



An **APLEONA** company

Planning
Statement

65 Gresham Street
London
EC2V 7NQ

T: +44 (0)20 7911 2468
F: +44 (0)20 7911 2560

133 – 136 High Holborn and 14, 15, 22 Southampton Place

Planning Statement

March 2014

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Prepared By: Camille Soor
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For and on behalf of GVA

1. Executive summary

- 1.1 The proposals seek to bring back into use four currently vacant office (and part A2 use) buildings within a key central London location in Holborn. The proposals represent an exciting opportunity to enhance the activity around Holborn and upgrade the buildings including three Grade II* Listed buildings. This is in line with national and local planning policy which seeks to ensure that buildings are in the optimum use and protect the historical fabric of London.
- 1.2 These proposals will have a huge impact on Holborn and respond directly to national and local policy which encourages flexible and user-friendly work spaces. Holborn will establish a unique identity by introducing inspirational co-working and shared workspaces - helping businesses and entrepreneurs to grow.
- 1.3 At the forefront of the proposals is the intent to create a genuinely advanced workplace combined with smart design to support and be a part of Holborn's new profile, helping put it on the map as a destination for the modern worker and to take advantage of the new Crossrail connections at Tottenham Court Road.
- 1.4 The proposals will create a dynamic eco-system, job prospects and diverse events that will bring businesses and entrepreneurs to Holborn.

2. Introduction

2.1 This Planning Statement has been prepared by GVA on behalf of Sicilian Lab Estates Ltd ('the applicant') in support of a full planning application and listed building consent for the proposed refurbishment and upgrading of Hogarth House and 14, 15 and 22 Southampton Place.

2.2 The description of development is as follows:

"Application for full planning permission and listed building consent for refurbishment and restoration of the buildings' external façade; internal upgrading of 14, 15 and 22 Southampton Place to retain office (B1) floorspace; and change of use of ground floor of 133-136 High Holborn from A2 use to flexible A1/A3 use."

The Vision

2.3 The overall vision for the Holborn Links Estate has been presented to senior officers at Camden ahead of submission of this application.

2.4 The overarching vision for the Holborn Links Estate is to create a new employment led destination for Camden and London. As part of this vision, LABS intend to create vibrant co-working spaces, focussing on innovative approaches to collaborative working in modern office environments that are capable of supporting small to medium enterprise. In addition, proposals will seek to activate street frontages and promote visual interest in the streetscape.

2.5 The buildings on the estate will be managed by LABS whose innovative model allows buildings and users to have immediate access to a connected community and a wealth of intuitive products and services, including a unique technology package. The LABS vision and their approach to the work environment reflects today's worker; every aspect inspires creation, productivity, and collaboration. Users will have the ability to book meeting rooms, engage with their community and access much-needed productivity tools - all whilst being within a key central London location.

2.6 The proposals will form a positive contribution to Holborn, promoting a greatly increased employment offer in the area whilst also encouraging flexible and user-friendly work spaces. LABS aim to establish a unique identity in Holborn by introducing inspirational co-working and shared workspaces - helping businesses and entrepreneurs to get started, learn and grow their businesses.

- 2.7 The overall vision will create a dynamic eco-system, job prospects and diverse events that will bring businesses and entrepreneurs to Holborn. Furthermore, existing, underused buildings (including listed buildings) will be sensitively refurbished as part of a programme of investment to ensure the continued vibrancy of the estate. The proposals will put Holborn on the map as a destination for the modern worker and are well placed to take advantage of the benefits of major new infrastructure such as the new Crossrail connections at Tottenham Court Road.

Supporting information

- 2.8 This statement should be read in conjunction with the following documents submitted in support of the application:
- Existing and Proposed drawings;
 - Design and Access Statement; and
 - Heritage Statement.

Structure of Planning Statement

- 2.9 In setting out the planning case in support of the proposals, the remainder of this Planning Statement is structured as follows:
- Section 3 briefly describes the site and surroundings;
 - Section 4 describes the development proposals;
 - Section 5 outlines the planning policy context;
 - Section 6 assess the proposals against the planning policy framework; and
 - Section 7 provides an overall summary and conclusions.

