

High Holborn House, London WC1V 6BX

Planning Statement

Updated October 2019



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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared to accompany the application for planning permission submitted on behalf of SRG Holborn Ltd for the site at High Holborn House. The proposal is for the change of use of part of the ground and basement of the building from office (Class B1) to a Gym (Class D2). The proposals include:

- Ground and basement alterations converting an existing garage and Class B1 office unit to a Class D2 leisure unit (gym);
- Alterations to the facade of the ground floor level in order to provide access to the unit;
- Erection of new external doors and glazing for the entrance;
- Erection of external lighting at ground floor level;
- Erection of signage boards / zones associated with the new use of the unit; and
- Creation of a new cycle store for up to 90 cycles.

1.2 This planning application seeks permission for the following:

“Application for the change of use of part of the ground and basement of the building from office (Class B1) to a gym (Class D2) and associated works”.

1.3 This Planning Statement has been prepared by DP9 Ltd and assesses the planning considerations associated with the scheme and considers the development in the context of national, regional and local planning policy and guidance.

1.4 This document comprises seven sections. Following this introduction;

- Section 2: Site Description;
- Section 3: The Proposed Development;

- Section 4: Planning Policy Framework Overview;
- Section 5: Planning Policy Assessment;
- Section 6: Community Infrastructure Levy & Draft Heads of Terms; and
- Section 7: Conclusion.

1.5 The Planning Statement should be read in conjunction with the enclosed plans and drawings submitted as part of the application. In addition to the Planning Statement, the planning application is accompanied by the following documents:

- **Application form**, certificates and notices prepared by DP9 Limited;
- **CIL form**, prepared by DP9 on behalf of SRG Holborn Ltd;
- **Site Location Plan**, prepared by Buckley Grey Yeoman Architects;
- **Design and Access Statement**, prepared by Buckley Grey Yeoman Architects;
- **Drawings/elevations/sections**, prepared by Buckley Grey Yeoman Architects;
- **Acoustic Report**, prepared by ICP; and
- **Energy and Sustainability Statement**, prepared by GDM.

2.0 SITE DESCRIPTION

The Site

- 2.1 The site is situated in the Holborn and Covent Garden Ward of the London Borough of Camden. The application site is located on the west side of Brownlow Street, which runs north from High Holborn.
- 2.2 The site is located within the Bloomsbury Conservation Area which was first designated in 1968 and was subsequently extended. The building is not statutorily or locally listed.
- 2.3 The site is located in an area with a Public Transport Accessibility Level ('PTAL') rating of 6b, demonstrating an 'Excellent' level of public transport as calculated using the Transport for London ('TfL') PTAL calculation methodology.
- 2.4 Holborn and Chancery Lane (Central line and Piccadilly line) are both located within a short walking distance of the site to the east and west respectively. The site is also located within easy access to frequently used bus routes.

Planning History

- 2.5 There are a number of planning applications relating to the building, as included on the London Borough of Camden's online planning register. It should be noted that none of these applications are relevant to the proposals.

Site Designations

- 2.6 The site benefits from the following planning policy designations as defined by Camden's Policies Map:

- Central Activity Zone;
- Bloomsbury Conservation Area;
- Growth Area (Holborn);
- Site Allocation (20);
- Archaeological Priority Area;
- Designated View (SA.2 Greenwich Park).

3.0 THE PROPOSED DEVELOPMENT

3.1 Full planning permission is sought for:

“Application for the change of use of part of the ground and basement of the building from office (Class B1) to a gym (Class D2) and associated works”.

3.2 The proposals seek to convert part of the ground and basement of the building into a new gym which is accessed via a separate entrance from Brownlow Street. The gym will comprise a total of 701 sqm GIA.

3.3 The basement of the building is currently used as ancillary storage space for the offices above as it lacks natural daylight and ventilation, making it unsuitable for typical office occupancy.

