

<b>Address:</b>	190 Enterprise House High Holborn London WC1V 7BH		<b>1</b>
<b>Application Number:</b>	2015/6719/P	<b>Officer: Fergus Freeneey</b>	
<b>Ward:</b>	Holborn & Covent Garden		
<b>Date Received:</b>	01/12/2015		
<b>Proposal: Change of use of the first and second floors of the existing building from Office (Class B1) use to Education/Training (Class D1)</b>			
<b>Background Papers, Supporting Documents and Drawing Numbers:</b> PEAL3001_01 00; One90 1st Floor; One90 2nd Floor; 15-0xxx-1-GL B; 15-0xxx-2-GL B; Transport Assessment (January 2016); Energy and Sustainability Statement (January 2016); Cover Letter (1st December 2015); Pearson University Vision.			
<b>RECOMMENDATION SUMMARY:</b> Grant conditional planning permission subject to a section 106 legal agreement			
<b>Applicant:</b>		<b>Agent:</b>	
c/o Agent		Turley The Charlotte Building 17 Gresse Street London W1T 1QL	

### ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace
Existing	<i>B1a Business - Office</i>		<i>Circa 10,000m<sup>2</sup></i>
Proposed	<i>D1 Non-Residential Institution</i>		<i>1656m<sup>2</sup></i>

## **OFFICERS' REPORT**

**Reason for Referral to Committee: This application is reported to Committee because it is a major development involving change of use of more than 1,000sq. mtrs of floorspace [clause 3(i)]**

### **1. SITE**

- 1.1. The site is located on the south side of High Holborn. It comprises a large 10 storey purpose built office building fronting both High Holborn and Smart's Place with service access at Stukeley Street.
- 1.2. The site is not within a conservation area, but is surrounded by the Bloomsbury Conservation Area to its north, east and south. It is also adjacent to the Grade II Listed former Holborn Town Hall and Library.
- 1.3. Enterprise House is located in an area of predominantly office and commercial properties, with the former Holborn Town Hall in use as offices with restaurant/bar at ground floor level and the adjacent building to the east on High Holborn also being a purpose built office block; Dragon Hall (to the rear fronting Stukeley Street) comprises a community hall and charitable trust, whilst the properties directly opposite the building on Stukeley Street are residential.
- 1.4. The application site is a modern post-war building, most likely constructed in the 1970s or 80s. It is clad in a dark red smooth granite type stone with dark framed windows. It has a large main entrance fronting High Holborn with a canopy displaying the company name.
- 1.5. The property was last refurbished in 2004 and offers a high specification of accommodation for commercial occupiers. It is occupied by a global education company, Pearson, who publish books and provide educational service, resources and technologies needed by universities and schools.

### **2. THE PROPOSAL**

- 2.1. The application is for the change of use of the property to allow Pearson to operate circa 1656sqm of space on the first and second floors of the building as educational D1 use.
- 2.2. Pearson is the world's leading global education company, combining a long heritage of highly respected book publishing with a commitment to the future needs of education and learners. Over the past 15 years it has invested in a wide range of educational services, resources and technologies needed by modern day universities and schools. This has been an essential part of its on-going success.
- 2.3. Pearsons have built up a small portfolio of teaching organisations in India, Brazil, Mexico and South Africa and they now seek to set up a university operation in the UK to complement their existing business.
- 2.4. To enable the above, it is proposed to seek the change of use of circa 1,656sqm of the first and second floor of the existing building from office use (Class B1) to

education use (Class D1). There are no external changes or extensions to the building included in the application.

### 3. RELEVANT HISTORY

**2003/2235/P** - The change of use of the basement car park (sui generis), ancillary work rooms and storage to office accommodation (use class B1). *Granted 6/11/2003*

**2003/2927/P** - The erection of a basement/ground floor extension to enclose a new lift shaft, new loading platform and steps at ground floor level and the installation of two replacement ground floor windows, to the Smart's Place elevation, together with the installation of a chiller unit to the rear on a first floor roof. *Granted 21/01/2004*

**2003/3654/P** - Submission of details of a refuse storage area, shower facilities and a secure area for 24 cycles, to replace those displaced by the change of use of the basement pursuant to additional condition 2 of planning permission granted on 6th November 2003 (2003/2235/P). *Granted 11/02/2004*

**2004/4750/P** - Erection of new transformer rooms on existing ramps and relocation of existing 12 No. bike racks. *Granted 28/01/2005*

**2011/1254/A** - Display of an internally illuminated fascia sign on front elevation at ground floor level of office (Class B1). *Granted 05/05/2011*

### 4. CONSULTATIONS

#### Adjoining Occupiers

<i>Number of letters sent</i>	31	
<i>Total number of responses received</i>	0	
<i>Number in support</i>	0	
<i>Number of objections</i>	0	

Site notice: 04/02/2016 – 25/02/2016

Press notice: 01/02/2016 – 22/02/2016

No comments have been received.

### 5. POLICIES

#### LDF Core Strategy and Development Policies

CS1- distribution of growth

CS5 – managing impact of growth

CS8 – promoting a successful and inclusive economy

CS9 - achieving a successful Central London

CS10 - supporting community facilities and services

CS11- sustainable travel

CS13 - tackling climate change through promoting higher environmental standards

CS14 - promoting high quality places and conserving our heritage

CS16 - Improving Camden's health and well-being

CS19 – delivering and monitoring the Core Strategy

DP13 – employment premises and sites  
DP15 - community and leisure uses  
DP16 - transport implications of development  
DP17 - walking, cycling and public transport  
DP18 - parking standards and limiting the availability of carparking  
DP19 - managing the impact of parking  
DP20 - movement of goods and materials  
DP21 - development connecting to the highway network  
DP22 - promoting sustainable design and construction  
DP23 - water  
DP24 - securing high quality design  
DP25 - conserving Camden's heritage  
DP26 - managing the impact of development on occupiers and neighbours  
DP28 - noise and vibration  
DP29 - improving access  
DP31 – open space and outdoor recreation  
DP32 - air quality and Camdens clear zone

Camden Planning Guidance 2011:

CPG3: Sustainability

CPG5: Town Centres, Retail and Employment

CPG7: Transport

The London Plan 2015

NPPF

## **6. ASSESSMENT**

- 6.1. Persons operate their headquarters from another central London location at 80 Strand with additional office facilities at the High Holborn site with numerous other locations around the UK and the world.
- 6.2. The application proposes a number of classrooms, lecture facilities and associated study spaces across both floors. The existing open plan office would be partitioned off to create this space with no external alterations or interventions to the main structure of the building.
- 6.3. The main material considerations arising from this change of use application are
  - land use,
  - impact on the amenities of the area,
  - sustainability and
  - transport issues.
- 6.4. There are no design issues to consider or impact on the character and appearance of the conservation area as no external changes to the building are proposed.

