

Esavian House
181 High Holborn and
7-11 Stukeley Street, London
Planning Statement

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7-11 Stukeley Street, London
Planning Statement**

October 2019

WSP | Indigo



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1. Introduction

- 1.1. WSP | Indigo has prepared this Planning Statement on behalf of Royal Mail Group Limited in support of a planning application at Esavian House, submitted to the London Borough of Camden.
- 1.2. Esavian House comprises the frontage along 181 High Holborn which has three upper floors and 7-11 Stukeley Street at the rear which is part one, part three storeys.
- 1.3. Planning permission is sought for the change of use of the ground floor of 7-11 Stukeley Street and part of the ground lower and upper ground floor of 181 High Holborn from warehouse, workrooms and showroom to offices (Use Class B1).
- 1.4. The proposed change of use will promote economic development through office development within Central London, therefore, complying with local policy requirements of the Camden Local Plan (2017). Furthermore, the principle of B1 office use has already been established through various consents for different parts of Esavian House.
- 1.5. The site is located within a sustainable location within Central London with public transport conveniently located within the vicinity including bus services along Drury Lane and Holborn station less than 300m to the east.
- 1.6. The purpose of this statement is to demonstrate that this change of use complies with the relevant policies set out within the Development Plan, having regard to other material planning considerations and, therefore, should be supported and approved without delay.
- 1.7. This application has been submitted via the Planning Portal along with the following documents:
 - Application form and certificates duly signed and completed;
 - Location plan;
 - Existing and proposed floor plans (prepared by Pure Real Estate Services Limited);
 - Planning Statement;
 - Sustainability Report (prepared by Ridge);
 - Transport Statement (prepared by WSP | Indigo); and
 - CIL form.
- 1.8. The payment of £487 (inclusive of the £25 Planning Portal administration fee) has been made via the Planning Portal.

Proposed development

- 1.9. Full planning permission is sought to allow for the change of use of the ground floor of 7-11 Stukeley Street and part of the ground floor and upper ground floor of 181 High Holborn for office use (Use Class B1) as shown on the accompanying scheme drawings. The site comprises the upper ground floor which is circa 116sqm, and the lower ground floor which is circa 1,035sqm.
- 1.10. This application seeks to amend the currently permitted use of this floorspace, which is restricted to a warehouse, workroom and showroom, to allow for the ground floor to operate as offices.
- 1.11. There are no external alterations proposed.
- 1.12. The site is not listed nor does it fall within a conservation area. The rear of the site sits

adjacent to the Seven Dials Conservation Area, and the rear part of the wider building falls within the Seven Dials Conservation Area (Sub Area Three). The extent of the conservation area is shown in grey in figure 1.

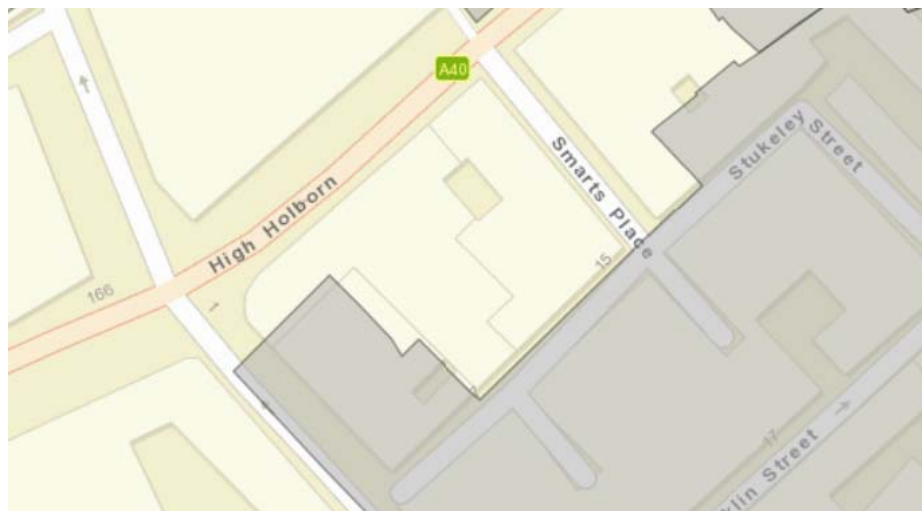


Figure 1. Seven Dials Conservation area (grey) taken from Camden Council's online maps.

