

22 February 2019



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Our reference: l-eaj- 10turnstileCOU- 210219

**10 GREAT TURNSTILE STREET, LONDON WC1V 7JU -
APPLICATION FOR PLANNING PERMISSION TOWN AND COUNTRY PLANNING ACT 1990**

We write on behalf of our client Mary Ward Centre ('the charity'), who are a leaseholder of the above property, to submit a planning application for the change of use of the third floor of the building from Class D1 (education) to an expanded range of permissible uses, spanning Use Class D1 (education & medical) and Class B1(a) (Office) use at the above property.

The application has been submitted via the Planning Portal (Ref: PP- 07493123) and comprises the following:

- This Cover Letter
- Planning Application Form and Certificate B
- Marketing Summary (Gryphon Property Partners, 2019)
- Statutory Application Fee of 462.00
- Drawings, as follows

Drawing Reference	Drawing Title	Scale and Size
565-00-00	Site Location Plan	1:1250 @ A4
565-00-05	Existing Third Floor Plan	1:100 @ A3
565-00-06	Proposed Third Floor Plan	1:100 @ A3

1. Site Context

The application relates solely to the third floor of 10 Great Turnstile Street ('the site'), which is one of the charity's property assets. The site occupies a prominent position on the street, accessed via the High Holborn A40 road.

The site comprises a modern five storey building, with Class B1(a) office uses on parts of the lower ground, ground and first floor and Class D1 educational use only on parts of the lower ground and the full second and third floors. This arrangement of uses dates to the charity's former, rather mixed-use of the premises, and a history of use that has adapted to suite circumstances, over time. The building itself dates back to the 1980's and is a reinforced concrete structure with stone cladding and metal framed double glazed windows. Great Turnstile Street is a pedestrian link between High Holburn (to the north), the junction of Whetstone Park (to the west) and Newman's Row (to the south).

For the last 35 years, Mary Ward has been providing a wide range of adult education and free legal advice services in Camden. The charity owned no.10 freehold, until late last year, but now leases back part of the property; being due to relocate in 2022. This follows a merger with Blackfriars Settlement, which provided an opportunity to offer a programme of adult education in Camden and other London Boroughs. Nevertheless,

the charity remain committed to providing free legal advice in Camden, with a recently awarded Legal Aid Agency contract and continued funding from the local authority.

The purpose of applying for a change of use is predicated by the charity's understandable need to make best use of its underutilised property asset and to ensure that the vacant floor area brought back into effective, lawful use, as soon as possible.

