

22 December 2015

Templar House, 81-87 High Holborn

in the London Borough of Camden

planning application no.2015/4407/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment of the site, following demolition of the existing 9 storey mixed use building (retail units (Class A1) and office uses (Class B1)), to provide 14 storey building onto High Holborn comprising 607sq.m. of retail floorspace (Class A1-A3) at ground floor level, 17,306sq.m. of office floor space (Class B1) at basement to 13th floor levels and 14 storey building fronting onto Eagle Street comprising a total of 48 Class C residential units (5 studio, 18 x 1 bed, 16 x 2 bed and 9 x 3 bed units), new and altered improvements to public realm, landscaping, vehicular and cycle parking, bin storage and associated works.

The applicant

The applicant is **Northwood Investors** and the agent is **DP9**.

Strategic issues

The principle of mixed use development is supported in strategic planning terms. However, the proposal should be redesigned to take account the strategic concerns regarding **housing, children's playspace, affordable housing, urban design, inclusive access, sustainable development** and **transport** to ensure compliance with London Plan policies.

Recommendation

That Camden Council be advised that whilst the proposed uses are supported in strategic planning terms, the design of the application is not acceptable due to the loss of the elevation fronting High Holborn.

Context

1 On 24 November 2015, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 4 January 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1B and 1C of the Mayor of London Order 2008:

- 1B “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (b) in central London (other than the City of London) with a total floorspace of more than 20,000 square metres.”
- 1C “Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London.”

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The proposal relates to 81 – 87 High Holborn Street. The site is approximately 0.24 hectares and currently comprises a 9 storey building that contains office and retail floorspace. The current building has frontage to High Holborn and Eagle Street and is served by two independent cores. The site is located within the Bloomsbury Conservation Area and the existing facade along High Holborn is acknowledged as being a positive contributor to the conservation area.

6 The site is bounded by High Holborn to the south and Eagle Street to the north. The adjacent building to the west was recently redeveloped to provide office accommodation in a 10 storey building. The buildings to the east are up to 7 storeys in height, comprising retail uses along the ground floor with office uses above. The existing building is currently occupied by Transport for London.

7 High Holborn is a borough road forming part of the Strategic Road Network (SRN). The nearest part of the Transport for London Road Network (TLRN), Farringdon Road, lies just under 1 kilometre to the east.

8 Holborn London Underground station is under 200 metres from the site and lies at a key node for numerous bus routes. As such the site has a high public transport access level (PTAL) of 6b, on a scale of 1 to 6b, where 6b is the most accessible.

9 High Holborn forms part of the local cycle network (LCN39) and the north-south cycle superhighway (CS6) is currently being implemented along Farringdon Road. It is within the Central London Cycle Grid area. There are a number of cycle hire docking stations in the vicinity of the site the nearest being less than 100 metres away in Red Lion Street.

Details of the proposal

10 The proposed scheme seeks to demolish the existing building and construct a mixed-use commercial and residential development. The proposed Class B1 office and Class A1-A3 retail accommodation will be provided in a new 15 storey (14 storeys + plant) building to the south along High Holborn. The Class C3 residential accommodation will be provided within a new 14 storey (13 storeys + plant) building to the north of the site on Eagle Street.

Case history

11 There was no pre applicant meeting held with the GLA regarding this proposal. It is understood by GLA officers that the applicant has had pre application meetings with planning officers at Camden Council.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan; the Mayor's Economic Development Strategy; Town Centres SPG*
- Housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Affordable housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*
- CIL *London Plan; Mayoral Community Infrastructure Levy*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Camden Core Strategy (2010); the Camden Development Policies (2010); and 2015 the London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations:

- National Planning Policy Framework and the accompanying National Planning Practice Guidance.
- The draft Minor Alterations to the London Plan (2015).
- The draft Camden Local Plan (2015).

Principle of development

Mixed use and employment space

15 The site is located in the Holborn Intensification Area and Central Activities Zone (CAZ). Policy 2.13 'Opportunity Areas and Intensification Areas' and Table A1.2 of the London Plan identifies the intensification area for a minimum of 200 new homes and an indicative employment capacity of 2,000, with scope for improved public transport accessibility and capacity and selective intensification through mixed-use redevelopment at higher densities. London Plan Policies 2.11 'Central Activities Zone – Strategic functions' and 4.3 'Mixed use development and offices' seek to ensure that proposals to increase office floorspace within the CAZ include a mix of uses, including housing.

