

Application ref: 2024/2525/P
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Date: 12 March 2025

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
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London
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planning@camden.gov.uk
www.camden.gov.uk/planning

Gerald Eve LLP
One Fitzroy
6 Mortimer Street
London
W1T 3JJ

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Full Planning Permission Granted Subject to a Section 106 Legal Agreement

Address:

**110 High Holborn
London
WC1V 6JS**

Proposal:

Change of use of (part) ground floor, first floor and second floor 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).

Drawing Nos:

4913: 001 rev A (2), 002 rev A (2), 003 rev A (2), 004 rev A, 100 rev A (2), 101 rev A (2), 200 rev A (2), 201 rev A (2), 201 rev A (2), 300 rev A (2), 301 rev A (2), Existing Basement Plan (Existing Car Parking and Cycle Store), Proposed Basement Plan (Proposed Car Parking and Cycle Store)

Marketing report

The Council has considered your application and decided to grant permission subject to the following condition(s):

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and

Country Planning Act 1990 (as amended).

- 2 The development hereby permitted shall be carried out in accordance with the following approved drawings:

4913: 001 rev A (2), 002 rev A (2), 003 rev A (2), 100 rev A (2), 101 rev A (2), 200 rev A (2), 201 rev A (2), 201 rev A (2), 300 rev A (2), 301 rev A (2), Existing Basement Plan (Existing Car Parking and Cycle Store), Proposed Basement Plan (Proposed Car Parking and Cycle Store)

Reason: For the avoidance of doubt and in the interest of proper planning.

- 3 Before the development commences, the cycle parking stores shown on the Proposed Basement Plan hereby approved, shall be provided. The cycle parking facilities shall thereafter be provided in their entirety prior to the use of the application premises, and permanently retained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policy T1 of the London Borough of Camden Local Plan 2017.

- 4 Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the flexible F1 use shall only be used for educational purposes and for no other purposes whatsoever.

Reason: To safeguard the amenity of the adjoining premises and the area generally, in accordance with policies A1 and A4 of the Camden Local Plan 2017.

Informative(s):

- 1 Reasons for granting permission:

Principle of potential change of use:

1. Loss of Class E (offices)

The principle of a change of use of offices to alternative uses is covered under Policy E2 of the Camden Local Plan (2018). The policy advises that development of business premises for non-business uses will be resisted unless it can be demonstrated that the site or building is no longer suitable for its existing business use and that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use(s) has been explored over an appropriate period of time.

The application relates to the ground, first and second floors of the building and the marketing report which has been submitted confirms that the first and second floor offices have been vacant since November 2021 and that the

ground floor offices have been vacant since January 2024.

The marketing report includes evidence of many (16) viewings of the existing office premises (or parts thereof) from 11/2021 to 03/2024. The principal reasons for the lack of take-up for office use(s) are the unsuitable configuration and low window and ceiling heights. The ground, first and second floors do not receive much natural light and despite prolonged attempts to let the offices there has been no uptake. Consequently, in principle, the loss of the office use of the premises is acceptable in land use terms.

2. Potential educational (Class F1) (and/or medical or health uses)

The provision of medical or health services, principally to visiting members of the public is noted as being a Class E use in the Use Classes Order 2020. There are no conditions on the original planning permission for the building (9400706) which prevent a change of use of the offices to another use within the same Use Class and so the use of the application premises for medical or health premises may not need planning permission and as such, the Development Plan would not be applicable.

Nevertheless, 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.

Paragraph 2.52 of Policy G1 (Location and Delivery of Growth) states that the Council will support medical, educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter.

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. The site is on the edge of the Knowledge Quarter.

Conclusion on principle of potential change of use

While a medical or health use may not require planning permission, taking together the evidence on the lack of employment use and the strategic aim to provide new educational and health facilities (particularly in the Knowledge Quarter) the proposed uses comply with policies E2, G1, C1 and C2 of the Local Plan and are acceptable in principle.

2 Employment / Training Contribution

The Council's Planning Guidance on Employment Sites and Premises states: 'Where the loss of employment use can be expected to result in a reduction of potential job opportunities for Camden residents, the Council will seek a contribution from developers towards measures which create or promote opportunities for employment or training of local people'.

The CPG has a formula for calculating the contribution to employment or

training.