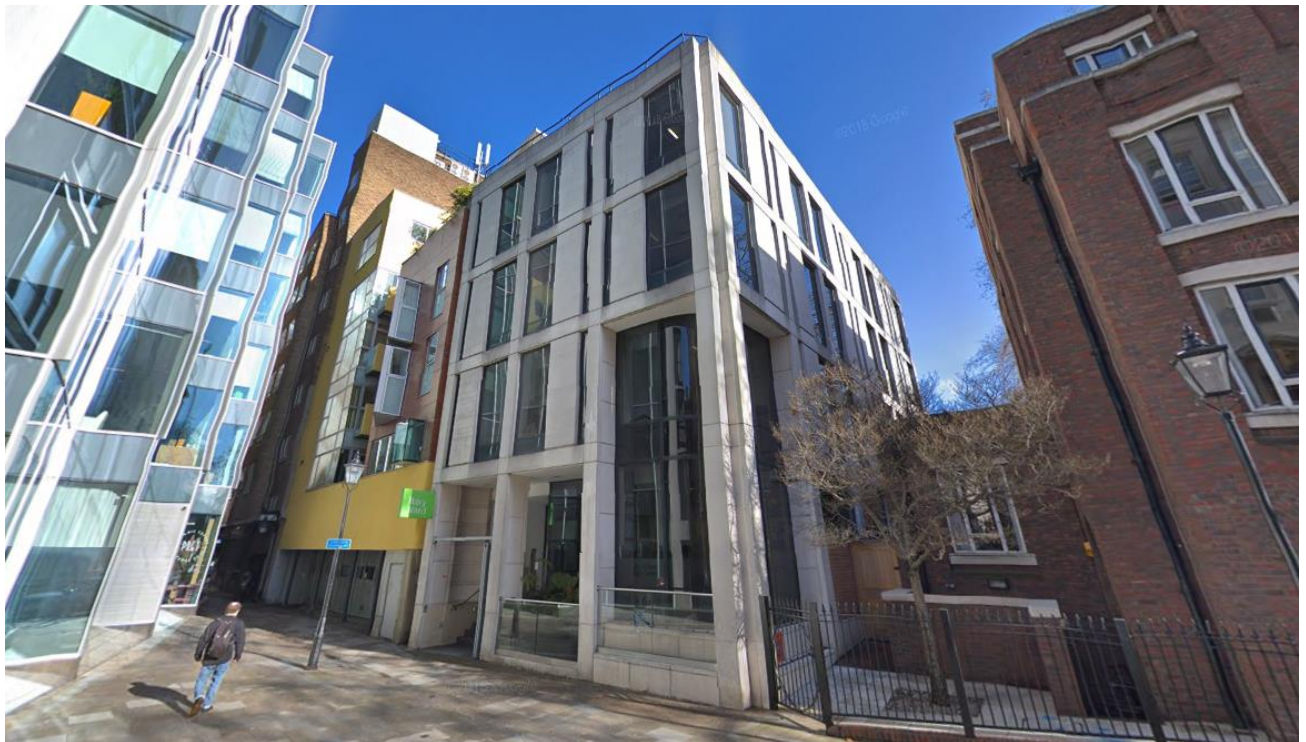


Figure 1- Street view of 10 Great Turnstile Street (Source: Google Maps, 2018)

2. Planning History

A search of the London Borough of Camden's ('the Council') website generated 4 planning applications for the site. These included, applications for the installation of a glass balustrade (Ref: 2016/5722/P), alterations to the ground floor entrance (Ref: 2011/0036/P) and the erection of additional security railings (Ref:2004/3286/P). The application of most relevance to this proposal is a permission that was granted in October 2010 (Ref: 2010/4976/P) for the "Change of use of part lower ground floor and second and third floors from office (Class B1a) to education use (Class D1)".

The application included the change of use of the second, third and some areas of the lower ground floor. While the application's focus was on the change of use, some internal works were also involved, including the insertion of partition walls to create classrooms, creation of teacher/training space, refurbishment of kitchens and toilets, installation of showers, replacement of plant and general upgrading and improvement works.

3. Current Application Proposal

Planning permission is sought for the "Change of use of the third floor from Class D1 (educational) to a flexible Class D1 (educational/medical) and Class B1(a) (Office) use and internal alterations"

The proposed change of use to a flexible Class D1 and B1(a) use provides the charity with the flexibility needed to find a new occupier for the third floor of the building. It should be noted that the proposal only relates to the third floor and there will be no loss of B1(a) office use as per the 2010 application. No external

changes are proposed as part of the application, and any alterations would fall to an incoming tenant in due course and in all likelihood would be internal and ancillary to the use which occupies the floor. There are no building layout changes or alterations whatsoever, within the enclosed application.

4. Planning Context

Any application made under the Planning Acts, should be determined in accordance with the development plan unless material considerations indicate otherwise. Planning law requires that where regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise¹. The National Planning Policy Framework 2019 ('NPPF') also holds weight in planning decisions, particularly where the adopted development plan is out of date.

The development plan comprises the London Plan (2016), Camden Local Plan (2017), Policies Map (2018) Site Allocations (2013) and the Euston and Fitzrovia Area Action plans which do not relate to this site. There are also no neighbourhood plans which relate to this site.

The site includes the following designations, Holborn Growth Area, Archaeological Priority Area and Central London Area (CAZ). The site is also adjacent to the Lincolns Lawn Open Space. The site is located within the Kingsway Conservation Area, the building is not listed.

Relevant development plan polices to the assessment of this application include:

- Policy DM1 (Delivery and Monitoring) relates to the vision, objectives and policies of the Local Plan.
- Policy A1 (Managing the impact of development) protects the quality of life of occupiers and neighbours amenity.
- Policy C1 (Health and Wellbeing) states that the Council will improve and promote strong, vibrant healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. This includes supporting the provision of new or improved health facilities. In line with Camden's Clinical Commissioning Group and NHS England requirements.
- Policy C2 (Community Facilities) ensures that community facilities and services are developed and modernised to meet changing needs of the community and reflect new approaches to the delivery of services. This partly includes retaining existing community uses and supporting the investment of health bodies to expand and enhance their operations.
- Policy G1 (Delivery and location of growth) concerns growth and the delivery of homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough. Specifically, the Holborn Growth Area has an aspiration to provide appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes
- Policy E1 (Economic Development) directs new office development to the growth areas, Central London, and town centres, in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031.
- Policy D2 (Heritage Assets) regards heritage assets and their preservation and enhancement where possible, these include Conservation Areas and Archaeological Priority Areas.
- Policy T1 (Prioritising walking, cycling and public transport) promotes sustainable transport in the area.