3. The site and surroundings

- 3.1 The application site consists of four buildings and a car park located within Holborn which is a key central London location comprising of a mix of uses including commercial, residential, retail, cultural and leisure uses.
- 3.2 Hogarth House is located at 133 to 136 High Holborn on the corner with Bloomsbury Court. It is a 7 storey building with existing A2 lawful use at ground floor level and office floorspace (B1a Use Class) on the upper floors. The building is currently vacant with Nationwide leaving the ground floor unit in recent weeks. There are two structures for plant on the roof and a car park to the rear which has space for six vehicles. The building dates back to the late 1980s and has a stone washed facade with tinted glass panels in vertical fenestration representing a post-modern design.
- 3.3 Immediately adjacent to Hogarth House along High Holborn is a four storey building with a restaurant (My Old Dutch) at ground floor level and offices above. Along Bloomsbury Court is a four storey office building. Holborn Tower, a 12 storey office building which is due to be refurbished to provide Grade A office space, is located further along Bloomsbury Court.
- 3.4 14, 15 and 22 Southampton Place form part of the application site boundary and comprise a terraced block which as a group is Grade II* Listed. The buildings date back to the mid-18th century and they comprise of darkened multi-colour stock brick with a stone band at first floor level and a tiled mansard roof with dormers. The buildings are three storeys in height, with an attic and basement. The buildings are currently in lawful office use and are currently vacant. Further detail on these buildings can be found in the accompanying Heritage Statement.
- 3.5 All the application proposal site buildings are located in a highly accessible central London location with a PTAL rating of 6b (considered the best level of connectivity). Holborn Underground Station is located a short walk from the site and is served by the Central and Piccadilly lines. Tottenham Court Road is located further west of the site and will soon be served by Crossrail which will provide a route west and east of central London.

Site specific policy designations

- 3.6 In accordance with Camden's adopted Policies Map, the site has the following site specific policy designations:
- Located within the Bloomsbury Conservation Area;
 - Located within the Central London Area;
 - Hogarth House is located within the Central London Frontage; and
 - Hogarth House, 14 and 15 Southampton Place are located in a transport Safeguarding Area.

- 3.7 The site is also located within the CAZ frontage of the Central Activity Zone (CAZ) as designated by the London Plan (2016).

Planning history

- 3.8 A review of the Council's online records has identified the following relevant planning history for the site.

Hogarth House

- 3.9 Planning Permission was granted (Ref: 8800104) on 19th August 1988 for the redevelopment of 133-136 High Holborn, 1-3 Bloomsbury Court and 14 Barter Street to provide a part 4 part 6 storey building for use as B1 and A2 use as well as 10 residential flats with associated car parking and other refurbishment works.
- 3.10 A number of other applications have since been submitted and approved for associated elevational and signage works.

14 Southampton Place

- 3.11 The existing listed building dates back to the mid-18th Century. Since the late 1980s a number of listed building consents have been granted for internal and external alterations to the building. As well as this, there are historic permissions for the change of use of part of the building from office use to D1 education use. The building was occupied by a private language school having been granted temporary planning permission in 1994 and then a further planning permission in July 2004 (2004/2397/P). Most recently, planning permission (ref. 2016/4652/P) was granted in October 2016 for the change of use from an educational facility (Class D1) back to office (Class B1a).

15 Southampton Place

- 3.12 The planning history for 15 Southampton Place is limited and predominantly provides details of planning permissions and listed building consents relating to minor works including internal alterations, temporary changes of use and external alterations.
- 3.13 The most relevant planning permission (2012/5875/P) relates to a change of use from office to six self-contained residential units (Class C3). This permission was granted by the Council in June 2013. However the consent has not been implemented on site and the lapsed on 18 June 2016.

22 Southampton Place

- 3.14 Recent planning history indicates that No. 22 Southampton Place has been predominantly in office use since at least the 1970s, with alterations undertaken overtime to accommodate various occupiers.
- 3.15 Alterations of note include a large scale refurbishment, which was carried out in the 1970s and included the introduction of a new lift core and the modernisation of the existing offices. Further refurbishments and servicing works were also undertaken during the 1980s and 90s. More recently, consent was granted (2016/6842/L) on 6th February 2017 for *'internal refurbishment works, including the replacement of the existing lift, removal of modern partition walls at basement, ground and fourth floor levels, installation of new partitions at basement level, removal of plasterboard suspended ceilings at basement level, renewal of modern internal wall, ceiling and floor finishes, and re-routing and installation of new services.'*

4. The Proposals

4.1 The application proposals seek to refurbish and upgrade the existing buildings to provide co-working (office) floorspace and flexible A1/A3 use at the ground floor level of Hogarth House. The application proposals are described in more detail below and the accompanying Design and Access Statement prepared by Oktra.

Hogarth House

4.2 The proposals seek to change the use of the ground floor level from A2 to flexible A1/A3 use which will provide a fluid space to the benefit of the public and small business users in the floorspace above. These proposals will further enhance the active frontages along High Holborn and are in keeping with the typical streetscene of the area.

4.3 The internal upgrading of the building is supported by a number of external alterations at ground floor level. This will include the removal of the tinted glass panels from the window mullions and exposing the original post-modern window design. This will allow more natural light into the ground floor and will enhance the building's original architectural quality.

4.4 The proposals also include the repainting of the mullions on the ground floor and replacement of the entrance doors with an automatic sliding door. The existing advertisement will also be removed to showcase the original window mullions and the ATM machine will be removed.

