

Esavian House
181 High Holborn and
7-11 Stukeley Street,
London
Planning Statement

indigo.

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Street, London
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January 2018

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1. Introduction

- 1.1. Indigo Planning has prepared this Planning Statement on behalf of Royal Mail Group Limited in support of a planning application at Esavian House, submitted to London Borough of Camden.
- 1.2. Esavian House comprises the frontage along 181 High Holborn which has three upper floors and 7-11 Stukeley Street at the rear which is part one, part three storeys.



- 1.3. Planning permission is sought for the change of use of the first and second floors of 7-11 Stukeley Street from the lawful mixed uses of warehouse, workrooms and showrooms to offices (Use Class B1). The remainder of the property already has consent for office use.
- 1.4. The proposed change of use will promote economic development through office development within Central London therefore complying with local policy requirements of the Camden Local Plan (2017). Furthermore, the principle of B1 office use has already been established through the consents for the remainder of the site.
- 1.5. The site is located within a sustainable location within Central London with public transport conveniently located within the vicinity including bus services along Drury Lane and Holborn station less than 300m to the east. The building is not listed and does not fall within a conservation area.
- 1.6. The purpose of this statement is to demonstrate that this change of use complies with the relevant policies set out within the Development Plan, having regard to other material planning considerations and therefore, should be supported and approved without delay.

Proposed Development

- 1.7. Full planning permission is sought to allow for the use of floors one and two of 7-11 Stukeley Street for office use (Use Class B1) as shown on the accompanying scheme drawings. The site comprises the first floor of 7-11 Stukeley Street which is circa 284sqm and the second floor which is circa 265sqm.
- 1.8. In effect, this application seeks to amend the currently permitted use of this floorspace, which is restricted to a warehouse, workroom and showroom, to allow for the whole of Esavian House to operate as offices.
- 1.9. There are no external alterations proposed.
- 1.10. The site is not listed nor does it fall within a conservation area. The site is well served by local amenities and is located within a sustainable location within Central London. Public transport is conveniently located within the vicinity including bus services along Drury Lane and Holborn station less than 300m to the east.
- 1.11. The proposed change of use will promote economic development within Central London and the principle of B1 office use has already been established through the consents for the remainder of the site.

2. Planning History

- 2.1. This application site forms part of a larger property known as Esavian House which includes the frontage along 181 High Holborn which has three upper floors as well as 7-11 Stukeley Street at the rear, which is part one, part three storeys.
- 2.2. The building was constructed in 1924 as a warehouse, workrooms, show rooms and offices in equal proportions. In 1978, personal planning permission was granted for the entire use of the building as a Post Office training school, branch Post Office, emergency sorting office facilities, welfare provision and administrative offices.
- 2.3. In August 1984, personal permission (Ref: 8400701) was granted to British Telecom (BT) for use of part of the first and part of the second floor for training school purposes whilst the remainder of the premises continued to be used by the Post Office.
- 2.4. From October 1984 until May 1995, the front of the building was occupied by BT for use as administrative offices and the Stukeley Street part was used for educational and training purposes also by BT.
- 2.5. On 9 May 1997, planning permission was granted for the change of use of the first, second and third floors of Esavian House and first and second floors of 7 – 11 Stukeley Street from the lawful mixed uses of warehouse, workrooms and showrooms to use within Class B1 (Ref: PS9704200).
- 2.6. Following the change of use approval, a personal planning consent was granted for the continued use of the first and second floors of 7-11 Stukeley Street as Class D1, personal to A.Wheeler of ARW Schools Ltd (Ref: PS9704459) on 18 July 1997. This was a retrospective permission as the ARW school had to leave at short notice and had already moved into the Stukeley Street premises at the time the application was submitted.
- 2.7. The upper floors of the Stukeley Street element of Esavian House have been in educational use (as a training centre) for over 20 years but this use was on the bases of personal permissions and is not, therefore, the lawful use of the premises, which is in fact the workhouse/workrooms/showrooms.
- 2.8. The informatives on the personal permission sets out that:

