

21st January 2020
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Planning Department
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Dear Sir/Madam

APPLICATION FOR THE CHANGE OF USE OF A GROUND FLOOR COMMERCIAL UNIT AT 71 HIGH HOLBORN, LONDON, WC1V 6DA TO A BUILDING SOCIETY (USE CLASS A2)

PLANNING PORTAL REFERENCE: PP-08426736

On behalf of Skipton Building Society, please find enclosed a planning application for the change of use of a ground floor commercial unit at 71 High Holborn (Mid City Place), London to a building society (Use Class A2).

The planning application is submitted to the London Borough of Camden as the Local Planning Authority, and is supported by the following documents which, together with this supporting planning letter, comprise the application submission:

- Planning Application Forms and Certificates;
- Site Location Plan;
- Existing Floor Plan; and
- Proposed Floor Plan (Drawing No. AB(0)01).

The planning application fee of £462.00 has been paid via the Planning Portal.

Background

Skipton Building Society are currently located at 81 High Holborn. The lease on this property expires in 2021 and therefore Skipton Building Society needs to find new premises. The site at 71 High Holborn is very close to the existing unit minimising the impact on trade and employees. Furthermore, the business model for Skipton Building Society is such that it focuses on face to face service rather than the internet and therefore has a positive impact on footfall in the high street. This is particularly relevant

give the challenges faced by traditional retail operators. Skipton Building Society is a mutual, owned by its members and a high street presence is important for these members.

Application Site

The application site comprises of a ground floor commercial unit at 71 High Holborn. The building has five ground floor commercial units, with the application site the second unit to the east of Red Lion Street. The application site has most recently been used as a takeaway café (use class A1), occupied by EAT.

The application site is within the Bloomsbury Conservation Area. The application site is not listed or designated, and none of the adjacent or neighbouring buildings to the application site are listed.

The application relates to the ground floor only and the application site extends to 195 sqm.

Planning History

71 High Holborn, London, WC1V is within the administrative area of Camden Council. From a review of the Council's public access system, the relevant planning history is set out in the table below:

Planning Application Reference	Address	Proposal	Decision and Date
PSX0004006 (Reserved Matters Application)	State House, 58-71 High Holborn, 18-23 Hand Court, 47 & 47A Bedford Row, WC1R 4LR	Submission of details of elevations and facing materials, pursuant to additional condition 01 of planning permission dated 1st October 1999. (as shown on drawing numbers; A-201, A-202, A-203, A-204, A-211, A-214, A-303, A-304, A-311, A-312, A-313, A-314, A-315, A-316, A-317; materials schedule (October 2000), supporting information (montages) two model photos and samples.	Granted 19 September 2000
PS9804967R1 (Original Planning Permission)	State House, 58-71 High Holborn, 18-23 Hand Court, 47 & 47A Bedford Row, WC1	Redevelopment to provide a basement, ground and eight storey building to be used for offices and retail (within Classes A1, 2 and 3), with 27 basement car parking spaces and service access, as shown on drawing numbers 001, 003, 101.06-113.01, 211, 212, 213, 214, 215, 216; and letter dated 25 January 1999 amending the number of car parking spaces from 35 to 27	Granted subject to S106 – 01 December 1999.

The applications noted above are the outline and reserved matters application for the original construction of 71 High Holborn (Mid City Place). There is no relevant planning history for this particular application unit.

It is understood that the site operated as Use Class A2 (Professional and Financial Services) until 2014 when it was let to EAT, who have operated under Use Class A1.

Proposed Scheme

The proposed development is for the use of the ground floor commercial unit at 71 High Holborn as a building society (Use Class A2). The proposed internal layout reconfiguration will include a public area with furniture to accommodate waiting customers, a reception/admin area, four private offices for client meetings, a larger meeting room and a staff area.

The planning application solely relates to the proposed change of use. Any new signage will be subject to a separate advertisement application once the details have been confirmed. Additionally, any shopfront alterations will be subject to a separate planning application.

