DP4179/JHM/DTJ

14th December 2016

Planning Department

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London Borough of Camden

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Dear Sir,

BROWNLOW HOUSE & 45 BEDFORD ROW, THE HIGH HOLBORN ESTATE, LONDON WC1R

FULL PLANNING APPLICATION UNDER THE TOWN AND COUNTRY PLANNING ACT **1990 (AS AMENDED)**

1.0 INTRODUCTION

- 1.1 On behalf of our client, MPG High Holborn LP Ltd, we enclose two separate planning applications for:
 - 1. "Remodelling of the Brownlow House office entrance and the addition of new plant at roof level."
 - 2. "Remodelling of the 45 Bedford Row office entrance, alterations to the external glazing at ground floor level and new plant at roof level"
- 1.2 As part of this planning application, please find enclosed the following for your review:

<u>Application 1 – Brownlow House</u>

- Application form, duly signed and dated by DP9 Limited;
- Site Location Plan, prepared by Buckley Gray Yeoman;
- Combined Design and Access Statement dated November 2016, prepared by Buckley Gray Yeoman;
- Acoustic Report, prepared by Lee Cunningham Partnership; and
- Application drawings, prepared by Buckley Gray Yeoman.

Application 2 – 45 Bedford Row



- Application form, duly signed and dated by DP9 Limited;
- Site Location Plan, prepared by Buckley Gray Yeoman;
- Combined Design and Access Statement dated November 2016, prepared by Buckley Gray Yeoman;
- Acoustic Report, prepared by Lee Cunningham Partnership; and
- Application drawings, prepared by Buckley Gray Yeoman.
- 1.3 The requisite fee of £195 is due for each planning application and will be paid to the Council upon registration of the planning applications.

2.0 BACKGROUND AND CONTEXT

- 2.1 The Sites are located within the London Borough of Camden, in the heart of Holborn, close to the City of London and the theatre district. The area is distinguished by the retail facilities of Hatton Gardens, Holborn Circus and Holborn Viaduct.
- 2.2 The planning applications relate to two different buildings within the urban block known as High Holborn Estate which is bound by Bedford Row, Brownlow Street, High Holborn and Hand Court. The two buildings that form part of the proposals are noted below. A detailed review of each building is set out within the enclosed Design and Access Statement prepared by Buckley Gray Yeoman.
 - **Brownlow House** Existing office building with ground floor retail.
 - **45 Bedford Row** Existing office building with ground floor retail.
- 2.3 The buildings are not listed but are located within the Bloomsbury Conservation Area.
- 2.4 The Sites are located in a highly accessible area with an Excellent PTAL rating (6b). Holborn and Chancery Lane tube stations are all located within close walking distance from the Sites.

3.0 PLANNING HISTORY

- 3.1 The Sites have an extensive planning history associated with proposals for comprehensive redevelopment of the High Holborn Estate block dating back to 2007 when two schemes were dismissed at appeal. The appeal schemes resulted in a successful planning permission for a comprehensive office-led development being granted in July 2009. That application was subject to minor material amendments which were approved in October 2011 (reference: 2010/5725/P).
- 3.2 Planning permission was sought in 2012 for the renewal of planning permission granted in July 2009. The application was the subject of a resolution to grant planning permission in February 2013, but the applicant at the time decided not to complete the S106 Agreement and therefore the planning application was formally withdrawn.

4.0 THE PROPOSALS

- 4.1 The Applicant is committed to return two prominent and valuable office buildings to the busy Holborn office market that currently lie vacant. These buildings are in need of refurbishment and significant overhaul in order to return them back to market to meet the demands of today's office standards. To do this requires the modification to the main office entrances, the complete overhaul of the internal fabric and existing servicing systems that will result in more efficient plant equipment to be replaced at roof level.
- 4.2 An overview of the proposals for each building are noted below. Full details of the proposals can be found in the submitted Design and Access Statement prepared by Buckley Gray Yeoman.

Brownlow House

- 4.3 The existing building comprises of basement and ground floor retail floorspace (Class A1) and 4 upper storeys of office accommodation (Class B1).
- 4.4 The proposals comprise:
 - The remodelling of the existing office entrance on Brownlow Street;
 - Internal refurbishment of offices accommodation on floors 1-4;
 - Internal refurbishment of the ground and basement common parts, to create shower and cycle facilities for office employees; and
 - New plant condensers at roof level.
- 4.5 Please note that the internal refurbishment works to the office building does not require planning permission and therefore does not form part of this planning application.