## **7. Land Use**

- 7.1. The proposal involves the loss of floorspace in established office (Class B1) building to be replaced by a new Class D1 educational establishment.

- 7.2. As noted above, Pearson is the world's largest education company, with an emphasis on publishing and technology. It has been branching out into providing direct university functions in a number of countries and seeks to augment its UK operation with a university which the company identifies as complementary to their main publishing activities, by providing direct access to students and learning in order to ensure that their publications respond to the needs of their target audience.
- 7.3. Pearson University will be a fully functioning university which will carry out teaching and research, and will have its own teachers, students, courses and fully approved university status (this process takes several years). Its distinctive specialism will be employer engagement in education, including corporate access for its students.
- 7.4. Pearson will offer courses in VFX, Games, Animation, Business, Accounting and Law, providing students with a chance to learn from leading companies and inspirational industry figures. Pearson Business School offers degree programmes in Business, Accounting and Law and Undergraduate Business programmes have been designed in partnership with companies like L'Oreal, Unilever, BT, Cisco, IBM, Wragge Lawerence Graham & Co, WPP and Lotus F1.
- 7.5. It is proposed that the university function would be interlinked with the main business by allowing students the opportunity to have company based mentors and internships within 190 High Holborn.
- 7.6. Policy CS8 identifies that the Council will safeguard premises that meet the needs of modern industry/ employers and seek provision of facilities for small and medium sized enterprises such as managed affordable workspaces. DP13 has a strong emphasis on the retention of land and buildings that are suitable for continued business use. Policy DP13 sets out a detailed policy test in terms of justifying the loss of employment floorspace. This includes demonstrating the site or building is no longer suitable for its existing business use and demonstrating that alternative business uses has been considered.
- 7.7. The existing building is fully occupied by Pearson and is a high quality office development. The proposed change of use of part of the building will represent just under 20% of the existing building. At present approximately 350 Pearson employees work across the two floors. The proposed change of use of the first and second floor will not result in the loss of existing jobs and will be facilitated through re-arrangement of other floors within 190 High Holborn and the relocation of some personnel to Pearson's other Central London office at 80 Strand. The university administration functions will be carried out on the first and second floors only, within the designated university space.
- 7.8. Pearson also plan to introduce flexible working, hot-desking and a desk sharing initiative which will enable the company to work towards a 1:25 ratio per desk throughout the rest of the building. The proposed education use is expected to generate 80-100 full time employees. This compares favourably to the average education density set by the HCA of 1 person per 40sqm which is generally applied in these cases.

- 7.9. The proposal would retain all the key features of the building that make it suitable for office use. It is proposed to add internal partitions for lecture theatres and seminar rooms but these could easily be removed in the future to reinstate the larger floorplates. The floor to ceiling heights, doorway/corridor widths, amount of light and flexible internal arrangement would all remain as existing. Therefore the physical features of the premises would be retained which would make it easily changed back to office use again.
- 7.10. Policies CS8 and CS10 recognise the contribution that educational uses make to Central London by helping to sustain a balanced economy and providing employment opportunities. Education facilities in general are considered under DP15 which requires proposals to be located close to the community they serve, be accessible by a range of transport modes, in particular walking and cycling and be located in the Central London Area or designated Town Centres. The application site would satisfy each of these criteria in being highly accessible and located in Central London close to other educational institutions and facilities. The in-principle support given to educational use is qualified by CS5 generally and CS10b (with reference to higher education in particular) with the requirement for such uses to have their impacts on the local environment and residential communities taken into account in the assessment of applications; this will be addressed in the following section on amenity.
- 7.11. Generally a change of use to D1 educational use could be used for any education purpose. However, in exceptional circumstances a personal permission to a specific tenant can be used to limit the nature and type of use. It is considered that the proposals include a number of key features which provide exceptional justification for the proposed change of use:
- the close ties between the university and the main business (by offering internships and mentoring etc)
  - the ongoing occupation of the main offices by Pearson which operates a global education company ;
  - the retention of existing employment levels within the building and
  - the ability to easily revert the new configuration back to office space
- 7.12. It is considered that in this specific instance there is justification for a personal permission for Pearson to operate a university at the first and second floor levels of their existing building. A condition would be attached requiring that the use revert back to B1 Office should Pearson vacate the premises. This would allow for the proposed education use to be implemented in such a way that the office space is not lost permanently should Pearson vacate but it recognises that the existing company would remain on site whilst providing an additional function with minimal impact on employment. The Council's Economic Development team support the application given the potential wider benefits for the borough and Camden residents and also recommend a personal permission.

## 8. Amenity

- 8.1. The applicant has provided information in relation to the proposed use which anticipates the maximum number of people within the education facility at any one time would be 340 individuals (both staff and students) there would be an estimated 80-100 staff members employed as part of the facility.

- 8.2. Core hours would be Monday – Friday 9am-7pm during term time. Access for students outside these hours will be made available to enable them to study independently.
- 8.3. The intensity of use compared to the existing office use is likely to be increased and this would have the potential to impact on the surrounding area due to increased comings and goings and activity on the premises. The application site is an existing office building and is not in mixed use. There are therefore no residential occupiers sharing the building whose amenities may be impinged upon. There are residential properties to the rear on Stukeley Street, however the main entrance to the building is on High Holborn therefore the residential properties to the rear are unlikely to be impacted upon in terms of both noise and increased visitor activity as these will be focused at the front of the building.
- 8.4. Whilst it is noted at para.10.7 of the Core Strategy that the clustering of higher education facilities can potentially lead to harmful impacts in the areas concerned, the predominant clusters in Bloomsbury are located some distance to the west of the application site nearer Bloomsbury and Russell Squares. Therefore it is considered unlikely that the proposed use will lead to any undue cumulative impacts on the existing character and residential amenities in the area of the application site.

## 9. Transport and access

### *Cycle parking:*

- 9.1. The site has a PTAL score of 6b, which indicates that it is highly accessible. The nearest station is Holborn, located to the east of the site, whilst Tottenham Court Road is located to the west and Covent Garden to the south. The nearest bus stops are located on High Holborn.
- 9.2. The submitted plans do not show any cycle parking. The London Plan requires universities to provide cycle parking for both long stay and short stay purposes, as follows:
- (long term) 1 space per 4 staff, and;
  - (long term) 1 space per 20 FTE students, and;
  - (short term) 1 space per 7 FTE students.
- 9.3. Long stay parking should be located so as to be secure and protected from the elements (i.e internally). Based on the requirements above a minimum of 20 long term spaces would be required for staff (based on 80 staff); 13 long term spaces required for students (based on 260 students); and 37 short term spaces required for students (based on 260 students).
- 9.4. At present only 10 racks (providing 20spaces) are provided within the building; there are 4 racks (providing a further 8 spaces) on the pavement adjacent to the building. A secure bicycle storage facility – ‘Midtown Cycle Vault’ – is located 130m away from the site and provides 100 bike racks, lockers, showers etc.

