

Planning Statement and Marketing Report

28-30 Theobalds Road
London WC1X 8NX



On behalf of Swiftline Engineering Limited

June 2019

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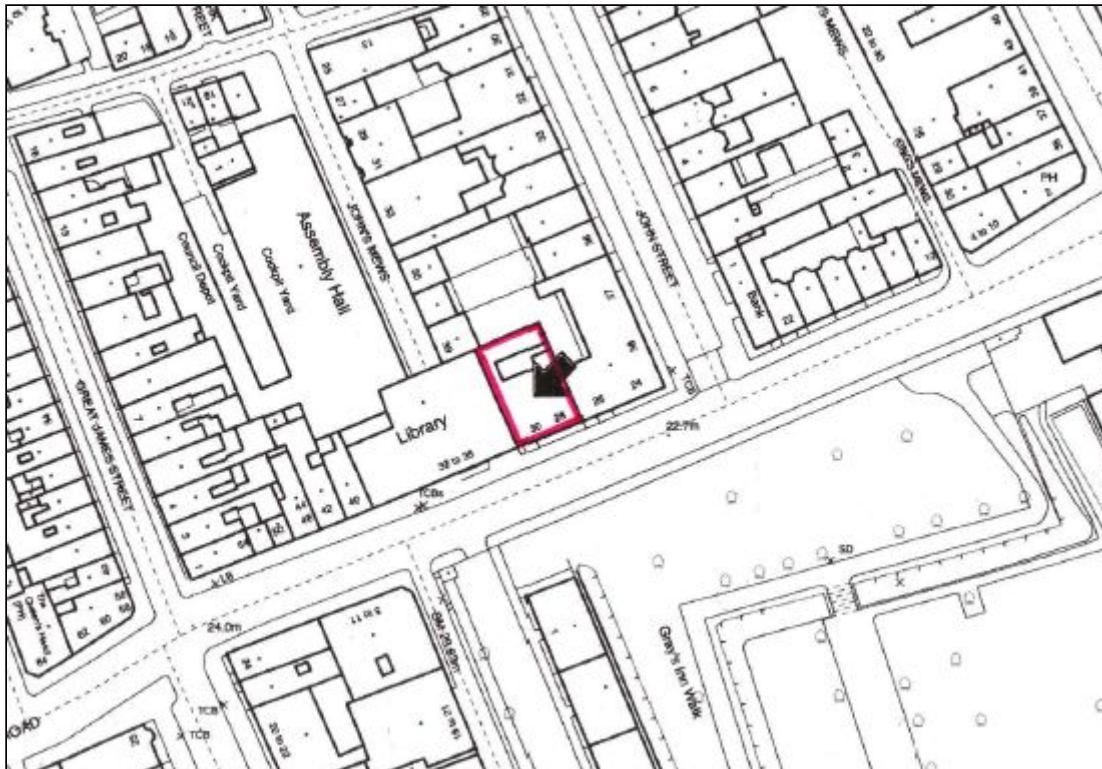
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- 1 - Confirmation of Previous Use Cease Date
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Site Location Plan

1.0 INTRODUCTION

On behalf of our client, Swiftline Engineering Limited, we hereby submit a full planning application in relation to a change of use of the ground and lower ground floors at 28-30 Theobalds Road, London WC1X 8NX.

The proposed development description is: ***“change of use of ground and lower ground floors from D1 to B1 use”.***

Planning Sense Ltd, in collaboration with Occupa Commercial Property Consultants, have been appointed to prepare this supporting statement and submit a planning application on their client’s behalf, which comprises the following elements:

- Planning application forms and ownership certificates;
- CIL forms;
- Planning application fee (£462.00);
- Site location plan;
- Existing & proposed floorplans; and
- This Planning Statement and Marketing Report, prepared by Planning Sense Ltd with detailed input provided by Occupa Commercial Property Consultants.



