

JM/CA/DP6496
13 June 2023

**London Borough of Camden,
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Dear Sir/Madam,

**CAROLINE HOUSE, 55-57 HIGH HOLBORN, LONDON, WC1V 6DX
TOWN AND COUNTRY PLANNING ACT 1990**

On behalf of our client, SRG Holborn Ltd. ('the Applicant'), we hereby enclose an application for full planning permission ('the Application') for external alterations in association with the creation of three roof terraces at Caroline House, 55-57 High Holborn, London, WC1V 6DX ('the Site').

Background:

The Site is located within the London Borough of Camden, on High Holborn and is an 8-storey office building. The building is not listed however, it is located within the Bloomsbury Conservation Area. The surrounding context of the area is a mix of commercial units on the ground floor with commercial offices on the upper floors. The surrounding heights of buildings vary from 5-10 storeys.

The existing building has two retail units on the ground floor with a reception area also for the building fronting High Holborn. The building is currently used as an office. This application therefore seeks to further improve the building through the installation of roof terraces to ensure that the building continues to meet the market needs of occupiers.

Planning history:

The Site has a limited planning history as set out on the Camden Planning Register, the majority of the applications relate to advertisements, with notable applications set out below. Please refer to **Appendix 1** for a full schedule of the planning application history for the Site.

In 2022 a full planning permission application was submitted for both High Holborn House and Caroline house for '*Replacement of ground floor level shopfronts and entrance doors on High Holborn, Brownlow Street and Bedford Row elevations with dark bronze, metal framed, bay shopfront windows and doors*'.

In September 2013 full planning permission was granted for '*Change of use at part 1st and 2nd floor levels from restaurant/bar (A3/A4) to office (B1). Alterations to the facades of the building to include refurbishment of south facade, installation of a new shopfront, window replacement to north, east and*



west facades, installation of new door at third floor level leading to new roof terrace with privacy screen and installation of plant with acoustic screen at roof level.'

Proposal:

This section should be read in conjunction with the proposed drawings and Design and Access Statement, prepared by Buckley Gray Yeoman, which are submitted to accompany this Application and describe the principal components of the proposed works ('the Proposed Development').

A summary of the Proposed Development is set out below:

- First floor terrace (west facing – access from the level 01)
- Rear roof terrace (north facing – access from the stairs connecting from level 07)
- Front roof terrace (south facing over High Holborn with access from stair connecting from level 07)

Full planning permission is sought for the following development:

"External alterations in association with the creation of three roof terraces"

The Proposed Development will enable office workers to enjoy outside amenity space, fresh air and enhance their well-being. The proposed terraces will improve the existing building quality and ensure that spaces are utilised and improve the greening of the building. It will also make the building more attractive to existing and future tenants of the building by offering outdoor spaces within the office building.

Planning Policy Assessment:

This section identifies the planning policy framework which is relevant to the Site. The planning policy context comprises three levels of adopted policy – national, regional and local. Within each level, there is both planning policy and guidance which combines to provide the framework for the consideration of the Proposed Development.

Development Plan:

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. The adopted Development Plan for the London Borough of Camden (LBC) comprises of the following:

- The London Plan 2021; and
- Camden Local Plan 2017



National Policy and Guidance:

The following national planning policy guidance and guidance documents are material considerations in the determination of the Application:

- National Planning Policy Framework (NPPF); and
- Planning Practice Guidance (PPG)

The NPPF was updated on the 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied. The revised framework replaces the previous NPPF published in March 2012 and revised subsequently in July 2018, June 2019 and July 2021.

At the heart of the NPPF is the presumption in favour of sustainable development, which consider three dimensions: social, economic and environmental sustainability.

Supplementary Planning Guidance:

The proposed development has been informed by supplementary planning guidance prepared by the Mayor and London Borough of Camden, namely:

- London Borough of Camden's Design CPG (2021)
- London Borough of Camden's Employment Sites and Business Premises CPG (2021)

Site designations:

The Site has the following designations, as defined within London Borough of Camden's adopted Policies Map (2017):

- Bloomsbury Conservation Area
- Local Plan Growth Area (Holborn)
- Local Plan Centre (High Holborn CLF)
- Central London Area
- Site Allocation 20 (Land Bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row and Brownlow Street).
- LVMF 2010 – Greenwich Park Wolfe Statue to St Paul's Cathedral
- Archaeological Priority Areas (2017)

Principle of development

At the heart of the NPPF is the presumption in favour of sustainable development, achieved through meeting the three 'overarching aims': building a strong and responsive and competitive economy, supporting strong, vibrant and healthy communities; and contribute to, protecting and enhancing the natural, built and historic environments.



Paragraph 81 of the NPPF states that planning decisions should support the growth of businesses through the opportunity to expand, as well as increasing productivity taking into account both local business needs and wider opportunities for development.

Policy E1 of the London Plan sets out that improvements of the quality of office space should be supported through new office provision and refurbishment.

