statement)

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1. INTRODUCTION

1.1. This Planning Statement has been prepared by DP9 Ltd on behalf of SRG Holborn Ltd ('the Applicant') in support of an application for full planning permission at 18 – 23 Hand Court. The site is located within the Holborn and Covent Garden Ward within the London Borough of Camden ('LBC').

1.2. This full planning application seeks permission for:

“Demolition of 18 – 21 Hand Court and the erection of a new building comprising, basement, ground plus 4 upper storeys of office (Class B1) and retail (Class A1/A3) uses; the refurbishment and change of use of basement and ground floor level at 22 – 23 Hand Court from office (Class B1) to retail (Class A1/A3); and associated works.”

1.3. This document will provide an overview of the Site and the Proposed Development, considers the relevant planning policies and sets out a justification for the development.

1.4. The Planning Statement should be read in conjunction with the other supporting information submitted in support of this application, which comprises;

- **Planning application forms and Certificates** prepared by DP9 Ltd;
- **CIL Additional Information form** prepared by DP9 Ltd;
- **Planning Application Drawings** (existing, demolition and proposed) prepared by Buckley Gray Yeoman;
- **Planning Statement** prepared by DP9 Ltd;
- **Design and Access Statement** prepared by Buckley Gray Yeoman;
- **Statement of Community Involvement** prepared by Four Communications;
- **Energy & Sustainability Strategy** prepared by GDM Partnership;
- **BREEAM Assessment** prepared by Verte;
- **Transport Assessment** prepared by Motion;
- **Delivery & Servicing Management Plan** prepared by Motion;
- **Travel Plan** prepared by Motion;
- **Daylight and Sunlight Assessment** prepared by Lambert Smith Hampton;
- **Draft Construction Management Plan** prepared by Volker;
- **Drainage Strategy Report** prepared by HTS;

- **Structural Statement** prepared by HTS;
- **Basement Impact Assessment** prepared by HTS;
- **Archaeological Impact Assessment** prepared by MOLA;
- **Air Quality Assessment** prepared by Syntegra;
- **Environmental Noise Survey** prepared by ICP; and
- **Townscape Visual Impact and Heritage Assessment** prepared by KM Heritage.

1.5. The following sections of the report are structured as follows; -

- **Section 2:** Site and Surrounding Area – describes the location, character and physical features of the site.
- **Section 3:** Planning History – sets out the relevant planning history of the site
- **Section 4:** Proposed Development – describes the application proposal.
- **Section 5:** Consultation – describes the consultation that has been undertaken on the Proposed Development prior to the submission of the planning application.
- **Section 6:** Planning Policy Framework – sets out the relevant planning policy associated with the site.
- **Section 7:** Planning Assessment – assesses the proposals against the provisions of the Development Plan and other planning policy and material considerations.
- **Section 8:** Community Infrastructure Levy and Planning Obligations – outlines the CIL and Section 106 requirements.
- **Section 9:** Conclusion – draws together the Statement into a set of conclusions.

2. SITE AND SURROUNDING AREA

The site

- 2.1. The site covers an area of approximately 0.07 hectares and is situated in the Holborn and Covent Garden Ward of the LBC. The application site is located on the east side of Hand Court, which runs north from High Holborn.
- 2.2. The site currently comprises of 18 – 21 Hand Court and 22 – 23 Hand Court.
- 2.3. 18 – 21 Hand Court comprises of a 3 storey office building which no longer meets the needs of modern office occupiers. 22 – 23 Hand Court is larger at 5 storeys and houses a mix of uses, including office at basement, ground and first floor with residential on the floors above.
- 2.4. The site is located in an area with a Public Transport Accessibility Level ('PTAL') rating of 6b, demonstrating an 'Excellent' level of public transport as calculated using the Transport for London ('TfL') PTAL calculation methodology.
- 2.5. Holborn and Chancery Lane (Central line and Piccadilly line) are both located within a short walking distance of the site to the east and west respectively. The site is also located within easy access to frequently used bus routes.

The Surrounding Area

- 2.6. The area is characterised by a variety of building sizes and uses, including buildings of up to eight storeys. Historically, this part of Holborn has been characterised by large commercial buildings fronting High Holborn. Either side of High Holborn is predominantly commercial (office/retail) uses with elements of residential peppered to the north of the Site.
- 2.7. The buildings of the High Holborn Estate are located in the Bloomsbury Conservation Area ('CA'). This CA was first designated in 1968 and subsequently extended. The current Conservation Area Appraisal ('CAA') was adopted in April 2011. Within the Bloomsbury CA there are in excess of 1,000 buildings and structures on the statutory

list of buildings of Architectural or Historic Interest. Of all listed buildings 4% are Grade II* and 2% Grade I, highlighting the historic and architectural significance of the area. The High Holborn Estate has elements located in both Sub-area 9: Lincoln's Inn Fields/Inns of Court/High Holborn; and Sub-area 10: Great James Street/Bedford Row.

- 2.8. The Site forms part of an important city block in this part of London. Buildings of different ages sit together forming elevations on High Holborn to the South, Hand Court to the West, Bedford Row to the North and Brownlow Street to the East. Hand Court has always been a pedestrianised thoroughfare where historically the Wheatsheaf Tavern once stood. High Holborn and Brownlow Street comprise of more formal elevations made up largely of office buildings.

3. PLANNING HISTORY

- 3.1. The site has an extensive planning history associated with proposals for comprehensive redevelopment dating back to 2007 when two schemes were dismissed at appeal. Although the appeal schemes were dismissed, they set the boundaries as to what would be acceptable in planning terms, mainly in relation to uses, height and massing of buildings, buildings which were of significance in heritage terms and the acceptable impact on the Conservation Area. The appeal schemes resulted in a successful planning permission for a comprehensive office-led development being granted in July 2009. That application was subject to minor material amendments which were approved in October 2011 (reference: 2010/5725/P).
- 3.2. Planning permission was sought in 2012 for the renewal of planning permission granted in July 2009. The application was the subject of a resolution to grant planning permission in February 2013, but the applicant decided not to complete the S106 Agreement and therefore the planning application was formally withdrawn.

