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London Borough of Camden
Planning and Building Development
5 Pancras Square
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Our ref: ANE/KFO/U0026637
Your Ref: PP-13001613

17 June 2024

**Ground floor, first floor and second floor, 110 High Holborn, London WC1V 6JS
Town and Country Planning Act (as amended) 1990**

We write on behalf of our client, UOL Group Limited ('the Applicant') to submit a planning application for the change of use of ground, first and second floor at 110 High Holborn, London WC1V 6JS ('the Site') from Offices (Class E) to a flexible use as either Offices (Class E) and/or Education (Class F1) and/or Medical or Health Services (Class E).

As such, planning permission is sought for:

"Change of use of the ground floor, first floor and second floor of 110 High Holborn to Offices (Class E) and / or Education (Class F1) and / or Medical or Health Services (Class E)."

Site and background

110 High Holborn is an office building (with an underpass beneath the building) located between Catton Street to the north, Procter Street to the east and High Holborn to the south.

The building comprises basement, ground floor and eight upper floors.

This application relates solely to the ground floor, first floor and second floor of the building.

The building is not statutory listed but is situated within close proximity of 114 and 115 High Holborn, which is Grade II listed and Baptist Church House Kingsgate House, which is Grade II* listed.

The building is not located within a conservation area, however, adjoins the Bloomsbury Conservation Area.

The Site is not located within protected views or viewing corridors within the London View Management Framework.

Relevant planning history

On the 5 July 1995, permission was granted under application ref. 9400706 for the following:

“The demolition and redevelopment for the purposes of offices retail and residential (11 flats) and a basement sports centre including the narrowing of Procter Street as shown on drawing numbers 1428/P01/E PO2/F PO3/F P04/F P05/F P06/F P07/G P08/H P15/1E P15/2E P16/1C P17/1E & P19/1 revised by letter dated 6 December 1994.”

This permission was built out.

On the 18 February 2003, permission was granted under application ref. PSX0204802 for the following:

“The use of part of the ground and the basement of the building for Class D2 (leisure and assembly) use as a health and fitness club, as shown on drawing numbered; AL(7)000 (site location plan), AL(7)001B, 002B, 012B, 015B, 312, 315, 301, 302, HIHO/02.01A, , 02. 04, 0206A, and SP/HH0-01A and letter dated.13.11.02 regarding disabled access arrangement.”

UOL Group Limited

UOL Group Limited is a leading Singapore-listed property and hospitality group which was founded in 1963.

UOL has a diversified portfolio of properties across Asia, Oceania, Europe, North America and Africa.

UOL have undertaken a review of their assets in London and have concluded the below.

“Historically, education providers would partner with a landlord to make a joint application to the local authority to enable their occupation on pre-agreed terms. As the market has evolved and more education space is applied for speculatively, tenants will largely now no longer risk the sunk deal costs for a subject to planning deal.

110 High Holborn is located in a high value area for education providers in close proximity to the knowledge quarter, a number of university campuses and good public transport connectivity to bring the space back to beneficial occupation. The self-contained nature and column grid on the second floor naturally lends itself to classrooms or treatment rooms either side of the column grid which were historically designed for cellular offices. These offices are no longer appropriate for modern open plan office space.”

The proposal

Planning permission is sought for the change of use of the ground floor, first floor and second floor of 110 High Holborn from Use Class E (Offices) to a flexible use comprising Use Class F1 (Learning and Non-Residential Institutions) and/or Use Class E (Offices or Medical or Health Services). This will enable UOL to provide an appropriate use for the space, as UOL have been unable to let the first and second floor to an office operator since November 2021 and the ground floor since January 2024 due to the configuration of the Site (refer to the Marketing Report, prepared by Savills for more information).

There is demand for educational and medical uses in this area due to the Site’s location within the Knowledge Quarter and within close proximity to universities, such as University College London (‘UCL’).

This change of use would draw new educational and/or medical footfall to High Holborn to activate the subject area.

There are no proposed changes to the methods of access. Existing access arrangements will be retained via the main building entrance on Procter Street. Within the building there is stair and lift access to all floors from the Procter Street entrance.

The proposal only relates to the change of use of the internal floor area (floor area broken down in Appendix 1). No external works are proposed as part of the application.

The Development Plan

The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:

- a) The London Plan (2021); and
- b) Camden's Local Plan (2017)

In terms of planning policy designations, the Site falls within the following designations:

- High Holborn growth area; and
- Archaeological Priority Area - Tier 2.

The NPPF (2021) is also a material consideration.

Emerging planning policy

Camden Council first consulted on their draft Site Allocations Local Plan ('SALP') between 13 February and 27 March 2020. A second round of consultation was undertaken between 30 November 2021 and 24 January 2022 to reflect national, regional and neighbourhood level planning changes. A call for sites and issues and options on the Local Plan Review was carried out between 4 November 2022 and 13 January 2023.

Camden Council consulted on the draft new Local Plan (Regulation 18) from 17 January 2024 to 13 March 2024. The Local Plan will cover the period from 2026 – 2041 and is targeting adoption in Summer 2026.

The draft Local Plan is still at an early stage and having regard to the three tests set out in Paragraph 48 of the NPPF, carries very limited weight.

Planning Considerations

Loss of Office Use

Policy E2 of the Local Plan sets out that the Council will seek to resist the development of business premises for non-business uses unless the building is no longer suitable for the existing business use, and the possibility of retaining for an alternative type of business use has been fully explored.

