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27 July 2018

NG/AS – 18/219  
BY PLANNING PORTAL

Dear Sir, Madam,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
APPLICATION FOR FULL PLANNING PERMISISON AT BUPA HOUSE, 15-19 BLOOMSBURY  
WAY, WC1A 2BA**

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We write on behalf of client, Lab-B Estate Limited ('the Applicant'), to submit an application for full planning permission with regards to the proposals at Bupa House, 15-19 Bloomsbury Way, WC1A 2BA ('the site').

The planning application is seeking a change of use at ground floor level from the existing office use (Class B1a), to part office use (Class B1a), part restaurant use (Class A3) and part mixed office/restaurant use (Sui Generis). The application relates to the change of use only and no external alterations are proposed.

In support of the proposed change of use, the following documents are submitted for consideration by the Council as part of the application:

- This supporting cover letter, prepared by Iceni Projects;
- Completed application form and certificate of ownership, prepared by Iceni Projects;
- Community Infrastructure Levy (CIL) form, prepared by Iceni Projects;
- Site Location Plan, prepared by Od Interiors;
- Existing floorplan, prepared by Od Interiors; and
- Proposed floorplan, prepared by Od Interiors;

The planning application has been submitted via the Planning Portal. The planning application fee of £462 will be paid directly to the London Borough of Camden in due course once the application has been registered. Please advise upon registration at the earliest opportunity so that payment can be made and the application validated.

**Site and Surrounding Area**

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The application site is located within the Holborn and Covent Garden Ward of the London Borough of Camden ('the Council'). The site occupies an independent square block fronting on to Bloomsbury Way to the north, Bury Place to the west, and Barter Street to the south and east.

The site contains a 10 storey building which was formerly used as the head office for Bupa. The lawful use of the entire building is office (Class B1a). The building is square in shape and extends across the majority of the site. The majority of existing ground floor arrangement comprises mainly ancillary spaces, including a gym, large reception lobby, associated storage rooms, and toilet and shower facilities. Approximately 175sqm of the ground floor is currently used as actual office floorspace. The building is not listed but is located within the Bloomsbury Conservation Area.

Uses in the immediate surrounding area are primarily commercial in nature, comprising of; offices, retail, education and restaurant uses. A number of buildings also comprise of residential use at upper levels.

The site is extremely well connected and has an excellent Public Transport Accessibility Level (PTAL) of 6b. A large number of public transport options are available within walking distance of the site. Holborn Underground Station is located to the south-east of the site and Tottenham Court Road Underground Station is located west of the site. Both stations are a 5 minute walk from the site.

## **Planning history**

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A full review of Council's planning history records has been undertaken and it has been identified that there are a number of relevant planning applications.

In July 1990, planning permission (LPA Ref: 9000160) was granted to change the use of part of the ground floor from offices (Class B1) to financial services (Class A2).

In May 1995, planning permission (LPA Ref: 9401544) was granted to allow the use of part ground and basement levels to be reverted back to offices (Class B1) from the approved financial use (Class A2), together with an internal refurbishment and external alterations.

In addition, a number of minor planning applications have also been approved concerning external alterations and advertisement consents.

## **The Proposed Development**

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The planning application is seeking a change of use at ground floor level from the existing office use (Class B1a), to part office use (Class B1a) and part restaurant use (Class A3). The application relates to the change of use of the ground floor only and no external alterations are proposed.

Specifically, planning permission is sought for the following description of development:

*'Change of use of the ground floor level from offices (Class B1a) to part office (Class B1a), part restaurant (Class A3) and a part mixed office/restaurant (Sui Generis)'.*

The proposed change of use will result in the provision of approximately 332sqm of office floorspace, which has been designed as a members co-working space for small and medium sized enterprises. The remainder of the ground floor will be split between a dedicated restaurant use (Class A3) (approximately 205sqm) and a mixed office/restaurant use (sui-generis) (approximately 225sqm). This area of the ground floor will be open to all members of the public, with the mixed office/restaurant use providing a flexible co-working and dining space for small to medium businesses who do not have access to the members co-working area.

