

PROPOSED HOTEL CONVERSION

**203 HIGH HOLBORN
LONDON WC1V 7BD**

PLANNING STATEMENT

SEPTEMBER 2011

EDISTON OPPORTUNITY FUND





Planning Statement

GVA
10 Stratton Street
London
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203 High Holborn **Ediston Opportunity Fund**

Planning Statement

September 2011

Contents

1.	Introduction	3
2.	Site Context	4
3.	The Proposals.....	7
4.	Planning Policy Framework	8
5.	Planning Assessment	11
6.	Conclusions	33

Appendices

Appendix I Marketing Report

1. Introduction

- 1.1 This Planning Statement is submitted in support of an application for full planning permission and listed building consent for the change of use and conversion of the existing building at 203 High Holborn to provide a 138 bedroom hotel (Use Class C1) with bar, restaurant and supporting facilities along with provision of refuse store, car parking and cycle parking submitted on behalf of Ediston Opportunity Fund.
- 1.2 The end occupier of the hotel has been identified as Premier Inn, part of the Whitbread Group Plc.
- 1.3 Further details of the development proposals are provided in Section 3 of this Statement and within the accompanying Design and Access Statement.

Supporting Information

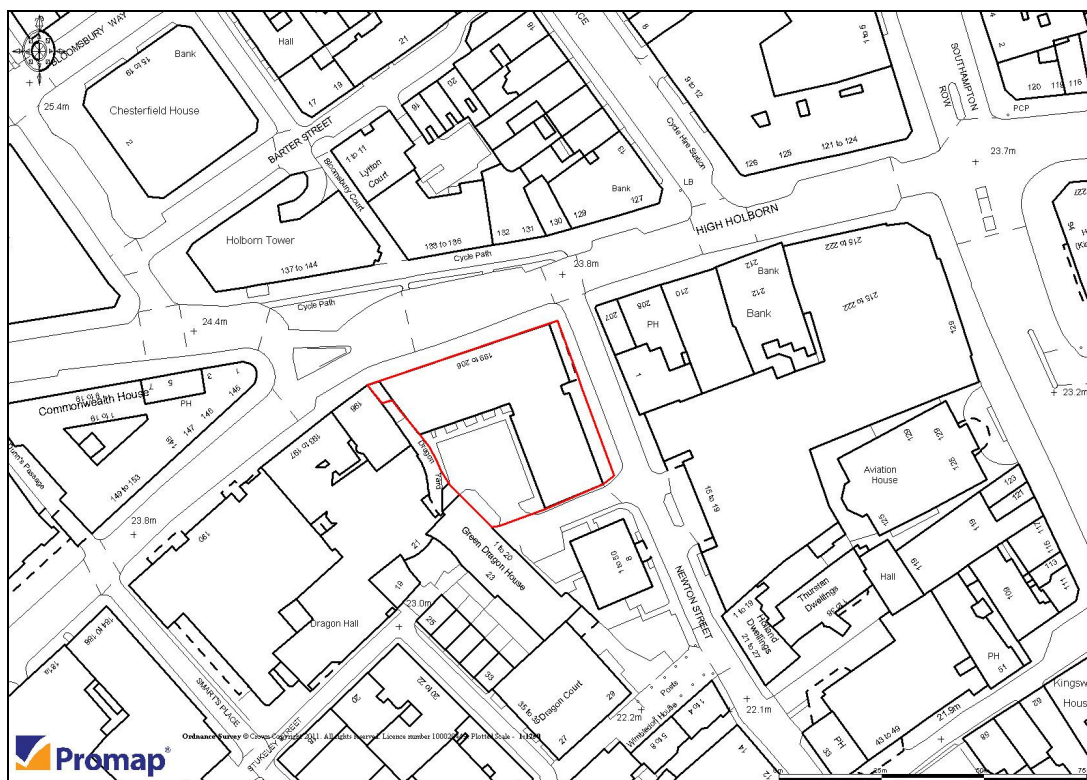
- 1.4 This Planning Statement should be read in conjunction with the accompanying documents, plans and drawings which are submitted as part of the application package and have been agreed with the London Borough of Camden (LBC) in advance of submission:
- [Planning Application Plans and Drawings \(Axiom Architects\)](#)
 - [Design and Access Statement \(Axiom Architects\)](#)
 - [Energy and Sustainability Strategy \(Applied Energy\)](#)
 - [Transport Statement \(RGP\)](#)
 - [Travel Plan \(RGP\)](#)
 - [Noise Impact Assessment \(AECOM\)](#)
 - [Flood Risk Statement \(Campbell Reith\)](#)
 - [Daylight / Sunlight Report \(GVA Schatunowski Brooks\)](#)
- 1.5 The development proposals have been subject to pre-application discussions and consultation with officers (Neil McDonald and Albert Grant) at LBC, including a pre-application meeting on 4 May 2011, where the principle of providing a hotel at this

location, the scale of the proposed extension and the scope of supporting information for the planning application were agreed.

2. Site Context

- 2.1 The application site is located at 203 High Holborn (incorporating the properties formerly at 199-206 High Holborn and 2-4 Newton Street) at the junction of High Holborn and Newton Street in the central London area of the London Borough of Camden. A Site Location Plan is provided at Figure 1.