3.4 The introduction of a gym (Class D2) will help to enhance the mix of activity and add to the support services for tenants of this building and in the locality, including workers and residents.

3.5 The application also seeks permission for the improvement of the external façade and entrance to the unit from Brownlow Street, including, making good the existing wall finishes, the erection of new glazing and doors, external lighting and advertisement boards / zones associated with the gym use. The application also includes the creation of a bicycle store associated with the gym and the office. We request that the details of the exact location and type of advertisement, including any associated lighting, be conditioned for approval by Camden at a later date.

4.0 PLANNING POLICY FRAMEWORK OVERVIEW

4.1 This section provides an evaluation of the development against planning policy relevant to the proposals. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level there is both planning policy and guidance which combine to provide the framework for consideration of the development. The key planning policy documents taken into account at this stage and referred to in this Planning Statement include those listed below.

National Planning Policy

4.2 National Planning Policy is set out in the form of the adopted National Planning Policy Framework (NPPF). The NPPF was updated in June 2019 and replaces all previous planning policy statements and guidance notes.

4.3 The NPPF is a material consideration in the determination of a planning application but does not form part of the Development Plan. In addition, the National Planning Practice Guidance (‘NPPG’) is a material consideration for planning applications. The NPPG was published in March 2014 and updated in July 2018 and sits alongside the NPPF. The NPPG adds further context to the NPPF and should both be read together.

The Development Plan

4.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that any determination under the Planning Acts, should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this instance the Development Plan for the area consists of the London Plan 2016, and the London Borough of Camden Local Plan (2017). In addition, further guidance is provided in the form of the Council’s and Mayor’s Supplementary Planning

Guidance ('SPG') or Supplementary Planning Documents ('SPD') as well as Camden Planning Guidance notes ('CPG').

The London Plan

- 4.5 Regional Planning Policy is set out in the London Plan (2016) and relevant Supplementary Planning Guidance ('SPG').

London Borough of Camden Local Plan

- 4.6 Local planning policy is set out in the London Borough of Camden Local Plan that was adopted in 2017. The Council also have a suite of planning guidance documents that should be considered when submitting planning applications. The most relevant for this application is the CPG Employment Sites.

5.0 PLANNING POLICY ASSESSMENT

5.1 This section reviews planning policies relevant to the development and assesses how the development addresses planning policy in respect of the following:

- Land Use
 - Loss of Office
 - Leisure Use
- Design
- Inclusive Design
- Transport and Servicing

Land Use – Loss of Office

5.2 The Proposed Development seeks to convert 701 sqm (GIA) of existing ancillary office/storage space (Class B1) to a gym (Class D2) with associated works to facilitate access to the unit from Brownlow Street.

5.3 The gym is proposed to be located at basement with a lobby at ground floor of the High Holborn House building. This floor is currently vacant and is used as ancillary storage to the offices above.

5.4 London Plan Policy 2.10 – 2.11 (Central Activities Zone) strongly encourages a mix of uses within the CAZ, including leisure floorspace.

5.5 The London Borough of Camden Local Plan identifies the site as being located within the Central Activities Zone and the Holborn Growth area which supports a variety of town center uses, including leisure facilities to support a truly mixed and varied offer for workers and residents.

- 5.6 The site is also identified within a larger site allocation within the London Borough of Camden Site Allocations Local Development Document (2013). Site allocation 20: Land bounded by 50-57 High Holborn, 18-25 Hand Court, 45-51 Bedford Row and Brownlow Street notes that the site is suitable for mixed use redevelopment and that active frontages are encouraged, especially along Brownlow Street which is currently characterised by a largely blank interface with the street.
- 5.7 Policy E1 (Economic Development) of the London Borough of Camden Local Plan encourages a mix of uses within office development which contribute to the economy and character, and provides support services for its businesses, workers and residents.
- 5.8 Policy E2 (Employment Premises and Sites) and the CPG Employment Sites and Business Premises document acknowledges the benefits of including Class D2 floorspace within Central Areas as they will help to generate employment and enhance the mix of activity and add to the support services for tenants of this building and in the locality.
- 5.9 Policy E2 (Employment Premises and Sites) of the London Borough of Camden Local Plan notes that they will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:
- a. the site or building is no longer suitable for its existing business use; and
 - b. that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.
- 5.10 In respect of point a, the existing office space is ancillary to the office building and is currently used for storage and back of house. The basement cannot be used as a functioning office space as it has no natural light, has low ceilings and does not have the capability to accommodate modern, minimum office standard