The planning application is submitted in connection with the wider refurbishment of the building to significantly improve the efficiency of the building and provide new Grade A co-working office accommodation throughout the building. The refurbishment is being undertaken by LABS who are an established commercial developer who specialise in co-working office developments and are investing significantly in the wider area.

## **Planning Policy Framework**

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Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that applications for planning permission must be determined in accordance with the policies of the relevant Development Plan documents unless material considerations indicate otherwise.

The Development Plan for the proposals include:

- The London Plan (2016); and
- The Camden Local Plan and Policies Map (2017).

The Local Plan Policies Map (2017) show the site to have the following policy designations:

- Central Activities Zone (CAZ);
- Bloomsbury Conservation Area; and
- Metropolitan Walk (Bloomsbury Way).

The London Borough of Camden has a number of supplementary planning documents entitled Camden Planning Guidance (CPG). In March 2018 Council adopted a number of new and updated CPG documents. These documents provide further information to support local policies and form a material consideration in planning decisions.

The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) also form a material consideration in the determination of planning applications.

The New Draft London Plan (2017) was published for consultation in November 2017 and the Greater London Authority ('GLA') are currently reviewing all representations received. A further draft will be published in 2019 and subsequently submitted to the Secretary of State for independent examination. Once adopted, the document will replace the current London Plan (2016).

## **Planning Consideration**

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The key planning consideration that applies in this instance is the principle of the proposed mix of uses and the loss of designated 'office' floorspace. This section provides an assessment of the proposals against relevant planning policy and other material considerations.

Policy E2 of the Local Plan (2017) sets out that the Council will encourage the provision of employment premises and sites in the borough. The Council seeks to protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.

In particular, Policy E2 promotes the provision of new floorspace suitable for start-ups, small and medium-sized enterprises. The Council's employment strategy seeks to maintain a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility, which will be vital in maintaining and developing Camden's successful economy.

The supporting text of Policy E2 sets out that when assessing proposals that involve the loss of a business use to a non-business use the Council will take into account various factors, including:

- The suitability of the location for any business use;
- Whether the premises are in a reasonable condition to allow the use to continue;
- The range of unit sizes it provides, particularly suitability for small businesses; and

- Whether the business use is well related to nearby land uses.

The proposals will result in the reconfiguration of the existing ground floor to provide approximately 332sqm of office floorspace (Class B1a), approximately 205sqm of restaurant floorspace (Class A3) and approximately 255sqm of mixed office/restaurant floorspace (Sui Generis).

The designated 'office' component will be provided as flexible co-working accommodation which would be accessible to members of the Applicant's co-working group; 'LABS'. The mixed office/restaurant component will provide a flexible co-working and dining area that will be accessible to members of the public who do not have access to the members co-working space. The previous building arrangement had been designed to accommodate large business occupiers and therefore, the proposals will provide the opportunity to promote small and medium sized businesses, which is considered to be a significant planning benefit of the proposals. The provision of more efficient flexible co-working space is more suitable and will provide the opportunity for small and medium sized enterprises, including start-ups, to occupy and use the building.

Alongside the co-working floorspace will be the designated 'restaurant' floorspace which would be run in connection with the 'LABS' brand. Whilst primarily a 'restaurant' use, the space has been designed to effectively integrate with the public co-working business environment, further enhancing the opportunities for small enterprises to use the site for business purposes. The reconfiguration of the ground floor is integral to the success and the objectives of the wider building refurbishment which aims to deliver modern flexible working spaces that are easily adaptable to suit the needs of a range of operators including small and medium businesses.

Local Plan (2017) Policy E1 is particularly relevant to this approach and the supporting text to Policy E1 promotes innovative approaches to new employment uses, stating that small businesses often seek premises that have flexible terms like shorter leases, layouts that can adapt as the business grows or changes and networking space to interact with other small business or to meet with clients. LABS are a market leader in providing innovative employment floorspace and fundamental to this is the ability to provide a range of facilities including: flexible occupancy terms; flexible layouts; studios; workshops; and networking, socialising and meeting space that will meet the needs of a range of business types and sizes.