- 1.13. The ground floor frontage which faces onto High Holborn is not identified as a protected frontage. A section of secondary frontage is situated adjacent to the site, along Drury Lane, as shown in figure 2 below.

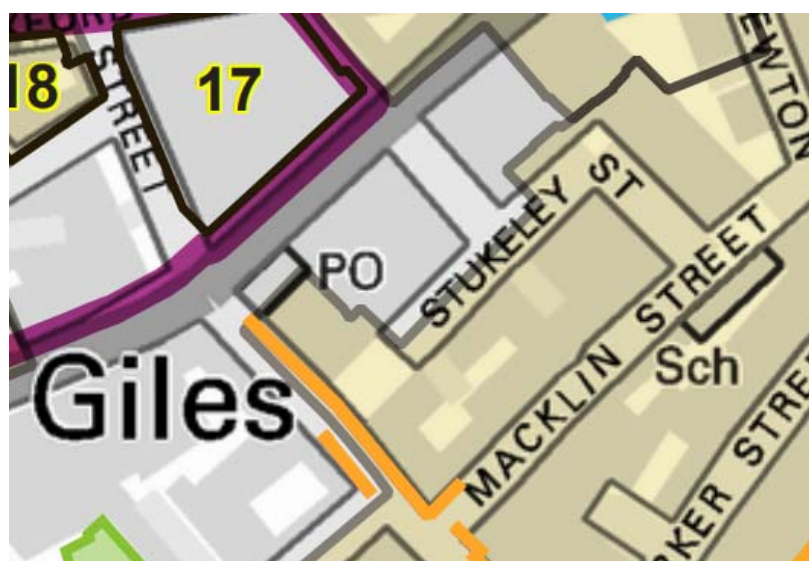


Figure 2: Exert from Camden Policies Map showing secondary frontage in orange.

- 1.14. The site is well served by local amenities and is located within a sustainable location within Central London. Public transport is conveniently located within the vicinity including bus services along Drury Lane and Holborn station which is located less than 300m to the east.
- 1.15. The proposed change of use will promote economic development within Central London and the principle of B1 office use has already been established through the consents for the remainder of the site.
- 1.16. The consent is required to facilitate the likely occupation of the unit by an existing Camden occupier, to enable them to continue operating within the borough.

2. Planning History

- 2.1. This application site forms part of a larger property known as Esavian House. Esavian House includes the frontage along 181 High Holborn which has three upper floors and 7-11 Stukeley Street at the rear, which is part one, part three storeys.
- 2.2. In 1924 planning permission was granted at Esavian House for use as warehouse, workrooms and showrooms and offices in equal proportions. In 1978, personal planning permission was granted for the entire use of the building as a Post Office training school, branch Post Office, emergency sorting office facilities, welfare provision and administrative offices.
- 2.3. In August 1984, personal permission (Ref: 8400701) was granted to British Telecom (BT) for use of part of the first and part of the second floor for training school purposes whilst the remainder of the premises continued to be used by the Post Office.
- 2.4. Esavian House was in use as a Post Office training school for over 20 years but this use was on the bases of personal permissions.
- 2.5. The informatives on the personal planning permission for the Post Office states:

“This permission shall be personal to the Post Office Corporation during their occupation... On their vacating the premises the use shall revert to the authorised use for warehouse, workrooms and showroom purposes”.
- 2.6. Part of the ground floor and mezzanine of Esavian House was utilised by Mail Media, under the personal permission, up until March 2017 when they vacated the building. This part of the building, therefore, will now have reverted back to the original use as a warehouse, workroom and showroom as the use of the unit by Mail Media has now ceased.
- 2.7. The previous Mail Media part of the ground floor and mezzanine has remained vacant since March 2017. This application seeks to change the lawful use of part of the ground floor and mezzanine to offices (Use class B1) to accommodate a new occupier.
- 2.8. Since 1984 there have been a number of consents granted for the first, second and third floors relating to changes of use for personal permissions and to office uses.

3. Planning Policy

National Planning Policy Framework (NPPF) (2019)

- 3.1. The NPPF is a material consideration in the determination of planning applications.
- 3.2. The key matters when assessing this proposal against development plan policy are the presumption in favour of sustainable development and employment.
- 3.3. Paragraph 7 highlights that the role of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 identifies that there are three dimensions to sustainable development.

“Economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

Social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

Environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

- 3.4. At the heart of the NPPF lies the presumption in favour of sustainable development. Paragraph 11 states that for decision taking this means approving development proposals that accord with the development plan without delay.
- 3.5. The NPPF is committed to building a strong, competitive economy through creating conditions in which businesses can invest, expand and adapt (Chapter 6). It goes on to state that *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”* (paragraph 80).
- 3.6. Chapter 11 encourages the effective use of land. It promotes the use of previously developed land, stating that planning policies and decisions should promote and support the development of under-utilised land and buildings.

The Statutory Development Plan

- 3.7. The development plan for the site comprises the following:

The London Plan

- 3.8. The current London Plan was updated in 2017. Policy 1.1 sets out the parameters for delivering the strategic vision and objectives for London. The policy sets out growth and change management and how this will be supported across all parts of London.

- 3.9. Policy 4.1 sets out the policy for development of London's economy; to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London.
- 3.10. The site is located within the Central Activities Zone (CAZ) which is the area where planning policy recognises the importance of strategic finance, specialist retail, tourist and cultural uses and activities as well as residential and more local functions.
- 3.11. Within appropriate parts of the CAZ, the Mayor will ensure that development of office provision is not strategically constrained, and that provision is made for a range of occupiers especially the strategically important financial business services.
- 3.12. The CAZ SPD 2016 provides guidance on London Plan policy for the core area including the protection of London's vibrant commercial heartland and ensuring it can remain a key driver of the UK economy.

Camden Local Plan (2017)

- 3.13. The Camden Local Plan was adopted 3 July 2017 and replaces the Camden Core Strategy (2010) and Development Management Policies.
- 3.14. Camden Council's objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, whilst ensuring that growth delivers opportunities and benefits for its residents and businesses. Policy G1 "Delivery and Location of Growth" sets out that the Council will create the conditions for growth to meet Camden's identified needs. The Council will deliver this growth by securing high quality development and promoting the most efficient use of land and buildings in Camden.
- 3.15. The Local Plan seeks to support businesses of all sizes in addition to maintaining a stock of premises that are suitable for a variety of business activities for firms of differing sizes and available on a range of terms and conditions for firms with differing resources. Furthermore, Policy E1 "Economic Development" directs new office development to the growth areas, Central London and town centres and supports Camden's industries by, amongst others, supporting proposals for the intensification of employment sites.
- 3.16. Policy A1 "Managing the Impact of Development" seeks to manage the impact of development through protecting the amenity of communities, occupiers and neighbours. Developments will be considered in relation to, amongst others, noise, visual privacy and transport implications.
- 3.17. Policy CC1 "Climate Change Mitigation", states that the Council will expect developments of more than 500 sqm to achieve a 20% reduction in CO2 emissions, unless it can be demonstrated that such provision is not feasible.
- 3.18. Policy CC2 "Adapting to Climate Change" sets out how the Council will promote sustainable design and construction. Part h of the policy expects developments of 500 sqm or above to achieve "excellent" in BREEAM assessments and encourages zero carbon in new development from 2019.
- 3.19. Policy CC5 "Waste" sets out the Council's objectives to make Camden a low waste borough.
- 3.20. Policy T1 "Prioritising walking, cycling and public transport" seeks to promote and encourage these sustainable transport methods, over the use of private vehicles.

Seven Dials (Covent Garden) Conservation Area (1998)

- 3.21. The rear of the site borders the Seven Dials Conservation Area (Sub Area Three). Stukeley Street is characterised within the Conservation Area Statement as having originally been an extremely narrow street with a commercial/industrial feel. The Appraisal document identifies

buildings of note along the south side of Stukeley Street such as The City Literary Institute and residential and commercial buildings.

- 3.22. No external alterations are proposed and so there will be no impact on the setting of the conservation area.

4. Planning Justification

- 4.1. The key planning considerations that relate to this development are set out below. The proposal has been assessed against relevant planning policies, concluding that the proposal is in accordance with national and local planning policy and guidance and, therefore, that planning permission should be granted.

