

# The Hoxton Hotel and associated retail units, 119-206 High Holborn

Planning Statement

indigo.

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retail units, 119-206 High Holborn**

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## Planning Statement

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Planning Statement

# 1. Introduction

## Overview

- 1.1. Indigo has prepared this Planning Statement on behalf of The Hoxton (Holborn) Limited (“the Applicant”) in support of a planning application to the London Borough of Camden (“the Council”). The application relates to three existing commercial units at:
- Former Cheeky nail bar, 199 High Holborn;
  - Hoxton Hotel, 199-206 High Holborn; and
  - Former Hoxton Grind coffee shop, 206 High Holborn.
- 1.2. Planning permission is sought for:
- Reconfiguration and amalgamation of existing retail (A1) floorspace and Hotel (C1) units to form a composite hotel and retail use (C1/A1).
- 1.3. The proposals seek is to provide a greater sense of space, by demolishing the existing partitions between the former ‘Hoxton Grind’ coffee shop, and entrance lobby of the neighbouring Hoxton Hotel. The development also seeks to improve the size and quality of the retail space by incorporating the less popular retail space formerly occupied by the ‘Cheeky’ nail bar. Through this process a larger, more open and more attractive retail space can be provided as a composite use and form part of the mix of ground floor uses within the existing hotel.
- 1.4. Further details of the proposed development are set out within this statement and the supporting documents. The full extent of the application site is outlined in red on the Site Location Plan submitted as part of this application.

## Document structure

- 1.5. The remainder of the Statement is structured as follows:
- **Section 2** describes the application site and context;
  - **Section 3** sets out the proposed scheme;
  - **Section 4** discusses the pre-application advice and consultation;
  - **Section 5** provides relevant planning policy and guidance;
  - **Section 6** sets out the planning assessment; and
  - **Section 7** concludes the statement.

## Submission documents

- 1.6. In addition to this Planning Statement the planning application comprises:
- Completed and signed application forms and certificates, prepared by Indigo Planning;
  - Completed Community Infrastructure Levy (CIL) form, prepared by Indigo Planning;

- Site Location Plan, prepared by Gundry + Ducker;
- Existing and Proposed Plans, prepared by Gundry + Ducker; and
- Existing and Proposed Elevations, prepared by Gundry + Ducker.

## 2. Site context

### Site and surroundings

- 2.1. The application site is located within the London Borough of Camden, at the west end of High Holborn. The site is bounded by High Holborn to the north, Newton Street to the east, an existing residential tower block to the south, and Dragon Yard to the west.
- 2.2. The application relates to the amalgamation of three separate planning units at ground floor level, namely:
  - Former Cheeky nail bar, 199 High Holborn;
  - Hoxton Hotel, 199-206 High Holborn; and
  - Former Hoxton Grind coffee shop, 206 High Holborn.
- 2.3. All three units are housed within the same development, situated on a corner plot of land on the south side of High Holborn, at its junction with Newton Street. The development comprises two buildings, an 'L' shaped post-war building, and the more historic building elements to the west, which is Grade II Listed (LEN: 1378880). Note that the listed elements of the building relate to the retained frontage only, and that the application does not propose any physical alterations to this building fabric.
- 2.4. Their location is considered to be highly accessible, as they are all located within close proximity of existing transport facilities, particularly Holborn Underground Station and the large number of bus routes which operate within the area. As such, the site benefits from a PTAL rating of 6b.
- 2.5. Camden's adopted Policies Map designates all three of these units within Holborn Central London Frontage that forms part of the designated 'primary' retail frontage, at the western end of the centre. It should be noted that the Policies Map includes both 'primary' and 'secondary' frontage designations, but that no 'secondary' frontages at the western end of the centre. The application site represents the western-most point of the centre, which is more of a peripheral location in comparison to the main heart of the centre, to the east of the High Holborn, Southampton Row and Kingsway Junction.

### Individual units

- 2.6. This section outlines the current or most recent use of the units, any constraints faced by tenants of these units, and what opportunities could be taken to improve their performance.