4. PROPOSED DEVELOPMENT

4.1. The application seeks permission for:

“Demolition of 18 – 21 Hand Court and the erection of a new building comprising, basement, ground plus 4 upper storeys of office (Class B1) and retail (Class A1/A3) uses; the refurbishment and change of use of basement and ground floor level at 22 – 23 Hand Court from office (Class B1) to retail (Class A1/A3); and associated works.”

4.2. The proposals seek to demolish the existing building at 18 – 21 Hand Court and erect a new building comprising basement, ground and 4 upper floors. The proposals include retail (Class A1/A3) at basement and ground floor level which will provide additional services to new and existing tenants, workers and the local community. High quality office (Class B1) floorspace will be provided on the upper floors of the building that serve the core Central London market, providing modern, attractive and flexible accommodation.

4.3. The proposals also include the change of use and refurbishment of 22 – 23 Hand Court at basement and ground level. The existing office (Class B1) floorspace will be replaced with retail (Class A1/A3) accommodation helping to improve activation along Hand Court. The proposals also include improvements to the ground floor façade of the building. The proposals are discussed in further detail within the accompanying Design and Access Statement.

4.4. The proposals will result in an increase of retail and office accommodation within the site. The existing and proposed GIA and GEA figures are provided in the tables below.

Table 4.1: Total Areas

Land Use	Existing Area GEA	Proposed Area GEA	Difference GEA
Retail (Class A1/A3)	0	1,065	+1,065
Office (Class B1)	1,788	2,279	+491
Total	1,788	3,344	+1,556

Land Use	Existing Area GIA	Proposed Area GIA	Difference GIA
Retail (Class A1/A3)	0	971	+971
Office (Class B1)	1,566	2,118	+552
Total	1,566	3,089	1,523

- 4.5. The area is characterised by a variety of building sizes and uses, including buildings of up to eight storeys. The scheme has been designed as a contemporary architectural building but incorporates detailing and influences which respond to the character of the conservation area.
- 4.6. There are no car parking spaces proposed as part of the development.
- 4.7. In accordance with emerging London Plan Policy, 54 additional cycle spaces and associated lockers and shower facilities will be provided within the basement of 18 – 21 Hand Court.
- 4.8. The existing access to the site would be retained for use by pedestrian and delivery vehicles. The new retail/office accommodation will be accessed by the main entrance via the lift and/or stair core.
- 4.9. In accordance with LBC requirements, the refuse store is located at basement level within 18 – 21 Hand Court. The existing provision at 22 – 23 Hand Court is sufficient to accommodate the change of use. A managed collection system will operate whereby bins are moved from the storage areas to the pick-up point within an acceptable distance to the public highway. The proposed refuse and servicing strategy is outlined further within the Transport Statement.

5. CONSULTATION

5.1. A series of pre-application meetings have been undertaken with LBC Planning, Design and Conservation Officers. Discussions commenced in July 2016 and have been ongoing for the duration of the pre-application period.

5.2. In addition to the above formal pre-application process, a further comprehensive programme of consultation has been carried out during the development of the proposed scheme that has informed the application proposals. The table below sets out the pre-application discussions with LBC and the Design Review Panel.

Table 5.1 – Pre-application Schedule

Meeting	Date	Focus
LBC Pre-app #1	08.07.16	Introduction to the scheme
LBC Pre-app #2	02.02.17	Design Principles
LBC Site Visit	03.03.17	Site Visit
LBC Pre-app #3	09.06.17	Design / Heritage
LBC Pre-app #4	01.08.17	Height & Scale
DRP #1	04.08.17	Design
LBC Pre-app #5	29.05.18	Design / Height
DRP #2	06.07.18	Design
LBC Pre-app # 6	10.08.18	Design

5.3. Four Communications have been appointed by the Applicant to undertake the consultation activities for the proposals. Section 1.5 of the Design and Access Statement sets out in detail the level of consultation undertaken.

5.4. The political and community stakeholders who were contacted about the application are as follows:

- Cllr Julian Fulbrook, ward councillor for Holborn & Covent Garden
- Cllr Awale Olad, ward councillor for Holborn & Covent Garden
- Cllr Sue Vincent, ward councillor for Holborn & Covent Garden
- Bloomsbury Association
- Bloomsbury Conservation Area Advisory Committee (BCAAC)
- Neighbours and local businesses

5.5. Formal letters were issued to both local stakeholders and neighbours to make them aware of the proposals. All letters included an offer of a face-to-face briefing and sought recipient's comments on the proposals. A small number of people requested further information about the scheme and this information was provided in a timely manner.

5.6. In bringing forward redevelopment proposals for 18-21 and 22-23 Hand Court, the Applicant has proactively sought to engage with elected representatives, neighbouring businesses, residents and local community groups. Stakeholders and neighbours were informed about the proposals by letter. A small number of conversations were had with neighbours, and the feedback received was positive.

6. PLANNING POLICY FRAMEWORK

- 6.1. This section of the report identifies the relevant planning policy context upon which the planning application is to be assessed, being the NPPF and Development Plan as identified within the Town and Country Planning Act 1990 (as amended).

National Policy

- 6.2. At the national level, planning policy is contained in the National Planning Policy Framework ('NPPF') 2018. The NPPF establishes overarching principles of the planning system, including the presumption in favour of sustainable development.
- 6.3. The NPPF is a material consideration in the determination of a planning application, but does not form part of the Development Plan. In addition, the National Planning Practice Guidance ('NPPG') is a material consideration for planning applications. The NPPG was published in March 2014, and updated in July 2018 and sits alongside the NPPF. The NPPG adds further context to the NPPF and should both be read together.
- 6.4. The NPPF sets out key policies on delivering sustainable development, which include:
- Chapter 6 (Building a Strong, Competitive Economy) notes 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.
 - Chapter 9 (Promoting Sustainable Transport) requires transport policies to be balanced in favour of sustainable transport modes with the appropriate Transport Assessment or Transport Statement provided. Decisions must take account of whether the opportunities for sustainable transport modes have been taken up, depending on the nature and location of development and whether improvements can cost effectively limit the significant impacts of the development.