Figure 1 - Site Location Plan

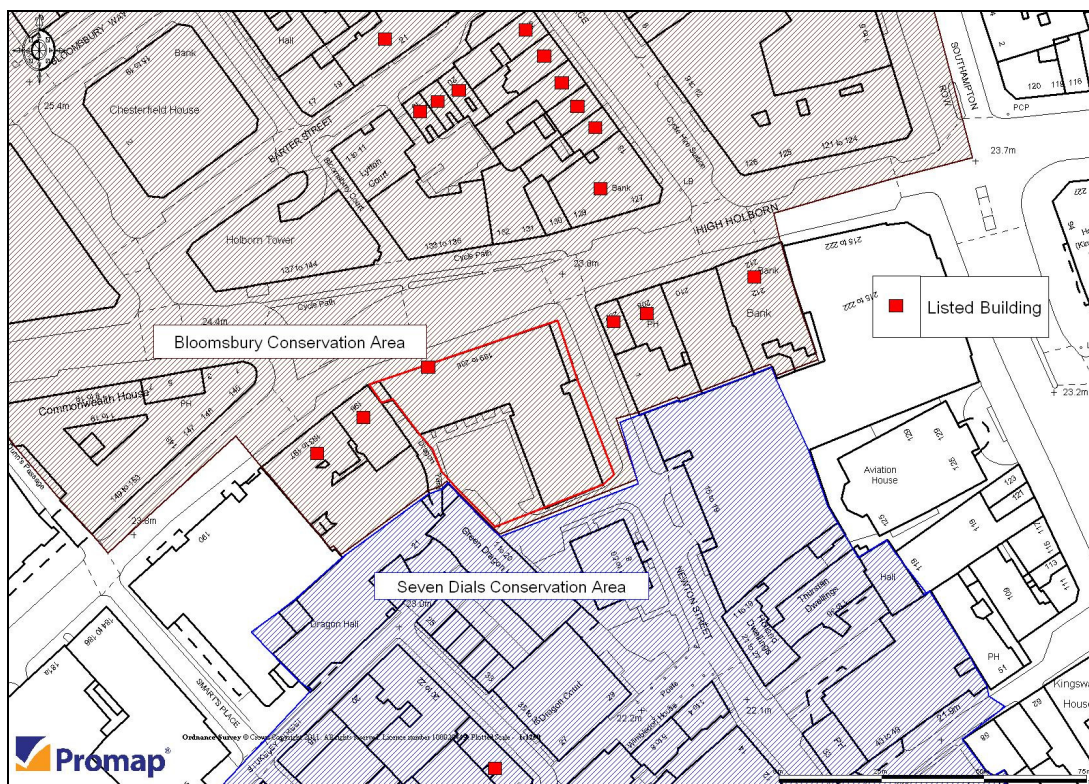


- 2.2 The site is occupied by a ground plus four storey office building with retail space on the ground floor and plant at roof level with a service yard to the rear. The proposals relate only to the existing office accommodation and the existing retail space will not be affected. The office element of the building comprises 3,737 sqm floorspace and was

formerly occupied by British Telecom (BT) until April 2010 but has remained vacant since then.

- 2.3 The existing building is clad in pre-cast concrete panels and is understood to have been built in the 1980s as part of the redevelopment of the site which encompassed 199-206 High Holborn and 2-4 Newton Street.
- 2.4 The façade fronting the building at 199-201 High Holborn, which forms part of the site, is Grade II listed. It is noted that only the façade is considered to be of 'special architectural or historical interest' as it is the only part of the original building that was retained as part of the original redevelopment.
- 2.5 The site is located within a mixed use area characteristic of its central London location with a range of central London uses, including retail, office, hotel and residential, along High Holborn and the surrounds. The site is ideally located within close proximity to a number of major tourist attractions such as the British Museum, open spaces such as Bloomsbury Square and business locations.
- 2.6 The site is located in a highly accessible location and benefits from a Public Transport Accessibility Level (PTAL) of 6b, which is the highest possible. Holborn London Underground Station, providing services on the Central and Piccadilly lines, is located approximately 150m to the east of the site. Tottenham Court Road London Underground Station, which is to provide Crossrail services, is also located within walking distance and the site is served by a number of bus routes along High Holborn (see Transport Statement for additional information).
- 2.7 The site is situated within the Bloomsbury Conservation Area and, as stated, the building at 199-201 High Holborn is Grade II listed. The site is also located in the vicinity of a number of listed buildings including the Grade II listed former Holborn Town Hall adjacent to the site to the west and the Grade II* listed Princess Louise Public House to the east. A map showing the location of the listed buildings and the Conservation Area is provided at Figure 2.

Figure 2 – Map of Listed Buildings and Conservation Area



Planning History

2.8 There have been no significant planning applications submitted or granted in connection with the building since planning permission for the current development was granted in the 1970s (Refs. P14/30/C/4921; P14/30/C/24765; P14/30/C/23184; P14/30/C/26509; P14/30/C/25458).

3. The Proposals

- 3.1 The proposed scheme seeks to bring the vacant building back into beneficial use through the change of use and conversion of the existing office (Use Class B1) accommodation to provide a 138 bedroom hotel (Use Class C1) with bar, restaurant and supporting facilities.
- 3.2 The proposals predominantly involve internal conversion works and will not impact upon the listed building. The external works only relate to the unlisted part of the building and comprise the removal of the roof top plant enclosure at fourth and fifth floor level along Newton Street and the construction of one additional floor of bedrooms. The uplift in gross floorspace amounts to 175 sqm.
- 3.3 The proposed replacement floor has been designed to replicate the existing façade treatment as far as possible and as such is considered to be a 'seamless' addition to the existing building. The plant enclosure that is being removed is considered to be surplus to the requirements of the proposed hotel use and with the existing roof-top space fronting High Holborn there will be sufficient capacity to accommodate the required plant systems. Works to improve the external appearance and presence of the building such as cleaning the concrete panels and repainting the High Holborn frontage will also be undertaken.
- 3.4 Further details of the proposals including the extent of the internal changes are set out in the accompanying Design and Access Statement, prepared by Axiom Architects.
- 3.5 The end-occupier of the proposed hotel will be Premier Inn, part of the Whitbread Group Plc. The Whitbread Group Plc is the largest hotel operator in the UK with nearly 600 hotels and more than 41,000 rooms. Premier Inn offers good, reliably high standard, overnight accommodation at a reasonable cost. The majority of Premier Inn's guests tend to be for business purposes and this is expected to be reflective of the proposals at 203 High Holborn given its central London location.

4. Planning Policy Framework

- 4.1 The proposals at 203 High Holborn have been prepared taking account of the relevant national, regional and local planning policy. This section of the Planning Statement summarises the relevant national, regional and local policies.

Adopted Planning Policy Framework

- 4.2 In accordance with Section 38 (6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.3 The relevant development plan for the site comprises the London Plan (2011), the LBC Core Strategy (2010) and the LBC Development Policies Development Plan Document (DPD) (2010).
- 4.4 In considering the proposals at 203 High Holborn, other key documents which will form material considerations in the determination of the planning application include national Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs) and the Greater London Authority's (GLA) and LBC's supplementary planning guidance documents.

Emerging Planning Policy Framework

- 4.5 In accordance with the Planning and Compulsory Purchase Act 2004, the LBC Unitary Development Plan (UDP) has been replaced with the Local Development Framework (LDF). In addition to the adopted Core Strategy and Development Policies DPD, which form part of the LDF, LBC is currently preparing the Site Allocations Development Plan DPD, which identifies specific strategic development sites. It is currently expected that the DPD will be adopted in September 2012.

National Planning Policy Framework

- 4.6 The Government is intending to replace existing PPGs and PPSs with a consolidated National Planning Policy Framework (NPPF) which will provide an overarching framework for the production of local policy documents.
- 4.7 The Government's draft NPPF was published for consultation in July 2011. The draft NPPF includes a presumption in favour of sustainable development and states that, where development complies with national planning policy, the default decision on developments taken by councils should be 'yes'. It is also stated that significant weight should be placed on the need to support economic growth through the planning system. It is anticipated that the NPPF will be adopted in late 2011 / early 2012.
- 4.8 In accordance with the Government's growth agenda, Greg Clark, the Minister for Decentralisation set out in his Ministerial Statement on 23 March 2011 that when deciding whether to grant planning permission, local planning authorities should support developments that promote the delivery of enterprise, housing, economic growth and other forms of sustainable development.