### Hoxton Hotel

- 2.7. The Hoxton Hotel (Use Class C1) has established itself as a major destination for tourists and the local community over the past five years since the building was converted from office use in 2011. The Hoxton brand provides hotel accommodation, meeting and event spaces, together with an inviting lobby area which is used heavily by hotel guests, local residents and members of the public.
- 2.8. The lobby of the hotel functions as a variety of different spaces, including a waiting area, restaurant and bar. The informal waiting area has been exceptionally popular, and is now heavily used as an area for socialising, working or for hosting informal meetings. It is used both by hotel guests and members of the general public. The function of the hotel lobby generates demand for retail functions which are currently fulfilled by the hotel.

### **Vacant 'Hoxton Grind' coffee shop**

- 2.9. The former 'Hoxton Grind' coffee shop (Use Class A1) is the western-most unit of the three, situated at the junction of High Holborn and Newton Street. The unit does have limited primary frontage along High Holborn, but does benefit from an extensive area of undesignated frontage along Newton Street.
- 2.10. The unit operated successfully as a coffee shop for a period of 4 years. Feedback from the tenant was that the business would benefit from a larger unit with greater retail frontage. This application is intended to address this point, opening up the retail unit into the hotel lobby, and enabling any future tenant to serve both the footfall along High Holborn and any individuals already in the lobby of the neighbouring hotel.

### **Vacant 'Cheeky' nail bar**

- 2.11. The 'Cheeky' nail bar (Use Class A1) is the western-most unit of the three, and is one of the most peripheral units within Holborn Central London Frontage. Due to its location the unit suffers from relatively poor visibility from High Holborn, with its shopfront being dispersed amongst the columns of the building, and access being via a small entrance lobby to the west. Combined, these issues mean that the existing retail unit suffers from low levels of activity, as visibility of the unit is poor, and the means of access is unclear. The application seeks to rectify this by relocating this floorspace into a more central, prominent and accessible location.

### 3. Planning history

- 3.1. There is an extensive history of applications having been made in relation to this site. This section outlines the key planning history for the application site.
- 3.2. Planning permission was granted in October 1963 under the reference P14/30/C/4921 for the redevelopment of the land at 199-206 High Holborn, and 2-8 Newton Street. This redevelopment involved the erection of a part eight, part nine storey building which comprised basement car parking, ground floor shops, and a mixture of restaurant, office and residential apartments on the upper floors of the building.
- 3.3. Planning permission was then granted in October 2011 under the reference 2011/4914/P for the change of use of the existing site from offices (B1) to hotel (C1), together with the erection of a four floor extension along the Newton Street frontage.
- 3.4. A Non-Material Amendment (NMA) was later granted in April 2013 under the reference 2013/1769/P. This amendment allowed changes to the internal configuration of the building, increasing the number of hotel rooms from 138 to 174.
- 3.5. Planning permission and Listed Building Consent was later granted in May 2013 under the references 2013/2899/P and 2013/3056/L. These permissions allowed an extension of the hotel into the rear service yard to provide an improved entrance, lobby and reception area, ancillary bar, restaurant and meeting rooms, and a further change of use of the remaining office floorspace at basement level, for use as a hotel (A3).
- 3.6. Planning permission was later granted in May 2014 under the reference 2014/2731/P for the erection of a single storey side extension into an existing undercroft. This application increased the size of the retail unit now referred to as the 'Hoxton Grind'.
- 3.7. Further planning permission was granted in October 2015 under the reference 2015/5788/P. This provided planning permission for the erection of a single storey side extension fronting Newton Street, which would be used to provide additional meeting space for the hotel. Note that this permission has not yet been implemented, and that there is a live application for further amendments, under the reference 2018/6316/P.
- 3.8. Finally, planning permission was granted in January 2017 under the reference 2017/0200/P for the erection of a six storey infill extension above the existing service yard, to accommodate an additional 46 hotel rooms.
- 3.9. The planning history of the site demonstrates that the Hoxton Hotel have made best use of an existing building, and continues to develop to improve the quality and appearance of this building, and to increase footfall at this end of Holborn Centre.