- Chapter 11 (Making Effective Use of Land) notes that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- Chapter 12 (Achieving well Design Places) states that the creation of high quality buildings and place 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 makes development acceptable to communities.
- Chapter 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change) outlines the key role that planning has in helping to shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is described as central to the economic, social and environmental dimensions of sustainable development.
- Chapter 15 (Conserving and Enhancing the Natural Environment) places great emphasis on enhancing and protecting the natural environment; minimising impacts on biodiversity and providing net gains in biodiversity where possible and preventing new development from contributing or being put at unacceptable risk from soil, air, water and noise pollution by remediating and mitigating where appropriate. This policy encourages the effective reuse of brownfield land provided that it is not of high environmental value.
- Chapter 16 (Conserving and Enhancing the Historic Environment) places emphasis on the preservation and enjoyment of the historic environment. There is recognition that heritage assets are irreplaceable resources and that they should be conserved in a manner appropriate to their significance and provides guidance to LPA's in determining applications that may affect heritage assets or their setting.

- The NPPF outlines that LPA's should approach decision taking in a positive way to foster the delivery of sustainable development. The right information is crucial to good decision-taking, particularly where formal assessments such as EIAs are required. This includes participation of other consenting bodies to enable early consideration of all the fundamental issues.

Development Plan

- 6.5. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts, should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan for the area consists of the London Plan 2016, and the London Borough of Camden Local Plan (2017). In addition, further guidance is provided in the form of the Council's and Mayor's Supplementary Planning Guidance ('SPG') or Supplementary Planning Documents ('SPD') as well as Camden Planning Guidance notes ('CPG').

London Plan (2016)

- 6.6. The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. Within the London Plan, the site lies within the Inner London area.
- 6.7. In December 2017, the Mayor of London published a draft New London Plan for consultation which ended on Friday 2nd March 2018.

The GLA has also produced a number of guidance documents which amplify London Plan policy and are relevant to the Proposed Development. These documents are material considerations but do not form part of the Development Plan. Where relevant within the supporting application documents these guidance notes have been referred to.

Camden Local Plan (2017)

- 6.8. Local planning policy is set out in the LBC Local Plan that was adopted in 2017. The Council also have a suite of planning guidance documents that should be considered when submitting planning applications.
- 6.9. The site benefits from the following planning policy designations as defined by Camden's Policies Map:
- Central Activity Zone;
 - Bloomsbury Conservation Area;
 - Growth Area (Holborn);
 - Site Allocation (20);
 - Archeological Priority Area;
 - Designated View (SA.2 Greenwich Park).

7. PLANNING ASSESSMENT

- 7.1. This section assesses the proposals against the Development Plan and other relevant Planning Policy at national or local level.

Principle of Development

- 7.2. Local Plan Policy G1 notes that the Council will create the conditions for growth to deliver the homes, jobs and infrastructure to meet Camden's identified needs. It goes on to note that Camden will do this by securing high quality development and promoting the most efficient use of land and buildings by, supporting development that makes best use of its site and expecting the provision of a mix of uses where appropriate.
- 7.3. The Policy identifies that the Plan seeks to meet Camden's objectively assessed needs to 2031 for 695,000 m² of office floorspace and circa 30,000 m² of retail floorspace.
- 7.4. The Proposed Development is located within the Holborn Growth area and is identified within part of a wider site allocation (20) within the London Borough of Camden Site Allocation Document (2013), to deliver:
- Secure an appropriate mix of uses, including housing and affordable housing.
 - Concentrate residential uses towards the north of the site.
 - Look to provide a range of flexible business floorspace for a range of business activities including small businesses.
 - Provide active commercial uses (particularly retail) at ground floor level along High Holborn, reflecting its location within a Central London Frontage.
 - Protect and enhance the fabric and setting of the existing Listed Buildings.
 - Retain the existing buildings which make a positive contribution to the Conservation Area, unless their demolition can be justified and the character of the Conservation Area would be preserved and enhanced.

- Ensure that any new buildings or additions are compatible with the scale, grain and character of the site and surrounding area and do not detract from the appearance of the Conservation Area.
- Improve the public realm around the site and ensure any new buildings are designed to positively address adjoining streets including Hand Court and Brownlow Street through the provision of active frontages, particularly at ground floor level.
- Improve permeability of the area for pedestrians and cyclists.

7.5. The site's accessibility and location within a Growth Area further supports the proposals for intensification of the Site to create additional commercial floorspace. Planning permission was granted in 2009 and amended in 2011 for a comprehensive scheme following the dismissal of two appeal decisions in 2007. In land use terms, there has been no change in Camden local policy since these decisions. The proposals seek for a significantly smaller redevelopment proposal on this part of the Site. As such, we believe the principle of redevelopment to be acceptable.

Office

- 7.6. The Proposed Development seeks to deliver 2,279m² (GEA) of office floorspace. This includes the loss of 591m² of office floorspace at 22 – 23 Hand Court due to the proposed change of use at basement and ground floor to retail (Class A1/A3). This loss is outweighed by the 802 m² increase of office floorspace at 18 – 21 Hand Court, resulting in an overall uplift of 491 m² of office floorspace on Site.
- 7.7. The new office accommodation will be a significant improvement upon the existing provision, providing larger, flexible floorspace that is more suited to the needs of today's occupiers.
- 7.8. The Site is located within the Central Activities Zone ('CAZ') which supports, and is the primary focus of, the provision of additional office floorspace. This is supported by policy at both local and regional level.

