

NS/GF/PD10125  
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22 August 2016

London Borough of Camden  
2<sup>nd</sup> Floor,  
5 Pancras Square  
London  
N1C 4AG

**FAO Kate Phillips**

**BY THE PLANNING PORTAL  
REF. PP-05375903**

Dear Sir

**APPLICATION FOR FULL PLANNING PERMISSION – CHANGE OF USE  
BUILDING IN A CONSERVATION AREA – TOWN AND COUNTRY PLANNING ACT 1990  
14 SOUTHAMPTON PLACE, LONDON, WC1A 2AJ**

On behalf of our client, Perez International Inc, please find enclosed an application for planning permission, for the change of use of 14 Southampton Place, London, WC1A 2AJ.

The application seeks permission for the following:

*“Change of use from an educational facility (Class D1) to offices (Class B1a).”*

**Introduction and Background**

The site comprises a six storey building terrace property (basement, ground plus four upper storeys), situated on the western side of Southampton Place, in High Holborn. The Site is located within the administrative area of the London Borough of Camden (“LBC”).

The building is currently vacant, having previously been occupied by a private language school from the mid-1990s. It was built as a house, but was used as offices in latter part of the twentieth century. It comprises 513 sq m of floorspace (GIA) (although due to the poor efficiency of the building, comprises only 357 sq m NIA).

The property is Grade II\* listed along with the remaining terrace which comprises a total of nine buildings (Nos. 14 – 22). The terrace was built between 1758 and 1763 probably under the direction of Henry Flitcroft. The list entry describes the interior of No. 14 as being “especially fine”. The Site is also located within the Bloomsbury Conservation Area.

Southampton Place is a one-way street linking High Holborn to the south with Bloomsbury Square to the north. The site is adjacent to two office buildings, a five storey building to the south which comprises a bank at ground floor level and a five storey building to the north, which forms part of the same terrace.

The Site benefits from excellent transport links, located only 150m from Holborn Underground station and 750m from Tottenham Court Underground and Crossrail station. The Site also benefits from excellent bus links with six bus stops within 600m. It has a Public Transport Accessibility Level of 6b, which is considered ‘excellent’.

### Planning History

On 4 August 1994, temporary planning permission was granted for the change of use of No. 14 (and the second and third floors of No. 15) from office use (Class B1) to education use (Class D1) (ref. 9400913). The temporary period was limited to 10 years and personal to the London College of International Business Studies.

The continued use of the building as an educational facility exists by virtue of a planning permission granted on 28 July 2004 (ref. 2004/2397/P) which retained the entire building as an educational facility (Class D1). This permission was neither temporary nor personal. We note that the ground floor plan does not appear to have been approved as it is not listed on the decision notice.

As noted above, the building is listed (Grade II\*) and the planning register shows a number of listed building applications which were granted for internal and external alterations to the building.

### **Proposed Development**

The proposal seeks to convert the entire building from an educational facility (Class D1) to offices (Class B1). The property is currently vacant, having previously been occupied by a private language school that vacated in September 2015.

The Applicant wishes to convert the building back to its previous use as an office. We note that the majority of buildings along Southampton Place are within an office use.

Functionally, the two uses are similar and no internal alterations are required to accommodate the conversion. There will be no changes to the access to the building as the building is particularly sensitive to physical alterations. Therefore, listed building consent is not required and planning permission is only sought for the material change of use of the building.

Ultimately, the proposed conversion seeks to preserve the building's special interest as a listed building, and the conversion to a suitable and viable alternative use ensures that the beneficial use of the building will be continued. The office use is a reinstatement of activity that the building was previously used for.

### **Planning Framework**

The proposals have had regard to the statutory development plan and other material considerations. For this site, the development plan includes:

- The Mayor's London Plan: The Spatial Development Strategy for London (Consolidated with Alterations since 2011) (March 2016);
- London Borough of Camden Core Strategy (2010);
- London Borough of Camden Development Policies (2010); and
- London Borough of Camden Proposals Map (2010).