## 4. Description of development

- 4.1. As evidenced by the existing floor plans, the existing configuration of the existing site performs poorly. The most accessible of the two retail units suffers from a lack of frontage along High Holborn, and the other suffers from a peripheral location, lack of visibility and obvious means of access.
- 4.2. This application seeks to improve the situation by rationalising the existing primary frontage of the site, amalgamating the existing retail units to provide a larger, more prominent and accessible retail unit.
- 4.3. In addition to this, the application also seeks to demolish any partitioning between the retail and hotel use, providing a more open layout and enabling the retail unit to serve guests and visitors of the hotel lobby. In combining the two, a composite planning use will be created.
- 4.4. For the avoidance of doubt, this application does not seek to make any material change of use. The application seeks to retain and combine the existing retail floorspace, merging two existing retail units into one larger unit.
- 4.5. The description of development is as follows:

Reconfiguration and amalgamation of existing retail (A1) floorspace and Hotel (C1) units to form a composite hotel and retail use (C1/A1).
- 4.6. The key works involved in this development are:
  - Demolition of existing partition walls;
  - Reconfiguration of the hotel (C1) lobby, relocating key aspects of the lobby (eg the ancillary bar and restaurant) westwards, to improve the amount of floorspace available for retail use at the eastern, more prominent end of the site; and
  - Relocating the combined retail (A1) floorspace at the eastern end of the site, which would benefit from both the existing points of access on High Holborn and Newton Street, and a new point of access internally, from within the hotel (C1) lobby.
- 4.7. Any necessary alterations to external advertisements will be addressed by way of a separate application for advertisement consent.

## 5. Pre-application advice

- 5.1. This application has been prepared in accordance with formal pre-application advice sought from the London Borough of Camden Council. A request for pre-application advice was submitted on 20 December 2018 and a meeting held on 29 January 2019. Through this meeting it was agreed that:
- the application site falls within the designated primary frontage as defined by the adopted Local Plan, Policies Map, and the adopted Town Centres and Retail Camden Planning Guidance (CPG);
  - that the evidence base for Holborn Central London Frontage demonstrates that the centre principally serves the daytime weekday office workforce, with much lower levels of visitors during the evening and weeks, and that the proposed/continued use as a retail (A1) coffee shop is appropriate for the area;
  - the development proposals must comply with the frontage controls set out by Policy TC2 and the CPG;
  - the development proposals should not prejudice the provision of retail (A1) use within this area, both in terms of existing floorspace and frontage length;
  - assuming that the retail (A1) use can be retained or even enhanced, the development proposals would comply with the controls set out within Policy TC2 and the CPG.
- 5.2. The following sections of this report build upon this advice. Section 6 sets out all relevant aspects of the adopted development plan, and Section 7 sets out our planning assessment, demonstrating compliance with the development plan, outlining the key benefits of the development and reasons why planning permission should be granted.

## 6. Relevant planning policies and guidance

- 6.1. This section identifies the relevant planning policies and guidance at a national and development plan level. The proposals are then assessed against these policies in Section 7 which follows.

### National planning policy

#### National Planning Policy Framework

- 6.2. The revised National Planning Policy Framework was published on 24 July 2018 and sets out the government's planning policies for England and how these are expected to be applied.
- 6.3. Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development. For decision taking, this means approving development proposals that accord within an up-to-date development plan without delay.

#### Draft New London Plan

- 6.4. A draft version of the new London Plan was initially published for consultation in November 2017 and has since been updated with minor suggested changes. It is currently being considered at a formal Examination in Public, which started on 15 January 2019; it is therefore still at an early stage of preparation and subject to a significant number of unresolved objections.

### Statutory development plan

- 6.5. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that where an adopted development plan contains relevant policies, an application for planning permission shall be determined in accordance with the plan, unless material considerations indicate otherwise.
- 6.6. The statutory development plan for this site comprises Camden Local Plan.