- 7.9. London Plan Policy 2.11 seeks to ensure that development proposals to increase office floorspace within CAZ include a mix of uses.
- 7.10. London Plan 2.13 notes that development proposals within opportunity areas and intensification areas should seek to optimise non-residential output and densities, provide necessary social and the infrastructure to sustain growth and where appropriate contain a mix of uses. It goes on to note that proposals should contribute to meeting the minimum guidelines for housing and/or indicative estimates for employment capacities.
- 7.11. London Plan Policy 4.2 seeks to support the management and mixed used development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of the London Plan.
- 7.12. Local Plan Policy E1 seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residential and businesses. The policy notes, among other aspirations, to:
- Maintain a stock of premises that are suitable for a variety of business activities, for forms of differing sizes; and
 - Direct new office development of the growth areas, Central London...in order to meet the forecast demand of 695,000 m² of office floorspace between 2014 and 2031.
- 7.13. Local Plan Policy E2 notes that the Council will encourage the provision of employment premises and sites in the borough, particularly those within the CAZ. The policy also notes that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business.
- 7.14. The Proposed Development seeks to provide a range of employment opportunities from A1/A3/B1 and it can be estimated, using the Employment Densities Guide (2015), that the Proposed Development will provide up to 150 FTE office jobs and 55 FTE retail jobs, totalling 205 FTE jobs. Therefore, the Proposed Development will have a total net increase of 94 FTE jobs in comparison to the existing situation.

- 7.15. In conclusion, the Proposed Development seeks to increase the quantum and quality of permanent office and employment generating accommodation on Site and fully accords with Development Plan policies LBC Policy E1 and E2 and London Plan Policy 4.2.

Retail

- 7.16. London Plan Policy 2.10 seeks to support and improve the retail offer of the CAZ for residential, workers and visitors.
- 7.17. Policy TC1 notes that the Council will focus new shopping and related uses in Camden's designated Growth Areas, having regard to the level of capacity available in these locations. Holborn is identified as one of these Growth Areas that have additional retail capacity.
- 7.18. The Proposed Development comprises 1,065m² (GEA) of retail uses (A1/A3), located in the basement and ground floor of 18 – 23 Hand Court. The retail offer fronts Hand Court, providing improved activation which will enhance the pedestrian environment and create a more inviting space whilst also providing an improved retail offer to existing and new workers and the local community.
- 7.19. The retail floorspace accords with the requirements of the NPPF, London Plan (Policy 4.8) and LBC Policy TC1.

Residential

- 7.20. Policy H2 of the Local Plan requires that where more than 200 sqm (gross) additional floorspace is provided, up to 50% of all additional floorspace should be housing, subject to conditions. The policy notes that where housing is required as part of a mix of uses, the Council will require self-contained housing to be provided on site. However, where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, the Council will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

- 7.21. The Proposed Development seeks to deliver 1,556m² of additional non-residential floorspace. Therefore, in accordance with Policy H2, 778m² should be delivered as housing.
- 7.22. We have undertaken an exercise to determine whether the site can accommodate residential accommodation onsite. Two options have been considered but neither of these are feasible. Further information can be found within the submitted Design and Access Statement prepared by Buckley Gray Yeoman.
- Option 1 - The provision of a further core in the office building to allow access to residential accommodation on upper floors. The provision of an additional core through the office building to serve residential would severely compromise the proposed office and retail floorplates to the extent that the office building would not be attractive to potential tenants and the scheme would not be viable. Separate entrances to each core from ground level would compromise the ground floor layout, reducing the amount of active frontage that could be delivered along Hand Court.
 - Option 2 - A separate residential block to accommodate the additional floorspace. This would dramatically reduce the size of the office building at 18-21 Hand Court resulting in inefficient buildings for both the office and residential. The office floorplates would be small and below market requirements meaning that the office building would not be viable.
- 7.23. Given these constraints, it has been discussed with LBC that residential accommodation cannot be practically provided onsite.
- 7.24. The next limb of the policy seeks for the residential accommodation to be provided off-site. The Design and Access Statement includes an assessment of sites within the Ward, surrounding Wards and borough and concludes that none are suitable for off-site provision. Therefore, the policy requirement can be addressed by way of a payment.

- 7.25. Based on discussions with the LB Camden policy officer during the pre-application process and the calculations set out in section 6 of LB Camden's Planning Obligations SPD, the financial contribution is calculated as follows:

$$\begin{aligned}\text{Non-residential additional floorspace} &= 1,556 \text{ m}^2 \text{ (GEA)} \\ &= 1,523 \text{ m}^2 \text{ (GIA)} \\ 1,523 / 2 &= 762 \text{ (rounded)} \\ 762 \times \text{£}700 &= \textbf{\underline{\underline{£533,400}}}\end{aligned}$$

Affordable Housing

- 7.26. Local Plan Policy H4 seeks a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition residential floorspace of 100 sqm (GIA) or more. The Council will seek a sliding scale target for developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity.
- 7.27. We have discussed the affordable housing requirements with the LB Camden's policy officer, who has confirmed that schemes that have a residential area below 1,000 sqm (GIA) can be addressed by way of a payment in lieu of affordable housing.
- 7.28. The LB Camden Planning Obligations SPD notes that capacity is assessed as the number of additional homes proposed or 1 home per additional 100sqm (gross), whichever is the greater. The calculation for the payment in lieu is set out below:

$$\begin{aligned}\text{Residential Area} &= 778 \text{ m}^2 \text{ (GEA)} \\ &= 762 \text{ m}^2 \text{ (GIA)}\end{aligned}$$

Capacity Study:

The capacity is 8 units (762 m² (GIA) / 100 = 8).

Calculation:

Capacity (8 units) * 2% per unit = 16%

778 sqm (GEA) x 16% = 124.48 m² (GEA)

125 sqm (GEA) x £2,650 (the affordable housing rate) = **£331,250**

Impact on Amenity*Daylight & Sunlight*

- 7.29. London Plan Policy 7.6 states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings and should provide high quality internal spaces.
- 7.30. Local Plan Policy A1 noted that the Council will seek to protect the quality of life of occupiers and neighbours, which includes in respect of sunlight, daylight and overshadowing.
- 7.31. In accordance with Policy A1, a Daylight and Sunlight Report has been undertaken by Lambert Smith Hampton in support of this application to consider the sunlight and daylight impact on neighbouring buildings.
- 7.32. The daylight and sunlight report prepared is based on the methods laid out in the BRE guidelines to determine the acceptability of daylight and sunlight using a detailed 3D computer model of the site and its surroundings.
- 7.33. The daylight and sunlight results show that on the whole, the vast majority of windows continue to enjoy good levels of daylight and sunlight. As emphasised within the Housing SPG (2016) for London, an appropriate degree of flexibility should be applied when using the BRE Guidelines and factors such as local circumstances and the need to optimise housing capacity should be taken in to consideration.
- 7.34. For further detail in this regard please refer to the accompanying Daylight and Sunlight Report prepared by Lambert Smith Hampton.