¹ Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act (1990)

- London Plan Policy 3.17 (Health and Social Care Facilities) supports the provision of high quality health and social care, these will particularly be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking.
- London Plan Policy 4.1 (Developing London's Economy) supports the continued development of London's economy, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost.

5. Planning Assessment

Principle of Use

The purpose of this application is to change the use of the existing third floor of the site from a position that is currently highly restrictive and a product of a past pattern of use, to a more commercially attractive, logical scope of uses spanning a flexible range, of D1 (educational/medical) and B1(a) (office) use. The D1 educational uses on the part lower ground and second floor and the B1(a) office uses on the ground and first floors will remain as existing. The previous change of use application was made to accommodate Mary Ward's Adult Education Centre, offering a wide range of courses in arts, humanities, languages and IT to Londoners. Their rehabilitation centre in Queen Square was limited on space at the time and was struggling to accommodate the above services. This subsequently led to the change of use application from office to educational on part of the lower ground, second and third floors. The Officer's report stated that the "*Mary Ward Centre is an established Camden based adult education centre providing education and training to Camden's residents*".

Paragraph 80 of the NPPF states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It further states that planning policies should also be flexible enough to enable a rapid response to changes in economic circumstances.

Policy E1 (Paragraph 5.24) recognises that, to meet Camden's office floorspace demand, the Council will need to direct new office development primarily to the growth areas and Central London. While, the Policy text states that the majority of demand will be met at King's Cross and Euston, "*smaller scale office development will also occur at other sites across Central London*".

Policy C1 (Paragraph 4.17) of the Local Plan (2018) specifically states "*that as the population grows and ages, there will be a requirement for different models of health and social care provided closer to home, which will need to be recognised in the development and alteration of health care premises*". Policy DM1 goes further and sets out the infrastructure requirements for the borough. The appendices of the Local Plan which coincide with this policy include the gross demand of 19 additional full time GPs, with the delivery focused on the "*creation and expansion of facilities and co-location with other community services*".

Policy C2 concerns community facilities, and acts to develop and modernise community facilities to meet the changing needs of the community. The text within the policy states that there '*may also be circumstances where a community use, either wholly or in part, is no longer required or viable in its current use*' (p.144). In this respect the applicant will need to demonstrate the loss of the facility would not create, or add to a shortfall in the provision for the existing community use.

The charity is now in a situation where the third floor is not required for educational use, the floor is therefore vacant, in an accessible area of central London. The proposed change of use does not remove the educational use, but seeks to enhance the D1 educational use to include a medical use and add a B1(a) office use. The site is located within the Central London Area of Holburn and is a suitably located for any of the uses proposed. Furthermore, the inclusion of the office use within the proposal, seeks to partly revert the building's usage back to its former use before the previous change of use application. In all circumstances, the uses proposed are considered to comprise clear benefits to either employment generation or community assets.

The proposed site location has excellent transport accessibility, reaching the surrounding high density levels of population and employment, which in our opinion suits any of the uses proposed. It should also be noted that the proposal does not remove the community facility at no.10, but acts to enhance the options for future usage. If the existing educational use is replaced by either medical or office use, this will not create a shortfall in educational use. Whilst there may be a loss in the lawful use of the third floor, dependent on the nature and use class of an incoming tenant, the existing third floor is vacant and the part lower and second floors will remain in that use. As your Council is doubtless fully aware, the charity also has facilities within its Queen Square building, 10 minutes' walk from the site.

A Marketing summary has also been prepared by Gryphon (who work on behalf of the charity) and this is submitted as part of this application and included within [Appendix 1](#) of this letter. As this clearly explains, the third floor unit has been on the market since March 2018, of which little interest has been received. It should be noted, that some of the interest received was not developed further because of the limited D1 educational use of the third floor. As the income rent from this floor will contribute towards the funds that run the charities services, it is essential that a new occupant is found.

With the above in mind, the proposed change of use from Use Class D1 (educational use) to a flexible Use D1 (educational/medical) and B1(a) (office) use is considered acceptable and policy compliant in principle. The use will overall generate either an office, health service or educational facility in Camden and the Holborn Growth Area that will undoubtedly contribute positively to the surrounding area and asset management of the charity. Overall the change of use complies with Local Plan Polices E1, C1, C2, DM1 and G1, London Plan Policy 3.17, 4.1 and the NPPF.

Design and Amenity

There will be no impact on the external appearance of the building and the Kingsway Conservation Area as a result of this application. Given that there are no external alterations included in the proposal, there are considered to be no issues on design or amenity concerns relating to privacy/overlooking, outlook or sunlight/daylight matters.

