

PDTBC/PB/JL

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12 March 2020

Submitted via the Planning Portal: PP-08539952

Dear Elaine

**TEMPLAR HOUSE, 81-87 HIGH HOLBORN, LONDON WC1V 6NU
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
APPLICATION FOR FULL PLANNING PERMISSION**

On behalf of our client, CER Investment SARL, please find enclosed an application for the refurbishment of Templar House, High Holborn, London WC1V 6NU . Full planning permission is sought for the following:

“Installation of additional plant equipment and screening, extensions to the existing cores, a new WC Block and works to create a terrace at roof level”

This application has been submitted via the Planning Portal under ref. PP-08539952.

Site Description

Templar House (81-87 High Holborn and 24 to 27 Eagle Street) comprises a part-nine (plus plant area) part-seven storey building (plus basement) faced with Portland stone on the High Holborn elevation and a mixture of brick and stone on the Eagle Street elevation. The side elevations are not visible from the public realm. The existing building on the Site was constructed in 1959 by Richard & McLaughlin Architects and was an infill building following bomb damage during WWII.

The building is laid out as three blocks, one fronting onto High Holborn to the south, one onto Eagle Street to the north and one forming a connecting block in between. The latter is set in from the boundaries with the adjoining sites creating courtyard spaces to the west and east.

The building comprises offices on the first to 8th floors on the building fronting High Holborn and offices on the first to 7th floors of the building fronting Eagle Street, with plant equipment located at roof level. There is retail floorspace at ground floor level fronting onto High Holborn, which is provided across five retail units. Most of the occupiers have relocated to other premises and are now vacant. Vehicle access to the Site is from Eagle Street via a ramp into the basement which is mainly used as car parking

The Site is in the Bloomsbury Conservation Area. There are no statutorily listed buildings adjacent to the site however there are listed buildings in the wider area, including the Rosewood Hotel at 247-252 High Holborn (Grade II) approximately 20m south of the Site.

Client Objectives

CER Investments SARL purchased the Site on 28 September 2019. It is their intent for Uncommon to both own, occupy and manage the office and retail floorspace. Uncommon has created a portfolio of workspaces with a focus on providing supportive working environments, with an emphasis on design-led spaces and health & wellbeing. Their aim is to promote a healthier way of working in an environment that evokes creativity and productivity.

The building to be designed and finished to the highest standards, providing an excellent working environment for members and member organisations. Key focuses include building users' wellness and improve the buildings contribution to interest and vibrancy of the area. The scheme is intended to be a destination for the public and surrounding building users, positively contributing to the retail and food and beverage offer in the borough by taking a different approach to retail, and providing a high quality user experience.

Planning History

Following a review of the available planning history for the Site, the following are considered relevant:

- Planning permission was refused on 22 March 2018 (ref. 2015/4407/P) for the redevelopment of the Site, following the demolition of the existing 9 storey mixed use building to provide a 12 storey building onto High Holborn comprising 350 sq m of retail floorspace at ground floor level, 15,499 sq m of office floor space at basement to 11th floor levels and a 14 storey building fronting Eagle Street comprising a total of 52 residential units. The proposals included new and altered improvements to public realm, landscaping, parking, bin storage and associated works.
- Planning permission was approved on 24 June 2019 (ref. 2018/5903/P) for refurbishment of the existing building, including the installation of new and replacement rooflights at ground to enclose the existing voids following conversion of underground basement car park and removal of car park ramp to create additional employment floor space (B1 use), the erection of a single storey extension at ground floor level and 8th floor level, the installation of metal railings to create a roof terrace at 8th floor level, installation of additional air conditioning units in the existing plant enclosure and alterations and replacement of the louvred screen at 7th floor level fronting Eagle Street. The proposals also sought the enlargement of the office entrance to High Holborn elevation, which included alterations to the existing retail accommodation layout and shop frontages and alterations to the ground floor openings on the rear elevation fronting onto Eagle Street.

Our client is not seeking to implement any previous express planning permissions in relation to the Site.

Proposed Development and Application Format

A pre-application meeting was undertaken with the Council on 14 February 2020, to discuss the proposed works.

As agreed in this meeting, the works for which permission is sought will be submitted as three separate applications to align with the procurement and sequencing of the works. These are driven by a desire to bring the building back in to functional and operational use at the earliest opportunity.

This application therefore solely relates to the:

- Installation of additional plant equipment, and associated screening to High Holborn and Link Blocks;
- Replacement of the existing plant enclosure to the Eagle Street Block;
- Re-location of the previously approved roof terrace from the Link Block to the High Holborn Block;
- A new-build WC block to serve the eight floor office workspaces and terrace; and
- Extension to the existing cores.

Due to the nature of the alterations sought in each application, the submitted drawings and DAS may show elements which do not relate to this submission. For the avoidance of doubt, this application is seeking the alterations listed above only.

Further information on the content of each application is in the Design and Access Statement (DAS) prepared by Cousins & Cousins Architects if needed.