- 9.5. The building tenants do not own the building and due to restrictions on the lease it is not possible to increase the number of on-site cycle spaces.
- 9.6. The proposed level of cycle parking does not meet policy and is likely to be insufficient to meet student needs. However given that the applicant is unable to provide cycle parking within the site, that only internal changes are proposed and that there are general cycle parking facilities in the area it is considered that a financial contribution towards improving the local cycle and pedestrian infrastructure in the area could be made in lieu of on-site provision as an exception.
- 9.7. The Council is currently involved in early designs of a major transport and public realm scheme in the Holborn area to address a number of significant challenges including road traffic casualties, congestion, poor air quality, traffic dominance, insufficient space for high volumes of pedestrians and cyclists, and a lack of high quality public space. Traffic modelling and urban design consultants have been commissioned to develop transport and urban realm proposals for the area. To help support this scheme we therefore seek to secure a financial contribution of £30,000 as a section 106 planning obligation to offset the lack of cycle parking within the development site.

*Construction Management:*

- 9.8. This development while not requiring a significant amount of demolition or construction will still entail a large number of deliveries in this busy central London location. This location is of particular concern due to the level of development in the area and the upcoming West End Project which is due to start in September.
- 9.9. As this will generate a significant enough number of construction vehicle movements during the overall construction period. Our primary concern is public safety but we also need to ensure that construction traffic does not create (or add to existing) traffic congestion. We also need to ensure that there is no cumulative impact with the West End Project and developments at 21 New Oxford Street, 34 New Oxford Street, a number of Drury Lane and the Improvements to High Holborn. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality).
- 9.10. The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. We are concerned especially about the impact on vulnerable road users during peak time, for example this is where the majority of cyclist death occurs. Transport for London has also expressed this concern and have requested that no HGV movements be allowed at peak times. "Heavy Good Vehicle movements should be optimised to avoid the AM and PM peak hours" TfL.
- 9.11. From this reason a Demolition Management Plan and a Construction Management Plan (DMP & CMP) should therefore be secured as a Section 106 planning obligation, with the addition obligation that freight movement should be limited between 9:30am to 4:30 Monday the Friday and 8am till 1pm Saturdays, with no deliveries on Sunday and bank holidays unless agreed beforehand with Camden Council.



### *Travel Plan:*

- 9.12. High Holborn is an extremely busy area, with High Holborn Tube station being one of the busiest stations in London. This development will lead to a large number of people traveling to and from the site for a training and learning experience, which will lead to increased pressure on the local transport infrastructure. This pressure will be elevated to a certain degree with the new station entrance on Procter Street, however this is unlikely to be the entrance used for people traveling to this site and are more likely to use the existing entrance on King's Way.
- 9.13. In this instance we would seek to mitigate the impact on this development by requesting a Travel Plan be put in place. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.
- 9.14. The Workplace Travel Plan would need to be secured as a section 106 planning obligation. The travel plan would need to be approved by the Council prior to completion of the proposed works. This would include a requirement for a Travel Plan Co-ordinator to be appointed 3 months before occupation.
- 9.15. We would also seek to secure a financial contribution of £6,020 to cover the costs of ensuring that the travel plan is implemented over a 5 year period. This would also need to be secured by a Section 106 planning obligation if planning permission is granted.
- 9.16. Transport for London encourages developers to use the TRICS database (formerly TRAVL) for trip generation predictions. We will require the applicant to undertake a TRICS after study and provide TfL and Camden with the results on completion of the development. TfL would then be able to update the TRICS database with the trip generation results for the various use categories associated with this development. We will seek to secure the necessary after surveys and results by Section 106 agreement as part of the Travel Plan review and monitoring process.

### *Servicing:*

- 9.17. This development will not change any of the existing arrangements for Servicing to the site and is not expected to create an increase to the level of deliveries. Therefore it is accepted that the development does not lead to the requirement for a servicing management plan.

## 10. Sustainability

- 10.1. Policy CS13 expects development or alterations to existing buildings to include proportionate measures to be taken to improve their environmental sustainability, where possible. There are no external changes proposed to the and only some non-structural partitioning proposed to the interior.
- 10.2. At present water meters are controlled by automated reading devices and there are two gas fired boilers in the basement. There are no changes proposed to the existing heating and water consumption. The proposed development lies within an Air Quality Management Area.

10.3. As only very minor internal changes, such as installing partitions will be taking place, and the proposal is for a personal permission for the existing occupier, energy and water usage and air quality will not differ from the current situation and is considered acceptable.

11. Other matters

*CIL*: No additional floorspace is proposed; therefore CIL is not liable on the proposal.

12. **CONCLUSION**

12.1. Given the specific nature of the site and the current occupier the proposal is considered to be acceptable. Pearson is a global education company with an expanding university provision, it would be able to remain in its current location within Camden and offer a university provision with close links to its business function with minimal impact on overall employment within the building as staff could be accommodated within the remaining 8 floors of the building.

12.2. There would be no external alterations to the building with only minor internal alterations, which would allow for an office use to be easily reinstated.

12.3. The proposed use is complementary to the Central London Area and will not impact upon transport or amenity within the area. Furthermore the proposed change of use is for would be personal to Pearson and would require that the use revert back to B1 Office should they depart.

12.4. Planning Permission is recommended subject to a S106 Legal Agreement covering the following Heads of Terms:-

- Contribution towards cycling and pedestrian improvements of £30,000
- Construction Management Plan
- Student Travel Plan
- Contribution to cover cost of implementing Travel Plan
- Highways Repair Work Contribution

13. **LEGAL COMMENTS**

13.1. Members are referred to the note from the Legal Division at the start of the Agenda.

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 This permission is personal to Pearson Education Limited and shall endure for the period of their occupation only. On Pearson Education Limited vacating 190 High Holborn the university (D1 Use Class) at first and second floor levels shall revert to the lawful use for B1a Office purposes.

Reason: In recognition of the special circumstances of the applicant/intended occupier and to accord with policies CS8, CS11 and CS13 of the London Borough of Camden Local Development Framework Core Strategy and policies DP13, DP16, DP17, DP18, DP19, DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.

- 3 Notwithstanding the provisions of Class D1 of the Schedule of the Town and Country Planning (Use Classes) Order, 1987, or any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, the parts of the premises to which this application relates at first and second floor levels shall only be used for non-residential education and training uses, and for no other purpose.

Reason: To ensure that the future occupation of the building does not reduce its employment generating potential or adversely affect the adjoining premises or immediate area by reason of noise, traffic congestion and excessive on-street parking pressure, in accordance with policies CS1 (Distribution of growth), CS5 (Managing the impact of growth and development), CS8 (Promoting a successful and inclusive Camden economy), CS10 (Supporting community facilities and services) and CS11 (Promoting sustainable and efficient travel) of the London Borough of Camden Local Development Framework Core Strategy; and policies DP13 (Employment sites and premises), DP26 (Managing the impact of development on occupiers and neighbours), DP28 (Noise and vibration), DP15 (Community and leisure uses) and DP19 (Managing the impact of parking) of the London Borough of Camden Local Development Framework Development Policies.

