

PEH/KES/DP3486

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Planning Department
London Borough of Camden
5 Pancras Square
London
N1C 4AG

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
facsimile 020 7004 1790

www.dp9.co.uk

Dear Sir/Madam

APPLICATION FOR CHANGE OF USE TO OFFICE (TOWN AND COUNTRY PLANNING ACT 1990)

2 LEATHER LANE, LONDON, EC1

Please hereby find enclosed a planning application for the above property, submitted on behalf of Holborn Management Limited and 120 Holborn Propco Limited. The planning application seeks:

“Change of use of the self-contained unit at part ground and mezzanine floors from leisure/fitness (D2) to offices (B1a) and associated works.”

Please find enclosed the following in respect of the application:

- Planning application form signed and dated, including certificates and Agricultural Land Declaration;
- Site location plans at 1:1250 ref. P10_001 Rev P1;
- Existing and proposed floorplans at 1:200;
- A cheque for £385 in respect of the application fee; and
- CIL Additional Information Form.

The site

The unit to which this application relates is located within a large office, retail and leisure building known as 120 Holborn. Being self-contained, the unit has its own address at 2 Leather Lane. It has an access at ground level, adjacent to the Sir Christopher Hatton pub, with the main area of floorspace located above the pub at mezzanine level.

The existing unit is in class D2 use, however the unit has been vacant since 31 May 2016. The unit extends to approximately 237sq m.



Planning history

There is one application of relevance to the proposal. Application reference 2013/8256/P was granted on 13 March 2014 for change of use from office use (class B1) at part ground and first floor levels to a fitness studio (class D2). The office space had been vacant since February 2006, and therefore officers considered that there was insufficient demand for the existing unit to remain in office use.

The proposed development

The owners of the office space at 120 Holborn adjacent to 2 Leather Lane, have been seeking to secure new office tenants for the building following the refurbishment of the building. Whitbread Group PLC, a company whose former office premises were located within the London Borough of Camden, have agreed to lease the office space at first floor level, above the existing spin studio, on the basis that 2 Leather Lane is in office use.

This application therefore seeks planning permission to change the use of the unit from leisure/fitness to offices to meet the requirements of a FTSE 100 company to remain in the borough.

Planning policy considerations

The site is located within the Hatton Garden Area, Hatton Garden Conservation Area, Holborn Growth area and Central London Frontage in the Camden Policies Map.

National Planning Policy Framework

The overriding aim of the National Planning Policy Framework (NPPF) is to achieve sustainable development. It states at paragraph 6 that '*there are three dimensions to sustainable development: economic, social and environmental*'. The economic role includes 'ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation'.

One of the core planning principles of the NPPF is to secure sustainable economic growth and '*proactively drive and support sustainable economic development to deliver [...] business units*' (Paragraph 17). The NPPF confirms that town centres are considered to be suitable locations to accommodate office uses.

LB Camden Core Strategy (2010)

Policy CS2 relates to Growth Areas and identifies that Holborn is a predominantly commercial area, and that the London Plan allocates a minimum of 2,000 new jobs to be created in the area up to 2026. The Council aspires to provide a mix of land uses in the Holborn Growth Area, with offices and housing as the predominate uses.

Policy CS8 seeks to promote a strong economy in Camden and specifically supports the provision of office floorspace within Growth Areas. The policy also seeks to promote and protect the jewellery industry in Hatton Garden.

Policy CS10 supports the retention and enhancement of existing leisure facilities.



LB Camden Development Policies (2010)

The protection of existing leisure facilities is addressed by Policy DP15, which states that *'The Council will protect existing leisure facilities by resisting their loss unless:*

e) adequate alternative facilities are already available in the area, and therefore no shortfall in provision will be created by the loss; or

f) the leisure facility is no longer required and it can be demonstrated that there is no demand for an alternative leisure use of the site that would be suitable'.

Supporting paragraph 15.9 provides further detail regarding this policy and states that the loss of a leisure facility should demonstrate that adequate alternative facilities are already in the area, and therefore that no shortfall in provision will be created by the loss. They should also show that the site cannot be used for an alternative leisure use, either because there is no demand, or because the location is no longer suitable for leisure use.

It is worth noting that Development Policy DP1, which requires up to the equivalent provision of secondary uses when proposals in Hatton Garden result in a net increase of floorspace by 200m² or more (gross), does not apply given that there is no proposed increase in floorspace.

Camden Planning Guidance 5 (Town Centres, Retail and Employment) (2013)

Paragraph 4.18 of Camden Planning Guidance 5 (CPG5) identifies that the Holborn Central frontage, within which the site is located, is dominated by office development and that office entrances often break up the continuity of shop premises. Notwithstanding this the Council seek to protect the retail function of the frontage.