Site Designations and Allocations

- 4.9 The principle of providing hotel accommodation at the site is supported by adopted and emerging planning policies.
- 4.10 The London Plan identifies the site as being located within the Central Activities Zone (CAZ), which the Mayor seeks to sustain and manage as the world's leading visitor destination and where the provision of visitor accommodation for business visitors is supported.
- 4.11 At Borough level, the site is located within the Central London Area, as defined by the LBC Core Strategy, which is considered to be one of the most suitable locations, outside of the growth areas, for larger scale growth and development. The LBC Core Strategy also states that the Council will support Central London as a focus for future growth including hotel uses.

- 4.12 The High Holborn frontage of the site is identified as part of the Central London Frontage in the LBC Core Strategy, where the provision of appropriate town centre and service uses is supported. As stated, the proposals at 203 High Holborn do not affect the existing retail units at ground floor level, which are to be retained.
- 4.13 The site is also located in an Archaeological Priority Area, where the Council will seek to protect remains of archaeological importance, as stated in the LBC Development Policies DPD. It is noted however that the proposals at 203 High Holborn do not comprise any ground works and therefore will not impact on any potential remains of archaeological importance.
- 4.14 As stated, the site is situated within the Bloomsbury Conservation Area and the building at 199-201 High Holborn is Grade II listed.

5. Planning Assessment

- 5.1 This section assesses the proposals against the national, regional and local planning policy framework as set out above.

Overview of the Principle of Development

- 5.2 Planning Policy Statement 1: Delivering Sustainable Development (PPS1, 2005) sets out the Government's objectives for the planning system and directs planning authorities to make more efficient use of land through the reuse of suitably located previously developed land and buildings. In order to deliver sustainable development, planning authorities should actively seek to bring back into beneficial use underused buildings and land. PPS1 also states that planning authorities should ensure that proposals optimise the potential of sites to accommodate development.
- 5.3 Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4, 2009) states that local authorities should "positively and proactively" encourage sustainable economic growth. PPS4 also states that policies should seek to "make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use".
- 5.4 In determining applications for economic development, Policy EC10 of PPS4 also states that planning applications should be assessed against the "accessibility of the proposal by a choice of means of transport including walking, cycling, public transport and the car".
- 5.5 Planning Policy Guidance Note 13: Transport (PPG13, 2011) reinforces the aim of maximising development potential by encouraging planning authorities to plan for increased density of development at locations which are highly accessible by a number of means of transport.
- 5.6 There are six objectives of the London Plan, four of which are particularly relevant to the proposed development. **Objective 1** is to ensure that London is a city that meets the challenges of economic and population growth. **Objective 2** is to provide an internationally competitive and successful city. **Objective 5** is to ensure that London becomes a world leader in improving the environment and **Objective 6** is to ensure that

the city is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

- 5.7 As stated in Section 4, the site is located within the Central Activities Zone (CAZ), as designated by the London Plan. Policy 2.10 of the London Plan states that the Mayor will, and boroughs should, enhance and promote the role of the CAZ as supporting a rich mix of local and strategic uses and forming the core of one of the world's most attractive and competitive business locations.
- 5.8 In accordance with national and regional policy, the LBC Core Strategy promotes the most efficient use of land and buildings by seeking to ensure that development makes full use of its site and by resisting development that makes inefficient use of Camden's limited land (Policy CS1). The site is located within the Central London area, as defined by the LBC Core Strategy, where Policy CS1 states that the Council will promote appropriate development. It is stated in Policy CS9 of the LBC Core Strategy that the Council will support and promote the Central London area as a focus for future growth including hotel uses.
- 5.9 The proposals at 203 High Holborn fully accord with the general principles of national, regional and local planning policy by bringing back into beneficial use an underused building for an appropriate central London use in this highly accessible location. The proposals are also supported by the draft NPPF which seeks to promote sustainable development and support economic growth.
- 5.10 The conversion and extension of the existing vacant building at 203 High Holborn to provide a 138 bedroom hotel seeks to make the most efficient and sustainable use of the site, which is located in an area identified as suitable for growth and development.
- 5.11 The provision of visitor accommodation at this central London location contributes to the rich mix of uses within the CAZ and assists in meeting the GLA's strategic objectives of ensuring that London is an internationally competitive and successful city.
- 5.12 The principle of the conversion and extension of the existing building for hotel use was considered acceptable by officers at LBC during pre-application consultation.

Land Use

Existing Office Use

- 5.13 As stated in Section 2, the site is occupied by a ground plus four storey office building with retail space on the ground floor. The office element of the building comprises 3,737 sqm gross floorspace and was formerly occupied by British Telecom (BT) until April 2010 but has remained vacant since then.
- 5.14 Through PPS4, the Government seeks to achieve sustainable economic growth through building prosperous communities and improving the economic performance of cities, towns, regions and sub-regions. Policy EC10 further states that local planning authorities should adopt a positive and constructive approach towards planning applications for economic development. It is also stated in Policy EC2 that local planning authorities should encourage new uses for vacant buildings and seek to prioritise previously developed land which is suitable for re-use and reflects the different location requirements of businesses.
- 5.15 Policy 4.2 of the London Plan recommends that LDFs should manage long term, structural changes in the office market, focusing new capacity where there is strategic as well as local evidence of demand, encouraging renewal and modernisation in viable locations and supporting changes of surplus office space to other uses.
- 5.16 The LBC Core Strategy Policy CS8 seeks to secure a strong economy in Camden by safeguarding existing employment sites and premises that meet the needs of modern industry and other employers.
- 5.17 Policy DP13 of the LBC Development Policies DPD states that the Council will implement Policy CS8 of the Core Strategy by retaining land and buildings that are suitable for continued business use and by resisting a change to non-business uses unless:
- It can be demonstrated that a site or building is no longer suitable for its existing business use; and

- There is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business uses has been fully explored over an appropriate period of time.

5.18 To address the above policy requirements, supporting evidence is provided in the form of a Marketing Statement (see Appendix 1), which demonstrates that the existing building is not considered viable for ongoing office or alternative business uses.

5.19 As set out in the Marketing Statement at Appendix 1, the existing building at 203 High Holborn was occupied by BT until April 2010. Prior to vacating the building, GVA and Farebrother were appointed as joint letting agents to market the building in June 2009 and have continued to do so without success. Details of the marketing strategy and level of interest are outlined in the Marketing Statement together with a copy of the most recent marketing particulars. Despite the attempts there has been a lack of demand and take up for the premises for a sustained period resulting in the building remaining vacant. The Marketing Statement highlights a number of constraints associated with the existing building which prevent it from being attractive to office occupiers, as summarised below:

- Existing accommodation is dated and not of a high enough specification;
- Floorplates are not considered large enough; and
- Inadequate floor to ceiling heights.

5.20 Given the age, nature and quality of the existing accommodation, it is understood that the building requires substantial refurbishment works to create modern space suitable for current and future business needs. However, taking account of the capital expenditure and expected rental return, Ediston does not consider this option to be commercially viable.