services. It is therefore far less suitable and even sub-standard for office accommodation. The basement has not, to our knowledge, ever been used for typical Class B1 'desk space'. Having always functioned as back of house and ancillary space. The principle of this not being in Class B1 is therefore considered to be acceptable.

- 5.11 In respect of point b, due to the constraints of the site, as noted above, it is not possible to use this space as a functioning office and therefore an alternative use is sought. This area within the building could be better utilised as a gym which will create activation at ground floor level which is sought and supported by Local Plan policy and as part of the wider site allocation. In addition, the use as a gym would provide facilities to the local community and workers as well as create additional jobs to the local economy. The ancillary office space does not currently generate any FTE jobs. The change of use to a gym will create 11 FTE (rounded) jobs when using the Homes and Communities Agency Employment Density Guide (3rd Edition) calculator.
- 5.12 The Proposed Development would not have a detrimental impact on the amenity of nearby residents in terms of loss of light, outlook, noise and vibration or privacy. Evidence of this is provided within the submitted Acoustic Report.
- 5.13 Marketing cannot be undertaken for this space because it does not meet the functioning requirements of an office. A gym has been chosen as the most logical use given the subterranean nature of the space. This is not uncommon in London. Below are other planning permissions which have been granted by the London Borough of Camden for the conversion of office space (B1) to gymnasiums (D2).
- LPA ref. (2018/3966/P) granted full planning permission for 'the change of use of existing commercial unit at ground floor/mezzanine level from office (B1) to gym (D2)'.

- LPA ref. (2017/4606/P) granted full planning permission for ‘the change of use from gym/ancillary Class B1 office space at basement level to a gym (Class D2) with public access from Plender Street and Mandela Street.’
- LPA ref. (2017/3812/P) granted full planning permission for ‘the change of use at ground level from office (Class B1) to a gym (Class D2) with associated works to front elevation including new aluminium framed doors, windows and ventilation louvres.’

5.14 Although it is acknowledged that the proposals would result in the loss of ancillary Class B1 floorspace. This should be weighed against the wider development in the High Holborn Estate. The Applicant obtained approval in September 2019 under planning permission ref. 2018/4924/P for the redevelopment and refurbishment of 18-23 Hand Court which created 552 sqm of additional Grade A office floorspace within the High Holborn Estate. This application included the creation of a new office building and the change of use of low-quality ground and basement office space to retail. In addition, the applicant is also currently at pre-application for the refurbishment of 46-48 Bedford Row which will result in 950 sqm of office floorspace being returned to active use within the High Holborn Estate and Camden. Therefore, the High Holborn Estate will result in a total uplift of circa 801 sqm, including the loss of 701 sqm of ancillary office space at High Holborn House.

5.15 The introduction of a gym facility within the ground and basement of the High Holborn House building will make more efficient use of the existing building, whilst also serving the needs of the local residents and office works. As such, the proposals will contribute to a successful mix of commercial uses, enhancing the area’s vitality and vibrancy and improving activation along this section of the street.

- 5.16 We believe that the proposed change of use from office (Class B1) to gym (Class D2) is wholly acceptable in this central location and when considered against London Plan Policy 2.11-2.12, and Camden Local Plan Policy E1 and E2.