“On the vacation of the premises by ARW Schools, the lawful use of the premises would revert to the mixed use of warehouse, workrooms and showrooms. The planning permission granted on 9 May 1997 [Ref PS9704200] was not granted, let alone implemented, prior to the occupation of the premises by ARW Schools on 1st May 1997 and the creation of a separate planning unit. If, however, the school vacates the premises prior to the expiry of the above permission on 8th May 2002, then a change of use to Class B1, prior to that date, would be lawful by virtue of the above permission”
- 2.9. The school still occupied the building beyond 8 May 2002, only vacating the premises around April/May 2015 following their lease expiring. The premises therefore, will now have reverted back to the original use as a warehouse, workroom and showroom as the educational use has ceased and ARW have vacated the premises.
- 2.10. It follows that floors one, two and three of Esavian House have consent for office use (Class B1) whilst floors one and two of 7-11 Stukeley Street has consent for the original warehouse use.

3. Planning Policy

National Planning Policy Framework (2012)

- 3.1. The National Planning Policy Framework (NPPF) is a material consideration in the determination of planning applications.
- 3.2. The key matters when assessing this proposal against development plan policy are the presumption in favour of sustainable development and employment.
- 3.3. Paragraph 6 highlights that the role of the planning system is to contribute to the achievement of sustainable development. Paragraph 7 identifies that there are three dimensions to sustainable development:

“Economic role: contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

Social Role: supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and

Environmental role: contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”

- 3.4. At the heart of the NPPF lies the principle of sustainable development as set out at paragraph 14. Paragraph 17 denotes the core principles of the NPPF which should *“proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs”* and *“always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.”*
- 3.5. Paragraph 18 of the NPPF identifies that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and paragraph 21 demonstrates that local authorities should support existing business sectors.

The Statutory Development Plan

- 3.6. The development plan for the site comprises the following:

The London Plan (January 2017)

- 3.7. Policy 1.1 sets out the parameters for delivering the strategic vision and objectives for London. The policy sets out growth and change management and how this will be supported across all parts of London. Policy 4.1 sets out the policy for development London’s economy; to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London.

- 3.8. Pertinent to this application, policy 4.2 considers offices setting out that the Mayor will and boroughs/other stakeholders should:
- *“Support the management and mixed use development and redevelopment of office provision to improve London’s competitiveness and to address the wider objectives of the Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises;*
 - *Recognise and address strategic as well as local differences in implementing this policy to:*
 - *Meet the distinct needs of the central London office market, including the north of the Isle of Dogs, by sustaining and developing its unique and dynamic clusters of ‘world city’ and other specialist functions and business environments, and*
 - *Consolidate and extend the strengths of the diverse office markets elsewhere in the capital by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable complementary uses.*
 - *Encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility;*
 - *Seek increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities in the context of policies 2.7, 2.9, 2.13 and 2.15-2.17.”*
- 3.9. Policies 2.7, 2.15, 2.16 and 2.17 are not relevant to this application. Policy 2.9 sets out the need to realise the potential of inner London in ways that sustain and enhance its economic and demographic growth. Policy 2.13 relates to opportunity and intensification areas, Holborn/ St Giles where the site is located, is identified as an intensification area. Development within such areas should, amongst others, contribute towards meeting (or where appropriate, exceeding) the indicative estimates for employment capacity which is 2,000 in Holborn.
- 3.10. The site is located within the Central Activities Zone (CAZ) which is the area where planning policy recognises the importance of strategic finance, specialist retail, tourist and cultural uses and activities as well as residential and more local functions.
- 3.11. Within appropriate parts of the CAZ, the Mayor will ensure that development of office provision is not strategically constrained and that provision is made for a range of occupiers especially the strategically important financial business services.
- 3.12. The CAZ SPD 2016 provides guidance on London Plan policy for the core area including the protection of London’s vibrant commercial heartland and ensuring it can remain a key driver of the UK economy.