5.21 In terms of alternative business uses, given the site's central location in a densely developed area and the constraints and costs of converting the existing building, it is not expected that the site will be desirable or appropriate for flexible B8 or B1(c) uses. In addition, the design and layout of the building lends itself to a single designated user. Therefore, it is unlikely that the building could be sub-let and occupied for small and medium enterprises. In addition, the impact of the listed façade, particularly on floor to

ceiling heights, means that the ability to redevelop or refurbish the site for new office space for other business uses is further constrained.

- 5.22 In light of the above factors, it is not considered that the existing building is viable for current or future office or alternative business uses and therefore the loss of office floorspace is justified, in accordance with Policies CS8 and DP13 of the LBC Core Strategy and Development Policies DPD respectively. Furthermore, the reuse of surplus office stock in order to achieve sustainable economic growth is in accordance with national and regional planning policy guidance, including the draft NPPF, which adopts a presumption in favour of sustainable development.
- 5.23 Policy DP1 of the LBC Development Policies DPD states that the Council will require a mix of uses in development where appropriate, including a contribution towards the supply of housing. Policy DP1 states that within the Central London area, where more than 200 sqm (gross) additional floorspace is provided, the Council will expect that up to 50% of all additional floorspace will be housing.
- 5.24 The proposed extension at the site would result in an uplift of 175 sqm of gross floorspace and would therefore not trigger the mixed use policy requirement. However, it is understood that where a change of use from office is accepted, the Council will seek the provision of new housing in the first instance.
- 5.25 Given the site's central London location fronting High Holborn which is a busy main route, it is not considered that the site provides the most appropriate environment for new housing due to the external noise and air quality conditions. In addition, the existing office building does not lend itself to residential use and the existing listed façade constrains the scope to undertake larger scale redevelopment. Therefore it is considered that the retention and conversion of the existing building to provide hotel accommodation, for which an operator has already been secured to ensure delivery, provides a sustainable approach and is the most appropriate use of the existing building.

Provision of Hotel Accommodation

- 5.26 As stated, the development proposals seek to provide a 138 bedroom hotel at the site, which is in accordance with national, regional and local planning policy guidance.

5.27 For the purposes of PPS4, economic development includes hotel uses, which are considered to be 'main town centre' uses. As stated in PPS4, the Government supports new economic growth and development of main town centre uses to be focused in existing centres. Policy EC10 states that local planning authorities should adopt a positive and constructive approach towards planning applications for economic development and that such applications should be assessed against a number of impact considerations, summarised as follows:

- Carbon dioxide emissions over the lifetime of the development and its overall resilience to climate change;
- Accessibility of the proposal by a choice of means of transport, including walking, cycling, public transport and the private car;
- High quality and inclusive design;
- Impact on economic and physical regeneration; and
- Impact on local employment.

5.28 The Government's Good Practice Guide on Planning for Tourism (DCLG, 2006) states that in providing tourist accommodation such as hotels, emphasis should be on identifying the most sustainable locations. Preference for large scale facilities should be to identify town centre sites wherever possible, in line with policies set out in PPS4 which supports hotel uses in town centres. The Good Practice Guidance outlines that the development should:

- Fit well with its surroundings, having regard to its siting, scale, design, materials and landscaping; and
- Be in harmony with the local environment (taking account of, amongst other factors, residential amenity, noise, traffic and parking in the vicinity).

5.29 The London Plan seeks to support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors. In seeking to achieve this, Policy 4.5 sets a strategic target of 40,000 net additional hotel bedrooms by 2031. The London Plan further seeks to ensure that the provision of new visitor accommodation is in appropriate locations.

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- 5.30 In seeking to secure a strong economy in Camden, Policy CS8 of the Core Strategy recognises the importance of alternative employment generating uses, such as tourism.
- 5.31 Policy DP14 of the LBC Development Policies DPD states that the Council will support tourism development and visitor accommodation by expecting new, large-scale development and accommodation to be located in central London. Policy DP14 further states that all visitor accommodation must:
- Be easily reached by public transport;
 - Provide any necessary off-highway pickup and set down points for taxis and coaches; and
 - Not harm the balance and mix of uses in the area, local character, residential amenity, services for the local community, the environment or transport systems.
- 5.32 As stated, the site at 203 High Holborn is located within the CAZ (London Plan) and the Central London Area (LBC Core Strategy), where hotel uses are supported. The site is considered suitable for hotel use given its highly accessible location in a mixed use area close to the Holborn Growth Area. As considered in further detail below and in the accompanying Transport Statement, the proposed hotel is unlikely to be served by coach parties and therefore it is not considered there is a need for on site coach parking or a dedicated coach drop. Whilst there are some residential properties in close proximity to the site, it is not considered that there will be any adverse impacts on residential amenity arising from the proposals.
- 5.33 It is envisaged that the proposals will create up to 51 new job opportunities, including 43 full time jobs and 8 part time jobs. In accordance with its corporate policy, Premier Inn will advertise the positions locally and Whitbread Group Plc provides training opportunities for its staff. In addition, based on research undertaken by Premier Inn, it is estimated that the proposal would attract approximately 54,000 visitors into the local area per annum, which would generate wider economic benefits through additional tourist spending helping local businesses.
- 5.34 In summary, the provision of hotel accommodation at the site is considered appropriate given its highly accessible, sustainable and mixed use location. The proposed hotel will support and enhance London's visitor economy and will contribute to securing sustainable
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economic growth by bringing back into beneficial use an underused building in a central London location.

- 5.35 The site is located in an area in need of investment and the proposals to convert the vacant building to provide a new hotel will make a positive contribution to the ongoing renewal of the area.

Design

- 5.36 PPS1 promotes high quality and inclusive design, creating well-mixed and integrated developments, avoiding segregation, with well planned public spaces. The PPS recognises that good design ensures attractive usable, durable and adaptable places and is a key element in achieving sustainable development. Good design should;

- Address the connections between people and places by considering the needs of people to access jobs and key services;
- Be integrated into the existing urban form and the natural and built environments;
- Be an integral part of the processes for ensuring successful, safe and inclusive villages, towns and cities;
- Create an environment where everyone can access and benefit from the full range of opportunities available to members of society; and
- Consider the direct and indirect impacts on the natural environment.