LBC are currently preparing a new Local Plan which will replace the current Development Plan documents, as the basis for making planning decisions in the Borough. Consultation was undertaken on the Submission Draft Local Plan between February and April 2016 and was submitted to the Planning Inspector for examination in June 2016. The draft Local Plan therefore carries very limited weight in the determination of planning applications.

The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) set out the national policy and guidance. Material considerations for the Site include relevant guidance contained

within Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs). These have been produced by LBC and the Mayor, and cover a number of topics. Camden's guidance is known as Camden Planning Guidance (CPGs), of which there are currently eight publications.

The adopted Proposals Map identifies the Site as being within the:

- Bloomsbury Conservation Area;
- Central London Area; and
- London Suburbs Archaeological Priority Area.

We note that the Site is adjacent to, but not part of the Central London Frontage which runs along High Holborn and 13 Southampton Place. Alterations to the Proposals Map are proposed within the new Local Plan, although none of these affect the Site.

## **Planning Policy Assessment**

### Principle of Loss of Education Use

The proposed development results in the conversion of 513 sq m of floorspace from an educational use (although only 357 sq m NIA). LB Camden does not have a policy that explicitly protects language schools as an education facility.

Core Strategy Policy CS8 does, however, recognise the importance of education uses as an employment generator and Policy CS9 supports the concentration of educational facilities within Central London.

The Council does have policies which support educational facilities, although these are related mainly to schools and high education establishments. For example, Core Strategy Policy CS10 supports the higher education sector in Camden by balancing its requirements with other sectors.

The existing use as a language school is not essentially considered a community use by LB Camden, nor is it a priority educational establishment. The previous tenant, which operated a private language school was not serving as a community facility. Development policy DP15, which seeks to protect community facilities, is therefore not considered to be relevant.

Emerging Policy E1 supports the development of education sectors as part of its economic development policy. Again, the supporting text to the policy refers to large scale employment generators such as universities.

The site has been unoccupied for 11 months, since the previous tenant vacated the property. The proposed development seeks to convert the building into offices, which is an alternative employment generator and a suitable land use within this location.

### Principle of Office Use

Core Strategy Policy CS1 seeks to promote the most efficient use of land and buildings in Camden. The site is located outside of the identified Growth Areas, but Policy CS3 promotes appropriate development within the highly accessible area of Central London which are suitable locations for the provision of a range of uses, including offices.

Policy CS5 aims to manage the impact of growth and development and ensure that development meets the full range of objectives of the development plan. Particular consideration is given to providing uses that meet the needs of the borough and contribute to the borough's London-wide role.

The Council aims to secure a strong borough economy and expects a mix of employment facilities and types, including the provision of facilities for small and medium sized enterprises (under Policy CS8).

Policy CS9 supports Central London as a successful and vibrant part of the capital to live in, work in and visit. The Council specifically supports this area as a focus for office growth. Development should contribute to London's economic, social and cultural role, while meeting the needs of local residents.

As discussed above, emerging Policy E1 of the Draft Local Plan seeks to continue the economic development policy and secure a strong economy. The Council will direct new offices to Central London and aims to meet the forecast demand of 695,000 sq m of office floorspace between 2014 and 2031.

We therefore consider that the principle of office development in this location is fully justified and will contribute towards business floorspace and employment generation within the borough. The site is located within Central London and is close a short distance from two separate Growth Areas. With an office tenant, there are likely to be 27-30 jobs generated.

#### Heritage Considerations

As noted above, the site forms part of an eighteenth century terrace which is Grade II\* listed and located within the Bloomsbury Conservation Area.

Core Strategy Policy CS14 seeks to ensure that Camden's places and buildings are attractive, safe and easy use through the preserving and enhancing of the borough's heritage assets and their settings including conservation areas, listed buildings and archaeological remains. Policy CS9 specifically seeks to preserve and enhance Central London's historic environment.

Development policy DP25 states that the Council will only grant consent for the change of use of a listed building where it considers that it would not cause harm to the special interest of the building, nor if it would cause harm to the setting of a listed building.