In relation to Hatton Garden, Camden Planning Guidance 5 identifies that existing offices will be protected (Paragraph 4.60), and that changes of use to non-business use will be resisted.

Hatton Garden Conservation Area Statement (1999)

The Statement identifies that although the area was historically characterised by jewellery uses, including showrooms and workshops, it has over time seen the introduction of other uses, including retail and offices. The character of the area today is one of a commercial and retail centre alongside the more traditional jewellery uses.

Planning policy response

As the proposals seek to convert approximately 237sq m of floorspace from fitness (D2) use to offices (B1a) they engage policies in the Core Strategy, Development Policies and Camden Planning Guidance relating to the loss of leisure floorspace, and the provision of office floorspace. The relevant policies are summarised above and addressed below.

Loss of leisure floorspace

Two years ago the Council approved the change of use of the unit from office use (B1a) to leisure use (D2). Since that time the space has been used for cycle spin classes, until becoming vacant in May this year.



The requirement to secure an office tenant for the adjacent office floorspace within 120 Holborn has necessitated the proposed reversal of the change of use to enable the adjacent office space to be re-let for office use.

Policy DP15 seeks to resist the loss of leisure space, unless adequate alternative facilities are already available in the area, and therefore there will be no shortfall in provision arising from the loss.

Planning permission was granted on 20 August 2015 for the change of use of part of the basement at 120 Holborn and 12A Leather Lane to a leisure centre (D2 use) (application reference 2014/2782/P). The gym permitted as a result of this consent is currently being installed and is scheduled to open in Autumn 2016. Given that the new gym will contain studio space, which could accommodate cycle spin classes, it is considered that there are adequate facilities in the area, and therefore the proposed loss of the leisure unit at 2 Leather Lane would not arise in an overall shortfall in provision in the local area. Indeed, the proposed gym is to be located within the 120 Holborn building, in very close proximity.

Overall it is considered that the loss of leisure floorspace in this location is acceptable in this instance due to the imminent supply of additional leisure facilities within the immediate locality of the site. The application therefore complies with policies CS10 and DP15.

Provision of employment use

Planning policies at all levels support the provision of main town centre uses, such as office, within town centre locations. The site is located within the Holborn Growth Area, which is recognised for its function as an office location.

Policy DP12 requires new town centre uses to not harm to the character, function, vitality and viability of a centre, particularly where the use is non-retail. Taking account of the site located within an area dominated by office use, and given the fact that until two years ago the site was previously in office use, it is considered that the proposed use is acceptable.

The proposed office use at 2 Leather Lane would enable 120 Holborn Partnership to secure a FTSE 100 company to remain within the Borough, and such economic growth should be supported.

Accordingly, the application is considered to accord with policies CS2, CS8, DP12 and DP13.

With regard to Policy DP1, whilst we are of the view that as the proposal does not result in the creation of any new floorspace and therefore the policy should not apply, it can be considered regardless that the space would not be suitable for either residential or jewellery use for the following reasons:

- Jewellery Use:
 - The lack of security measures that are in place;
 - The proximity to the pub;
 - The large glazed front aspect; and



- The size of the unit is too large for a single jewellery use and cannot easily be subdivided into smaller units given its location on a mezzanine floor, with restricted single point access.
- Residential Use
 - Given the arrangement of the unit, it is evident that any residential dwelling(s) would be single aspect, facing west into Leather Lane. Single aspect units are generally resisted by the Development Plan;
 - The position of the unit on a mezzanine floor, with a significant overhang of the building above, will likely result in poor levels of daylight and sunlight. This would be hampered by the necessary single aspect nature of the dwellings, with rooms to the rear receiving no natural light whatsoever. The resulting internal amenity of the dwellings would be poor;
 - The dwellings would not be provided with any form of private or shared amenity space, given the inability to provide balconies or a dedicated external area on Leather Lane; and
 - The unit is positioned above a pub. The entrance at the ground floor is also adjacent to the pub's service entrance. A residential use in such close proximity to the pub is not considered to be appropriate, given the impacts of the pub on the residential accommodation and vice versa.

With regard to the proposals' potential impact on the character of the Hatton Garden Conservation Area, the proposed office use would not replace a historic jewellery use, and would not generate any particular impacts which would differ from the uses already found in the area. As such it is not considered that the proposal would fail to preserve or enhance the Conservation Area.

Summary Conclusions

Submitted with this letter is an application for the change of use of 2 Leather Lane from leisure use (D2) to office (B1). The change of use proposed is considered to be in accordance with the Development Plan requirements. Whilst they will result in a loss of D21 leisure space, this is considered to be acceptable in this instance for the reasons listed above.

We trust that you have sufficient information to validate and consider the application. Should you require any further information, please contact Katie Smith of this office.

Yours faithfully

DP9 Limited