- 5.37 Policy 2.10 of the London Plan states that the Mayor seeks to sustain and enhance the distinctive environment and heritage of the CAZ through high quality design and urban management. It is stated in Policy 7.1 that the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood. Policy 7.4 states that development should have regard to the form, function and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. Policy 7.6 sets out the design principles stating that buildings should, inter alia:

- Be of the highest architectural quality;
- Comprise details and materials that complement, not necessarily replicate; and

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- Optimise the potential of sites.
- 5.38 Policy CS14 of the LBC Core Strategy states that the Council will require development of the highest standard of design that respects local context and character.
- 5.39 Policy DP24 of the LBC Development Policies DPD reiterates that all developments, including alterations and extensions to existing buildings, should be of the highest standard of design and sets out a number of considerations that developments will be expected to consider, including:
- The character, setting, context and the form and scale of neighbouring buildings;
 - The character and proportions of the existing building, where alterations and extensions are proposed; and
 - The quality of materials to be used.
- 5.40 As stated in Section 3, the proposals predominantly comprise internal conversion works to the existing building. As such, the character and appearance of the existing building remains largely unchanged by the proposals.
- 5.41 It is considered that the small scale extension at roof level along the Newton Street frontage which replaces the existing plant area with an additional floor of hotel rooms will make a positive contribution to the street scene. The extension takes account of the character and appearance of the existing building and its surroundings to ensure it appears contiguous.
- 5.42 The works to improve the external appearance and presence of the building such as cleaning the concrete panels and repainting the High Holborn frontage will further enhance the character and appearance of the building, including the listed façade.
- 5.43 In summary, the proposed conversion works are sympathetic to the existing building, and the proposed extension is of a small scale and replicates the existing building in its architecture and materials.

Heritage

- 5.44 Planning Policy Statement 5: Planning for the Historic Environment (PPS5, 2010) sets out the Government's overarching planning policies put in place to conserve the historic environment and its heritage assets so that they may be enjoyed by future generations.
- 5.45 PPS5 outlines a balanced approach to the conservation of the historic environment. It aims to create a planning process which will "deliver sustainable development (and ...) conserve England's heritage assets in a manner appropriate to their significance" (paragraph 7).
- 5.46 PPS5 gives guidance relating to designated heritage assets - listed buildings, conservation areas, World Heritage Sites and Registered Parks and Gardens - and undesignated heritage assets i.e. buildings positively identified as having a degree of heritage significance meriting consideration during the planning process. Policy HE9 includes "a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be" (HE9.1). Policy HE7 expresses "the desirability of sustaining and enhancing the significance of heritage assets" (HE7.4) in general.
- 5.47 It is stated in the London Plan that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate (Policy 7.8). The London Plan further states that development affecting heritage assets should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 5.48 The LBC Core Strategy seeks to preserve and enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings (Policy CS14).
- 5.49 In order to maintain the character of Camden's conservation areas, it is stated in Policy DP25 of the LBC Development Policies DPD that the Council will only permit development within conservation areas that preserves and enhances the character and appearance of the area. Policy DP25 also seeks to preserve or enhance listed buildings by stating that the Council will only grant consent for a change of use or alterations and extensions to a listed

building where it considers this would not cause harm to the special interest of the listed building.

- 5.50 As stated, the site is situated within the Bloomsbury Conservation Area. The part of the site at 199-201 High Holborn is grade II listed and is described in the Bloomsbury Conservation Area Appraisal and Management Strategy (2010) as a “five-storey office building with an Italian Renaissance stuccoed front punctured by a series of arched window openings”. As stated in Section 3, the existing building was developed in the 1980s behind the retained façade, which is considered to be the only part of the building of special architectural or historical interest.
- 5.51 As stated, Listed Building Consent is sought in connection with the internal works to the building behind the retained façade. As agreed during pre-application discussions with officers, it is not considered that the works would impact on the special architectural or historical interest of the façade.
- 5.52 In addition, it is considered that the proposed extension at roof level along the Newton Street frontage would not impact on the setting of the listed façade at 199-201 High Holborn by taking account of the character and appearance of the property and surroundings to ensure it blends in and appears contiguous. The proposed conversion works would make a positive contribution to the street scene by replacing the existing plant structure and would therefore preserve the setting of the listed façade at 199-201 High Holborn, the Conservation Area and the listed buildings in the vicinity of the site.

Transport and Servicing

- 5.53 Planning Policy Guidance 13 (PPG13): Transport (2011) directs new development to locations that are highly accessible by public transport, walking and cycling, recognising that an integrated transport system is necessary to support a strong and prosperous economy. PPG13 states that the consideration of the location, scale, density, design and mix of land uses can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking and cycling.

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- 5.54 A strategic objective of the London Plan is to ensure that London is a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities. In seeking to achieve this objective, Policy 6.1 states that the Mayor will encourage patterns and nodes of development that reduce the need to travel, especially by car. The London Plan further seeks to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand. In addition, Policy 6.1 states that the Mayor will support development that generates higher levels of trips at locations with high public transport accessibility and / or capacity. Policy 6.13 states that development must provide for the needs of businesses for delivery and servicing.
- 5.55 Policy CS1 of the LBC Core Strategy states that the Council will promote the most efficient use of land and buildings in Camden by expecting development that will significantly increase the demand of travel to be located in growth areas and other highly accessible parts of the borough. Policy CS11 states that the Council will promote the availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel, and relieve pressure on the borough's transport network.
- 5.56 Policy DP14 of the LBC Development Policies DPD states that all tourism development and visitor accommodation must be easily reached by public transport. Policy DP16 of the LBC Development Policies DPD states that the Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. It is stated in Policy DP17 that development should make suitable provision for pedestrians, cyclists and public transport.
- 5.57 The accompanying Transport Statement, prepared by Russell Giles Partnership, confirms that the site benefits from an excellent Public Transport Accessibility Level (PTAL) of 6b, and is therefore a preferable location for the proposed hotel development. Given the site's highly accessible central London location, it is unlikely that the proposed hotel would be accessed by private car. The proposed development therefore seeks to encourage sustainable transport choices.
- 5.58 The Transport Statement demonstrates that the conversion of the building from office (Class B1) use to a 138 bedroom hotel (Class C1) would result in a net reduction of 15 vehicles trips in a typical day. Due to the range and capacity of public transport services available in the vicinity of the site, it is considered that, although the proposed hotel use
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would result in an increase in public transport trips, the development would have a negligible impact on the public transport network.

- 5.59 The Delivery and Servicing Plan, submitted as part of the Transport Statement, concludes that the proposed hotel use would generate a minimal level of HGV vehicle movements. The servicing arrangements for the site have been designed to minimise the risk to other road users and the impact of freight traffic across Central London.
- 5.60 The Transport Statement is also accompanied by a Travel Plan, which seeks to promote more sustainable travel for staff and guests of the hotel by proposing a number of travel plan initiatives.
- 5.61 In summary, the provision of hotel accommodation in this highly accessible central London location will not have an adverse impact on the existing highways and public transport networks and will promote sustainable transport choices. In this regard, the proposals are in full accordance with national, regional and local planning policy guidance in relation to public transport accessibility and highways.

Car, Coach and Cycle Parking

- 5.62 PPG13 encourages the use of parking policies alongside other planning and transport measures, to promote sustainable transport choices and reduce the reliance on private car journeys.

Car Parking

- 5.63 Although the London Plan does not set maximum car parking standards for hotel development, it is stated at Policy 6.13 that, in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people). It is also stated that development should provide at least one accessible on or off street parking bay designated for Blue Badge holder, even if no general parking is provided.