The application proposes no physical changes to the building, either internally or externally. The previous use as a private language school operated with similar space to that which an office tenant would operate and the only changes required prior to occupation is a change in furniture. This, in itself does not require planning permission or listed building consent.

The change of use to office is not considered to cause harm to the special interest of the building. The building was previously in use as an office and this use is prevalent along the other properties in the group.

#### Transport

Core Strategy Policy CS11 is the primary transport policy which promotes the availability of sustainable transport choices to support growth, reduce environmental impact of travel, and relieve pressure on the transport network.

This is supported by detailed Policy DP16 which seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. This is also promoted under Policy DP17, which resists development that is dependent on travel by private motor vehicles.

The change of use will have no material impact on the transport network given that the two uses are similar and the network capacity is among the highest in London. There is no increase in development, or intensification of use of the site and therefore any increase in trip generation would likely be minimal.

The Site is located in an area of excellent public transport accessibility, and is suitably located close to the London Underground (at Holborn) numerous bus stops and a cycle hire station, on the opposite side of Southampton Place. Walking, cycling and the use of public transport will be the main form of accessing the site for both staff and visitors. The site does not benefit from any private car parking.

### Other Matters

The proposed conversion is considered to be in accordance with Core Strategy Policy CS5 which seeks to ensure that development meets the full range of objectives within the development plan. This includes the protection of residents' amenity, ensuring that the impact of development on occupiers and neighbours is fully considered. The change of use from a private school to an office is considered to be beneficial from an amenity point of view, due to the more permanent nature of users and visitors of the building, using it during the day. This compares to a school, in which students are visiting on a transient basis throughout the day.

Development policy DP22 aims to promote and measure sustainable design and construction by expecting non-domestic developments of 500sqm of floorspace or above to achieve "excellent" in BREEAM assessments from 2016. Whilst the site consists of a building of more than 500sqm, there are no internal alterations proposed to this listed building. The existing building performs at level which is acceptable for a modern office tenant and no changes are proposed. This ensures that the listed building is not physically altered and its special interest conserved.

Core Strategy Policy CS18 seeks to make sure that developments include facilities for the storage and collection of waste and recycling. The site will utilise the existing waste storage and servicing regime, which is to store waste on site, and for it to be collected from the street by a private contractor.

### **Conclusions**

The proposals have been formulated in accordance with the NPPF, the adopted London Plan and Camden's adopted and emerging development plan documents. The proposed development is considered to accord with the relevant policies of the plan and is consistent with the aims and objectives of national planning policy.

The application, which seeks the change of use of the existing educational facility to an office is considered to have a number of benefits, including, but not limited to:

- Successfully delivers sustainable development through the re-use of an existing building;
- Delivers a development that would contribute positively to the delivery of the vision for Camden and its strategic objectives.
- Delivers over 500 sqm of employment floorspace, which will generate approximately 27 – 30 jobs.
- Brings back into use a building which has been vacant for the best part of a year.
- Delivers an appropriate use that will not harm the special interest of the listed building, and converts it back to a use it was previously within.

### **Application Submission**

The application for planning permission is submitted via the Planning Portal (ref. PP-05375903) and comprises the following documentation:

1. This Cover Letter;
2. Planning Application Form (including Ownership Certificates);
3. Community Infrastructure Levy Forms;

4. Site Location Plan;
5. Existing and Proposed Floor Plans;

The application fee has been calculated in accordance with The Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment) (England) Regulations 2012 (Statutory Instrument No. 472). This fee, amounting to £385.00 and will be paid via bank transfer following the submission of the application.

We would be grateful if the London Borough of Camden could confirm that our application is complete and will be validated shortly. If you require any further information, or wish to discuss in more detail, please contact Gareth Fox (020 7312 7408 / [gareth.fox@montagu-evans.co.uk](mailto:gareth.fox@montagu-evans.co.uk)) or James Huish (020 7312 7484 / [james.huish@montagu-evans.co.uk](mailto:james.huish@montagu-evans.co.uk)) of this office in the first instance.

Yours faithfully

*Montagu Evans*

**MONTAGU EVANS LLP**

**Enc.**