The CPG recognises that where a proposed use would generate some employment opportunities for Camden residents but the number of full time jobs created would be fewer than if the building remained in its former use then the contribution should be based on the difference between the number of jobs expected to be supported if a building remained in its existing employment generating use and the number of jobs expected to be generated by the proposed use.

The agent has pointed out that the application is for 'a flexible use as either offices (Class E) and/or education (Class F1) and/or medical or health services (Class E)' and depending on the quantum of office/educational/medical/health use the contribution to employment or training will vary. Further to the Use Classes Order a medical/health use principally to visiting members of the public is a Class E use. Given that there are no conditions preventing such a use the Council could not exercise any planning controls on such a use and the requirement for employment / training contributions would not be applicable.

However, it will be necessary for a S.106 legal agreement to be devised and completed to ensure that, in the event of the implementation of an educational (Class F1) use, the relevant employment or training contribution will be made in accordance with the Employment Sites and Premises. CPG.

Transport

Policy C1 requires new community facilities to positively contribute to creating high quality, active, safe and accessible places and policy C2 on community facilities requires (new) community uses to 'ensure that facilities provide access to a service on foot and by sustainable modes of travel'.

The applicant states that the proposed change in use will not lead to a significant change in the numbers of people using the floor space. End user details have not been provided. However, it is considered on balance that the proposed flexible use is likely to have a broadly neutral impact on the use of the floor space.

The Council Transport Planning Team has noted that under London Plan cycle parking standards there is a requirement for 11 long stay spaces and 2 short stay spaces (13 spaces total) for the office floorspace.

The cycle parking requirement for education and medical uses depends on the numbers of staff/students.

Further to negotiations the applicant has submitted a Proposed Basement Plan which shows the provision of an additional 55 cycle parking spaces, in addition to the existing 77 cycle parking spaces available in the basement. (It should be noted that the retention of the existing 77 cycle parking spaces in the basement was not stipulated as a condition of the original planning permission for the building - 9400706.

A condition is attached to ensure the provision of the cycle parking spaces

shown on the Proposed Basement Plan and the retention of the same thereafter.

Whilst the applicant states that no off-street parking is currently provided and none is proposed, it is apparent from the approved plans for the building's planning permission that there is a basement car park for the building. Future occupants of the proposed change of use floor space should not have access to these basement parking spaces, in line with Policy T2 of the Camden Local Plan. A legal agreement will be necessary to ensure that future occupiers of the application site premises shall be excluded from obtaining car parking permits.

- 3 Given that this is a change of use application, it is anticipated that there is unlikely to be a material difference in the servicing and delivery arrangements of the building. As such a Servicing Management Plan is not considered necessary.

As no external alterations are being proposed, with the application being limited to the change of use and internal layout of the building only, a Construction Management Plan is considered unnecessary.

It is similarly considered that a highways contribution is unnecessary in this instance.

Policy A1 (Managing the impacts of development) require any development proposals not to (significantly) harm the amenity of any neighbouring occupiers with reference to: light, privacy, outlook, security, noise and disturbance.

No extensions or additional floorspace are proposed and so there would be no effects on light, privacy or outlook.

The proposed uses are unlikely to result in excessive noise or disturbance, either from within the building or in the surrounding area. It should be noted that there are no planning conditions which currently restrict the hours of use of the premises.

It is considered that the proposed uses are unlikely to involve noisy processes or activities and given the nature and prevailing noise climate within the area it is not considered that a condition to prevent hours of use is necessary.

No letters of objection have been received as a result of statutory consultation on the application.

The planning history of the site and the neighbouring sites have been taken into account in the assessment of the application.

As such, the proposed development is in general accordance with policies A1, C1, C2, D1, E2, G1, T1 and T2 of the Camden Local Plan 2017. It also accords with the London Plan 2021 and the National Planning Policy Framework 2021.

- 4 You are advised that the alternative use permission hereby granted gives flexibility of use for 10 years from the date of this permission. After 10 years the lawful use will revert to whichever of the uses is taking place at the time.
- 5 This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
- 6 All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)

Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.

- 7 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

You can find advice about your rights of appeal at:

[https://www.gov.uk/appeal-planning-decision.](https://www.gov.uk/appeal-planning-decision)

If you submit an appeal against this decision you are now eligible to use the new [submission form](#) (Before you start - Appeal a planning decision - GOV.UK).

Yours faithfully



Daniel Pope
Chief Planning Officer