- 4 The development hereby permitted shall be carried out in accordance with the following approved plans: PEAL3001\_01 00; One90 1st Floor; One90 2nd Floor; 15-0xxx-1-GL B; 15-0xxx-2-GL B; Transport Assessment (January 2016); Energy and Sustainability Statement (January 2016); Cover Letter (1st December 2015); Pearson University Vision.

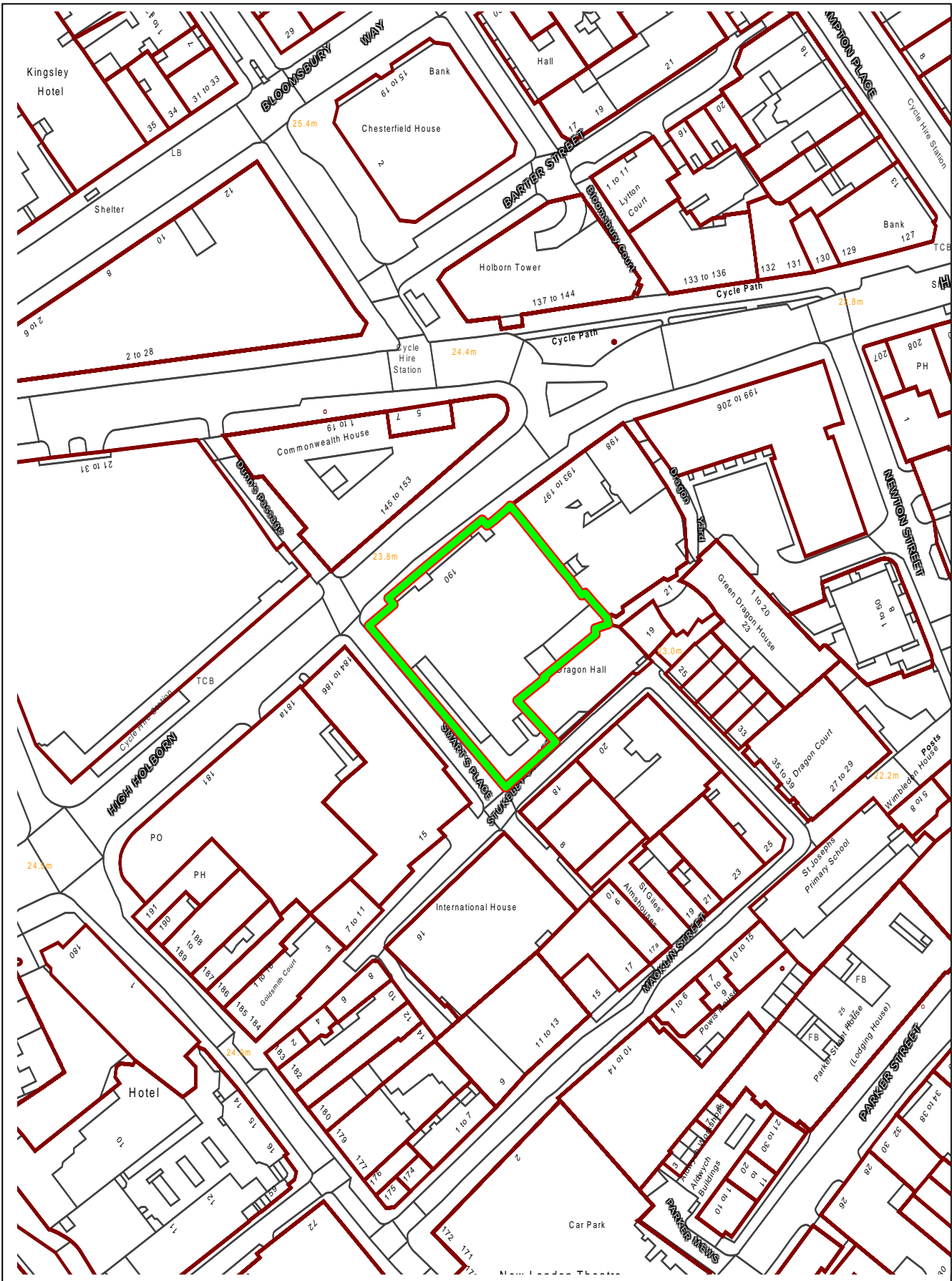
Reason: For the avoidance of doubt and in the interest of proper planning.

Informative(s):

- 1 Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts which cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Argyle Street WC1H 8EQ, (tel: 020-7974 6941).
- 2 Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You are advised to consult the Council's Noise and Licensing

Enforcement Team, Camden Town Hall, Argyle Street, WC1H 8EQ (Tel. No. 020 7974 4444 or on the website <http://www.camden.gov.uk/ccm/content/contacts/council-contacts/environment/contact-the-environmental-health-team.en> or seek prior approval under Section 61 of the Act if you anticipate any difficulty in carrying out construction other than within the hours stated above.

- 3 Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.