16 The site is also located within the High Holborn/Kingsway town centre and forms part of the London Town Centre Network. London Plan Policies 2.15 'Town Centres', 4.7 'Retail and Town Centre Development' and 4.8 'Supporting a successful and diverse retail sector and related facilities and services' provide the strategic framework for town centre development and implementation. The High Holborn/Kingsway Town Centre is identified as an area appropriate for medium growth and regeneration, indicating that there is a moderate demand for retail, leisure and office floorspace and capacity to achieve regeneration objectives including physical, environmental and economic renewal.

17 Given the above, the proposal for redevelopment including housing, office and commercial accommodation is supported in principle.

18 London Plan Policy 4.2 'Offices' seeks to support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of the plan. It also seeks to meet the needs of the central London office market, consolidate and extend the strengths of a diverse office market and encourage the renewal and modernisation of the existing office stock. Increases in stock will be sought where there is authoritative, strategic and local evidence of sustained demand. The applicant has indicated that the existing building has 10,057sq.m. gross internal area (GIA) of Class B1 floorspace and 426sq.m. GIA of Class A1-A3 floorspace. The proposal seeks to provide 16,585sq.m. GIA of Class B1 floorspace, and 578sq.m. GIA of Class A1-A3 floorspace. The proposal therefore represents an uplift in commercial floorspace provided on the development site and is therefore supported in strategic planning terms.

Housing

19 London Plan Policy 3.3 'Increasing Housing Supply' affirms the Mayor's determination to work with relevant partners to increase London's housing supply by an annual average of 42,000 net additional homes to meet the need identified in the plan, enhance the environment, improve housing choice and affordability, and to provide better quality accommodation for Londoners. To achieve that figure, the London Plan sets an annual target of 889 additional dwellings in Camden for the ten-year period from 2015-2025. Therefore the provision of additional dwellings in the proposal is supported in strategic planning terms.

20 The proposal includes the provision of 48 residential units, with the following indicative unit schedule:

Tenure	Number of units	Percentage
Studio	5	10%
1 Bedroom	18	38%
2 Bedroom	16	33%
3 Bedroom	9	19%
Total	48	100%

Housing choice

21 London Plan Policy 3.8 'Housing Choice', together with the Mayor's Housing SPG and the Housing Strategy, seek to promote housing and a balanced mix of unit sizes in new developments. Policy 3.11 'Affordable Housing Targets' also states that priority should be accorded to the provision of affordable family housing. Whilst the development is predominately

2 bedrooms or less, given the site's location and the advice in the Housing SPG this mix is considered to be acceptable. The inclusion of 3 bedroom units totalling 19% of the unit schedule is welcome.

Density

22 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within a central location where the density matrix sets a guideline of 650 to 1100 habitable rooms (or 140 to 405 units) per hectare on a site such as this where the PTAL is 6b, although the London Plan notes that these ranges should not be applied mechanistically.

23 The applicant has not provided density figures for the proposal, however calculations undertaken by GLA officers have been used to assess the density of this proposal. As the proposal is a mixed use development the calculation needs to be undertaken in accordance with paragraph 1.3.47 of the Housing SPG. The application has 48 units/131 habitable rooms on a site area for density purposes of 0.07 hectares. This equates to 686 units or 1871 habitable rooms per hectare. Although it is acknowledged that a tower development on a relatively small site is always going to produce relatively high density figures. Notwithstanding this, and despite the densities indicated by Table 3.2 being intended as a guide and not to be applied mechanistically, the current proposals are well in excess of these guidelines. A development with density above the ranges recommended in the London Plan should meet the 'good practice' standards as set out in the Housing SPG. Mindful of the residential quality assessment below and under the 'urban design' section, GLA officers are of the view that further work needs to be undertaken before the proposed residential density can be deemed acceptable in strategic planning terms.

Residential quality

24 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision and sets out minimum space standards at Table 3.3. Further guidance is also available in the Housing SPG. As of 1 October 2015 the Government's technical housing standards came into effect. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

25 As stated above, quality issues are particularly important in a high density development and therefore development would be expected to target the good practice standards stated in the Housing SPG. Further analysis of residential quality is detailed under 'urban design' below.

Children's playspace

26 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG, which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child playspace provided on-site as a minimum.

27 The applicant's planning statement indicates that playspace will be provided. Not enough information has been provided to assess the provision of playspace. Details regarding

on-site provision for children under 5, and the access to and capacity of off-site provision should be supplied to GLA officers prior to the application being referred back to the Mayor.