Aerial View of site (from the south)

2.0 SITE AND SURROUNDING CONTEXT

- 2.1 The application site comprises a six storey (lower ground, ground to fourth floor) brick building located on the northern side of Theobalds Road, Holborn. Whilst currently vacant, the lawful use of the lower ground and ground floor is for D1 training centre. The upper floors have been converted to residential accommodation in 2006.
- 2.2 The surrounding area is mixed use in character, with a variety of commercial uses at ground floor level further to the east and west along Theobalds Road, many with residential properties above. The site itself faces the open space of Grays Inn Walks Gardens to the south of Theobalds Road.
- 2.3 The unit in question has two access points, the main entrance being from street level and a secondary door accessed via the front lightwell stair. The site lies in a highly accessible location with a public transport accessibility level (PTAL) of 6a. It benefits from being in close proximity to a large number of bus routes along Theobalds Road serving Central, North and East London, and is a short walking distance from Chancery Lane and Holborn tube stations.
- 2.4 The property is not listed, but lies within the Bloomsbury Conservation Area and the Central London Area.



Relationship between site and immediate context - site on right hand side (photo Feb 2018)

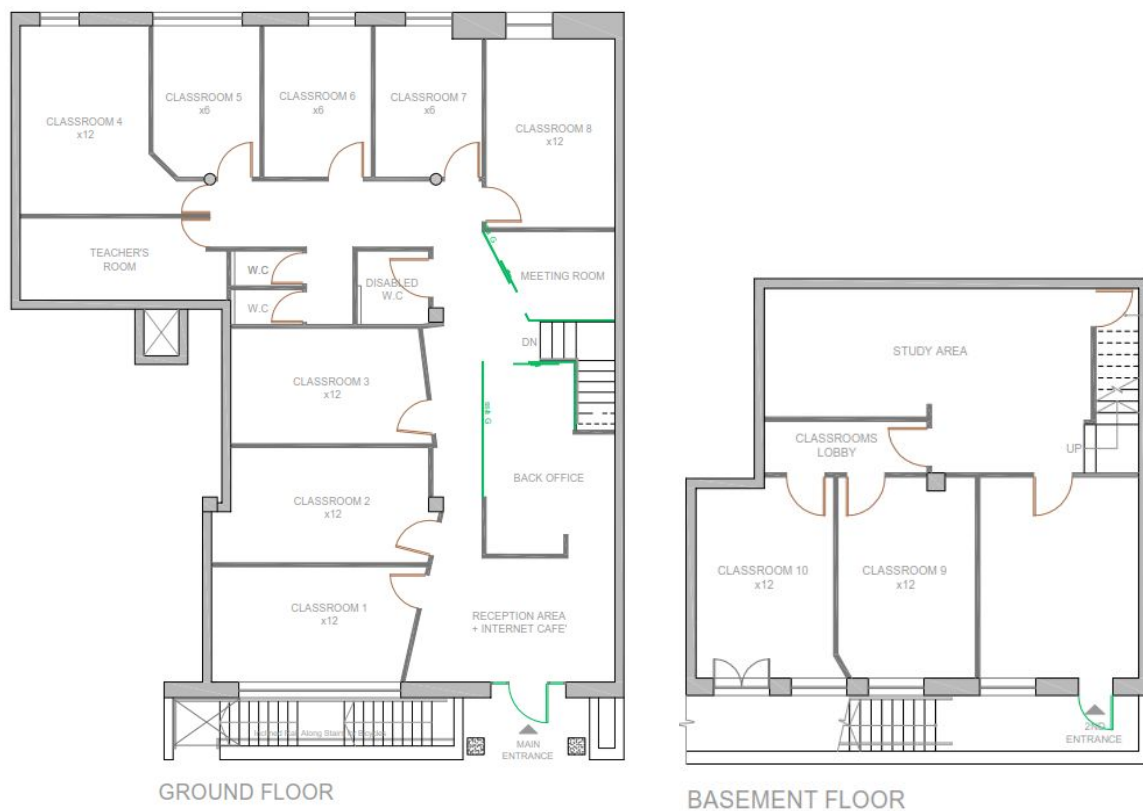
3.0 SITE HISTORY

- 3.1 The upper floors of the building were converted into residential accommodation following an application for *“Change of use from office (B1) to restaurant (A3) use at part lower ground and ground floor levels, and 14x residential units (C3) at upper floors and basement; erection of a 6-storey rear extension including remodelling of rear elevation, roof extension to form an additional floor with roof terrace and installation of a new shopfront and entrance door”* (ref 2006/0296/P - Granted 11/05/2006). Various details associated with this scheme, concerning windows, accessibility, facing materials were approved the following year.