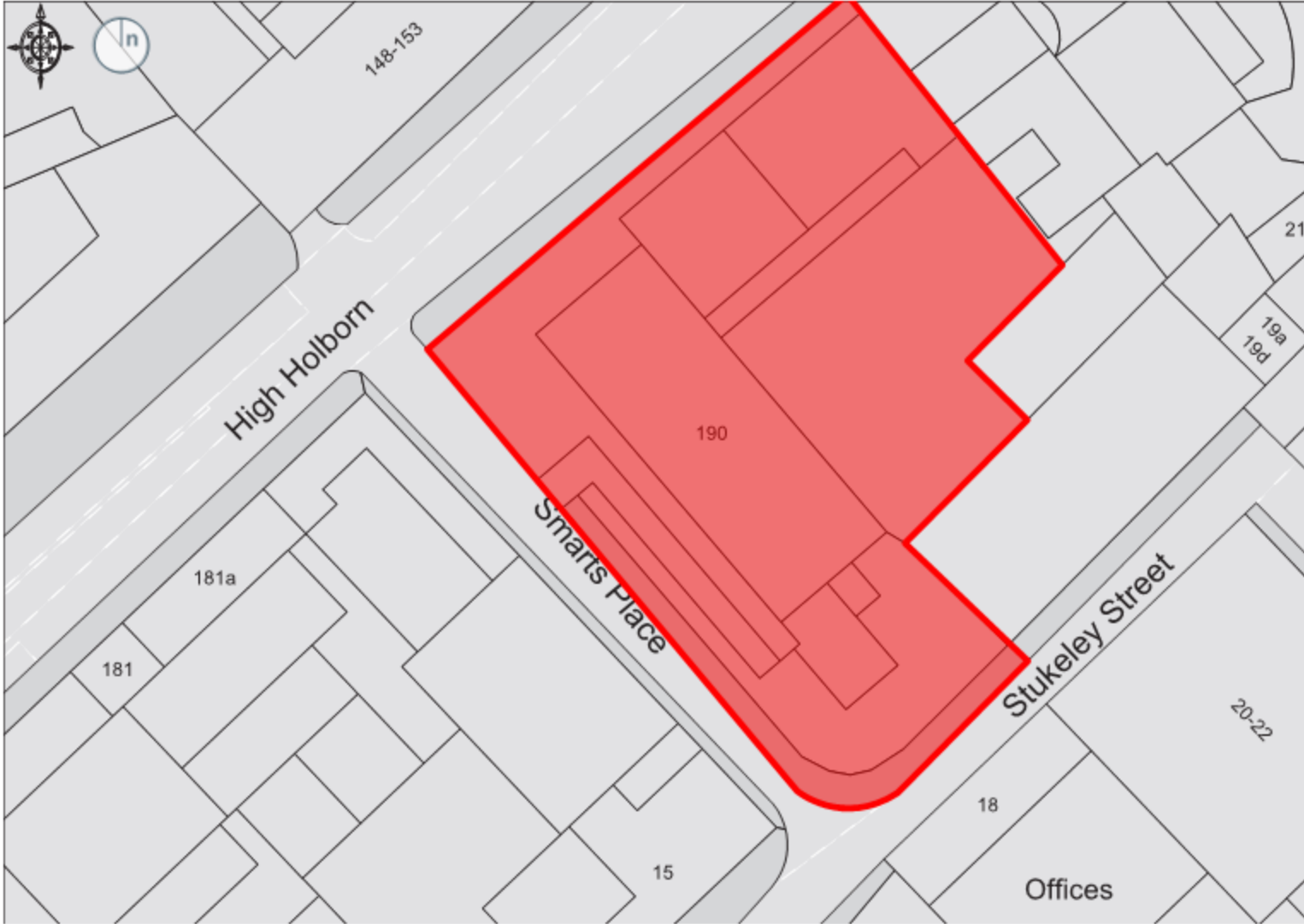


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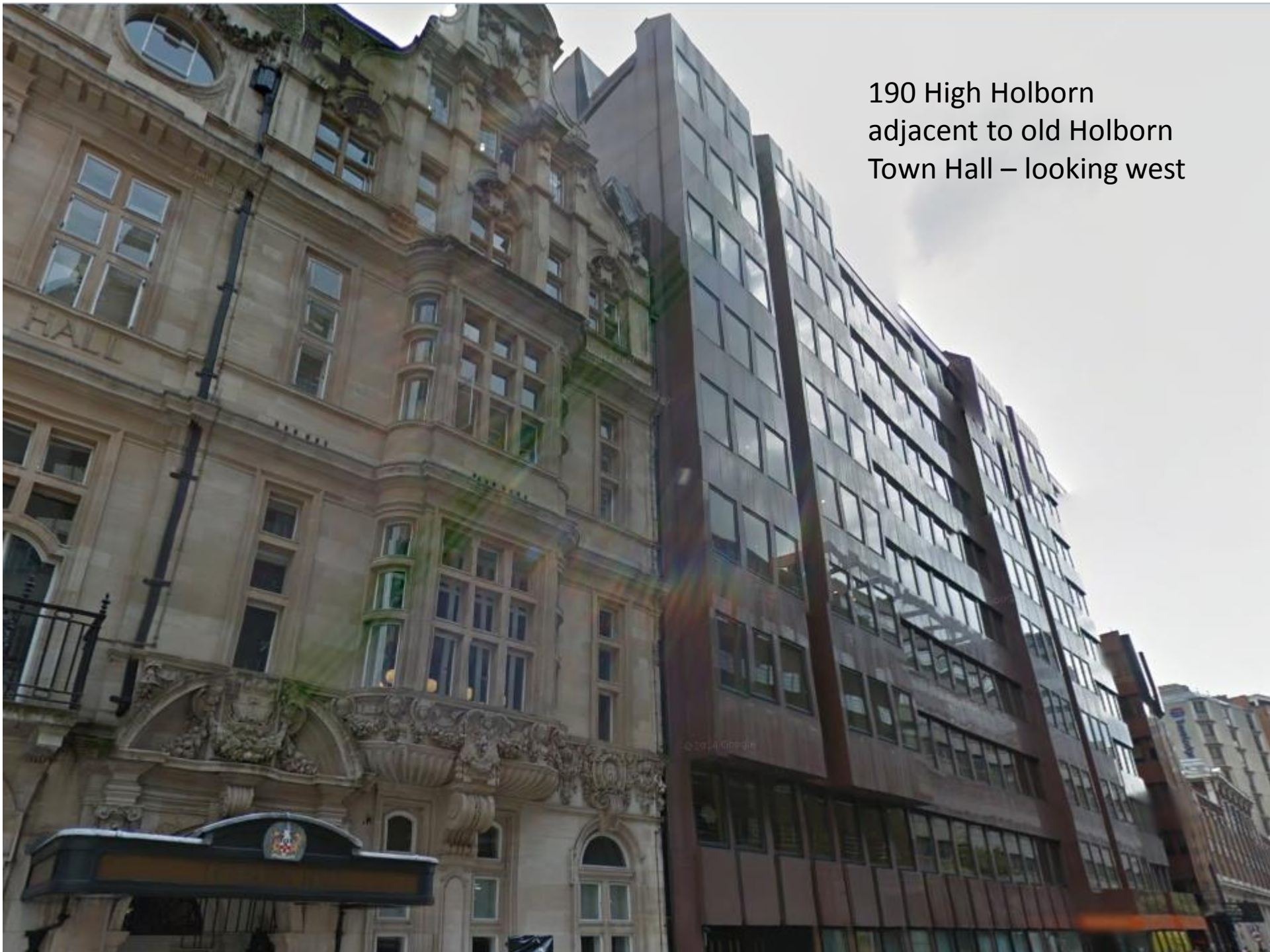