Affordable housing

28 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan Policy 3.11, which includes the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale.

29 While the Mayor has a set strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

30 Policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit appraisal might need to be independently verified. Paragraph 3.75 highlights the potential need to re-appraising the viability of schemes prior to implementation in order to take account of economic uncertainties and ensure the maximum public benefit is secured over the period of the development.

31 Camden Council has set an overall target as required by London Plan Policy 3.11, and expects 50% affordable housing to be provided for new developments, with a tenure mix of 60% social rented and 40% intermediate.

32 It is understood by GLA officers that the applicant is currently in discussions with Camden Council regarding the affordable housing provision. The proposed options being discussed are on-site provision of 6 intermediate units; payment in lieu of affordable housing; or, payment towards an off-site housing scheme.

33 Policy 3.12 of the London Plan expects affordable housing to be provided on-site, and the Mayor's Housing SPG reiterates this point, noting that on-site provision generally gives the greatest certainty of actual provision as well as meeting the Plan's policies on mixed and balanced communities.

34 In order to maximise affordable housing delivery, however, it is recognised that in exceptional circumstances and where it would have demonstrable benefits, it may be provided off-site or through a cash in-lieu contribution ring fenced and if appropriate 'pooled', to secure efficient delivery of new affordable housing. However, off-site options should only be secured when it has been fully demonstrated as to why on-site provision is not possible.

35 The policy lists a number of exceptional circumstances where off-site provision may be acceptable including:

- to secure a higher level of provision;
- better address priority needs, especially for family housing;
- to secure a more balanced community; and
- better sustain strategically important clusters of economic activities, especially in parts of the CAZ (land swap/housing credit).

36 It is acknowledged that the site's central location, with high property values and rent levels, could potentially make the scheme an unattractive investment for local registered

providers. It is also recognised that the high values would mean it is not possible to provide intermediate homes within the GLA's income thresholds.

37 It is acknowledged therefore, that a higher number of larger, family homes could be provided off-site. However, it must first be demonstrated that a suitable quantum and mix of affordable housing cannot reasonably be provided on-site before considering off-site solutions, and the applicant should consider the full range of affordable products, including discounted market sale/rent (DMS/DMR) which do not require the investment of a registered provider.

38 The applicant's viability appraisal should include details of rent levels and a range of scenario tests (including a policy compliant scenario test) to demonstrate how the offer has been maximised. Following scenario testing, the appraisal should demonstrate how the affordable offer is the optimum that can be achieved through any on/off site mix or commuted sum.

39 In addition, GLA officers will also require further details on the scheme for any donor site, including plans showing the layout and mix of the affordable units, and further detail on timescales for delivery in the context of the phasing for the development on the application site. The London Plan expects applications for donor sites to come forward concurrently with the substantive planning application for the development site. If this is not possible, GLA officers may require the section 106 agreement to include a cascade arrangement allowing for alternative options to be explored if the preferred donor site cannot be delivered.

40 Currently it is not possible to determine whether the application accords with London Plan Policies 3.8, 3.9, 3.11 and 3.12. Further details regarding the proposed affordable housing provision are required. If payment towards an off-site affordable housing scheme is agreed upon, Council should ensure that the off-site provision is delivered prior to the on-site market housing. GLA officers require the applicant submit a viability assessment to demonstrate that the maximum reasonable amount of affordable housing is being provided or that the chosen method of affordable housing is most appropriate for this site. This will need to be independently assessed by the Council and results shared with GLA officers prior to the application being referred back to the Mayor.

Heritage

41 The building is located within the Bloomsbury Conservation Area. The existing facade along High Holborn is identified as being a positive contributor to the conservation area and a good example of post-war classical architecture. It is noted that the applicant has provided details on how the proposal relates to the existing building and how retaining the facade would result in the blocking of windows due to the proposed floor assembly. However, GLA officers would like to see a design solution that incorporates retention of the facade, adapting it to suit the new floor to ceiling heights. This approach has been successfully achieved recently in other developments, such as St James's Gateway (GLA reference 2294a, LPA case number 10/04744/FULL) and Project Monico (GLA case number 3648, LPA case number 15/07092/FUL), both in Westminster, where the applicant stretched the stone facade/window openings to accommodate the floors behind.

Urban design

42 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 7 which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the

quality of new housing provision, tall and large-scale buildings, built heritage, views, and public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

43 GLA officers require further detailed plans to assess the appropriateness of this proposal. Plans showing the context of the surrounding area including adjacent development, illustrating adjacent land uses and window locations, should be provided. Floor plans showing the development in its entirety should also be provided, rather than separating the office and residential components.