Land Use – Leisure Use (Class D2)

- 5.17 London Plan Policy 3.2 (Improving Health and Addressing Health Inequalities) states that the Mayor will promote London as a healthy place for all, from homes to neighborhoods and across the city as a whole. The Proposed Development will help provide an alternative exercise option, to encourage workers and residents to engage in physical activity.
- 5.18 London Plan Policy 4.6 (Support for and Enhancement of Arts, Culture, Sport and Entertainment) notes that the Mayor will, and boroughs and other stakeholder should, support the continued success of London’s diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents’ workers and visitors.
- 5.19 London Plan Policy 4.7 (Retail and Town Centre Development) states that the Mayor supports a strong partnership approach to assessing need and bringing forward capacity for retail, commercial, culture and leisure development in town centers. The supporting text to this policy notes that boroughs should encourage a diverse range of activities including leisure venues as this diversity can enable a mix of activities in the public realm and help keep the public spaces safe.
- 5.20 London Borough of Camden Local Plan Policy C1 (Health and Wellbeing) states that the Council will require developments to positively contribute to creating high quality, active, safe and accessible places.
- 5.21 London Borough of Camden Local Plan Policy C3 (Cultural and Leisure Facilities) states that the Council will seek opportunities for new cultural and

leisure facilities in major, mixed used developments. It goes on to state that smaller facilities may, however, be appropriate anywhere in the borough providing they do not have an adverse impact on the surrounding area or the local community.

5.22 The proposals will provide a facility that is accessible to the local community and workers in a central accessible location. The use will also provide much needed activation along this otherwise blank façade.

5.23 Leisure facilities such as gyms provide a much-needed service for the local community but also provide an opportunity for social interactions adding to the sense of community of an area. This is becoming an increasingly important issue in communities.

5.24 The gym is proposed to have its own separate entrance which means that it will not impact on the office entrance or its day to day function.

5.25 The provision of a gym in this area is tenant led which indicates need in the local area. As such, we believe that the proposals will be wholly beneficial to the local community and in line with London Plan Policy 3.2, 4.6-4.7 and Local Policy C1 and C3.

Design

5.26 The NPPF at paragraph 131 states that in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.

5.27 Paragraph 124 states that the creation of high-quality building and places is fundamental to what the planning and development process should achieve. It goes on to say that good design is a key aspect of sustainable development,

creates better places in which to live and works and helps make development acceptable to communities.

5.28 Paragraph 127 of the NPPF outlines that planning policies and decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.29 Good design is central to all objectives of the London Plan. Policies contained within Chapter 7 set out a series of overarching design principles for development to achieve by addressing its layout, height and massing and elevations.

5.30 London Plan Policy 7.1 requires good quality environments to be provided which have the best possible access to services, infrastructure and public transport.

5.31 Policy 7.6 states that ‘Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.’ In respect of design and appearance Policy 7.6 also requires new buildings and structures to be ‘of the highest architectural quality; they should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm’ and they should include details and materials that ‘complement, not necessarily replicate’ local architectural character.

5.32 Local Plan Policy D1 notes that the Council will seek to secure high quality design in development, in line with the following criteria:

- a) respects local context and character;
- b) preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- c) is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- d) is of sustainable and durable construction and adaptable to different activities and land uses;
- e) comprises details and materials that are of high quality and complement the local character;
- f) integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
- g) is inclusive and accessible for all;
- h) promotes health;
- i) is secure and designed to minimise crime and antisocial behaviour;

- j) responds to natural features and preserves gardens and other open space;
- k) incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,
- l) incorporates outdoor amenity space;
- m) preserves strategic and local views;
- n) for housing, provides a high standard of accommodation; and
- o) carefully integrates building services equipment.

5.33 The proposals have been designed by Buckley Grey Yeoman Architects and provides the following enhancements:

- Consideration has been given to ensure that the design replicates that of the existing office building and positively contributes to the area.
- A new independent entrance is proposed from Brownlow Street to the unit to help animate the street.
- An internal lift is being refurbished to ensure the gym is DDA compliant.
- New doors, glazing and external lighting is proposed as part of the application.