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- 5.64 Policy CS11 of the LBC Core Strategy supports the London Plan by seeking to minimise provision for private parking in new developments, in particular through car free developments in the borough's most accessible locations. Policy DP18 of the LBC Development Policies DPD reiterates that the Council will expect development to be car free in the highly accessible locations, such as Central London. For car free developments, it is stated that the Council will seek to limit on-site car parking to spaces designated for disabled people.
- 5.65 The LBC Development Policies DPD sets the following disabled parking standards for hotel (Use Class C1) development:
- Staff/operational – 1 space per disabled employee or, from a threshold of 2,500 sqm, 1 space per 20,000 sqm or part thereof – whichever is the greater
 - Customer – from threshold of 2,500 sqm, 1 space per 1,250 sqm or part thereof
- 5.66 In order to promote sustainable transport choices and given the site's excellent public transport accessibility level, it is proposed that the development will be car-free with the exception of the provision of four disabled car parking bays, in accordance with LBC policy.

Coach Parking

- 5.67 The Parking Addendum to the London Plan states that hotel development should provide for one coach parking space per 50 bedrooms.
- 5.68 Policy DP14 of the LBC Development Policies DPD states that all visitor accommodation must provide any necessary off-highway pickup and set down points for taxis and coaches. Where hotel development comprising more than 2,500 sqm is proposed, the parking standards in the LBC Development Policies DPD require that the Transport Assessment considers the need for space for coaches to pick-up / set-down and wait.
- 5.69 As stated, the proposed hotel is unlikely to be served by coach parties and therefore it is not considered there is a need for on site coach parking or a dedicated coach drop off point. Research undertaken by Premier Inn has highlighted that only three central London Premier Inn hotels have accommodated coach party bookings over the last two years.

5.70 The accompanying Transport Statement demonstrates that the proposed hotel would generate in the region of 15 taxi movements per day and considers that this activity could be facilitated on Newton Street or on High Holborn adjacent to the site access without a causing a detrimental impact on the highway.

Cycle Parking

5.71 Policy 6.9 of the London Plan seeks to ensure that development provides secure, integrated and accessible cycle parking facilities in line with the minimum standard for hotel development of 1 cycle parking space per 10 staff.

5.72 The LBC Development Policies DPD states that development should make suitable provision for cyclists (Policy DP17) by meeting the Council's minimum standard for hotel development over 500 sqm of:

- Staff/operational – 1 space per 500 sqm or part thereof;
- Customer – 1 space per 500 sqm or part thereof.

5.73 In accordance with regional and local planning policy, the proposals encourage the use of sustainable modes of travel through the provision of 20 secure and sheltered cycle parking spaces in an accessible location within the rear servicing yard for use by staff and guests.

Inclusive Environment

5.74 In seeking to create an inclusive environment, Policy 7.2 of the London Plan states that the Mayor will require all new development to achieve the highest standards of accessible and inclusive design and that boroughs should require development proposals to include an Access Statement. It is also stated in Policy 4.5 that development for visitor accommodation should ensure that at least 10% of bedrooms are wheelchair accessible.

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- 5.75 Policy CS14 of the LBC Core Strategy states that the Council will seek the highest standards of access in all buildings and places and requires development schemes to be designed to be inclusive and accessible.
- 5.76 It is reiterated in Policy DP29 of the LBC Development Policies DPD that all buildings should meet the highest practicable standards of access and inclusion.
- 5.77 The submitted Design and Access Statement, prepared by Axiom Architects, has examined and reviewed how the overall design of the project incorporates inclusive access standards in order to meet the mandatory standards as required by Building Regulations Approved Document Part M (2004). The Access Statement demonstrates how inclusive design elements have been incorporated into the scheme, including two DDA compliant lifts servicing all floors and the provision of 7 Universal Access bedrooms suitable for use by disabled guests.

Energy and Sustainability

- 5.78 Planning and Climate Change, a supplement to PPS1 (2007) and Planning Policy Statement 22 (PPS22): Renewable Energy (2004) encourage development proposals to incorporate renewable energies and promote energy efficiency, where the technology is viable and the economic and social impacts can be fully addressed.
- 5.79 Policy 5.2 of the London Plan seeks to ensure that development proposals make the fullest contribution to minimising carbon dioxide emissions in accordance with the following Mayor's energy hierarchy:
- Be lean: using less energy;
 - Be clean: supplying energy efficiently; and
 - Be green: using renewable energy.
- 5.80 It is further stated in Policy 5.2 that major non-residential developments should achieve a 25% improvement on 2010 Building Regulations between 2010-2013 for carbon dioxide emissions reductions.

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- 5.81 In addition, Policy 5.3 states that development proposals should demonstrate that sustainable design standards are integral to the proposal and should meet the minimum standards set out in the Mayor's Sustainable Design and Construction SPG (2006).
- 5.82 Policy CS13 of the LBC Core Strategy seeks that all development meets the highest feasible environmental standards that are financially viable during construction and occupation by minimising carbon emissions and implementing the Mayor's energy hierarchy. The supporting text for Policy CS13 states that development or alterations to existing buildings should include proportionate measures to improve their environmental sustainability, where possible.
- 5.83 The LBC Development Policies DPD states that the Council will require development to demonstrate how sustainable development principles have been incorporated into the design and proposed implementation and incorporate green or brown roofs and green walls, wherever suitable.
- 5.84 The Camden Planning Guidance 1: Design (2011) states that the Council will seek to balance achieving higher environmental standards with protecting Camden's unique built environment. The Camden Planning Guidance 3: Sustainability (2011) states that development involving a change of use or conversion of 500 sqm of floorspace will be expected to achieve 60% of the un-weighted credits in the Energy category of the BREEAM Assessment. It is noted however that special consideration will be given to listed buildings to ensure that their historic and architectural features are preserved.
- 5.85 The accompanying Energy and Sustainability Strategy, prepared by Applied Energy, demonstrates that the proposed scheme will achieve a 21.1% reduction in carbon dioxide emissions against the 2010 Building Regulations Target Emissions Rate. The proposed design will improve on the existing building services systems installed and will also exceed Part L 2010 Building Regulations requirements for energy performance by improving energy efficiency through measures such as incorporation of Air Source Heat Pumps, energy efficient lighting and heat recovery provided to the air handling plant.
- 5.86 In seeking to supply energy efficiently, the scheme proposes to install a gas-fired Combined Heat and Power (CHP) unit, which is considered an appropriate technology for hotel operations. Although there is currently no communal or district heating scheme in
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close proximity to the site, the proposals have been future-proofed to allow connection in the event that the distribution network is established.

- 5.87 In accordance with the Mayor's energy hierarchy, feasibility studies have been carried out on the various renewable technologies available. However, as outlined in the Energy Strategy, due to the central London location, the proposed hotel use and the Grade II listed status of the building, it is not considered feasible or viable to incorporate renewable energy technologies.
- 5.88 As set out in the Energy and Sustainability Strategy, the proposed development will seek to achieve a minimum BREEAM rating of 'Very Good' with an aspiration to achieve 'Excellent'. In accordance with the Camden Planning Guidance 3: Sustainability, the development will also seek to achieve 60% of the credits available under the Energy category of the BREEAM Assessment.

