



Flitcroft House
114-116 Charing Cross Rd
London WC2H 0JR
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

London Borough of Camden
Development Management
Regeneration and Planning
2nd floor
5 Pancras Square
London
N1C 4AG

05 June 2019

NG/AS – 18/220
BY PLANNING PORTAL

Dear Sir, Madam,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
APPLICATION FOR FULL PLANNING PERMISION AT 90 HIGH HOLBORN, LONDON, WC1V
6LJ**

I write on behalf of our client, 90 High Holborn Limited ('the Applicant'), to submit an application for full planning permission with regards to 90 High Holborn, London, WC1V 6LJ ('the site').

The planning application seeks permission to reconfigure ground floor frontage area to deliver upgraded retail floorspace, reconfigured office lobby floorspace and a new coworking café in association with the LABS coworking brand.

This application relates to the front area at ground floor level only (as identified on the submitted red line location plan and supporting drawings).

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

- 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 LABS;
- Existing floorplan, prepared by LABS; and
- Proposed floorplan, prepared by LABS.

The planning application has been submitted via the Planning Portal and the requisite planning application fee of £462 was paid upon submission of the application.

Site and Surrounding Area

The site is located within the Holborn and Covent Garden Ward of the London Borough of Camden ('the Council'). Specifically, this application relates to the front area at ground floor level only (as identified on the submitted red line location plan). The wider building comprises of a rectangular block which is bound by Eagle Street to the north and fronts High Holborn to the south.

The site was previously occupied by a 1960's building known as Sunley House. The building was demolished and re-built between 1999 and 2001 and is now know as 90 High Holborn. The building is 8 storeys in height and comprises a curved front which protrudes past the building line on High Holborn. The building currently comprises a mix of retail (A1), coffee shop (A3) and lobby space (connected to the office use) at the ground floor level and offices on the upper floors.

The existing uses that occupy the red line area comprise of 339.1sqm of office use (Class B1a), 142.9sqm of retail (Class A1), and 136.2sqm of café use (Class A3) as illustrated in Figure 1 below.

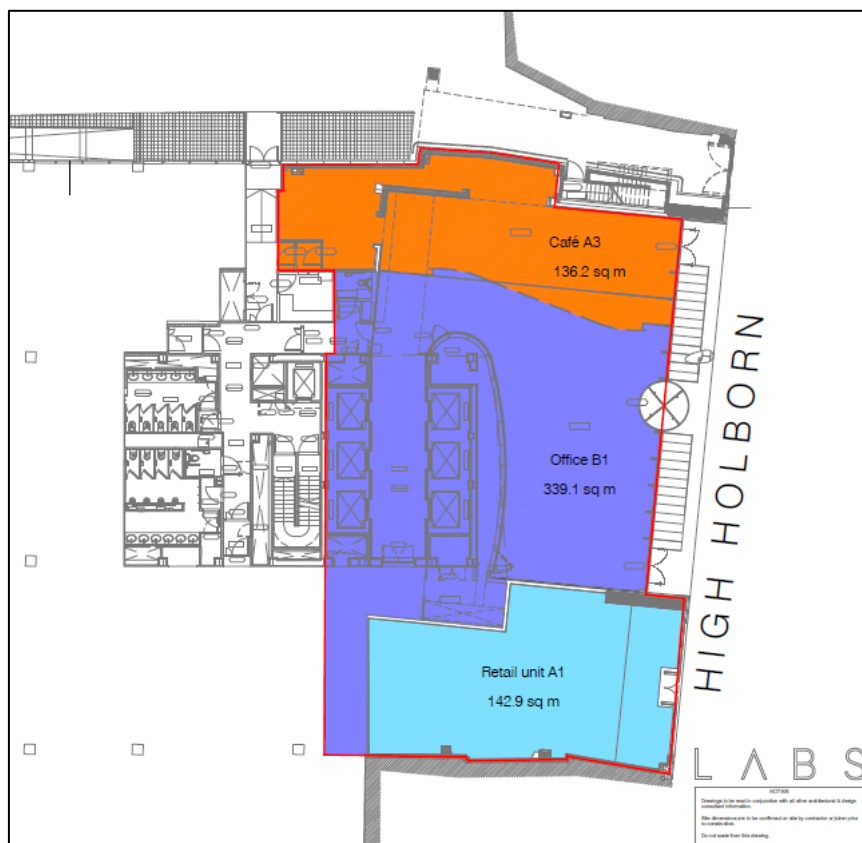


Figure1: Existing use split

The building is not listed but there are a number of listed buildings within the surrounding area. The site is located within the Bloomsbury Conservation Area. Uses in the immediate surrounding area are primarily commercial in nature, comprising of; offices, retail, hotels and restaurant uses.