The application is for a change of use from Offices (Class E) to a flexible use comprising offices (Class E), educational use (Class F1) and/or medical/health services (Class E) to enable the ground floor, first floor and

second floor of 110 High Holborn to be let out. The first and second floor of the Site has not been let to an office operator since November 2021, whilst the ground floor of the Site has not been let since January 2024. Savills state in the enclosed Marketing Report that this is due to the unsuitable configuration and low window and ceiling height. As a result, the ground, first and second floors do not receive much natural light. As such, the floorspace is not suitable for office use. Please refer to this Marketing Report for more information on the marketing attempts for the Site.

It is considered that an alternative use would be more appropriate for the space as it has not been possible to let the space as an office.

Community Use

The proposed use is for educational purposes and/or medical or health services and is therefore defined as a community use in the Local Plan. Policy C2 of the Local Plan states that the Council will seek to ensure community facilities and services are developed to meet the changing needs of the community and reflect new approaches to the delivery of services.

Policy E1 of the Local Plan states that the Council will support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan.

Policy S3 of the London Plan sets out that proposals should ensure there is a sufficient supply of good quality education facilities to meet demand and offer educational choice.

Consideration should also be given to Paragraph 100 of the NPPF which sets out that to ensure faster delivery of other public service infrastructure such as further education colleges, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.

Due to the large numbers of students in the surrounding area, there is a requirement for a provision of floorspace to accommodate the teaching facilities for the students from nearby universities (such as UCL) and schools. This change of use will assist in providing appropriate teaching facilities and will therefore assist in meeting the needs of its students.

As such, the proposal complies with the requirements of London Plan Policy S3 and Local Plan Policies C2 and E1.

Medical/Health Use

The proposed use is for medical/health services purposes (and/or educational purposes and/or offices).

Policy S2 of the London Plan supports the provision of high-quality new and enhanced health facilities to meet identified need.

Policy C1 of the Local Plan states that the Council will support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements.

Policy C2 recognises that facilities such as health centres are a vital part of the infrastructure supporting Camden's quality of life.

Paragraph 2.52 of the Local Plan states that the Council will support the concentration of medical, educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter.

To ensure sustainable growth and success of the Knowledge Quarter Innovation District, Draft policy KQ1 of the draft Site Allocations Local Plan documents sets that proposals for additional employment should be supported by evidence that the type of floorspace appropriately reflects current and emerging needs of the knowledge economy.

Policy supports the provision of medical and/or health uses within the borough. Furthermore, due to the Site's location in the Knowledge Quarter, medical and/or health uses are supported.

Design

The proposal is for the change of use to an existing building and does not involve any external alterations which would affect the design or appearance of the building.

Transport and Servicing

Policy T4 of the London Plan sets out that developments should not increase road danger and be assessed to determine if schemes would have an adverse impact on transport systems.

Policy T1 of the Local Plan states that the Council will promote sustainable transport by prioritising walking, cycling and public transport.

Policy CC5 of the Local Plan sets out that the Council will aim to make sure that developments include facilities for the storage and collection of waste and recycling.

The existing use of the Site is for office purposes. The proposal seeks a change of use to provide teaching facilities which involve both desk-based and workshop-type activities and/or medical/health facilities. The proposed use will lead to a similar number of persons using the space as the existing, meaning there will be a negligible change in overall footfall and occupancy levels within the building. Therefore, the proposal will not have an adverse impact on the transport network or on waste and recycling.

In terms of modes of transport, the existing building does not include any car parking spaces, therefore all prospective occupiers of the building would need to travel to the Site via a sustainable mode of transport.

With regards to cycle parking, consideration has been given to providing appropriate cycle parking spaces on the Site to accommodate the students/staff within the building. All cycle parking will be provided within the lower ground level of the building where an existing 77 spaces are situated.

The proposal therefor complies with Policy T4 of the London Plan and Policy T1 and CC5 of the Local Plan.

Summary

The scheme is being brought forward to enable UOL to try and let the vacant ground floor, first floor and second floor of 110 High Holborn to educational tenants and/or medical/health tenants, as despite investing significant time and capital, UOL have been unable to let the Site to an office tenant. Due to the Site's location, there is a demand for educational uses and medical uses in the area. Therefore, this change of use from Offices (Class E) to Offices (Class E) and / or Education (Class F1) of and/or Medical or Health Services (Class E) is considered suitable and in accordance with the development plan.

Application Documentation

To support this application, the following documents, along with this cover letter, have been submitted through the online Planning Portal:

- Application form and certificates, prepared by Gerald Eve;
- CIL form, prepared by Gerald Eve;
- Site location plan, prepared by Loop Interiors International;
- Existing and proposed drawings, prepared by Loop Interiors International;
- Marketing Report, prepared by Savills.

The fee of £578 (plus the £70 Planning Portal Fee) was paid by the Applicant to the London Borough of Camden online via the Planning Portal.

We would be grateful if you could confirm receipt of each of this application at your earliest opportunity and we look forward to confirmation that it has been validated. In the meantime, should you have any queries please do not hesitate to contact Alex Neal (0207 333 6301) or Katie Fong (0203 486 3736) of this office.

Yours sincerely

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Appendix 1 – Floor area (the proposals do not seek to change the floor area)

Floor	GIA sqm
Ground floor	246.9
First floor	264.9
Second floor	312.8
Total	824.6