Environmental and Amenity Considerations

Flood Risk

- 5.89 Planning Policy Statement 25 (PPS25): Development and Flood Risk (2006) sets out the factors for consideration by developers to assess whether a proposed development is likely to be at risk of flooding or to increase flood risk elsewhere.
- 5.90 Policy CS13 of the LBC Core Strategy states that the Council will seek to make Camden a water efficient borough and minimise the potential for surface water flooding by ensuring that development incorporates efficient water and foul water infrastructure and requiring development to avoid harm to the water environment, water quality or drainage systems.
- 5.91 It is stated in Policy DP23 of the LBC Development Policies DPD that the Council will require developments to reduce the risk of flooding by incorporating water efficient features, limiting the amount and rate of run-off, and reduce the pressure placed on the combined storm water and sewer network from foul water and surface run-off.

5.92 As stated in the accompanying Flood Risk Statement, the site is located within Flood Zone 1 where all types of development are suitable in flood risk terms, as set out in PPS25. The Environment Agency has advised during pre-application discussions that it has no concerns with regard to flood risk issues at the site. The surface water run-off into the surrounding sewer system will remain as existing with no increase in surface water discharge. The opportunity to introduce green roofs has been reviewed but is not considered feasible as the existing roof structure does not have sufficient capacity to support the additional weight of the green roof build up without significant structural engineering.

Noise

5.93 Planning Policy Guidance Note 24 (PPG24): Planning and Noise (1994) seeks to minimise the adverse impact of noise without placing unreasonable restrictions on development.

5.94 Policy 7.15 of the London Plan states that development proposals should seek to reduce noise by minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, a development and promoting new technologies and improved practices to reduce noise.

5.95 Policy DP28 of the LBC Development Policies DPD states that the Council will seek to ensure that noise and vibration is controlled and managed and will not grant planning permission for development likely to generate noise pollution or development sensitive to noise in locations with noise pollution, unless appropriate attenuation measures are provided.

5.96 A Noise Impact Assessment is submitted in support of the application to demonstrate that the building services plant noise emission from the proposed development has been considered. The Assessment notes that attenuation will be incorporated into the plant during the detailed design process to ensure that the plant noise emission limits are achieved.

Amenity

- 5.97 PPS3 seeks to create high quality living environments in which people will choose to live, the PPS further promotes the creation of places and spaces with the needs of people in mind and which focus on the living environments being created.
- 5.98 Policy 7.6 of the London Plan seeks to ensure that buildings do not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate.
- 5.99 Policy CS5 of the LBC Core Strategy seeks to ensure that the impact of development on occupiers and neighbours is fully considered. Policy DP26 of the LBC Development Policies DPD states that the Council will protect the quality of life of occupiers and neighbours by only granting planning permission that does not cause harm to amenity taking into consideration factors such as overshadowing, sunlight, daylight and artificial light levels and the inclusion of appropriate attenuation measures.
- 5.100 A Daylight / Sunlight assessment is submitted in support of the application, which demonstrates that the neighbouring residential properties will retain a good level of daylight and sunlight as a result of the proposals. Whilst a very small number of windows will experience a reduction in daylight, this will only be a marginal change and the impact is considered acceptable in the context of the site's central London location.

Planning Obligations

- 5.101 Paragraph B5 of Circular 05/2005: Planning Obligations states that in order to be sought, a planning obligation must be:
- relevant to planning;
 - necessary to make the proposed development acceptable in planning terms;
 - directly related to the proposed development;
 - fairly and reasonably related in scale and kind to the proposed development;
 - reasonable in all other respects.

5.102 The policy tests set out in Circular 05/2005 have recently been put on a statutory footing by the Community Infrastructure Levy Regulations (SI 2010/948). In particular, Regulation 122 (2) of the Regulations states that:

“A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.”

5.103 The above statutory tests are based on three of the policy tests contained in paragraph B5 of Circular 05/2005 (tests (i), (iii) and (iv)). The two remaining tests (i.e. tests (ii) and (v)) were omitted from Regulation 122, as they were considered unnecessary and repetitive of matters covered by the other policy tests.

5.104 The draft NPPF reiterates the three policy tests for planning obligations set out above and states that “local planning authorities should avoid unnecessary conditions or obligations, particularly where this would undermine the viability of development proposals”.

5.105 Policy CS19 of the LBC Core Strategy states that the Council will use planning obligations, where appropriate, to support sustainable development, secure any necessary and related infrastructure, facilities and services to meet the needs generated by development and mitigate the impact of development.

5.106 It is anticipated that an appropriate package of Section 106 contributions, which will be subject to scheme viability, will be discussed with officers following submission of the application based on the following key heads of terms set out in the officer’s pre-application advice:

- Legal and Professional Costs
- Highways Works
- Green Travel Plan
- Service Management Plan
- Sustainability Plan

- Energy Plan
- Local Employment

6. Conclusions

- 6.1 The application seek permission for the change of use and conversion of the existing vacant office building at 203 High Holborn to provide a 138 bedroom hotel that will optimise the potential of a vacant building in a highly accessible central London location in order to support sustainable economic growth and London's visitor economy.
- 6.2 The proposals have been subject to pre-application consultation with LBC, including a pre-application meeting where officers confirmed that the principle of providing hotel uses at the site is acceptable.
- 6.3 As demonstrated by the supporting documentation, the existing office building has been vacant since April 2010. By virtue of its age and layout and the expected cost of any conversion or refurbishment works, it is not considered that the building is viable for ongoing office or alternative business uses.
- 6.4 Although LBC policy identifies residential as the priority land use in the Borough, it is not considered that the existing building and site lends itself to residential use and that hotel is considered a more appropriate use.
- 6.5 The site is in a preferred location for new hotel uses as set out in regional and local planning policy. The proposals would deliver a range of benefits including new jobs and additional hotel rooms to meet London's growing business and tourist needs.
- 6.6 The proposed conversion works are sensitive to the existing building and seek to optimise the potential of the site by making the most sustainable and efficient reuse of the existing building at 203 High Holborn whilst respecting the local character and setting. The proposed extension is of a small scale and would make a positive contribution to the street scene therefore preserving the setting of the identified heritage assets.
- 6.7 As demonstrated in the accompanying Transport Statement, the provision of hotel accommodation in this highly accessible central London location will not have an adverse impact on the existing highways and public transport networks and will promote sustainable transport choices.

- 6.8 The proposals have been designed to make use of sustainable and energy efficient building techniques, where feasible within the constraints of the existing building.
- 6.9 In summary, the proposals seek to bring back into beneficial use an underused central London building through the provision of visitor accommodation that will support the sustainable growth of London's visitor economy and will provide a range of planning benefits, which will fulfil the overall objectives of planning policies at national, regional and local levels. The proposals comprise a sustainable form of development, for which there should be a positive presumption in favour of.