44 The frontage for the residential component along Eagle Street is largely inactive. The applicant should revisit this element of the design and try to maximise active frontage along Eagle Street. This could be achieved through reducing the entrances for refuse and parking and increasing the space given to the residential lobby.

Residential quality

45 As stated previously, a proposal that exceeds the density ranges as set out at Table 3.2 of the London Plan, such as this one, would be expected to deliver exceptional residential quality.

46 The units fronting onto Eagle Street are predominantly north facing with minimal secondary aspect. Whilst this does provide cross ventilation which is welcome, further analysis is required regarding daylight, sunlight and cross ventilation. The applicant should also provide Average Daylight Factor (ADF) readings to the GLA prior to the application being referred back to the Mayor.

47 Information provided to GLA officers indicates that there may be issues regarding overlooking and privacy of some of the units. This is of particular concern in the northern most units, where it appears there will be privacy issues resulting from overlooking from the north western units of the north eastern units. Camden Council should be satisfied that the outlook of the residential units will be appropriate for a development in this location.

48 The proposed scheme also includes 6 units across floors seven to nine that do not currently meet the Mayor's minimum space standards as set out in Table 3.3 of the London Plan. The applicant should revisit the design of these units and ensure that all proposed residential units accord with Policy 3.5 and Table 3.3.

Amenity space

49 The proposed external terrace is limited in terms of outlook and daylight, but given the central location this may be appropriate. Currently it is unclear if residents will be able to access this space, or if playspace will be provided here. Further details should be provided regarding the use and access of this amenity space.

Trees

50 London Plan Policy 7.21 seeks to protect, maintain and enhance London's trees and woodlands. Camden Council's Core Strategy also provides a strategic framework for protecting and preventing the loss of street trees. It is understood by GLA officers that the applicant intends to keep the street tree located out the front of Templar House on High Holborn. The method for protection during construction should be secured by way of planning condition by Camden Council.

Architecture and massing

51 Due to the high density and height of this proposal the appearance of the building will need to be of outstanding quality. Critical to this will be the final choice of material and quality of detailing, and as such the local authority will need to scrutinize this carefully. A clause should be included in the S106 agreement that will ensure the same calibre of architects are retained to produce all construction drawings, or a budget is allocated to allow them to review these when they get produced.

Conclusion of urban design comments

52 Given the sites central location the residential quality could be acceptable subject to the applicant addressing the comments raised in this report.

Inclusive access

53 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

54 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The applicant's design and access statement provides details of levels and gradients. Information regarding the widths, surface materials, and how disabled people are segregated from traffic and turning vehicles should also be provided.

55 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet Lifetime Homes standards. Currently the applicant is proposing to provide 4 wheelchair accessible/adaptable units. This equates to 8.3% of the proposed residential units, and therefore does not comply with London Plan Policy 3.8 which requires 10% of all residential units to be wheelchair accessible/adaptable. The applicant should provide an additional wheelchair accessible/adaptable unit to ensure compliance with Policy 3.8. The information submitted by the applicant indicates that the wheelchair accessible/adaptable units will be distributed across unit sizes which will afford similar choice to disabled and elderly people as non-disabled people, and is welcome. The applicant should include typical flat layouts and plans of the wheelchair accessible or easily adaptable units in the design and access statement.

56 As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4(2) and M4(3) by condition.

Sustainable development

Energy

57 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole.

58 Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Energy efficiency standards

59 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include LED lighting and controls and mechanical ventilation with heat recovery for the residential element.

60 The applicant is proposing to use water to water heat pumps to recover heat rejected from the cooling system for the commercial buildings and use it for the domestic building's hot water. This is welcomed, however further information should be provided on how (if at all) the benefits from this system have been included in the carbon savings calculation. The applicant should also confirm that the baseline emissions have been calculated using a gas heating base case rather than an electricity base case.

61 The demand for cooling will be minimised through external shading and solar control glazing (g values of 0.15-0.17 for commercial and 0.4 for residential) however active cooling is proposed for the domestic as well as the non-domestic. The applicant has stated that the development (both domestic and non-domestic) meets the overheating criteria in Part L. The use of active cooling in the dwellings is not supported unless it is demonstrated that cooling demands have been minimised by passive design (in line with Policy 5.9) before the inclusion of air conditioning. Dynamic thermal modelling in line with CIBSE Guide TM52 and TM49 is recommended to demonstrate that overheating risk has been addressed.