The Development Plan

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires special attention to be given to the desirability of preserving or enhancing the character or appearance of that area when exercising planning functions.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that “*where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise*”. The parts of the development plan of relevance to this application are:

- The London Plan (2016); and
- The Camden Local Plan (2017) and associated policies map, with alterations (2017).

The Site is subject to the following allocations/designations:

- Located in the Central Activities Zone (CAZ);
- Located in the Holborn Intensification Area;
- Located in the High Holborn/Kingsway Central London Frontage; and is
- Located in the Bloomsbury Conservation Area.

Local Plan Policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to be of the highest architectural and urban quality, which improves the function, appearance and character of the area, and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's heritage assets and their settings, including both conservation areas and listed buildings. These policies have been accounted for in the development of proposals and the assessments provided below.

Planning Policy Assessment

1. Installation of additional plant equipment, and associated screening to High Holborn and Link Blocks

Policy E1 (Economic development) of the CLP seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses by supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 (Employment premises and sites).

Policy E2 (Employment premises and sites) prioritises the provision of employment premises and sites in the borough and protects premises or sites that are suitable for continued business use. Specifically in relation to intensifying the levels and quality of employment floorspace provided, the policy outlines that the Council will view favorably premises which include floorspace suitable for start-ups, small and medium-sized enterprises.

The proposals seek to increase the quantum of plant equipment at roof level in order to optimise the quality of the office accommodation and the number of employees who can be accommodated in the building. This desire to optimise the employment generating uses on-site is in accordance with both the CLP and the wider objectives of the CAZ. Further, and given the desire of Uncommon to achieve a WELL Platinum working environment, of which a mandatory requirement is to achieve high levels of indoor air quality it would not be possible to meet the indoor air quality with just natural ventilation, which adds to the level of plant equipment needed to ventilate/service the space. The WELL concept and its requirements are outlined in the DAS and the Ventilation Plant Strategy document.

To support the additional plant equipment proposed, a Ventilation Plant Strategy has been prepared by Milieu Consult. This document demonstrates that quantum of plant is at the minimum level required to serve the intensified occupancy of the office floorspace, and that the most efficient and suitable plant option is being pursued. This strategy is in accordance with the requirements of the Energy Efficiency CPG document. The on-floor layout of the mechanical and electrical plant will allow for maximum future flexibility with minimal plant adjustment, reducing the requirement for future modification or refurbishment in the future. It should be noted that the high levels of filtration means it is likely that the air exhausted from the building will contain less particulates than the outside air.

The plant is to be located on the High Holborn block at roof level, and is set back from the existing parapet to reduce visibility from the street level. This location was discussed with Camden at the pre-application meeting and a number of key views were agreed and have been included in the submission.

When viewed from street level, a very small area of the High Holborn plant screening would be visible, however this would be visually broken by the balustrade proposed for the roof terrace element. We consider that to this elevation, the step in massing complements the stepping in the façade and the design of the neighbouring building. The proposals therefore accord with the requirements of Policy D1 (Design) and Policy D2 (Heritage) and they should be viewed positively in terms of the buildings overall contribution to the character and appearance of the Bloomsbury Conservation Area.

Overall, the need for additional plant is driven by a desire to optimise the use of the Site and bring it back in to operational use at the earliest opportunity and optimise the number of employees which the Site can accommodate. This objective firmly aligns with Policy E1 (Economic development) and Policy E2 (Employment premises and sites). The proposed ventilation system will allow the building to recover heat and coolth, meaning the system is far more efficient than the previous scheme and should be viewed favourably.

2. Replacement of the existing plant enclosure to the Eagle Street Block

The Eagle Street plant enclosure is to be enlarged when compared to the existing arrangement to accommodate the additional services required to achieve the objectives of Uncommon and the WELL accreditation requirements, thus improving the internal working conditions and sustainability of the building.

The principle of plant equipment and screening to this elevation has been established previously, and although visible in longer views along Eagle Street, the height of the screen would ensure that it would be no more visible than that approved under ref. 2018/5903/P. The size of the enclosure has been defined by the services within, and the dimensions have been kept to a minimum, and will be acoustically lined to prevent any noise disturbance to the residential building opposite.

Policy A4 (Noise and vibration) of the CLP outlines that the Council will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity. In this context, a Plant Noise Assessment Report has been prepared by Auricl which concludes that noise emissions associated with the proposed plant (35 dB) are predicted to be 10 dB less than the lowest measured background noise level (45 dB) and therefore meet the requirements stipulated in this regard by Camden's standard noise condition.

We propose the following compliance condition to give the Council comfort that this requirement will be adhered to:

"The proposed plant equipment shall be installed as such that when operating, the cumulative noise level LAEQ arising from the proposed plant equipment, measured or predicted at 1m from the façade of the nearest noise sensitive premises shall be a rating of at least 10dB(A) below the typical background noise level LAF90 (15dB(A) where tonality or impulsivity is perceptible), and is to be maintained whilst the plant equipment is operational and in situ. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142:2014.

