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Ben Farrant Senior Planning Officer Camden Council London Borough of Camden 2nd Floor, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE

Sent by e-mail.

Dear Mr Farrant

212-214 High Holborn

I have been asked by my colleague, Matthew Sobic, to provide an overview to you in connection with your request to explore the delivery of a 'shared' access between the office and retail floorspace proposed as part of the planning application at the above. This letter demonstrates that a shared access does not work.

By way of background, I am a Director within the Central London Investment team, and have extensive experience in dealing with transactions in the Central London commercial property market. You will also be aware that Savills has significant experience in the Central London commercial property market including through our investment, agency, development, management and planning divisions.

With the above in mind, there are no examples in Central London, where the site is located, of an office user and a retail user sharing exclusively the same access point. We are also not aware of examples more widely.

I have seen the Fairbrother letter of 22nd June 2017 that sets out that the arrangement of a shared access is 'generally unworkable'. We are not aware of any examples where there is such arrangement. The Fairbrother letter states further that there is an odd exception, but generally in larger buildings and provides the example of 90 High Holborn and the, now, former Starbucks. That is not an accurate analysis. Whilst it is correct that in some larger office buildings there can be an access into a separate commercial premises such as a coffee shop, such an access is only an internal access with a dedicated pavement frontage access to customers. This was the configuration at 90 High Holborn and therefore it is not a correct comparison to the proposal as it is not a 'shared access' – there is a direct customer access from High Holborn and an internal access from the larger office building.

You will be aware that retail occupiers have specific operational requirements in order to take premises. That includes direct customer access for branding and access purposes, and further for deliveries. Those are not matters that retail occupiers compromise on, particularly not in a competitive occupational market in Central London.

Further, office occupiers would not support a shared access position such as that which the Local Planning Authority is suggesting, which could result in customers accessing the retail space, attempting to access the office space; even by mistake. Whilst security measures could be put in place to assist with preventing customers of the retail space accessing the office space, those measures are not completely 'fail-safe', and purely by having a combined access point, the risk and security issues surrounding the ability for non-office workers to access the office floorspace is increased. This will be an unacceptable arrangement to potential office occupiers.

As the Local Planning Authority will be aware, the Central London office market is extremely competitive and the arrangement you've suggested would result in office occupiers not taking space at the proposed development, to the detriment of the development that is intended to bring back into use and intensify the







existing employment floorspace. The same comment does not apply to the arrangement that had taken place at 90 High Holborn as there is a direct customer access point to avoid the potential conflict between customers accessing the office building and therefore reducing the security risk arising from the conflict.

As Fairbrother do correctly state, the only arrangements where either an office occupier will accept an internal access into a retail unit, and a retail occupier will accept an internal access into its unit from office floorspace is at a larger floorplate office building. The reason for this is such buildings are large, have sufficient room to accommodate both uses with minimum conflict outlined above, but importantly can accommodate large lobbies that enhances natural surveillance reducing the security risk of conflict between the uses as outlined above. That arrangement cannot work at 212-214 High Holborn due to the constrained nature of the site. Critically, even in the circumstance outlined above, where an internal access between the uses could work, that is not at the expense of a dedicated customer access to the retail unit and a dedicated access used solely for the office

We trust that the information within this letter demonstrating why shared office and retail accesses do not work is helpful.

Yours sincerely

Barry Mangan Director Savills (UK) Limited