#### Camden Local Plan (2017)

- 6.7. The Camden Local Plan is the key strategic document in Camden's development plan. It sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions. It was formally adopted on 3 July 2017. This replaces the former Core Strategy and Development Policies planning documents which were adopted in 2010. The key policy of the plan is Policy TC2, which relates to Camden's designated centres and shopping areas.
- 6.8. Also relevant to the proposals, as it is referred to within Local Plan, are the adopted Camden Planning Guidance (CPG) documents. The most relevant of these is considered to be the Town Centres and Retail CPG (May 2018), which is summarised below:

#### Town Centres and Retail Camden Planning Guidance (CPG) (May 2018)

- 6.9. The CPG summarises Holborn Central London Frontage

## 7. Planning assessment

- 7.1. This section of the report demonstrates compliance with all relevant aspects of the development plan.

### Principle of development

- 7.2. Policy TC2 seeks to promote successful and vibrant town centres throughout the borough, aiming to serve the needs of residents, workers and visitors. The Policy states that the Council will protect and enhance the role of each centre, by ensuring that new development is of an approximate scale and character.
- 7.3. Policy TC2 achieves this by categorising each frontage within Holborn Central London Frontage, assigning it as either primary, secondary, or non-designated frontage.
- 7.4. The three commercial units which form part of the application site all fall within the designated primary frontage of the centre. Primary frontages are considered to be key areas which should be subject to a degree of protection. The Council achieves this by protecting these frontages against non-town centre uses, and by setting specific controls for each frontage.
- 7.5. The controls for Holborn Central London Frontage are set out within the council's Town Centre and Retail CPG. These controls state that the primary frontages should retain a minimum of 50% retail use, and a maximum of 25% food and drink uses.
- 7.6. The application proposes the retention of the existing retail frontage and floorspace, and does not seek to affect the existing composition of uses, apart from their locations within the frontage. Assuming that the application will not adversely affect the amount of retail frontage or floorspace, the proposals will comply with Policy TC2.
- 7.7. The following sections will demonstrate that there will be no adverse impact upon the amount of retail frontage or floorspace associated with the proposals.

### Impact upon primary frontage

- 7.8. The frontage along this stretch of High Holborn is designated in the Local Plan a Primary Frontage. Policy TC2 states that primary frontages will be protected as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre. These areas are considered to be the most prominent parts of the Holborn Central London Frontage and are protected to ensure that the centre remains viable and attractive to shoppers.
- 7.9. The application seeks to reconfigure the internal layout of the building, merging the two existing retail uses, and positioning them in the most functional and viable position possible.
- 7.10. The following sections outline the changes to the composition of both retail frontage and floorspace as a result of the development.
- 7.11. The existing frontages of the application site is outlined below, in metres:

Unit	Retail (A1)	Hotel (C1)	Other
Cheeky	7.72 metres	0.00 metres	0.00 metres
Hoxton Grind	4.80 metres	0.00 metres	0.00 metres
Hoxton Hotel	0.00 metres	27.72 metres	0.00 metres
<b>Total (per use)</b>	<b>12.52 metres</b>	<b>27.72 metres</b>	<b>0.00 metres</b>
<b>Total (all uses)</b>	<b>40.24 metres</b>		

- 7.12. As demonstrated by the table above, there is a total of 12.52 metres of existing retail frontage which must be retained. The table below outlines the amount of primary frontage that will be dedicated to the newly amalgamated unit:

Unit	Retail (A1)	Hotel (C1)	Other
Composite retail	14.40	0.00 metres	0.00 metres
Hoxton Hotel	0.00	27.72 metres	0.00 metres
<b>Total (per use)</b>	<b>14.40 metres</b>	<b>25.92 metres</b>	<b>0.00 metres</b>
<b>Total (all uses)</b>	<b>40.24 metres</b>		

- 7.13. The above table demonstrates that that a total of 14.40 metres can be dedicated to the newly created retail unit, representing an increase of 1.88 metres. This increase, together with the relocation of the retail frontage to the eastern side of the will help to improve the prominence, visibility and viability of retail floorspace within the site.