Noise

- 7.35. An acoustic environment survey has been carried out by ICP to assess the potential noise impact of the plant installation on surrounding noise sensitive receptors.
- 7.36. The assessment demonstrates that the noise levels are commensurate with those expected for an urban location. The report recommends that mitigation measures such as attenuators and an acoustic louvre screen are put in place to meet the requisite policy and regulatory standards.
- 7.37. The noise assessment prepared by ICP provides further information on level of exposure to noise and the proposed mitigation measures.

Design and Layout

- 7.38. A raft of policies at national level, within the London Plan and at the local level are relevant to determining the design of the proposal and its contribution to the surrounding townscape.
- 7.39. Paragraph 124 of the NPPF states that the Government attaches great importance to the design of the built environment and that 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.
- 7.40. Paragraph 127 of the NPPF outlines that planning policies and decisions should aim to ensure that developments:
- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

7.41. Good design is central to all objectives of the London Plan. Policies contained within Chapter 7 set out a series of overarching design principles for development to achieve by addressing its layout, height and massing and elevations.

7.42. London Plan Policy 7.1 requires good quality environments to be provided which have the best possible access to services, infrastructure and public transport.

7.43. London Plan Policy 7.4 states that ‘Buildings, streets and open spaces should provide a high-quality design response that:

- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale proportion and mass,
- b) contributes to a positive relationship between the urban structure and natural landscape features,
- c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings,
- d) allows existing buildings and structures that make a positive contribution to the character of the place to influence the future character of the area, and
- e) is informed by the surrounding historic environment’.

7.44. Policy 7.6 states that ‘Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality

materials and design appropriate to its context.’ In respect of design and appearance Policy 7.6 also requires new buildings and structures to be ‘of the highest architectural quality; they should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm’ and they should include details and materials that ‘complement, not necessarily replicate’ local architectural character.

7.45. Local Plan Policy D1 notes that the Council will seek to secure high quality design in development, in line with the following criteria:

- a) respects local context and character;
- b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c) is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d) is of sustainable and durable construction and adaptable to different activities and land uses;
- e) comprises details and materials that are of high quality and complement the local character;
- f) integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g) is inclusive and accessible for all;
- h) promotes health;
- i) is secure and designed to minimise crime and antisocial behaviour;
- j) responds to natural features and preserves gardens and other open space;
- k) incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l) incorporates outdoor amenity space;
- m) preserves strategic and local views;
- n) for housing, provides a high standard of accommodation; and

- o) carefully integrates building services equipment.

18 – 21 Hand Court

- 7.46. The building to Hand Court is expressed as a series of vertically-emphasised bays separated by brick piers with stepped brick reveals and soldier course brick soffits and cills. Scalloped brick spandrels mark the floor levels, and this curvature is also expressed in the parapet at fourth floor and the shallow arches at ground floor. Each window bay consists of an uninterrupted fully height glazing unit. The ground floor is organised into wider bays, the width of four bays in the office floors above, and have bronze framed glazed shop fronts. The office entrance has stepped reveals and soffit, echoing the elevation above.

22 – 23 Hand Court

- 7.47. The proposal for 22 - 23 Hand Court seeks to change the existing use from office (B1) to retail (A1/A3) at ground and basement level only, in addition to some modifications to the front elevation along Hand Court to improve the frontage for retail and provide independent access for the existing first floor office unit. The façade to Hand Court is retained and refurbished, save for the removal of non-original shop fronts.
- 7.48. The proposed new shop fronts will enlarge the amount of glazing and thus the visibility – and viability – of the retail units. The design of the new shop fronts will be respectful and entirely in keeping with the character and appearance of the host building, made of traditional materials and detailed appropriately.
- 7.49. The accompanying Design and Access Statement prepared by Buckley Gray Yeomen provides an analysis of the constraints and opportunities presented by the Proposed Development. It sets out the design objectives, design principles and building evolution which have informed the Proposed Development. It explains how the proposals contribute positively to the context of the site and surroundings and how the proposals contribute positively to the streetscape.

7.50. In summary, the design of the proposal is considered to offer a number of significant benefits by:

- Delivering an office led, mixed use scheme of the highest quality architectural standards, setting a benchmark for the local environs;
- Enhancing the character of the area with modern development that is complimentary to its surroundings in the use of materials, whilst also responding to and enhancing heritage assets;
- Activating street frontages – which will encourage pedestrians to move north along Hand Court, improving the pedestrian environment;
- Providing well designed, accessible bicycle facilities; separate daily and occasional users; and
- Creating an iconic, unique development of exceptional quality architecture inside & outside.

7.51. It is considered that the proposal provides a scheme of the highest architectural quality, in terms of appearance, layout and massing and will contribute positively to the townscape of the surrounding area. The design of the building has been influenced through detailed consideration of the surrounding local context and through detailed discussions with LBC and their Design Review Panel. The Proposed Development thereby accords with policies contained within the NPPF, London Plan Policies 7.2-7.6, and LBC Local Plan Policy D1.

Townscape and Conservation

7.52. The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”) is the legislative basis for decision making when determining planning applications that relate to the historic environment.

7.53. Section 66 of the Act imposes a duty on local planning authorities when considering applications which affect a listed building or its setting to have “special regard” to the desirability of preserving or enhancing the building or its setting or any features of special architectural or historic interest which it possesses.