- 3.2 Planning permission was subsequently approved in October 2011 (ref 2011/4023/P) for *“change of use of part of the lower ground and ground floor level from office (class B1) to adult education centre (Class D1) to be opened Monday to Saturday 08:00 to 20:00”*. Details associated with this permission were approved shortly after and the change of use took place in 2012.
- 3.3 In determining the application, officers considered (at the time) that the loss of B1 floorspace to be acceptable in principle despite a conflict with policy DP13 at the time which sought to protect existing business premises. In light of other D1 permissions granted in the locality the proposed use was considered acceptable.
- 3.4 The premises were occupied by “Club Class English Language School” from 2012 until March 2018. Following a period of decline in the number of pupils the school became commercially unviable and Club Class took the decision to close the premises in late February 2018 (See Appendix 1, email dated 27th Feb 2018).
- 3.5 The property has been vacant since this time and has been actively marketed by Commercial Property Consultants Occupa. Further details of the marketing process are set out in section 6.2 of this report.

4.0 APPLICATION PROPOSALS

4.1 Previous Layout

4.1.1 The previous English school use of the building was configured as a series of 10 small classrooms (8 at ground floor, 2 at lower ground), with reception area and internet cafe and associated study area and toilets meeting room and office.



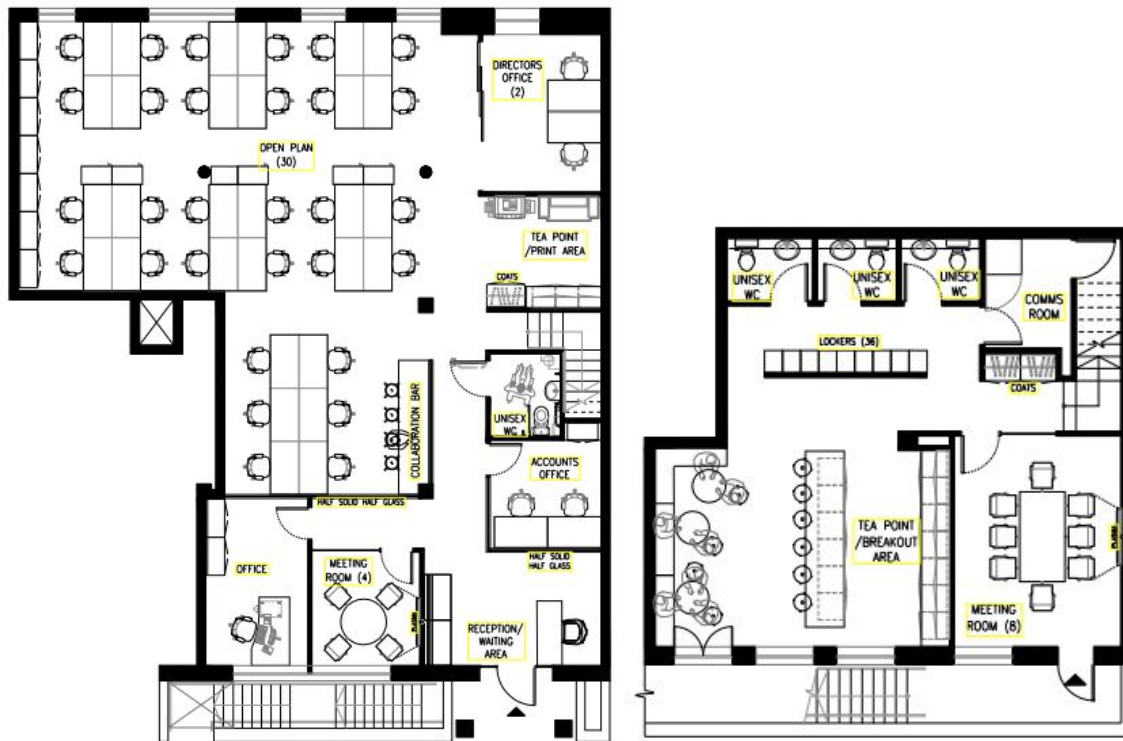
Existing Floorplans

4.1.2 The previous use configuration was in many respects over-intense for the proposed use and provided little in the way of “breakout” space for students. Some of the classrooms, and the study area to the centre of the building do not benefit from natural light, and limited kitchen/toilet facilities were provided. Although no precise reasons were provided for the decline in number of pupils at the school, appeal to users may have been a factor to

4.1.3 Of the total floorspace (292sqm) just under 50% was provided as classroom space (144sqm), with the remainder provided as ancillary spaces/offices/lobbies/toilets.