62 The development is estimated to achieve a reduction of 63 tonnes per annum (13%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development from efficiency measures (fabric and services) BRUKL sheets have been provided to support the savings claimed. The applicant should also provide DER and TER sheets after efficiency measures alone (instead of the SAP sheets provided) for the domestic component.

District heating

63 The applicant has identified that Citigen district heating network is within the vicinity of the development and has investigated the potential to connect to the network. Evidence of correspondence with the network operator has been provided confirming that the site is too far and has a heat demand that is too low to make connection viable at this time.

64 The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The applicant should explain how this will be achieved in practice, including an explanation of the distribution system within the building and how this will be designed to be served by heat pumps now but be suitable for connection to district heating in the future.

65 The site will be supplied from a single plant room at basement level. The applicant has confirmed that space will be set aside for heat exchangers for future connection.

Combined heat and power

66 The applicant has investigated the feasibility of CHP. However, due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable energy technologies

67 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install:

- 150sq.m. of solar PV on the roofs
- Air source heat pumps to provide space heating and hot water to the domestic element.

68 A roof plan showing the proposed locations of the PV has been provided. The applicant should clarify how the savings from ASHPs have been derived and if they are included in this tier of the energy hierarchy of the previous ones.

69 A reduction in regulated CO₂ emissions of 19 tonnes per annum (4%) is claimed for this third element of the energy hierarchy.

Overall carbon savings

70 Based on the energy assessment submitted at stage 1, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy.

	Total residual regulated CO₂ emissions	Regulated CO₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building regulations	474.4		
Energy Efficiency	411.7	63	13%
CHP	411.7	0	0%
Renewable energy	393	19	4%
Total		81	17%

71 A reduction of 81tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 17%.

72 The on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. The applicant should address the comments above and clarify how the heat pump savings were derived. Any shortfall in carbon savings to meet the 35% target should, in liaison with the borough, be met off-site.

Flood risk

73 The 0.24 hectare site will not require Flood Risk Assessment. The site is within Flood Zone 1 and has no significant surface water flood risk, although a segment of high Holborn close to the site does have surface water flood risks that may be contributed to by drainage from this site.

74 The development is acceptable in terms of London Plan Policy 5.2 'Flood Risk Management'.

Sustainable drainage

75 The Sustainability Statement prepared by Arup states that greywater harvesting will be used for the residential building, and rainwater harvesting for the commercial building. A greywater treatment plant would be located in the basement beneath the residential building.

76 The Statement also suggests that the development could include brown roofs on the residential and commercial buildings, with rainwater attenuation for the residential section of the development.

77 The brown roofs and water harvesting proposals should be secured through appropriate planning conditions.

78 This approach is considered to comply with London Plan Policy 5.13 'Sustainable Drainage'.

Green Infrastructure

79 The proposed brown roofs comply with London Plan Policy 2.18 'Green Infrastructure', 5.10 'Urban Greening' and 5.11 'Green Roofs'. The proposed log and rubble piles on the brown roofs mentioned in the Sustainability Statement, and the proposed bird and bat boxes mentioned in the Planning Statement comply with London Plan Policy 7.19 'Biodiversity'.

80 The measures should be secured through appropriate planning conditions.

Climate change adaptation

81 Camden Council should secure through planning condition that the application responds to strategic policies regarding climate change adaptation, including use of low energy lighting and energy efficient appliances, metering, high levels of insulation, low water use sanitary-ware and fittings, in addition to biodiverse roofs.

Transport

Trip generation

82 The increase in trips generated by the development is not considered to be significant.

Cycling provision

83 The transport assessment (TA) states that long stay cycle parking is to be provided in accordance with London Plan standards, together with facilities such as showers, changing rooms and lockers. However, there appears to be an error with the calculation for the commercial element creating a shortfall of 32 spaces. This should be resolved.

84 Due to the limited footpath space surrounding the site, Camden Council officers consider that it is not possible to provide additional short-stay cycle parking directly adjacent to the site. Instead, a contribution towards expansion elsewhere in the area is proposed. This seems an appropriate solution, and the contribution should be secured through the section 106 agreement.

85 The nearest cycle hire docking station, Red Lion Street, is in the top 5% for hires and in the top 10% for docks and it has 36 docking points. Other nearby stations are also busy and the 'car-free- development will add to this demand. However, as with short-stay cycle parking, there is no space to accommodate an additional docking station adjacent to the site.