- 7.54. Section 72 of the Act imposes a duty on local planning authorities when considering applications which affect buildings in conservation areas to pay “special attention” to the desirability of preserving or enhancing the character or appearance of the conservation area.
- 7.55. The legal tests in the Act are supplemented by the policy guidance in Chapter 16 of the NPPF.
- 7.56. In determining applications, the NPPF requires local planning authorities to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 192 of the NPPF identifies the following criteria in relation to this:
- ‘the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.
- 7.57. When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 193 states that ‘...great weight should be given to the asset’s conservation (the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’
- 7.58. Paragraph 194 of the NPPF states “Any harm to or loss of the significance of a designated heritage asset (from its alteration or destruction or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings ... should be exceptional; and to grade II* listed buildings should be wholly exceptional.
- 7.59. Paragraph 195 of the NPPF states “Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the

substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

7.60. Paragraph 196 of the NPPF states “Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use”.

7.61. In relation to the consideration of impacts on non-designated heritage assets, paragraph 197 states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

7.62. Paragraph 200 of the NPPF states: “Local planning authorities should look for opportunities for new development within Conservation Areas ... and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

7.63. With regard to the loss of a building (or other element) which makes a positive contribution to a Conservation Area, paragraph 201 states this should be treated: ‘...As substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the

element affected and its contribution to the significance of the Conservation Area...as a whole.’

- 7.64. London Plan Policy 7.6 requires development to respond to the potential of sites and the local context, providing a development that enhances the public realm and complements the local architectural character, while mitigating any potential impacts on residential amenity, and the local environment and microclimate.
- 7.65. London Plan Policy 7.8 states that development should conserve the significance of heritage assets by being sympathetic to their form, scale, materials and architectural detail.
- 7.66. The existing buildings are not listed but lie within the Bloomsbury Conservation Area. There are more than 1000 buildings and structures within the Bloomsbury Conservation Area on the statutory list of buildings of Architectural or Historic Interest. Many of its squares are protected under the 1931 London Squares Act and a number are on the Register of Parks and Gardens of Special Historic Interest. The closest listed buildings are No. 46, 47, 47A and 48 Bedford and attached railings which are Grade II listed. The listing reads:
- ‘3 terraced houses. Late 18th century, altered. No. 47 with two entrances. Yellow stock brick. 4 storeys and basements. Nos. 46-48 (consecutive) form a group closing the vista at the south end of the street’.*
- 7.67. In the wider context, Bedford Row contains many Grade II and II* listed buildings, as well as a Grade II K2 telephone kiosk, bollards and cast-iron water pump opposite Brownlow Street.
- 7.68. There are no locally listed structures in Hand Court of within the High Holborn Estate. However, the unlisted buildings within the Estate, with the exception of No. 18 Hand Court and Nos. 55-57 High Holborn, are considered to make a ‘positive contribution’ to the character of their immediate surroundings and to the Conservation Area as a whole.

- 7.69. It should also be noted that the site falls within Camden's London Suburbs Archaeological Priority Area. A separate Archaeological Desk Based Assessment has been undertaken by MOLA in support of this application.
- 7.70. The design proposals have taken into account the view of the Proposed Development from within the Conservation Area and its impact on any surrounding listed buildings.
- 7.71. Policy D2 outlines that in order to maintain the character of Camden's Conservation Areas the Council will not permit development that causes harm to the character and appearance of that conservation area.

18 – 21 Hand Court

- 7.72. The proposed scheme for 18 - 21 Hand Court will create a new active frontage on Hand Court, helping to enliven this space. The scale and proportions of the proposed building relate directly to the immediate context, with the setback respecting the the scale of 22 - 23 Hand Court. The proposed building improves on the present situation by replacing the squat, unsatisfactory and altered existing building with a new development that respects the townscape quality of the 'court' while assuming a more appropriate scale.
- 7.73. The proposal is design to the highest standard and represents a simple and elegant design, using a modest palette of traditional materials to create a crisp and contemporary scheme. The combination of appropriate scale and the quality of its design to complement its context.

22 – 23 Hand Court

- 7.74. The contribution made by 22 - 23 Hand Court to the Bloomsbury Conservation Area lies in principally its façade to Hand Court, and this will be preserved and enhanced in the proposed scheme. The scheme will secure the building for the long term in its optimum viable use, and a key to achieving this is the careful improving and reinstating the traditional design principles of the ground floor frontage.

- 7.75. The Proposed Development is of a high quality of design, well considered and relates well to both the site and its context. In architectural terms, the Proposed Development is of a distinctive modern character that is well propositioned in its own right and respect the rhythm and articulation of the street scene. The articulation of the massing and the detailed design of the façade will provide a positive new addition to the local townscape.
- 7.76. The Heritage and Townscape Assessment concludes that the Proposed Development is a well-considered design with appropriate scale and architectural approach which compliments the Bloomsbury Conservation Area. Both schemes for 18 - 21 Hand Court and 22 - 23 Hand Court will preserve and enhance the Bloomsbury Conservation Area, the setting of nearby listed and locally listed buildings, and will have no effect on the registered landscape.
- 7.77. It is considered that the proposal provides a scheme of the highest architectural quality, in terms of appearance, layout and massing and will contribute positively to the Conservation Area in accordance with the NPPF, London Plan Policy 7.6 & 7.8 and Local Plan Policy D2.

Transport, Parking and Servicing

- 7.78. The NPPF requires new developments to consider local transport capacity and promote sustainable transport choices. The London Plan promotes development that will not adversely affect safety on the transport network.
- 7.79. Policy T1 of the Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 7.80. In line with London Plan Policy 6.3 the application is supported by a Transport Assessment prepared by Motion which assesses the impact of the redevelopment of the site on the existing local road network.

- 7.81. The site Public Transport Accessibility Level ('PTAL') rating is 6b 'Excellent'. A full breakdown of the PTAL scores for each building is located within the Transport Assessment.
- 7.82. A Framework Travel Plan has also been prepared and accompanies the planning application. The Framework Travel Plan will be further developed in detail at a later stage to include measures to support and further encourage the use of sustainable modes of transport by commercial occupiers of the development.
- 7.83. Given the above, the Proposed Development will have a beneficial impact on the local road network in comparison to the existing uses operating from the site and is, therefore, in accordance with national, regional and local planning policy requirements.