4.2 Proposed Use

4.2.1 The proposal is to convert the premises back to its previous use for B1 offices, as set out below:



Proposed Floorplans

4.2.2 At ground floor level, the principal change is the opening up of the rear area to create a larger office space. The general layout (with front lobby, side offices/meeting room) is similar to that of the existing premises.

4.2.3 At basement level a larger meeting room is provided, along with relocated toilets, lockers, and a tea point / breakout area for staff. This makes more efficient use of the spaces that do not benefit from as much natural light in the building.

5.0 PLANNING POLICY

5.0.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. As such, in preparing the scheme, consideration has been given to both the National Planning Policy Framework and the London Borough of Camden's adopted Development Plan Policies.

5.1 National Planning Policy Framework

5.1.1 The National Planning Policy Framework (March 2012) sets out the Government's planning policies for England and replaced much of the Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs).

5.2.1 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 14). It states, at paragraph 17, that planning should proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs.

5.2 Development Plan Policies

5.2.1 The relevant development plan documents include the London Plan and the Camden Local Plan (2017) plus supplementary guidance. Ensuing Section 6 of this report provides an assessment of the scheme against the relevant policies of the Plan and supplementary guidance accordingly.

6.0 PLANNING ASSESSMENT

6.1 Loss of Existing D1 Use

6.1.1 Policy C2 of the Camden Local Plan explains that the Council will:

ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met:

i. a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users;

ii. the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing;

6.1.2 The D1 use that exists at the site in this case is relatively new, having been granted permission in 2011. The premises have been vacant for a considerable period of time due to the failure of the college to attract students and hence the business failing (see marketing section overleaf and attached documentation).

6.2.3 Bearing in mind the original B1 office use (which is strongly supported by policies E1 and E2 of the Local Plan) the failure of the D1 use, combined with the lack of interest in the premises following extensive marketing, it is considered that the reversion to an office use in this location would accord with the provisions of the relevant policies contained within the plan and should be supported.

6.2.4 Further details of the marketing of the property for D1 use is provided overleaf and in attachments submitted with the application.

6.2 Marketing Process

- 6.2.1 In accordance with the guidance set out in the Council's Supplementary Planning Guidance, Occupa Commercial Property Consultants have provided the following report providing details of the marketing that has taken place in relation to the property since their formal appointment in March 2018:

Marketing Report - 28-30 Theobalds Road, London WC1X 8NX

Further to our discussions in relation to the above site please find set out below details of the extensive marketing exercise we have undertaken for the property, and attached copies of the relevant evidence relating to this process.

Background

Occupa are a firm of commercial property consultants, primarily focused on the Central London office market. Occupa provide a comprehensive service to help clients find their ideal office space in London, and specialise in acting for tenants looking for their ideal conventional leased office space, negotiating the most advantageous terms and reducing substantially their client's costs and liabilities.

Occupa were appointed by the property owner, Clubclass Language Schools in March 2018 to market the premises under a virtual freehold / 999 year lease (992 years remaining). A copy of emails and the marketing agency agreement is attached at Appendix 2. At that point in time, the property had been empty for 5 months - the previous occupiers (Club Class English Language School) having vacated the unit in December 2018. It has remained vacant for the duration of the marketing period. To date, the property has been vacant for a continuous period of 18 months.

Occupa commenced our marketing of the property immediately in March 2018 at a guide price of £2,750,000 and continue to do so.

Marketing Methods

The marketing of the property has been undertaken via the following channels:

On Site

A sale board was positioned externally at the property in late March 2018 and remains in situ presently. A copy of the original order for the installation, along with a current photograph of the board is attached at Appendix 3.

Online

The property details were provided to a number of online portals and posted on the internet from May 2018. A series of emails are provided at Appendix 4 which identify the companies appointed to present the particulars online.