4.5 The existing solid door on the rear elevation of the building will be replaced with a toughened glass door with security control and locks.

14, 15 and 22 Southampton Place

4.6 Listed Building Consent is sought for refurbishment works to the properties to facilitate the use of the buildings as co-working office floorspace. The proposed works include the following:

- The formation of an opening between the rear of 14 and 15 Southampton Place to improve the connection between the two buildings;
- Replacement of a solid door to the rear of number 15 with a toughened glass door;
- Redecorating the front doors to the properties to match the existing paint colour; and
- Fixing a small door entry call box to the doorways and brass name plaque.

4.7 The internal works comprise of sensitive upgrading of the buildings ensuring that the historical features are protected and retained.

- 4.8 A full and comprehensive schedule of internal works is included in the accompanying Design and Access Statement prepared by Oktra as well as a separate, thorough assessment of the heritage assets and the impact that the proposals will have.

5. Planning policy

- 5.1 Section 38(6) of the Town and Country Planning Act 1990, states that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 Camden's Development Plan consists of the following documents:
- London Plan (2016);
 - Core Strategy (2010); and
 - Development Policies (2010).
- 5.3 Camden's Supplementary Planning Guidance is also relevant to the determination of this application and of key importance to this particular scheme is Town Centres, Retail and Employment (2013); Design (July 2015); Sustainability (July 2015); and the Bloomsbury Conservation Area Appraisal.
- 5.4 The National Planning Policy Framework (2012) and the London Plan (2016) are also material considerations to the determination of this planning application.

National Planning Policy Framework (2012)

- 5.5 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14). For decision-taking this means approving development proposals that accord with the development plan without delay. The NPPF includes a set of 12 core planning principles. The following are of relevance to this development proposal:
- "not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives"; and
 - "take account of the different roles and character of different areas, promoting the vitality of our main urban areas..."; and
 - "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable".
- 5.6 Section 1 of the NPPF relates to building a strong and competitive economy. Paragraph 20 states that "to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century".

- 5.7 Section 2 of the NPPF relates to the vitality of town centres. Bullet points 4 and 5 of Paragraph 23 are clear in stating that town centres should be competitive and provide customer choice and a diverse retail offer which reflects the individuality of the town centre and should ensure that markets remain attractive and competitive.
- 5.8 Section 12 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 128 states that in determining planning applications, local planning authorities should seek that the applicant describes the significance of any heritage assets affected, including any contribution made by their setting.
- 5.9 Paragraph 134 states that “where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”.

London Plan (2016)

- 5.10 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20 – 25 years.
- 5.11 The key policies are as follows:
- Policies 2.10 and 2.11 relate to the CAZ. Policy 2.10 states that the CAZ should be enhanced and promoted as a rich mix of local as well as strategic uses. Policy 2.11 states that the Mayor will seek solutions to constraints on office provision and other commercial development imposed by heritage designations without compromising local environmental quality. The Mayor will also identify, enhance and expand retail capacity to meet strategic and local need and focus this on CAZ frontages.
 - Policy 2.13 deals with opportunity and intensification areas. Holborn is allocated as an intensification area and has an indicative employment capacity of 2,000.
 - Policy 4.2 relates to offices. The policy is clear in that the Mayor will encourage the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility.
 - Policy 4.10 which relates to new and emerging economic sectors states that the Mayor will work with developers to ensure availability of a range of workspaces, including start-up space, co-working space and ‘grow-on’ space.
 - Policy 7.8 addresses heritage assets and archaeology. The policy states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

Core Strategy

5.12 The Core Strategy is Camden's overarching strategic policy document. Its key policies in relation to this development are as follows:

- Policy CS3 refers to highly accessible areas and states that these areas are considered to be suitable for the provision of offices and retail uses.
- Policy CS5 addresses the management of the impact of growth and development. It is clear in that particular consideration will be given to the protection and enhancement of the environment and heritage and local communities.
- Policy CS7 refers to promoting Camden's centres and shops. The site is located within a "Central London Frontage". The policy states that the Council will provide for and maintain a range of shops, services, food, drink and entertainment and other suitable uses to provide vibrancy, variety and choice.
- Policy CS8 relates to promoting a successful and inclusive Camden economy. It will safeguard existing employment sites and premises in the borough that meet the needs of modern industry and other employers.
- Policy CS14 deals with conserving the borough's heritage. It seeks to preserve and enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Development Policies

5.13 The relevant development policies are as follows:

- Policy DP13 considers employment premises and sites. It states that where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that the level of employment space is maintained or increased.
- Policy DP24 seeks to secure a high quality design. The policy expects the developments to consider the character, setting, context of neighbouring buildings and the materials to be used in the development proposed.
- Policy DP25 seeks to conserve Camden's heritage. It will only permit development in conservation areas where it preserves and enhances the character and appearance of the area. In relation to listed buildings it states that applications will only be permitted for alterations to a listed building where it considers this would not harm the special interest of the building.