Car Parking

- 7.84. London Plan Policy 6.3 sets out that development proposals should ensure that impacts on transport capacity and the transport network, at both corridor and local level are fully assessed. It also notes that development should not adversely affect safety on the transport network.
- 7.85. London Plan Policy 6.13 seeks to prevent excessive car parking provision that can undermine cycling, walking and public transport use.
- 7.86. Paragraph 6.15 of the London Plan reflects the policies set out within the NPPF to locate developments which generate significant amounts of movement in areas of high public transport accessibility, stating that:
- “... new developments that will give rise to significant numbers of new trips should be located either where there is already good public transport accessibility with capacity adequate to support the additional demand or where there is a realistic prospect of additional accessibility or capacity being provided in time to meet the new demand.”

- 7.87. Policy 6.13 of the London Plan sets out the parking standards which states that proposals should propose no more parking than the maximum standards included in the Plan. This is to ensure of an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. It also notes adequate parking spaces for disabled people must be provided preferably on-site.
- 7.88. The Proposed Development will not provide any car parking on site.

Cycle Parking

- 7.89. Long-stay and short-stay cycle parking for employers and visitors will be provided in accordance with the Draft London Plan (2017), in accordance with the table below:

Use Class	Description of use	Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
A1	Food retail	From a threshold of 100 m ² : 1 space per 175 m ² gross external area (GEA)	From a threshold of 100 m ² : First 750 m ² : 1 space per 20 m ² ; thereafter: 1 space per 150 m ² (GEA)
	Non-food retail	From a threshold of 100 m ² : first 1,000m ² : 1 space per 250m ² . Thereafter: 1 space per 1,000 m ² (GEA)	From a threshold of 100 m ² : areas with higher cycle parking standards (see Figure 10.2): First 1,000 m ² : 1 space per 60 m ² ; thereafter: 1 space per 500 m ² (GEA). Rest of London:

			first 1,000 m ² : 1 space per 125 m ² ; thereafter: 1 space per 1,000m ² (GEA)
A2 – A5	Financial / professional services; cafés & restaurants; drinking establishments; takeaways	From a threshold of 100 m ² : 1 space per 175 m ² (GEA)	From a threshold of 100 m ² : areas with higher cycle parking standards (see Figure 10.2): 1 space per 20 sqm (GEA). Rest of London: 1 space per 40 m ² (GEA)
B1	Business offices	1 space per 75 m ² .	First 5,000 m ² : 1 space per 500 sqm. Thereafter: 1 space per 5,000 m ² (GEA)

7.90. The Proposed Development is fully in accordance with the adopted policy requirements. The development will deliver 54 cycle parking spaces located in a secure store within the basement of 18 – 21 Hand Court.

7.91. Associated showers, lockers and changing areas will also be provided for staff, near the cycle parking at basement level.

Servicing & Deliveries & Waste Management Strategy

7.92. The Proposed Development is estimated to generate a total of 3 delivery and servicing trips a day. It is considered that these are most likely to comprise deliveries of stationary office supplies and couriers and therefore would most likely be undertaken by Transit type vans or smaller.

7.93. The waste generation and storage requirements have been calculated in accordance with LBC Guidance, supplemented by the British Standard for Waste Management in

Buildings. Waste will be stored at basement level and will be taken out on collection days by the building management team.

- 7.94. The Transport Assessment prepared by Motion provides further information on the proposed servicing, deliveries and waste management strategy for the Site.

Sustainability and Energy

- 7.95. Paragraph 150 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaption measures, including through planning of green infrastructure. Also, to ensure that it can help to reduce greenhouse gas emission, such as through its location, orientation and design.
- 7.96. The London Plan climate change policies collectively require developments to make the fullest contribution to the mitigation of, and adaptation to, climate change, and to minimise carbon dioxide emissions.
- 7.97. London Plan Policy 5.2 sets out an energy hierarchy (Be lean, Be clean, Be green) within which development proposals should seek to minimise carbon dioxide emissions. The Policy also sets a target for residential buildings in the period 2013-2016 to achieve a 40% improvement on 2010 Building Regulations for carbon dioxide emissions. The GLA document “Energy Planning: Greater London Authority guidance on preparing energy assessments (April 2014)” states the following: “As outlined in the Sustainable, Design and Construction SPG (to be published in April 2014), from 6 April 2014 the Mayor will apply a 35 per cent carbon reduction target beyond Part L 2013 of the Building Regulations - this is deemed to be broadly equivalent to the 40 per cent target beyond Part L 2010 of the Building Regulations, as specified in Policy 5.2 of the London Plan for 2013-2016”.
- 7.98. London Plan Policy 5.3 seeks to achieve the highest standards of sustainable design and construction and states development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and

operation. Major development proposals should also meet the minimum standards outlined in the Mayor's supplementary planning guidance.

- 7.99. London Plan Policy 5.7 seeks to increase the proportion of energy generated from renewable sources, with major development proposals expected to provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation.
- 7.100. London Plan Policy 5.9 states that major developments should reduce potential overheating. Policy 5.10 promotes urban greening and notes that developments should include green roofs and walls where feasible (Policy 5.11).
- 7.101. Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 7.102. Local Plan Policy CC2 notes that all development should adopt appropriate climate change adaption measures such as:
- a) the protection of existing green spaces and promoting new appropriate green infrastructure;
 - b) not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;
 - c) incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and
 - d) measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.
- 7.103. It also notes an expectation for non-domestic developments of 500 m² of floorspace or above to achieve "Excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019.
- 7.104. An Energy and Sustainability Statement has been prepared to detail how Lean, Clean and Green measures have been considered to reduce carbon emissions.

7.105. The conclusions of the Energy Strategy and Sustainability Statement are listed below:

- The Proposed Development will achieve carbon savings of approximately 19.2% in comparison to a baseline building that is fully compliant with the standards set by Part L 2013.
- The energy efficiency measures contained within this proposal include enhanced fabric insulation; enhanced air tightness; high efficiency fans; high efficiency heating and cooling plant, heat recover on ventilation systems and daylight control of the lighting. This will ensure the development achieves Part L 2013 compliance through energy efficiency measures alone.
- There is currently no existing or proposed heat distribution networks in the vicinity of the site and as such this option has been disregarded.
- Combined heat and power engines are not viable for development of this nature due to the low annual heating demand and there being no significant background heat demand during the summer. This combined with the lack of district heating scheme means that the Green Measures for this development are not viable.
- Photovoltaic collectors are compatible with the proposed building service solution albeit there is limited space available on the roof. With this in mind the extend of the PV array has been restricted to an area of 83 m².
- Due to the 18-21 Hand Court not reaching a carbon reduction target of 35%, a carbon offset payment will accommodate the additional 15.8%. With the London Borough of Camden's carbon offset costing £90 per tonne, 18-21 Hand Court's cost over a 30 year period is £24,536 which equals £818 per year.
- The new office floorspace is seeking to achieve an Excellent BREEAM rating whilst the retail elements are seeking to achieve a Very Good BREEAM rating.