Policy E1 of the Local Plan sets out that London Borough of Camden will look to support a successful and inclusive economy in Camden by safeguarding existing employment sites within the borough. The borough supports the intensification of employment sites where the provision of additional employment and other benefits are in line with Local Plan Policy E2.

Local Plan Policy E2 sets out that Camden will encourage the provision of employment sites in the borough. Furthermore, protecting sites that are suitable for continued business use including those which are located within the CAZ.

The Proposed Development consists of the provision of three roof terraces, which will utilise the existing floorspace within the building to allow for improvements to the amenity of the existing office. The proposed terraces will allow for the improvement of this office space by giving a revitalised space for users and guests of the office. This conforms with both London Plan policy and the Local Plan policies which look to enhance and improve the economy within London, specifically when improving the quality of office stock within the borough of Camden.

Design

The Design approach of the Proposed Development has been outlined in the submitted plans, drawings and Design and Access Statement prepared by Buckley Gray Yeoman.

Paragraph 126 of the NPPF sets out that the creation of high-quality, beautiful and sustainable buildings and places is a fundamental to what the planning and development process should achieve. And that good design is a key aspect of sustainable development and allows for the creation of better places to work and live and helps development become acceptable to communities.

Paragraph 130 of the NPPF highlights that development should optimise the potential of sites to accommodate and sustain the appropriate amount and mix of development which include green spaces. As well as creating places which are inclusive and accessible and promote health and well-being and create a high standard of amenity for existing and future users.

London Plan policy D3 sets out that development must make the best use of the land by following a design-led approach. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context.

The Local Plan sets out in Policy D1 that the council will seek to ensure that there is high quality design in development. The council will require development to meet the criteria as set out in the policy, which includes enhancing local context and character.



The Proposed Development has been guided by the architecture of the surrounding area and the existing building as shown by the Design and Access Statement. The proposed terraces have been considered thoughtfully and will be a high quality addition to the existing building. The materials used for these terraces will also compliment the existing building, and as such the Proposed Development is acceptable in this regard.

Heritage and Conservation

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 place a statutory duty on local planning authorities to consider the impact of proposals upon listed buildings and conservation areas and to pay special regard to the desirability of preserving and enhancing the special architectural or historic interest of listed buildings or their setting and the character and appearance of conservation areas.

Within the NPPF it sets out the national policy on the preservation and conservation on the historic environment. The NPPF looks to ensure that development that affects the significance of heritage assets is mitigated against and does not cause substantial harm.

Paragraph 206 of the NPPF sets out that developments that provides new opportunities within a conservation area should be positively supported if they enable a positive contribution to the asset.

The London Plan sets out in Policy HC1 that proposals should conserve the significance of heritage assets by being sympathetic and appreciative of their surroundings. Proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Local Plan D2 sets out that the council will not permit the loss of or substantial harm to designated heritage assets. Furthermore, LBC will not permit development which results in harm (less than substantial) to the significance of a designated asset unless the public benefit of the proposal outweighs the harm. Specifically, LBC state that within conservation areas, development should enhances the character and appearance of the area.

The site is located within the Bloomsbury Conservation Area. The Proposed Development has been designed to be of a high quality and there will be no harm to the heritage asset. Two of the roof terraces which are proposed are concealed and would not be visible from surrounding streets in the conservation area. With the front terrace although being directly facing High Holborn, would not be intrusive as the space is existing and located on the 7th floor. Therefore, it is considered that the Proposed Development is acceptable in this regard.

Conclusion

The Proposed Development will significantly improve the amenity officering of Caroline House. The proposal will enhance the use of outdoor space and allow for a more vibrant place to work and improve the office offering. It will ensure the continued use as an office building through the improvements to the amenity space. The proposed roof terraces are of a high design quality and there would be no harm to the conservation area. The Proposed Development accords with the Development Plan and should be approved.



Application documents:

In addition to this covering letter, this application is accompanied by the following documents:

- Planning Application Form and Ownership Certificate, prepared by DP9;
- CIL Additional Information Form, prepared by DP9;
- Site Location Plan, prepared by Buckley Gray Yeoman; and
- Design and Access Statement, prepared by Buckley Gray Yeoman.

The planning application fee (inclusive of VAT and service charge) has been paid online via the Planning Portal.

We trust that you have all the necessary information to validate and duly determine the planning application. should you have queries in the interim, please contact Jonathan Marginson or Charlotte Allen at this office.

Yours faithfully

DP9 Ltd.