Supplementary Planning Guidance

- 5.14 Camden has a suite of Supplementary Planning Guidance which supports its planning policies. The most relevant documents to this application are as follows:
- Design (July 2015);
 - Town Centres, Retail and Employment (2013); and
 - Sustainability (July 2015).
- 5.15 Also relevant to the site is the Bloomsbury Conservation Area Appraisal and Management Strategy (2011).
- 5.16 The Council's Design SPD builds on policies CS14 and DP25 and states that alterations should always take into account the character and design of the property and its surroundings.
- 5.17 The Council's Town Centres, Retail and Employment SPD states that the Council's policy position is to protect retail uses and the retail function of the area. Planning permission for food, drink and entertainment uses will be granted in this area, as long as it does not exceed the maximum of 25% of premises being in that use within each frontage.
- 5.18 The Council's Sustainability SPD states that as a guide, at least 10% of the project cost should be spent on environmental improvements however, special consideration will be given to buildings that are protected such as listed buildings to ensure that their historic and architectural features are preserved.

6. Planning assessment

Co-working (office) use

- 6.1 All of the existing Southampton Place and High Holborn buildings (except for the ground floor of Hogarth House) on site are vacant in lawful office (B1a) use. The current office space will be maintained and greatly enhanced in accordance with policies CS8 and DP13. Therefore, the retention of the existing office use within the existing buildings is acceptable in planning terms.
- 6.2 Further to this, this proposal directly responds to London Plan policy 4.2 which clearly states that the Mayor will encourage the renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility. This proposal seeks to bring back to use vacant office units by improving their quality and flexibility. This responds directly to market changes whereby more flexible and user-friendly office space is required in key central London locations.
- 6.3 This is further supported by the preamble to Core Strategy policy CS8. Paragraph 8.20 states that the Council will seek the provision of innovative new employment floorspace in developments. The LABS model meets this requirement as it is founded on providing flexible workspaces for small business users and entrepreneurs.
- 6.4 Therefore, the re-provision of high quality flexible office floorspace is welcomed by planning policy and will benefit the local economy by bringing back into use vacant office units which goes to the heart of the overall vision for the Holborn Links Estate.

Flexible A1/A3 use

- 6.5 The proposed change of use of the ground floor level of Hogarth House from A2 to flexible A1/A3 will further support the buildings' ability to meet a market demand for flexible, user-friendly co-working space in a key central London location.
- 6.6 Local planning policy seeks to retain shops in key locations. Given the unit will remain within the A Use Class category there is no loss of retail space and in any case, the unit benefits from permitted developments from A2 to A1 or A3.
- 6.7 The proposed ground floor unit will operate as a public space whereby people are able to eat, shop and work in a 'community hub' like environment. This is akin to the usage of the ground floor of the Hoxton Hotel which is located directly opposite the site.
- 6.8 This will be a positive addition to the CAZ frontage where the Mayor seeks to enhance and expand retail capacity to meet strategic and local need and so is therefore in accordance

with local planning policy and is in accordance with the wider vision for the Holborn Links Estate.

Heritage significance

- 6.9 As previously mentioned, 14, 15 and 22 Southampton Place are Grade II* Listed buildings and located within the Bloomsbury Conservation Area. Hogarth House is also located within the Bloomsbury Conservation Area. In accordance with national policy (paragraph 131-134 of the NPPF), the scheme is required to assess its effect on heritage significance.
- 6.10 The accompanying Heritage Statement prepared by KM Heritage concludes that overall the proposals seek to return the buildings to their former quality with a comprehensive programme of restoration and sympathetic refurbishment. This will positively enhance the special interest of the listed buildings and the conservation area.
- 6.11 Furthermore, any internal partitions are proposed so as to avoid damage to the historic fabric of the properties and will be capable of being removed in the future should demand change or future proposals be proposed.
- 6.12 The report concludes that the effect on the character and appearance of the Bloomsbury Conservation Area and on the setting of the other listed buildings will be negligible but positive and so therefore in accordance with policy.

7. Summary

- 7.1 The proposals seek to restore the existing buildings to their former quality and provide co-working space in line with the wider vision for the Holborn Links Estate. Collectively, the buildings will represent a genuinely dynamic and vibrant destination for co-working and shared workspace, capable of meeting the needs of the modern market. Furthermore, the proposals will be a major milestone for LABS in realising their ambitions to develop innovative, co-working floorspace in Camden and across central London.
- 7.2 This application proposed is therefore in accordance with national and local planning policy and represent an opportunity to significantly improve a key area of Camden whilst enhancing and protecting the existing listed buildings and nearby heritage assets.