Whilst it is acknowledged that the proposals will result in the reduction of a proportion of designated 'office' floorspace on the site, when compared to the existing ground floor arrangement, the proposals will significantly improve the efficiency and business floorspace available. The current ground floor arrangement comprises of approximately 175sqm of floorspace that is used specifically for offices purposes. The remaining 617sqm is currently occupied by ancillary facilities, including; a gym, large reception lobby, associated storage rooms, and toilet and shower facilities. The proposals would provide a larger area of genuine working space at the ground floor level, specifically the LABS members co-working space (approximately 332sqm) and the mixed office/restaurant space (approximately 225sqm) which will be accessible to the public.

In terms of job creation and employment opportunities, the proposals have the opportunity to enhance and make a positive contribute to job creation on the site. Based on the existing ground floor arrangement, approximately 15 people could use the floorspace for genuine office or employment opportunities. The proposals have the opportunity for approximately 24 employees to use the designated 'office' floorspace, 12 people to be employed by the designated 'restaurant' component, together with the opportunity for 22 people to use the designated 'restaurant' area as an informal co-working and business meeting space.

Furthermore, the current use of the building and ground floor arrangement does very little to interact with the street. As part of the wider refurbishment of the building, the exiting ground floor ancillary gym will be relocated to the basement which will allow the introduction of the 'restaurant' use at ground level. The proposals therefore have the opportunity to significantly improve how the building interacts with the street by creating and introducing activity through the new ground floor arrangement. This is considered to be a further planning benefit of the proposals which would accord with the policy aspirations for uses within the CAZ.

Therefore, overall, we consider that the new ground floor layout arrangement, which together with the comprehensive refurbishment of the upper floors of the building (not forming part of the application but to be carried out by LABS), will significantly improve the employment offer at this site and make a positive contribution to immediate surrounding area.

## Summary & Conclusion

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The planning application is seeking a change of use at ground floor level from the existing office use (Class B1a), to part office use (Class B1a), part restaurant use (Class A3) and part mixed office/restaurant use (sui-generis). The application relates to the change of use of the ground floor only and no external alterations are proposed.

The proposed change of use will result in the provision of approximately 332sqm of 'office' floorspace, which has been designed as a members co-working space for small and medium sized enterprises. The remaining part of the ground floor, which under the current ground floor arrangement is principally used as ancillary/back of house space, would provide a dedicated restaurant use (Class A3) (approximately 205sqm) associated with the LABS brand and a mixed office/restaurant use (Sui Generis) (approximately 225sqm), both of which will be open to members of the public.

The planning application is submitted in connection with the comprehensive refurbishment of the building to significantly improve its efficiency and provide new flexible co-working office accommodation. The refurbishment is being undertaken by LABS who are an established commercial developer who specialise in co-working office developments and are investing significantly the wider area.

Whilst it is acknowledged that the proposals will result in the reduction of a proportion of designated 'office' floorspace on the site, when compared to the existing ground floor arrangement, the proposals will significantly improve the efficiency and business floorspace available. The current ground floor arrangement comprises of approximately 175sqm of floorspace that is used specifically for offices purposes, with remaining 617sqm currently occupied by ancillary facilities. The proposals would provide a larger area of genuine office floorspace at the ground floor level, which when combined with the restaurant and mixed office/restaurant floorspace, will significantly improve employment opportunities when compared with the existing arrangement.

We trust that the enclosures are sufficient for you to consider the application, but should you have any question please contact Anna Snow on 020 3640 1022 or [asnow@iceniprojects.com](mailto:asnow@iceniprojects.com) or Nick Grant on 020 3640 1030 or [ngrant@iceniprojects.com](mailto:ngrant@iceniprojects.com).

We look forward to receiving confirmation of the registration and validation of this planning application at the earliest opportunity.

Yours faithfully,



ICENI PROJECTS LIMITED

Enc.