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Appendix 1:

Planning Ref.	Application Date	Description	Decision Status
2022/3536/P	10 October 2022	Replacement of ground floor level shopfronts and entrance doors on High Holborn, Brownlow Street and Bedford Row elevations with dark bronze, metal framed, bay shopfront windows and doors.	
2014/4683/P	25 July 2014	Alteration to height and width of acoustic screen at 8th floor level granted under reference 2013/4051/P dated 30/09/13.	Granted 13/08/14
2014/2980/P	14 May 2014	Replacement of shop fronts facing High Holborn, Brownlow Street and Hand Court.	Granted 17/06/14
2013/5341/A	3 September 2013	Display of one externally illuminated fascia sign	Granted 08/10/13
2013/4051/P	18 July 2013	Change of use at part 1st and 2nd floor levels from restaurant/bar (A3/A4) to office (B1). Alterations to the facades of the building to include refurbishment of south facade, installation of a new shopfront, window replacement to north, east and west facades, installation of new door at third floor level leading to new roof terrace with privacy screen and installation of plant with acoustic screen at roof level.	Granted 03/09/13
2012/3542/C	6 July 2012	Renewal of Conservation Area Consent granted on 07/07/2009 (ref: 2009/0677/C) to involve the demolition of 18,19-22 Hand Court, Caroline House and parts of High Holborn House and demolition behind retained facade of 23 Hand Court.	Withdrawn
2012/3541/P	6 July 2012	Renewal of planning permission granted on 07/07/2009 (ref: 2009/0675/P) for the mixed use redevelopment of the site involving the demolition of Caroline House, 18-22 Hand Court and parts of High Holborn House, retention of facade and rebuild of part of High Holborn House facing High Holborn and the facade of 23 Hand Court and rear of High Holborn House (49-51 Bedford Row), Brownlow House and 45-48 Bedford Row. The erection of a new eight storey (plus two level basement and roof plant floor) building to accommodate A1 (Retail) floorspace and flexible A3/A4 (Restaurant/Drinking Establishment) at ground floor level together with new B1 (Office) space. Conversion of 46-48 Bedford Row to create 3x single family dwellings, change of use and extension of existing B1 (office) space to form 15x residential units within, 45 Bedford Row and 49-51	Withdrawn



		Bedford Row; conversion and extension of Brownlow House to provide 10x residential units (affordable housing); Redevelopment of 23 Hand Court to provide 22 student units in place of 6x existing residential units; new servicing access from Brownlow Street, and various public realm works to Brownlow Street, Bedford Row and Hand Court.	
2011/6037/C	1 December 2011	Renewal of conservation area consent granted on 07/07/2009 (ref: 2009/0677/C) for the demolition of 19-22 Hand Court and parts of High Holborn House and demolition behind retained facade of 23 Hand Court.	Withdrawn
2011/6030/P	1 December 2011	Renewal of planning permission granted on 07/07/2009 (ref: 2009/0675/P) for the mixed use redevelopment of the site involving the demolition of Caroline House, 18-22 Hand Court and parts of High Holborn House, retention of facade and rebuild of part of High Holborn House facing High Holborn and the facade of 23 Hand Court and rear of High Holborn House (49-51 Bedford Row), Brownlow House and 45-48 Bedford Row. The erection of a new eight storey (plus two level basement and roof plant floor) building to accommodate A1 (Retail) floorspace and flexible A3/A4 (Restaurant/Drinking Establishment) at ground floor level together with new B1 (Office) space. Conversion of 46-48 Bedford Row to create 3x single family dwellings, change of use and extension of existing B1 (office) space to form 15x residential units within, 45 Bedford Row and 49-51 Bedford Row; conversion and extension of Brownlow House to provide 10x residential units (affordable housing); Redevelopment of 23 Hand Court to provide 22 student units in place of 6x existing residential units; new servicing access from Brownlow Street, and various public realm works to Brownlow Street, Bedford Row and Hand Court.	Withdrawn
2010/5725/P	11 November 2010	Revisions to planning permission 2009/0675/P, dated 07/07/2009 for mixed use redevelopment of the site involving the part demolition, part retention and part erection of new eight storey (plus two level basement and roof plant floor) building to accommodate A1, flexible A3/A4, B1, residential and student units. Revisions relate to variations in building envelope, office and retail space, including an overall reduction of office (Class B1) accommodation by 552sqm and overall increase of retail (Class A1) by 426sqm, as a result of reduction of floor to ceiling heights at ground	Granted 27/10/11



		and first floor levels and relocation of plant room to basement to create an eighth floor of office (Class B1) accommodation and various other internal reconfigurations and to create ground floor retail units on Hand Court (west) elevation; increase in parapet height at seventh and eighth floor levels on Brownlow Street (east) elevation by 1.1m, increase in height of mansard roof associated with High Holborn House on south elevation by 1m; alteration to location of service yard entrance (to the south) and kerb (to the west to widen the highway) on Brownlow Street, retention of Brownlow Street highway to High Holborn (as opposed to 2009/0675/P which pedestrianised part of Brownlow Street) and associated alterations.	
2009/0677/C	26 February 2009	Demolition of 19-22 Hand Court and parts of High Holborn House and demolition behind retained facade of 23 Hand Court.	Granted 07/09/09
AS9604319	16 December 1996	Display of internally illuminated advertisement hoarding 6 metres x 3 metres on west facing flank wall, as shown by 1 x unnumbered illustration and 1 x site plan.	Refused and appeal dismissed 1997