The amenity assessment of the previous application (Ref: 2010/4976/P) recommended the condition to restrict the use to educational Class D1. This was to enable the Council to have reasonable control of the future use of the building and require other uses within Class D1 to submit applications for planning permission. This was considered necessary to at the time, protect the amenity of neighbours and occupiers. Whilst it is considered there will be an increase in footfall from the uses proposed, it will not be of considerable change from the current B1(a) and D1 uses that occupy the building. The amenity impact of the proposed change of use is therefore considered to be negligible and compliant with Local Plan Policies A1 & D2.

Transport

Policy C2 specifically states that community *“facilities should provide access to a service on foot and by sustainable modes of transport”* (p.138). The PTAL rating of the site is 6b which is considered the best rating on the PTAL scale and therefore a highly sustainable location. The site is located within the central London area of Holborn and is served well by a range of transport modes. This is mainly down to the site's close proximity to the Holborn Underground station (300m) and Chancery Lane underground station (280m). The site is also served by a number of bus routes to the north on the A40 High Holborn road.

Consideration should also be given to the site's proximity within the high residential population density of central London, which unconditionally encourages cycling and walking. The application does not include cycle parking as there is not a feasible location around the building for storage to be located. There are also a number of cycle racks associated with Lincolns Inn field, which is a short walk to the site. The transport accessibility of this site is considered appropriate to the proposed uses and therefore compliant with Policy C2 and T1 which encourages sustainable transport.

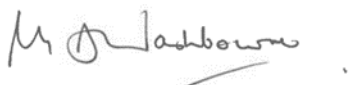
Conclusion

The proposal will allow for a change of use to a flexible Class D1 (educational/medical) and/or Class B1(a) (office) use on the third floor of the building, which will undoubtedly have benefits to local residents and the Council. Moreover, this will ensure that the charity can derive much-needed income to support and continue its good works, in the city. The change of use is not considered to be a loss of an existing community use, but rather an enhancement of the lawful uses that can operate in the building, to assist with charity's asset management. The site is located within a sustainable location in central London, within easy walking distance of two underground stations, and served by a number of bus stops and cycle routes.

Overall, it is considered that the proposed change of use is an entirely logical, appropriate and policy-compliant proposal, which will assist and support Mary Ward Centre, moving forward. The application is considered in all circumstances to present public benefits to the local population and the Council. We therefore request that the Council determine the application favourably, in accordance with Paragraph 11 of the NPPF.

We trust that you have all the information necessary to register, validate and determine the planning application, however, if you have any queries please contact Edward James or myself. We look forward to shortly receiving acknowledgement of this planning application.

Yours faithfully

A handwritten signature in black ink, appearing to read "Mike Washbourne". The signature is fluid and cursive, with a horizontal line underneath the name.

Mike Washbourne
Director



Appendix 1 – Marketing Summary



Mary Ward Settlement instructed Gryphon Property Partners, a specialist City and Midtown letting agency, in March 2018 to market and let the 3rd floor accommodation at 10 Great Turnstile, on flexible terms if appropriate, for occupation from August 2018.

The accommodation was offered to the market in a fitted condition, ready for immediate occupation if required. It enjoys good natural light and plans out well for a wide range of occupiers. Its location is attractive, being very close to Lincoln's Inn Fields and within a short walking distance of Holborn and Chancery Lane Underground stations.

The property has been widely marketed directly to occupiers, and also widely to the agency community, which tends to represent over 90% of enquiries from occupiers in the market for new space. Furthermore, the premises have had wide exposure on various platforms including Rightmove, EGi, CoStar, City Agents Club, West End Agents Society, Estate Agents Clearing House and on our website.

During a period of 12 months there have been only two parties that have shown any meaningful interest in the accommodation, both of whom were D1 medical users:-

1. The first party was Well-Locus Consulting Ltd (a hair transplant company) who had showed an interest in [May 2018] and there were brief negotiations to take a lease of the space before ultimately, they discounted 10 Great Turnstile.
2. The second party was Babylon (General Practice Consultants) who in December 2018 were interested taking a lease subject to achieving a change of use to D1 medical. However, ultimately they rejected the accommodation principally on grounds of poor location for their use.

Other than the interest set out above, we have had some other viewings for prospective tenants (the majority of which have been D1 medical users) but the space has typically been discounted due to the preference from these parties to be situated on the ground or lower ground floor.

There has only been one D1 Educational viewing since marketing the space which was for a nursery. They deemed it to be inappropriate for a nursery due to the absence of the required outside space.

We have had a number of enquiries from agents looking at the space for B1(a) office use, but no such interest has progressed as the property has been discounted immediately due to the current D1 use.

21st February 2019.