5.34 It is considered that the proposal provides a scheme of the highest architectural quality and will contribute positively to the surrounding area. The Proposed Development thereby accords with policies contained within the NPPF, London Plan Policies 7.1 and 7.6, and LBC Local Plan Policy D1.

Inclusive Access

5.35 London Plan Policy 7.2 states that development should be of the highest standards of accessible and inclusive design. The Mayor will assist borough and other agencies in implementing accessible and inclusive design in all development

proposals by updating the advice and guidance in the SPG ‘*Accessible London; achieving an inclusive environment*’.

- 5.36 Design issues relating to access and inclusion are discussed in greater detail in the accompanying Design & Access Statement.

Transport and Servicing

- 5.37 The NPPF requires new developments to consider local transport capacity and promote sustainable transport choices. The London Plan promotes development that will not adversely affect safety on the transport network.

- 5.38 Paragraph 6.15 of the London Plan reflects the policies set out within the NPPF to locate developments which generate significant amounts of movement in areas of high public transport accessibility, stating that:

“... new developments that will give rise to significant numbers of new trips should be located either where there is already good public transport accessibility with capacity adequate to support the additional demand or where there is a realistic prospect of additional accessibility or capacity being provided in time to meet the new demand.”

- 5.39 London Plan Policy 6.1 encourages closer integration of planning and development and promotes development that reduces the need to travel and encouraging walking by improving the urban realm. Development proposals should ensure that impacts on transport capacity are assessed (Policy 6.3). Developments should provide secure cycle facilities (Policy 6.9).

- 5.40 London Plan Policy 6.13 seeks to prevent excessive car parking provision that can undermine cycling, walking and public transport use.

- 5.41 Policy T1 of the Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 5.42 It is proposed that the gym operator shall manage their own waste within their demised space. The gym will be serviced as per the existing arrangement which are based on refuse collections from Brownlow Street.
- 5.43 As existing there are 50 cycle spaces for the benefit of the High Holborn House tenants. The proposal is to re-provide these spaces plus an additional 40 spaces (including short-term visitor spaces) with a rationalized cycle store. This exceeds the London Plan requirement. The High Holborn House cycle store will be accessible from street level. There is also direct access from the cycle store to the main core.
- 5.44 A total of 16 cycle spaces will be provided as part of the development, these will be located on the western edge of the 10 Lower Thames Street building.

6.0 COMMUNITY INFRASTRUCTURE LEVY AND DRAFT HEADS OF TERMS

Community Infrastructure Levy (CIL)

- 6.1 The Mayor formally adopted his CIL charging schedule on 1st April 2019. The Mayoral CIL is now payable on most new developments.
- 6.2 For development schemes in the London Borough of Camden, the Mayoral CIL will be levied at £80 per m² of uplift from existing to consented floorspace in lawful use and in accordance with the requirements of the CIL Regulations (as amended).
- 6.3 London Borough of Camden adopted their borough CIL charging schedule on 1 April 2015. CIL is levied at variable rates across the borough and is also dependent on the nature of the proposed uses. Borough CIL funds will pay for a wide range of infrastructure, which includes, but is not limited to; parks, schools, community facilities, health facilities and leisure centres.
- 6.4 A CIL Additional Information Requirement form has been completed and is included within the planning application submission.

Planning Obligations for the Development

- 6.8 It is understood that the proposed development will not generate any S106 obligations and/or contributions.

7.0 CONCLUSION

- 7.1 This application seeks planning permission for the change of use of part of the ground and basement floor of the High Holborn House building to a gym along with associated works.
- 7.2 The creation of a gym in this location will maximise the efficiency of the site, without affecting the quantum of usable office floorspace. It will provide a much-needed leisure offering in the local area for both residents and workers as well as providing activation along this otherwise blank street elevation.
- 7.3 Overall it is considered that the proposals are sustainable and are in accordance with the provisions of the Development Plan, and as such full planning permission should to be granted.