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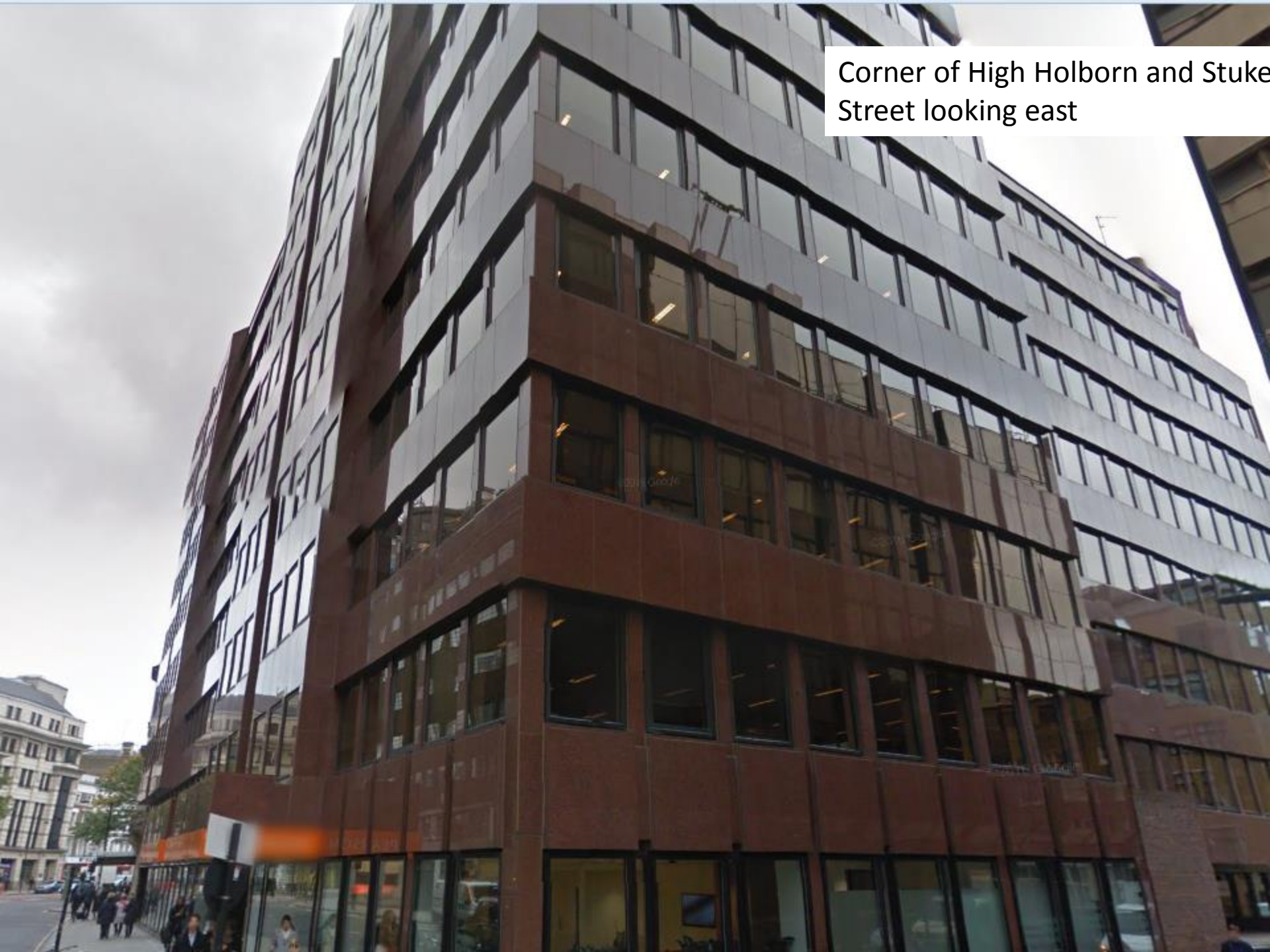
190 High Holborn  
adjacent to old Holborn  
Town Hall – looking west