Principle of development

- 4.2. The principle of office use at the application site has already been established through the granting of consents throughout Esavian House enabling parts of the building to be used for office purposes.
- 4.3. The change of use of part of the ground floor and mezzanine will bring a vacant site back into active employment generating use. The reuse of previously developed land is promoted within Chapter 11 of the NPPF (Making effective use of land).
- 4.4. The provision of office floorspace is fully compliant with the policies set out in Section 3 of this report. The change of use will contribute to the strengthening of the local economy through the provision of modern employment floorspace within Central London.
- 4.5. The proposal is appropriate to the building which already comprises office space on the upper floors. It is also compatible with the commercial nature of the wider area. Furthermore, this part of the building has up until recently been used by Mail Media for office uses, albeit as part of a personal consent linked to the Post Office.
- 4.6. The offices will make a positive contribution to the local economy and will add to the vitality and viability of this particular area of the Borough. The site is appropriately sized for office space and would be in keeping with the area.
- 4.7. The change of use will support the aspirations of the Central Activities Zone (CAZ) set out within the London Plan through assisting in the provision of suitable and sustainable office space and the protection of London's vibrant commercial heartland, ensuring it can remain a key driver of the UK economy; as sought by the CAZ SPD.
- 4.8. The proposed office will positively contribute to the role of Central London, ensuring that the vitality and viability of the area is maintained therefore complying with Local Plan Policy E1.

Design

- 4.9. The proposed change of use will not alter the character of the building or surrounding area. The application does not propose any external alterations to the building and will not impact on the setting of the Seven Dials Conservation area.
- 4.10. The change of use will establish office space into part of the ground floor and mezzanine of the building, complimenting the existing office space on the upper floors.

Access and servicing

- 4.11. The access and servicing of the site will remain unaltered by this application. Access into the part of the building subject to this application is taken from Stukeley Street and High Holborn.
- 4.12. The arrangements for waste storage and collection will continue, as such the proposal accords with Policy CC5 of the Local Plan.

- 4.13. As the current arrangements are considered acceptable uses, we consider that there is no reason why an alternative B1 use (office), in place of an existing employment use (warehouse, workroom and showroom), would be unacceptable. Especially as the most recent use operated out of the application site was for offices.
- 4.14. Esavian House offers a public transport accessibility level of 6b; the best category (as defined by Transport for London). The site is in a highly sustainable location and it is expected that most trips generated by the proposed office use would be undertaken by foot or public transport, thus having little impact on the existing traffic network. This proposal, therefore, complies with Local Policy T1 which prioritises sustainable transport methods.

Sustainability and Energy

- 4.15. The Sustainability Statement has been prepared by Ridge in support of the application.
- 4.16. The statement explores the energy efficiency savings and opportunities associated with the proposed change of use. The methodology adopted follows the Energy Hierarchy 'Be Lean; Be Clean; and Be Green' principles.
- 4.17. We are aware that as part of the justification for Local Plan Policy CC1 'Climate Change Mitigation', that the Council will **expect** developments more than 500 sqm to achieve a 20% reduction in CO2 emissions, **unless** it can be demonstrated that such provision is not feasible (emphasis added).
- 4.18. As this application only seeks planning permission for internal works it limits the scope of the refurbishment works being carried out and the alterations / amendments / improvements that can be made with regards to incorporation of energy efficiency measures. Changes to building fabric is often an area where large savings can be made in terms of energy efficiency. However, in this instance as no external works are proposed the building fabric will remain as existing.
- 4.19. Therefore, consideration will be given to incorporating LED lighting where the existing lighting systems are to be replaced as a means of meeting the energy reduction targets.
- 4.20. Overall, the scheme accords with the provisions of the Local Plan, as the requirement is flexible in terms of the level of energy reduction to be achieved where this is justified. The Sustainability Statement provides further justification, explaining why certain energy efficient measures can be incorporated as part of the refurbishment works, and also why others have to be discounted.

Summary

- 4.21. The proposed change of use will promote economic development through formally establishing a standalone consent for office uses within a large building in Central London.
- 4.22. The principle of offices at Esavian House has been established through various consents allowing office uses to be operated out of a number of parts of the building overtime. With the application site being in office use until very recently, although this was carried out under a personal permission.
- 4.23. There are no external alterations proposed and the change of use will not have detrimental impact on the surrounding uses or highway network given the nature of the use being compatible with the other floors and wider uses in the area.
- 4.24. The application fully accords with Local and National Policy and should be supported and approved without delay.

