

**PD12929/GF/JL**

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23 June 2023

***Submitted via the Planning Portal: PP-12250923***

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 full planning permission in relation to Templar House, High Holborn, London WC1V 6NU ('the Site'). Following pre-application advice and a meeting on-site with Officers in July 2022 and further conversations in June 2023, full planning permission is sought for the following description of development:

*"Change of Use of the Ground Floor from Sui Generis (Use Class A1/A3) to Sui Generis (Use Class E and 'Bar' function)"*

This application is submitted to the London Borough of Camden ('the Council') via the Planning Portal.

**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 to designs 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 formerly comprised 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 was retail floorspace at ground floor level fronting onto High Holborn, which is provided across five retail units. Vehicle access was from Eagle Street via a ramp into the basement which was 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.

## **Background and Application Format**

CER Investments SARL purchased the Site on 28 September 2019, with the intention for Uncommon to both own, occupy and manage the office and associated ground floor commercial / retail floorspace. To facilitate this objective, three standalone planning applications were submitted and duly approved (refs. 2020/1350/P, 2020/1310/P, and 2020/1351/P), and which were subsequently amended as follows:

- Application A: 2020/1350/P – amended by 2021/3561/P, and 2022/4204/P.
- Application B: 2020/1310/P – amended by 2021/3885/P, and 2022/4205/P.
- Application C: 2020/1351/P – amended by 2021/3887/P, and 2022/4206/P.

Works are progressing well on-site with the construction stage expected to complete in September 2023, with occupation of the development due to take place following this, later this year. Both the Applicant and the wider design team are looking forward to seeing the contribution which this development will make to the vitality of this part of Holborn and indeed the wider area.

## **Proposed Development**

Driven by a desire to bring the building back in to functional and operational use at the earliest opportunity, our Client has been reviewing the works permitted.

Following this review and further design refinement it is apparent that there is an opportunity to further maximise the contribution which the ground floor of the building makes not just to the office accommodation provided above but also to the function, interest, and commercial desires of this part of Camden.

As a result, and as discussed and agreed with Officers during a site visit / pre-application meeting in July 2022 our Client is seeking to refine the previously approved ground floor uses to secure a more flexible use of the space for unrestricted Sui Generis use comprising unrestricted 'Class E' and 'Sui Generis (Bar)' functions.

No additional floorspace is proposed and there are no changes to the external design of the building. The proposals are set out in the supporting plans which have been submitted as part of this application, including indicative layouts and CGIs within the Design and Access Statement prepared by astudio architects.

## **The Development Plan**

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 (2021); and
- The Camden Local Plan (2017) and associated policies map, with alterations (2017).

The Site is subject to the following allocations/designations relevant to land use / this application:

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

## **Planning Policy / Land Use Assessment**

Class E (Commercial, Business and Service), was introduced on 1st September 2020, including a broad and diverse range of uses which principally serve the needs of visiting members of the public and or are suitable for a town centre area. Class E also allows for a mix of uses which recognises that a building may be in several different uses concurrently or be used for different uses at different times of the day.

Planning Permission ref. 2020/1310/P (as amended) secured the use of the basement and ground floor as A1 and A3 uses (Sui Generis) and was granted subject to the following condition:

*“The proposed ground floor retail floorspace within Class A1 of the Schedule of the Town and Country Planning (Use Classes) Order, 1987 (as amended), or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, shall not comprise less than 150 sq. m of the ground floor area hereby approved in accordance with approved drawing no. 19006\_20\_EE\_102 P3”.*

It must be noted that the changes to the Use Classes Order in 2020 which created a new Class E use which includes class A1, A2, A3 and B1 means that all the permitted uses at basement and ground floor level would fall within Class E and could change between retail, professional services and food and drink uses in the future without the need for planning permission (with the exception of the A1 floorspace as per the above condition).