Camden Local Plan (2017)

- 3.13. The Camden Local Plan was adopted 3 July 2017 and replaces the Camden Core Strategy (2010) and Development Management Policies.
- 3.14. Camden Council’s objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, whilst ensuring that growth delivers opportunities and benefits for its residents and businesses. Policy G1 sets out that the Council will create the conditions for growth to meet Camden’s identified needs. The Council will deliver this growth by securing high quality development and promoting the most efficient use of land and buildings in Camden.

- 3.15. The Local Plan seeks to support businesses of all sizes in addition to maintaining a stock of premises that are suitable for a variety of business activities for firms of differing sizes and available on a range of terms and conditions for firms with differing resources. Furthermore, Policy E1 directs new office development to the growth areas, Central London and town centres and supports Camden's industries by, amongst others, supporting proposals for the intensification of employment sites.
- 3.16. Policy A1 seeks to manage the impact of development through protecting the amenity of communities, occupiers and neighbours. Developments will be considered in relation to, amongst others, noise, visual privacy and transport implications.

4. Planning justification

- 4.1. The key planning considerations that relate to this development are set out below. The proposal has been assessed against relevant planning policies, concluding that the proposal is in accordance with national and local planning policy and guidance and therefore planning permission should be granted.

Principle of development

- 4.2. The principle of office use at the application site has already been established through the granting of consent for the entire building to operate as B1 offices and the continued use of the remainder of Esavian House for offices.
- 4.3. The change of use will bring a vacant brownfield site back into use as promoted within the 12 planning principles of the NPPF.
- 4.4. The provision of office floorspace is fully compliant with the policies set out at Section 4 and will contribute to strengthening the local economy through the provision of modern, flexible, employment floorspace within Central London.
- 4.5. The proposal will be suited to the site and its surroundings through the provision of office space within the compatible commercial area and allowing the whole of Esavian House to operate as offices.
- 4.6. The offices will make a positive contribution to the local economy and will add to the vitality and viability of this particular area of the Borough. The site is appropriately sized for office space and would be in keeping with the area and will, therefore, not harm the viability of other town centre uses.
- 4.7. The change of use will support the aspirations of the Central Activities Zone (CAZ) set out within the London Plan through assisting in the provision of suitable and sustainable office space and the protection of London's vibrant commercial heartland, ensuring it can remain a key driver of the UK economy; as sought by the CAZ SPD.
- 4.8. The proposed office is a traditional town centre use and will positively contribute to the role of Central London, ensuring that the vitality and viability of the area is maintained therefore complying with Local Plan Policy E1.

Design

- 4.9. The proposed change of use will not alter the character of the building or surrounding area. The application does not propose any external alterations to the building and the change of use will allow for the whole of Esavian House to be utilised as an office space, therefore allowing more compatible uses at the site.

Access and servicing

- 4.10. The access and servicing of the site will remain unaltered by this application. Access into the part of the building subject to this application is taken from Stukeley Street.
- 4.11. As the current arrangements are considered acceptable uses, we consider that there is no reason why an alternative B1 use (office), in place of an existing employment use (warehouse, workroom and showroom), would be unacceptable.
- 4.12. Esavian House offers a public transport accessibility level of 6b; the best category (as

defined by Transport for London). The site is in a highly sustainable location and it is expected that most trips generated by the proposed office use would be undertaken by foot or public transport, thus having little impact on the existing traffic network.

Summary

- 4.13. The proposed change of use will promote economic development through office development within Central London and will allow for the whole of Esavian House to operate as office space.
- 4.14. The principle of the use at Esavian House has been established through the remainder of the premises having consent for office use. There are no external alterations proposed and the change of use will not have detrimental impact on the surrounding uses or highway network given the nature of the use being compatible with the other floors and wider uses in the area.
- 4.15. Planning permission should be granted as the application complies with all relevant aspects of the Development Plan, the NPPF, and all other material considerations.