86 Instead, TfL propose to extend the existing Red Lion Street docking station. This would be funded in part by a contribution to £100,000 from the development, secured in the section 106 agreement. Expansion of this docking station would result in loss of two on street paid-for car parking spaces. If Camden Council do not support this, the £100,000 would be utilised to support improved cycle hire operations in the area.

Car parking

87 The 'car-free' nature of the scheme, except for two disabled car parking spaces, is welcomed. However this should be secured by condition, together with exemption of occupiers obtaining controlled parking zone (CPZ) parking permits appropriately included in the section 106 agreement.

88 It is accepted, given the public transport alternatives that, due to site constraints, all five spaces required for 100% car parking provision for the wheelchair units cannot be provided. One or both of the spaces should be provided with electric vehicle charging infrastructure.

Servicing and construction

89 Servicing arrangements would be similar to existing i.e. from Eagle Street, and would limit use of High Holborn to outside hours of operation of the bus lane. It would be expected that the majority of construction activity also takes place from Eagle Street, thereby minimising impacts on traffic flow on the SRN. The draft deliveries and servicing (DSP) and construction logistics plans (CLP) should be secured by condition.

90 The site lies in the vicinity of London Underground running tunnels. As such, TfL requests appropriate infrastructure protection condition.

CIL and Crossrail planning obligations

91 The Mayoral CIL rate for Camden is £50 per square metre.

92 The site also lies within the 'Use of planning obligations in the funding of Crossrail' SPG central London contribution area. As such, the development is liable to pay an additional contribution area. As such, the development is liable to pay an additional contribution towards Crossrail through the section 106 agreement, at a rate of £140 per square metre GIA of the office uplift only. This gives a contribution of £913,920; however the CIL payment above can be offset, which should be reflected in the section 106 agreement.

Conclusion

93 Subject to confirmation of cycle parking for the office element, the inclusion of the conditions identified in this section of the report and the securing of the contributions towards short stay cycle parking, cycle hire and Crossrail in the section 106 agreement, the development is likely to be accordance with London plan policy in terms of strategic transport.

Local planning authority's position

94 Camden Council is likely to report this application to its planning committee in January 2016.

Legal considerations

95 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

96 There are no financial considerations at this stage.

Conclusion

97 London Plan policies on employment, housing, affordable housing, heritage, urban design, inclusive access, sustainable development and transport are relevant to this application. The proposed scheme raises strategic issues and these should be addressed before the scheme can be considered acceptable. These issues are summarised below:

- **Housing:** The housing choice and density are generally supported in strategic planning terms, although consideration should be given to the urban design and residential quality comments outlined in this report. Camden Council should include a condition to secure the proposal is designed to meet the governments technical standards. Further information is required regarding the child playspace strategy and this should be supplied to GLA officers prior to the application being referred back to the Mayor.
- **Affordable housing:** There are some strategic concerns regarding the affordable housing provision. Currently it is not possible to determine if the application accords with London Plan policies 3.8, 3.9, 3.11 and 3.12. Further information should be supplied to GLA officers regarding the affordable housing provision prior to the application being referred back to the Mayor.
- **Heritage:** GLA officers have requested a design option which retains the High Holborn facade as the building is considered to be a positive contributor to the conservation area. This should be supplied to GLA officers prior to the application being referred back to the Mayor.
- **Urban design:** Whilst the residential quality is somewhat compromised, given the sites context and central location this may be considered acceptable subject to the issues raised in this report being addressed prior to the application being referred back to the Mayor.
- **Inclusive access:** In order to comply with the London Plan and draft interim Housing SPG the applicant is required to provide an additional wheelchair accessible unit to meet the 10% requirement. Other matters outlined in this report should also be addressed prior to the application being referred back to the Mayor.

- **Sustainable development:** Further information and discussion (detailed in the body of this report) are required before the proposals can be considered to be acceptable and the carbon dioxide savings verified. This should be submitted for assessment before the application is referred back to the Mayor. Conditions securing commitment for climate change adaption measures should be included within the application when it is referred back to the Mayor.
- **Transport:** Further information (detailed in the body of this report) regarding transport matters are required for assessment prior to the application being referred back to the Mayor.

for further information, contact GLA Planning Unit (Development & Projects Team):

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development & Projects)

020 7983 4895 email justin.carr@london.gov.uk

Jessica Lintern, Senior Strategic Planner, Case Officer

020 7983 4653 email jessica.lintern@london.gov.uk