The above condition was imposed to seek to ensure the development was in accordance with the requirements of Local Plan Policies TC2 (Camden's Centres and Other Shopping Areas), TC4 (Town Centre Uses) and A1 (Managing the Impact of Development), however since this point in time there are a number of contributory factors which have meant that the previously approved arrangement no longer represents the solution which would best respond to the wider sites commercial function, and the changing desires of High Holborn.

As the Site is located in the High Holborn / Kingsway Central London Frontage, Policy TC2 (Camden's centres and other shopping areas) aims to protect and enhance the role and unique character of each of Camden's centres. The Council will seek to provide for and maintain, a range of commercial, retail, and other uses that provide variety, vibrancy and choice – this desire is wholly supported by these proposals which see to provide this, whilst also providing facilities for the wider office users and also members of the public.

Local Plan Policy TC4 (Town Centre Uses) seeks a provision of an appropriate amount of retail and food, and drink uses along Central London frontages. The Town Centres and Retail CPG (March 2019) also requires at least 50% of units to be Class A1 (when assessing applications for the loss of Class A1 retail) and for no more than 25% being in food drink or entertainment use (A3, A4 and A5). We would suggest that whilst guidance requires the above split to be considered, it should only be used as a guide to be making a balanced judgement, taking all relevant factors into account including the objectives of the area and the character of the host building.

This is due in part to the introduction of Class E since this policy was adopted, and the benefits that such a use, as proposed, of the ground floor would provide. Furthermore, the proposed Class E use would include the ability for the ground floor to be used for all previously approved functions under Planning Permission ref. 2020/1310/P (as amended), building in flexibility, should there be interest from a potential occupier or changing market demand. It would also allow for frontage to have the best chance of remaining occupied, which was an issue previously prior to the wider redevelopment of the Site secured by the 2020 permissions.

The proposals seek to provide a greater mix of commercial and retail facilities at ground floor across one central space that also incorporates the larger, more open office entrance. The intention is to create a space that can support a number of different uses, users and visitors in an open plan space. This will be combined with the office entrance, so that amenities can be shared between the local community, office users and the

public. Minor internal layout changes, which by their nature would not necessitate planning permission also mean that the ground floor benefits from better access from within the building itself, as well as the street – this makes it a more attractive proposition for an operator as this increases its footfall / customer numbers.

Uncommon have confirmed that the ground floor café / bar and communal space will be open to the public, and we propose that opening hours are managed via appropriately-worded compliance condition.

For the avoidance of doubt, the lawful use of the basement is able to change without the benefit of planning permission and therefore is not included within this application. We would be grateful of Officers confirmation that this is indeed the case, and would be happy to discuss further should it be helpful.

The proposed street activity and footfall is far more attractive to new retailers and consumers, and the improvement in its function, quality and flexibility of the space would ensure, in our view, that the requirements of Local Plan Policy TC2 are met. In the context of Local Plan TC4 (Town Centre Uses), we would consider that when viewed alongside the refurbishment of the building as a whole, and other material considerations, would create further footfall in the area and help maintain vibrancy and choice in the Central London frontage.

On balance the proposal is therefore considered to be acceptable, and this was the position agreed informally with Officers prior to submission. Notwithstanding this, should Officers have any further queries we would be happy to arrange a site visit to this, or any of Uncommon's other sites so that they can see first hand the benefits which this flexible use of the ground floor can bring to an area.

## **Conclusion & Administrative Matters**

This letter has been prepared in support of the planning application at Templar House, High Holborn. The proposals benefit the occupancy of the building as a whole, would create additional footfall in the area and would help to maintain vibrancy and choice in this part of Holborn. To assist with the determination of this application, the following information has been submitted in addition to the relevant Application Forms:

1. Planning Assessment (i.e. this letter);
2. CIL Form (for the purposes of validation);
3. Design and Access Statement; and
4. Site Location Plan / Proposed Ground Floor Plan.

This application has been submitted via the Planning Portal, and the application fee of £526.00 paid 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](mailto:james.leuenberger@montagu-evans.co.uk) / 07341 090034) at this office in the first instance.

Yours sincerely,



**Montagu Evans LLP**  
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