- 7.106. For further information please refer to the Energy and Sustainability Strategy prepared by GDM Partnership.

8. COMMUNITY INFRASTRUCTURE LEVY AND PLANNING OBLIGATIONS

Community Infrastructure Levy (CIL)

- 8.1. The Mayor formally adopted his CIL charging schedule on 1 April 2012, following an Examination in Public in November 2011. The Mayoral CIL is now payable on most new developments.
- 8.2. For development schemes in the London Borough of Camden, the Mayoral CIL will be levied at £50 per m² of uplift from existing to consented floorspace in lawful use and in accordance with the requirements of the CIL Regulations (as amended).
- 8.3. LBC adopted their borough CIL charging schedule on 1 April 2015. CIL is levied at variable rates across the borough and is also dependent on the nature of the proposed uses. Borough CIL funds will pay for a wide range of infrastructure, which includes, but is not limited to; parks, schools, community facilities, health facilities and leisure centres.
- 8.4. A CIL Additional Information Requirement form has been completed and is included within the planning application submission.

Crossrail Contribution

- 8.5. Sites identified within the ‘Use of Planning Obligations and the Mayoral Community Infrastructure Levy SPG’ require a Section 106 financial contribution from office, retail and hotel development where there is a net increase of 500 sqm or more in floorspace, measured by Gross Internal Areas (GIA).
- 8.6. The Proposed Development is located within the ‘Central London’ area as identified within Figure 2 of the abovementioned SPG and is therefore subject to a Crossrail payment.
- 8.7. The Mayor of London’s CIL will be offset against the Crossrail planning obligations payment. As such, where the Mayor’s CIL is higher than the Crossrail planning contribution, only the Mayor’s CIL will be payable. However, where the Crossrail

planning contribution amount is greater than the Mayor's CIL then the "top up" or balance will also be payable.

Planning Obligations for the Development

- 8.8. It is recognised that the Proposed Development will generate S106 obligations and contributions.
- 8.9. The LBC Planning Obligations SPD (2018) has been considered as part of this application and will be used in considering financial contributions to LBC. Further discussions are to be held with LBC Officers during the determination of the planning application to agree the contributions to be made.
- 8.10. Set out below, on a without prejudice basis, is a draft set of heads of terms for a S106 legal agreement.
- 8.11. Financial s106 Obligations could include the following and will be subject to further discussions and agreement with LBC:
- Construction phase skills and training;
 - End user phase skills and training;
 - Site specific public realm improvements;
 - Carbon emission reduction offset;
 - Affordable housing;
 - Mixed use policy; and
 - Monitoring.
- 8.12. Non-financial s106 Obligations could include the following and will be subject to agreement with LBC:
- Target a percentage of the total jobs created by the construction and end-user phases of the development to be advertised exclusively to local residents through the Council's job-brokerage services for a specified minimum period;

- Apprenticeships and work placements for the construction phase of all new development and the end user phase of commercial development;
- Target 10% of the total value of contracts, which procure goods and services during the construction phase of the development, to be achieved using firms located within the borough;
- Site specific transport requirements; and
- Site specific public realm improvements.

8.13. The financial and non-financial obligations would be discussed with officers during the consideration of the application, subject to viability. The final s106 Heads of Terms and amounts of contribution would be agreed prior to the determination of the application.

8.14. The areas of contribution are indicative and may be subject to change as a result of further discussions between the Applicant and the relevant authorities.

9. CONCLUSION

9.1. DP9 Ltd have been appointed to submit a full planning Application for:

“Demolition of 18 – 21 Hand Court and the erection of a new building comprising, basement, ground plus 4 upper storeys of office (Class B1) and retail (Class A1/A3) uses; the refurbishment and change of use of basement and ground floor level at 22 – 23 Hand Court from office (Class B1) to retail (Class A1/A3); and associated works.”

9.2. The Planning Statement has assessed the Proposed Development against the provisions of the NPPF, London Plan, LBC Local Plan and supplementary planning guidance. It is considered that the Proposed Development accords with the relevant local, regional and national policies and delivers significant benefits, in particular:

- The scheme for 18 - 21 Hand Court provides a high quality new office building that serves the core Central London market, with modern, attractive and flexible office accommodation;
- Deliver an additional 94 FTE jobs across the proposed office and retail uses;
- The creation of 1,065 m² of new retailing floorspace, providing opportunities for local businesses to accommodate floorspace in a prime location.
- The scheme will provide a greater number of uses, adding increased life and vitality to the site as well as its surroundings;
- The scheme enlivens the ground level street frontages with active uses; this enhances the pedestrian experience of the site and the area, making the use of the streets around the site a safer and more pleasant experience; and
- It will optimise the employment potential of this site in the heart of the CAZ in a genuinely sustainable manner for the following reasons:
 - The development will be car-free;

- The development will provide 54 short and long-stay cycle parking spaces, along with dedicated facilities to improve the cycle experience including showers, lockers and changing areas and at-grade access to all cycle spaces; and
- The commercial buildings can achieve a BREEAM rating of ‘Excellent’, utilising a range of green technologies and design measures.

9.3. The Proposed Development will not harm the character and appearance of the Bloomsbury Conservation Area and the setting of nearby listed buildings. For the above reasons, and those set out in this statement, planning permission is sought for the Proposed Development.

9.4. The Planning Statement has assessed the proposed scheme against the provisions of the Development Plan and other material considerations relevant to the determination of the application. It is considered that the proposal accords with the Development Plan, is a sustainable scheme and in accordance with the National Planning Policy Framework.