Planning
Statement

Appendix 1 Marketing Statement



203 High Holborn, London Borough Camden

Marketing Statement

1. Introduction

1.1 The office building at 203 High Holborn is owned by Ediston Opportunity Fund but is held on a long lease by British Telecom Plc (BT) until 2025. BT occupied the building until April 2010 and the building has remained vacant since. GVA was initially instructed by BT to informally market 203 High Holborn in June 2009 and approached a number of targeted parties at that time. In August 2009, GVA was formally instructed alongside Midtown specialist agent Farebrother to proactively market the building in anticipation of BT vacating.

2. Details of Marketing Strategy

2.1 The premises were initially brought to the market at a guide quoting rent of £22.50 per sq ft which was below the full estimated rental value. This was in order to attract as much interest as possible and to try to secure a letting at the earliest point in time rather than seek the highest possible rent at the risk of the building remaining vacant for longer.

2.2 Monthly marketing meetings were set up by GVA and Farebrother with the client to report on the level of interest. Letting particulars were prepared and circulated to prospective tenants with known requirements. The building was also marketed on a number of web based property search engines including BT's own site, GVA's and Farebrother's website along with Focus, which is the the most widely used in the property industry. Numerous inspections of the building were undertaken by both GVA and Farebrother but ultimately none of these resulted in a letting being concluded. Set out below is a sample of the parties who inspected the building during the past year (2010).

Date	Occupier	Size (sq ft)	Comments
Jan	Schiller University	15,000	Did not inspect the accommodation because they ideally want a self contained building of 15k and 203HH is deemed to be too large.

Feb	London School of Business and Finance	40,000	Interested in entire. Ultimately looked to purchase a building
Apr	BCD Travel	30,000	Discounted due to concerns over the quality of the building
May	Bircham Dyson Bell	38,000 - 40,000	Early stages of the search. Currently based on Broadway SW1 and preference is to stay in the area. However, may look further a field if fail to find suitable options. Size is perfect.
May	Cyril Sweett	30,000	Long standing requirement with an expiry in 2011. Now based on 60 Gray's Inn Road they are prepared to look from SE1 to Kings Cross. Building not good enough for them.
May	Undisclosed (King Sturge)	13,000	Looking across City and Midtown and wish to be over no more than two floors. Max budget of £40 psf and looking to move immediately. Requirement too small
Jun	FTC Kaplan	32,500 - 35,000	Viewed four times. Requested terms. Went to a building further East.
Jun	RBC	30,000 - 50,000	Took 110 desks at 1 Poultry. Looking City fringes ideally with 20k plus floors. Need a good floor to ceiling height and timing is for VP by Q4 2011. 203 HH being reported back to client but early days.
Jul	Benetton	40,000	They have a lease expiry coming up in Covent Garden. The location was an issue and they are budget conscious.
Jul	Shed Media	40,000	Discussions had been had prior to appointment of Agent. Ultimately went to a higher specified building.
Jul	Undisclosed Media	50,000	Information provided. The building was not of sufficient quality.
Sep	Undisclosed client of CBRE	30,000 - 50,000	Shortlisted 203 HH but ultimately selected a building with larger floorplates in the West End.
Sep	Red Bee Media	30,000 - 80,000	Looking for occupation by mid 2011. Looking in Docklands, Midtown and SE1. The building was deemed to low a specification for their needs.
Sep	Undisclosed Media	30,000 - 40,000	Looking Kings Cross, Southwark, Farringdon and Kingsway. Looking for a self contained building or larger floorplates. Occupation by March 2011. Max budget £40.00 per sq ft. Specification not good enough.
Oct	Undisclosed Data Provider	40,000 - 70,000	Shortlisted two options. Now looking more likely to go to a higher specified other option.

- 2.3 As indicated above, a diverse mix of tenants have inspected the property including those from the educational and media sectors along with legal firms already based in the local area looking for overflow space. The most common reasons for prospective tenants not taking their interest any further was that the existing accommodation was not of a high enough specification or that the floorplates were not considered large enough.
- 2.4 The building was presented to the market in its existing condition, which is considered to be reasonable but of a dated second hand nature and only partially fitted out. As a result this has made it very difficult to attract interested parties and secure a letting. Whilst there is a good level of demand for office space in the Midtown sub-market, this predominantly relates to refurbished or new developments. These developments are typically available at rents which are not significantly higher than second hand space such as 203 High Holborn which makes them much more attractive to occupiers. The cost of refurbishing and upgrading the existing building would involve a significant capital expenditure and would not be viable particularly on a speculative basis given the current market conditions.

3. Summary

- 3.1 The property has been actively marketed since 2009 and has been vacant since early 2010. Despite some interest from prospective tenants, the marketing attempts have not resulted in a successful letting. It is not anticipated that this position will change in the short to medium future and if it remains vacant during this time the building is at risk of falling into disrepair as a result of the increased costs of maintenance to the landlord.

Offices To Let

203 High Holborn
London
WC1V

January 2011



Self Contained Office Building To Let

40,227sq ft - (3,737.2 sq m)



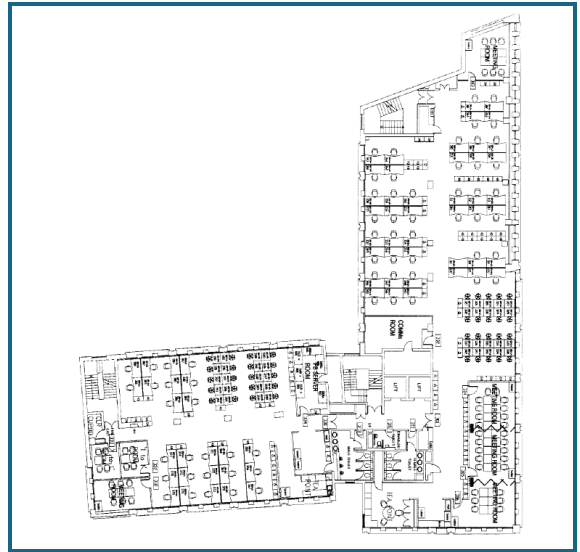
- 2 Passenger Lifts
- Car Parking
- Comfort Cooling
- Raised Floor

- Shower Facilities
- Suspended Ceiling
- To be refurbished – spec to be agreed

gva.co.uk
020 7236 6363

Accommodation

Floor	Sq Ft	Sq M
5 th	3,875	360
4 th	5,521	512.9
3 rd	8,740	812
2 nd	8,730	811
1 st	8,654	804
Ground	3,216	298.8
Basement	1,491	138.5
TOTAL	40,227	3,737.2



Lease

Sub-lease from BT until June 2025 or shorter by arrangement.

Guide Rent

Circa £27.50 per sq ft

Rates

Circa £13.94 per sq ft.

Service Charge

TBC

For further information or an appointment to view please contact:

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Our joint agent Farebrother

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