The considered and uniform finish of the plant screening will help to improve the overall appearance of the building and not detract from the character and appearance of the host building in terms of its siting or design. This area of plant will be at a reduced height and stepped back from the parapet to minimise visual impact. In any event, given the considered design and materiality of the plant enclosure it will provide an improved, uniform aesthetic which has no impact or element of harm when viewed from public viewing points. It would therefore not detract from the building or the contribution that the elevation makes to the Bloomsbury Conservation Area.

3. Re-location of the previously approved roof terrace from the Link Block to the High Holborn Block

A new roof terrace is proposed at 8th floor level, similarly to application ref. 2018/5903/P, and allows office users to have access to a large roof top amenity space. The proposals include the installation of a lightweight canopy to enclose open plan planting and seating, which not only acts as shelter but further conceals plant services at roof level.

It was noted in the Members' briefing report for 2018/5903/P that *"due to its size (approximately 250 sq m) there may be potential for a large number of people to use the area and to generate noise that may disturb the neighbouring residential properties that overlook the site"*. The proposed roof terrace has been relocated to the High Holborn frontage, away from the residential properties on Eagle Street further removing any potential overlooking or noise/amenity issues.

In design terms, the terrace is modest in size and height and the use of appropriate materials does not harm the character or appearance of the building or its setting, but would optimise the office accommodation on-site by providing ancillary facilities which would be of benefit to Uncommon, those working in the building below and the pool office of office stock in this principally commercial location. This is in line with the objectives of Policy E1 (Economic development) and Policy E2 (Employment premises and sites).

4. A new WC block to serve the eighth floor office workspaces and terrace

The proposals incorporate an enlarged WC block to the 7th floor roof of the 'link' block and is needed to serve the increased occupancy of the building. The proposed block follows the existing building line and causes no discernible impact due to its lack of visibility, modest size and use of high quality materials. It would not be unduly visible from public vantage points, and would have no impact on the appearance of the building or its setting in the Bloomsbury Conservation Area.

The improvement of the facilities for the office accommodation again resonate with the objectives of Policy E1 (Economic development) and Policy E2 (Employment premises and sites) and should be viewed positively as there are no detrimental heritage impacts.

5. Extension to existing cores

The proposals seek to extend the existing cores to the High Holborn and Eagle Street Blocks to allow the necessary plant services and lift overruns to be concealed, providing a considered aesthetic. The height of the extensions have been set at the minimum possible and this element will have no impact on the character and appearance of the conservation area, as the enclosure will be constructed using hit-and-miss brickwork, to match the existing brick core colour and texture, therefore complying with Policies D1 (Design) and D2 (Heritage).

Daylight and Sunlight Considerations

Due to the proposed high level alterations, and in order to protect residential amenity, a Daylight and Sunlight Report has been prepared to account for the aforementioned alterations.

The assessment finds that following a review of the proposed development on the relevant rooms in surrounding residential dwellings the layout of the proposals follow the BRE guidelines and do not reduce sunlight or vertical sky component measurements to existing surrounding properties. The daylight and sunlight values for these will be adherent with the suggestions contained in the BRE Guide, causing no harm to amenity.

Conclusion

This supporting letter has been prepared in support of the planning application at Templar House, High Holborn, on behalf of our Client, CER Investment SARL which forms part of the wider package of works which seek to bring the currently vacant building back into operational use at the earliest opportunity.

The proposals considerably increase the level and quality of accommodation provided in this location. The proposed plant equipment has no impact on the character and appearance of the Bloomsbury Conservation Area, and the proposed alterations cause no adverse impact on surrounding amenity. The provision of additional office floorspace is a welcome addition to the commercial nature of this area, providing an opportunity to increase the vibrancy and vitality of the area.

The need for additional plant equipment is key to bringing the Site back in to operational use as early as possible and as there is no impact as a result of this, from both a legislative and planning policy perspective the proposals accord with the Development Plan for Camden by bringing this vacant Site back in to its maximum operational use.

Application Submission and Administrative Matters

To assist with the determination of this application, a suite of technical documents has been submitted in support of this application, and details of these documents are set out in the accompanying Schedule of Submitted Information (Document Ref. TH-1) and the Schedule of Application Drawings (Document Ref. TH-2), both prepared by Montagu Evans.

This application has been submitted via the Planning Portal, and the application fee of £1,386.00 has been calculated in accordance with The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) 2019.

Payment has been made to the Planning Portal directly.

Closing

We trust that the information submitted is sufficient and allows you to validate the application.

Should you require any further clarification, information or assistance please do not hesitate to contact James Leuenberger (james.leuenberger@montagu-evans.co.uk / 020 3962 6458) or Paul Burley (020 7866 8602 / paul.burley@montagu-evans.co.uk) at this office in the first instance.

Yours sincerely,



Montagu Evans LLP
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