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-west of the site, approximately 3 minute walk away and Chancery Lane Underground Station is located east of the site, approximately 5 minute walk away. Various bus routes service the A40 and A4200. Bus stops along these roads are located within walking distance from the site.

Planning History

Planning permission for the existing building was granted in 1998 which comprised an 8 storey office building with part retail at ground floor level.

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

The Proposals

The planning application is seeking to reconfigure and change the use of the front area at ground floor level only (as identified on the submitted red line location plan and supporting drawing). The proposed uses will comprise of (Class B1a), retail (Class A1), and coworking/café space (Sui Generis).

The application relates to the change of use and internal reconfiguration only, with no external alterations proposed.

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

“The reconfiguration and change of use of the front area of the building at ground floor level to provide; office (Class B1a), retail (Class A1), and a coworking/cafe (Sui Generis).”

The proposal will result in the provision of 264.9sqm of office floorspace (Class B1a), 301.7sqm of coworking/café space (Sui Generis), and 51.6sqm of retail (Class A1) as illustrated in Figure 2 below.



Figure 2: Proposed use split

The office (Class B1a) and coworking/cafe (Sui Generis) floorspace will be connected to and run by the co-working brand, LABS. This planning application is submitted in connection with (but not linked to by this application) the wider refurbishment of the building which is taking place to significantly improve the efficiency of the building and provide new Grade A office accommodation throughout the

building. As those works are internal and do not involve a change of use express consent is not required.

LABS are an established commercial developer who specialise in co-working office developments and are investing significantly in this part Camden and extensively across the Borough.

The office (Class B1a) floorspace will be accessible to LABS co-working members only. The coworking cafe (Sui Generis) floorspace will be open to all members of the public, providing a flexible co-working and meeting/dining space.

The proposed retail unit will maintain the same active frontage as existing on to High Holborn and will be operated independently to the LABS related areas.

Planning Policy Framework

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);
- Growth Area;
- Central London Frontage (part of the site only where existing café is located);
- Central London Area; and
- Bloomsbury Conservation Area.

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 (2018) (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') has recently completed an Examination in Public ('EiP'). The Inspectors Report is due to be published in late Summer 2019 with adoption targeted for early 2020. Once adopted, the new document will replace the current London Plan (2016).

Planning Considerations

The key planning considerations in this instance are considered to be the principle of the proposed mix of uses and the contribution they will make to this part of Holborn, together with the perceived loss

of designated 'office' and 'retail' floorspace. This section provides an assessment of the proposals against relevant planning policy and other material considerations.

Employment Generating Uses

The proposals will result in the reconfiguration of the front area at ground floor to provide 264.9sqm of office floorspace (Class B1a) and 301.7sqm of coworking/café space (Sui Generis). This would technically result in the loss of 74.2sqm of existing designated 'office' floorspace, however, it is noted that this existing 'office' floorspace is currently used as a large inefficient lobby area and circulation space.

The proposed designated 'office' component will deliver a new lobby area which also includes an area of flexible co-working accommodation accessible to members of the Applicant's co-working group; 'LABS'. In addition, the coworking cafe 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. It is therefore considered that this element of the proposals, whilst not strictly falling under B1 use, is employment generating in its own right and should be taken into account when assessing the proposed reconfiguration of uses.

Policy E2 of the Local Plan (2017) encourages 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 and medium sized businesses, 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, and 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 previous building arrangement was designed to accommodate large business occupiers and as such is not suitable for smaller occupier's needs. The proposals will serve small and medium sized businesses, which is considered to be a significant planning benefit of the proposals. With the changing face of business and in the context of an identified need for work space for small and medium occupiers, the provision of more efficient flexible co-working space is considered to be wholly appropriate in the context of planning policy and the history of the building.