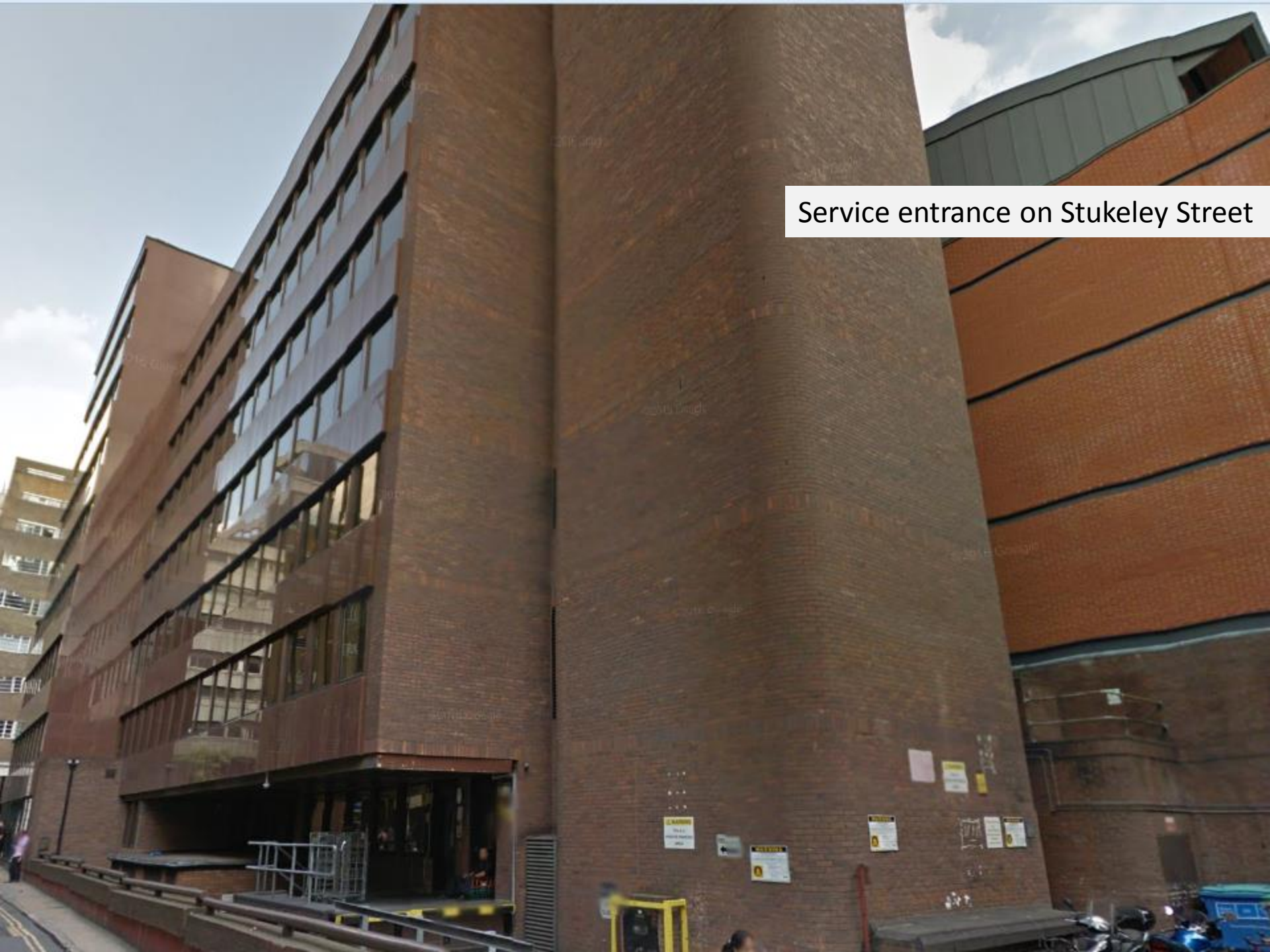
Main Entrance on High Holborn





Corner of High Holborn and Stuke Street looking east

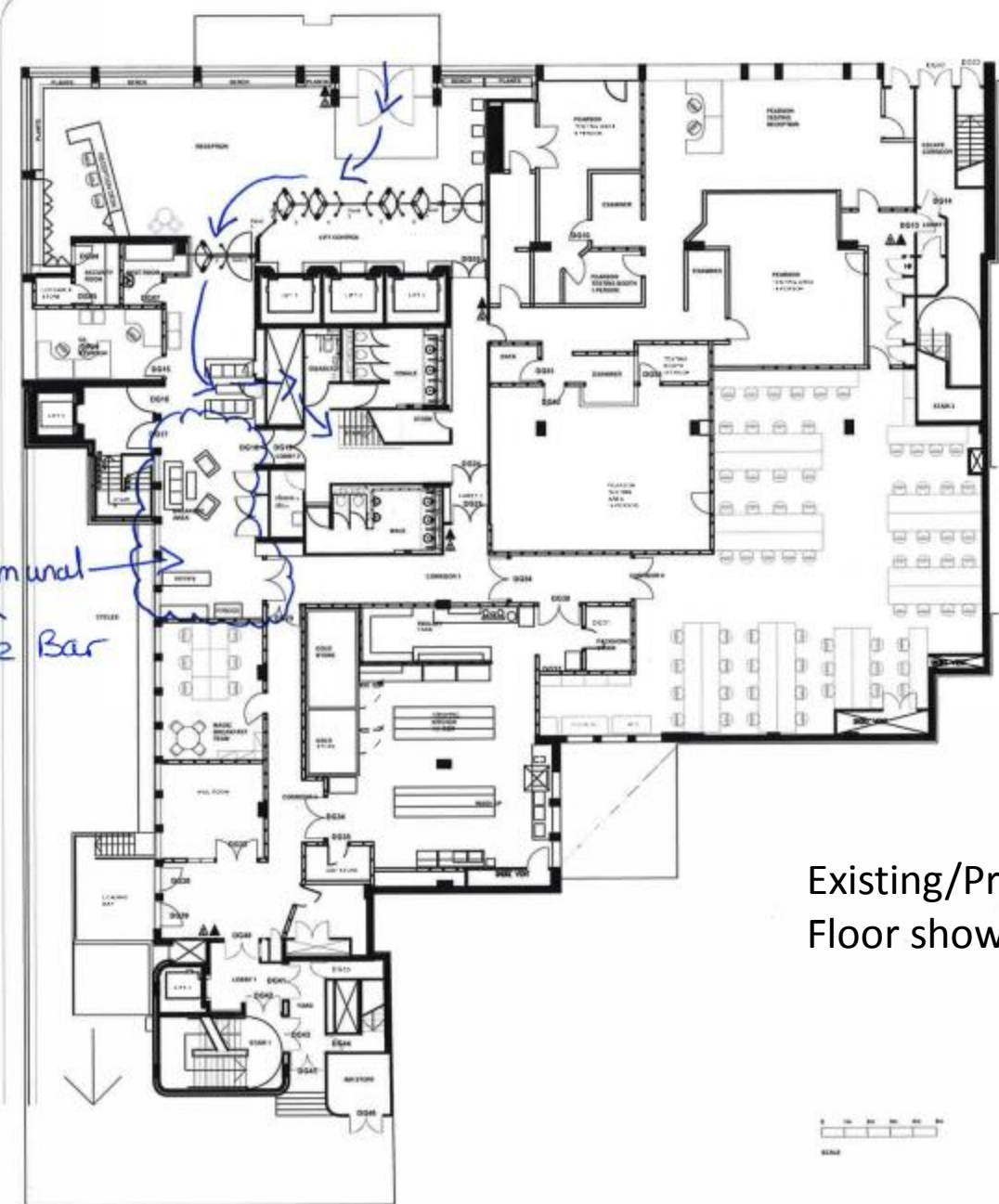




Service entrance on Stukeley Street



Communal  
Area  
Coffee Bar



▲ WATER FIRE EXTINGUISHER  
▲ CARBON DIOXIDE FIRE EXTINGUISHER

Existing/Proposed Ground Floor showing student access

# One90 - 1st Floor

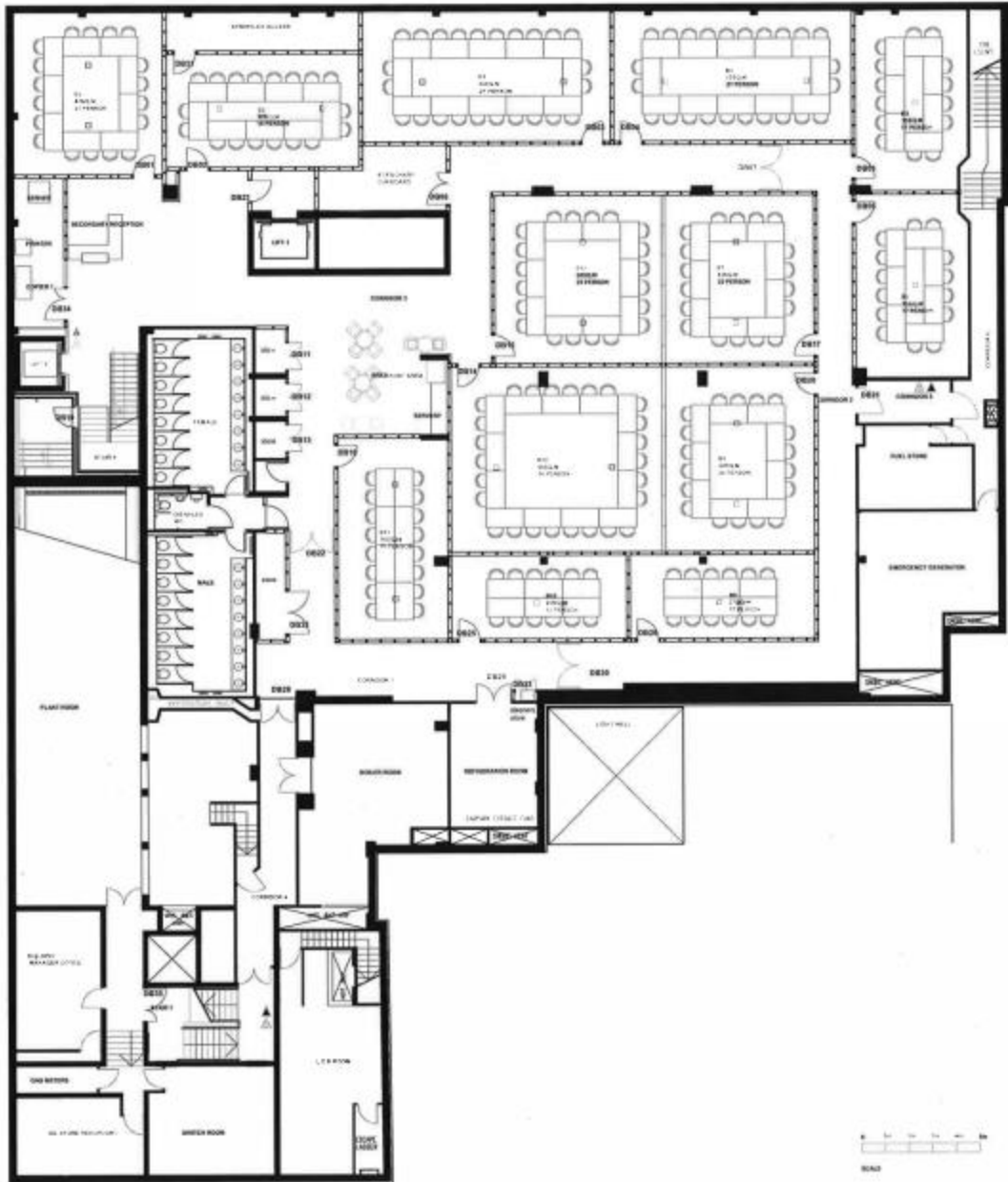
Existing First Floor Plan



# One90 - 2nd Floor

## Existing Second Floor Plan





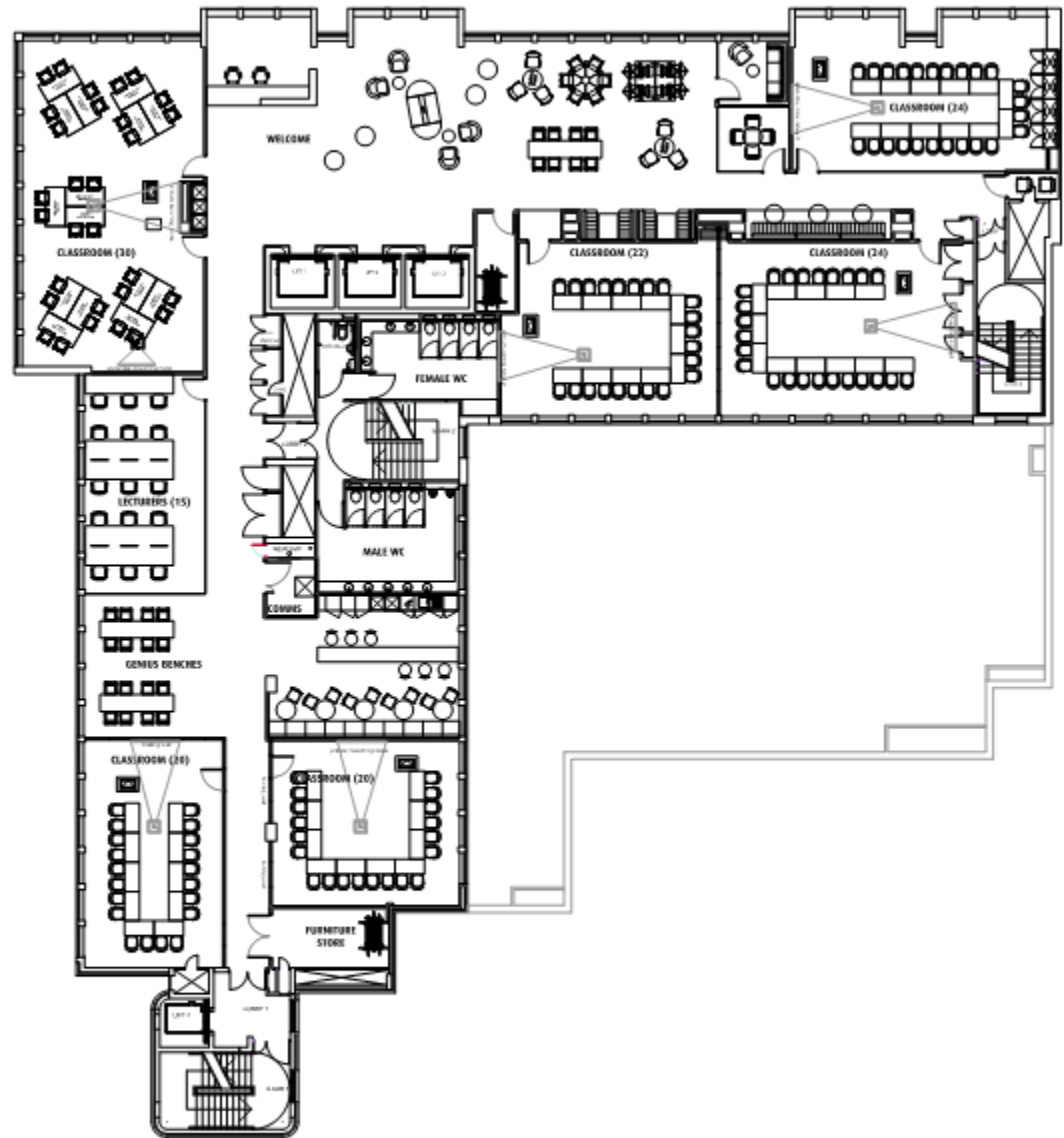