Postal / Email

Letters and property particulars were sent to various clients and agents known to Occupa at the beginning of the marketing process and further mailshots during the year. Details of these are also contained within the email list provided at Appendix 4.

A copy of the marketing particulars is attached at Appendix 5. These clearly specify the lawful use of the property as D1 use.

Asking Price

A guide price for the property was set at £2,750,000, based on local comparators and assumed market demand. Interested parties were provided with the necessary information regarding the property to make their own assessment as to the viability of the premises and to make any offers accordingly.

Viewings

During the marketing period, Occupa received a number of enquiries - a list of the agent's emails relating to the property since March 2018 is provided at Appendix 6. Viewings were carried out on an ad hoc basis during the course of the year - Occupa do not maintain records of each and every property viewing, however the level of correspondence at Appendix 4 shows the level of initial interest in the site.

Feedback/Monitoring

Again, Occupa do not retain detailed records of feedback received during viewings, the agent responsible for showing the property to interested parties has provided a summary of the comments made by prospective purchasers below:

- *“Unsuitable for intended use”*
- *“More suited to office use”*
- *“Limited natural lighting to basement level”*
- *“Layout not ideal”*

Offers Received / Interest Generated

Despite extensive efforts to market the property, only a small number of offers were made for the premises. All of these, except for that of the current party (the applicant) were significantly below the market rate and completely unrealistic commercially.

Conclusion

To date, Occupa have marketed the property for sale at an appropriate price, reflective of the local market, for a period in excess of 12 months. Details of the premises have been circulated widely by way of a number of different media types. Despite these efforts, the level of interest in the property for its permitted D1 use has been extremely limited. Taking into account the historic use of the building and its location we consider that a reversion to its previous B1 office use would be beneficial to ensuring the long term occupation of the building.

Alex Reuben

Occupa Commercial Property Consultants

6.3 Proposed B1(a) Office Use

6.3.1 The local plan offers a strong support to the provision of new and existing employment premises. Policy E2 states that:

“The Council will encourage the provision of employment premises and sites in the borough. We will 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.

6.3.2 Again, the D1 use present at the site is relatively young, having taken place in 2011 and only operating for 6-7 years before the associated business failed.

6.3.3 There is no question that the location of the building is suited to office use: indeed its original long term use was for that precise purpose. There are a range of office spaces in the locality and it is highly accessible by public transport.

6.3.4 The offices will be occupied by an existing medium-sized local business looking for larger premises to expand further - Policy E1 states that the Council will support businesses of all sizes, in particular start-ups, small and medium-sized enterprises.

6.3.5 For these reasons we consider that the reversion to B1 complies with the relevant employment policies (E1 and E2) of the adopted Local Plan.

6.4 Other Matters

Neighbouring Amenity

6.4.1 As already noted, the characteristics of the proposed use are very similar to that of the previous use in terms of both the level of employment and also the number of daily movements / visitors to the site. It is not considered that the proposal will have any impact upon neighbouring occupiers in this regard.

6.4.2 No changes are proposed to the exterior of the building that would affect the appearance of the building or visual amenity of adjoining residents.

Highways and Transport

6.4.3 The site lies in a highly accessible location with a public transport accessibility level of "6a". Policy C3 of the Local Plan encourages the provision of offices in highly accessible areas. It is considered that the trips associated with the use will be similar to those generated by the previous use. It is therefore considered that the proposal will have no effect upon highways and transport.

Waste and Recycling

6.4.4 In comparison to the existing use the office will not generate a significant level of waste and recycling. The current arrangements for waste collection at the site will be unaffected by the proposals.

7.0 CONCLUSION

- 7.1 The application hereby submitted seeks permission for change of use from vacant D1 premises to B1 office.
- 7.2 The building was originally designed for B1 office use and was only converted to D1 use in 2011. Since that time, the D1 training centre use failed in terms of its business operations and has been vacant for 18 months. The premises have been marketed since March 2018 at a reasonable market rate, yielding no firm interest from any potential purchasers or tenants.
- 7.3 A reversion of the use to B1 would enable a local medium-sized business to expand into slightly larger premises and also make best use of vacant premises in accordance with national guidance.
- 7.4 For all of these reasons we consider that the proposals accord with the provisions of the development plan and trust that Council will grant permission for the change of use accordingly.