#### **Impact upon retail floor area**

- 7.14. Whilst Policy TC2 focuses upon the protection of Primary Frontage, the impact upon the amount of floorspace used for purposes forms a material consideration in the context of this development.

- 7.15. The amount of existing floorspace is outlined below, in square metres:

Unit	Floorspace
Hoxton Grind (A1)	57 sqm
Hoxton Hotel lobby (C1)	498 sqm
Cheeky Nails (A1)	56 sqm
<b>Total</b>	<b>611 sqm</b>

- 7.16. As demonstrated by the table above, there is a total of 113 sqm of existing retail (A1) floorspace which must be retained. The table below outlines the amount of retail (A1) floorspace that will be made available within the newly amalgamated unit:

Unit	Floorspace
Hoxton Hotel (composite A1)	122 sqm
Hoxton Hotel lobby (C1)	489 sqm
<b>Total</b>	<b>611 sqm</b>

- 7.17. The above table demonstrates that the area assigned for composite retail use is larger than the two existing units combined. The total amount of retail floorspace can be increased from 113 sqm to 122 sqm.

- 7.18. This does not involve the creation of new floorspace and is achieved, instead through the loss of 9 sqm of hotel floorspace. This is not considered to have a negative impact upon the town centre, as the provision of additional retail floorspace will be thought to make a positive contribution to the centre.

#### **Summary of impact upon primary frontage**

- 7.19. The information presented in the above tables demonstrate that the development proposals will not adversely affect the amount of retail (A1) frontage or floorspace within the protected primary frontage of Holborn Central London Frontage. The amount of retail frontage can be increased, and total floorspace will be unaffected. As such the proposals are compliant with Policy TC2.

## **Management of proposed retail use**

- 7.20. The creation of a composite hotel (C1) and retail (A1) use will benefit the retail tenant. By removing any partition walls, the coffee shop will be easily accessible both to trade passing along the footway of High Holborn, and to anyone within the lobby of the neighbouring hotel. The removal of the partition walls will therefore have a positive impact upon the vitality and viability of the centre.
- 7.21. The composite hotel (C1) and retail (A1) uses will exist within the same open space, but will have a clear demise into which trade and management responsibilities will be assigned. These areas are shown on the submitted plans. The demise of the retail (A1) use is in the south eastern corner of the building, benefiting from a wide stretch of primary frontage, and three separate points of access.
- 7.22. The demise plan also ensures that footfall associated between the two uses can be accommodated, and that there will be no conflict between the two.

## 8. Conclusions

8.1. Planning permission is sought for:

Reconfiguration and amalgamation of existing retail (A1) floorspace and Hotel (C1) units to form a composite hotel and retail use (C1/A1).

8.2. The amalgamation of existing retail (A1) and hotel (C1) uses will prove beneficially for both occupants of the building, providing a more welcoming, open space for customers, and improving access from the hotel to the neighbouring coffee shop. This will help to maximise trade for the coffee shop and reinforce the hotel's ground floor use as an area in which to relax, work or socialise. This space is available for use by both guests of the hotel, and members of the surrounding community.

8.3. The development will also benefit Holborn Central London frontage by relocating and improving the visibility of all retail (A1) floorspace within the application site. This will attract further footfall to this part of the more peripheral part of the Holborn Central London Frontage, and will have a positive impact upon the vitality of the centre.

8.4. The improvements to the space will also help to reinforce the hotel's character as a key anchor for Holborn Central London Frontage, acting as a driver of footfall eastwards to what is a more peripheral part of the centre.

8.5. On this basis we strongly believe that the development is in keeping with the heart of the Local Plan policy. The works will deliver a sustainable form of development which will enhance the vitality and viability of the High Holborn Centre and permission should be granted in this instance.