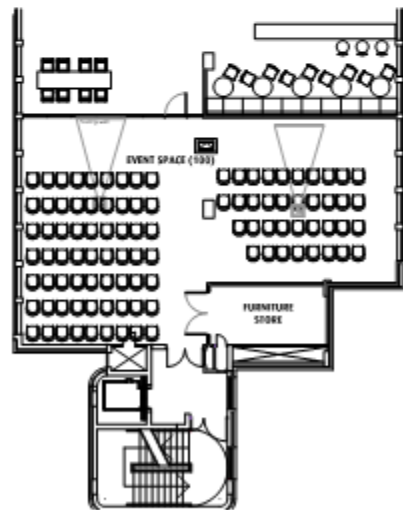
# Existing/Proposed BASEMENT Plan

**WATER FIRE EXTINGUISHER  
CARRIAGEWAYS FOR EXTINGUISHER**

- B1 42 sqm, 21 person
- B2 38 sqm, 19 person
- B3 55 sqm, 27 person
- B4 55 sqm, 27 person
- B5 35 sqm, 17 person
- B6 35 sqm, 17 person
- B7 44 sqm, 22 person
- B8 48 sqm, 24 person
- B9 27 sqm, 13 person
- B10 27 sqm, 13 person
- B11 38 sqm, 19 person
- B12 65 sqm, 34 person
- B13 50 sqm, 25 person



# Proposed First Floor Plan



○ 1ST Floor  
190 High Holborn



# Proposed Second Floor Plan