The coworking/café space has been designed to integrate with the public co-working business environment, further enhancing the opportunities for small enterprises to use the site for business purposes, business meetings etc. The reconfiguration of the front ground floor area is integral to the success and the objectives of the wider building 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 with the supporting text to Policy E1 promoting 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 have an established reputation in Camden and 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. The proposals for 90 High Holborn will deliver exactly this.

Whilst it is acknowledged that the proposals will result in a small reduction of designated 'office' floorspace on the site when compared to the existing ground floor arrangement, the proposals will significantly improve the contribution the building makes to the street scene and this important mid-town location, together with improving the efficiency and business floorspace available at the site. The existing ground floor arrangement at the front of the building comprises 339.1sqm of floorspace, however this is currently occupied by ancillary facilities, including; a large poorly designed reception lobby and circulation space - none of the existing 339.1sqm is used for genuine 'office' use. The proposals would provide a larger area of genuine working space at the front ground floor level, specifically the new LABS lobby which will include members co-working space (264.9sqm) and the coworking/café space (301.7sqm) which will be accessible to the public. In real terms there will thus be an increase in employment generating floorspace in line with Policy E2.

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 of the designated 'office' area, there are limited job opportunities as the area is dominated by the large lobby. The proposals will create a new more efficient lobby area and the coworking/café area would allow for approximately 40 people to use the area as an informal co-working and business meeting space. The 'café' element of the front area would create approximately 6-8 FTE opportunities.

Furthermore, the current use of the building and ground floor arrangement does very little to interact with the street. The provision of the mixed office/cafe use has the opportunity to significantly improve how the building interacts with the street by creating and introducing activity across 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 office and coworking cafe layout arrangement, will significantly improve the employment offer at this site and make a positive contribution to immediate surrounding area.

Retail Uses

Policy TC1 of the Local Plan (2017) states that Council's objective is to focus new retail and related town centre uses in designated growth areas and centres. The policy states that the Council will promote additional retail and other town centre uses in Central London Frontages.

Policy TC2 of the Local Plan (2017) promotes successful and vibrant centres throughout the borough. The policy highlights the Council's expectation to create a mix and balance of uses within frontages for each designated centre. Appendix 4 of the Local Plan (2017) which is referred to in this policy sets out the mix of uses that Council expects on primary and secondary frontages. The Council seeks to

protect retail uses by setting a minimum proportion of shops (Class A1) and allow for other complimentary uses by setting a maximum proportion of food, drink and entertainment uses (Classes A3, A4 and A5) in each individual frontage.

The proposals would reconfigure the existing retail (Class A1) unit on the western side of the building, maintaining the same level of active frontage, but reducing the internal depth of the unit where it becomes narrow and less usable towards the rear. The new retail unit (Class A1) would be 51.6sqm, meaning a loss of 91.3sqm when compared to the existing. On the eastern side of the building frontage, a glass partition wall currently divides a coffee shop (mixed Class A3) from the lobby area. The proposed reconfiguration would replace the coffee shop use with the coworking/cafe (Sui Generis) providing greatly improved activity along the entire frontage of the building.

Whilst the proposals would result in a net loss of retail floorspace, the lost floorspace is of a poor quality and the retail unit itself will remain. This should be considered in the context of the wider proposals which will retain the retail frontage in this location as well as securing a much greater extent of active frontage, along High Holborn.

Overall, the proposals will enhance the contribution that the building makes to this part of High Holborn by creating an active frontage across the site. This part of High Holborn comprises of a large number of established retail uses and the proposals have the opportunity to maintain an element of retail (Class A1) and compliment this with the proposed coworking/café use (Sui Generis).

LABS operate a number of mixed office/restaurant uses within Camden and they have all had a positive impact on their locations. The proposals for this site have the opportunity to significantly enhance this dated building at ground floor level, addressing the issues with which it has struggled.

Summary & Conclusion

The planning application is seeking to reconfigure and change the use of the front area at ground floor level only (as identified on the submitted red line location plan and supporting drawing).

The existing uses within the red line area comprise of office use (Class B1a), retail (Class A1), and café (Class A3). The proposed uses will comprise of (Class B1a), retail (Class A1), and a coworking cafe use (Sui Generis). The application relates to the change of use and internal reconfiguration only, with no external alterations proposed.

Overall, the new ground floor layout arrangement will significantly improve the contribution the building makes to the immediate street scene as well as making a positive contribution to the surrounding area.

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 or Nick Grant on 020 3640 1030 or 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