45 Bedford Row

- 4.6 The existing building comprises a mix of retail (Class A2) and office (Class B1) at basement level, ground floor retail (Class A2) and five upper floors of office accommodation (Class B1).
- 4.7 The proposals comprise:
 - Remodelling of the office entrance on Bedford Row;
 - Replace existing shop front doors with new glazed metal frame doors along Hand Court;
 - Replace existing ground level glazing with new metal frame glazing;
 - Internal refurbishment of offices accommodation on floors 1-5; and
 - New plant condensers at roof level.
- 4.8 Please note that the internal refurbishment works to the office building does not require planning permission and therefore does not form part of this planning application. As part of the refurbishment works, the Applicant will change the use of the ground floor unit from an A2 use to an A1. As this change is allowed under Part 3 Class E of the Town and Country Planning (General Permitted Development) Order 2015, it does not form part of this planning application.



5.0 INITIAL PLANNING POLICY ASSESSMENT

- 5.1 The Council's 'Development Plan' consists of the London Borough of Camden Core Strategy and Development Plan Policies Document (2010), The Site Allocations Development Plan (2013) and the London Plan (2016). Consideration is also given to the National Planning Policy Framework (NPPF) and the Council's Supplementary Planning Guidance (SPGs).
- 5.2 The Site benefits from the following planning policy designations as defined by Camden's Policies Map:
 - Central Activity Zone;
 - Central London Frontage;
 - Bloomsbury Conservation Area;
 - Growth Area (Holborn);
 - Site Allocation (20);
 - Archeological Priority Area;
 - Designated View (SA.2 Greenwich Park).
- 5.3 We have undertaken an initial assessment of our client's proposals in the context of the Site's planning policy framework and comment as follows:

6.0 PLANNING POLICY REVIEW

- 6.1 Policy CS3 notes that the Council will promote appropriate development in the highly accessible areas of Central London. This area is considered to be a suitable location for the provision of homes, shops, food, office, community and entertainment uses.
- 6.2 Policy CS8 seeks to promote a successful and inclusive economy in Camden. The policy supports Camden's industries by safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers.
- 6.3 Policy CS9 promotes the Central London area of Camden as a successful and vibrant part of the capital to live in, work in and visit.
- 6.4 Under Policy CS14 the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by requiring development of the highest standard, seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible.
- Policy DP13 notes that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business.
- 6.6 Policy DP24 requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider a variety of factors such as the quality of materials to be used, the appropriate location for building services equipment and the provision of appropriate amenity space.



- 6.7 Policy DP25 seeks to conserve the heritage of Camden. Development affecting conservation areas should take account of conservation area statements and will only be permitted if it preserves and enhances the character of the conservation area. It seeks to preserve trees and garden spaces which contribute to the character of the conservation area.
- 6.8 Policy DP28 seeks to ensure that noise and vibration is controlled and managed across the borough. The Council will only grant planning permission for plant or machinery if it can be operated without causing harm to amenity and does not exceed the Councils noise thresholds. Further, the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development.
- 6.9 Policy DP30 seeks a high standard of design in new and altered shopfronts, canopies, blinds, security measures and other features. The policy notes that the Council will resist the removal of shop windows without a suitable replacement.

7.0 POLICY ASSESSMENT

Office Use

7.1 The proposals include the remodelling of the entrances to 45 Bedford Row and Brownlow House. In association with these improvements, the existing office floorspace will be refurbished to modern office standards to allow these vacant buildings to be occupied. Although, the internal refurbishment works do not technically require planning permission, they identify a positive step from the Applicant to create improved office accommodation within the Central London area, in accordance with Core Strategy Policy CS 3,8, 9 Development Management Plan Policy DP13. Policy 4.2 of the London Plan also supports the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of the London Plan.

Design

- 7.2 The proposed alterations to the existing buildings have been designed to respect the character of its surrounding and the conservation area. The use of materials is sympathetic to the buildings and seek to modernise the buildings to attract new tenants.
- 7.3 On this basis it is considered that the proposed alterations will preserve and enhance the appearance and character of the Bloomsbury Conservation Area, and as such comply with the aims of Core Strategy Policy CS14 and Policies DP24, DP25 and DP30 of the Development Policies document.

Noise

7.4 The plant units will not be visible from ground level and have been placed in suitable locations to minimise their impact on neighbouring properties. The plant noise assessment prepared by Lee Cunningham Partnership concludes that the noise levels will meet the requirements of Policy DP28.





- 8.1 The proposals comprise minor alterations to the existing building that are sympathetic to their architectural character. The proposals enable the refurbishment of the buildings to bring them back into active use, creating additional employment within this Central London location. The scheme is well designed and represents a contextual response to its surroundings and the Bloomsbury Conservation Area.
- 8.2 The above applications have all been submitted to the London Borough of Camden online via the planning portal.
- 8.3 We trust that the above and enclosed is sufficient for the validation and registration of the applications, however if any additional details are required please do not hesitate to contact Dean Jordan or Jonathan Marginson from this office.

Yours faithfully

DP9 Ltd

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