Background and Relevant Policy

The site has been in use as an 'EAT' takeaway café since circa 2014, prior to this the site had been occupied by TD Direct Investing (retail stockbroker), which operated under A2 use (financial and profession services).

As there is no planning history confirming the established use of the unit, information that has been received from EAT regarding their operation which confirms that the majority of the trade is from takeaway lunches and therefore, unit is operating as Use Class A1 rather than as Use Class A3 café). Based on information from EAT and as there is no evidence of intervention from the local planning authority, we are of the view that it operates as A1.

Article 4 Direction

An Article 4 Direction implemented in 2018 by Camden Council removes the permitted development rights for change of use from A1 (shops) to A2 (financial and professional services) for the area shown within the red line on the plan below. On this basis, any change of use from Use Class A1 to A2 would require express planning permission.

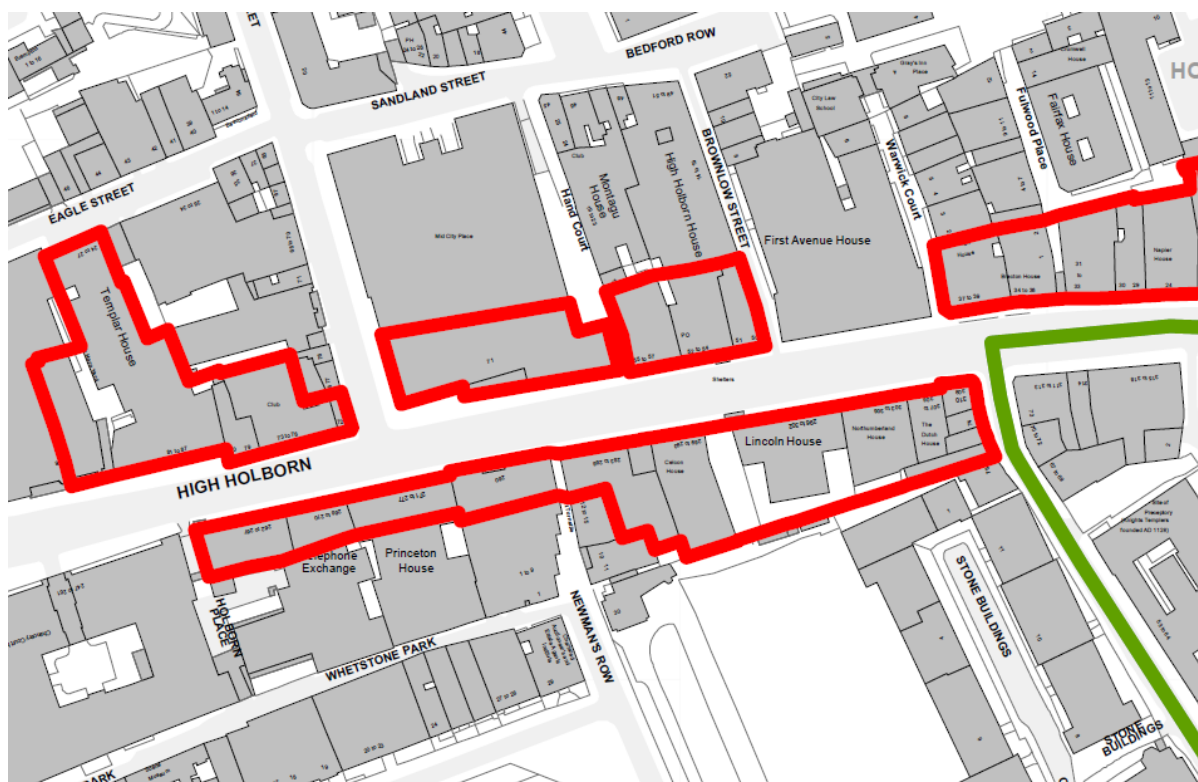


Figure 1 - Article 4 Direction Map

The starting point for the consideration of any planning application is the adopted development plan for the area. In this case the Camden Local Plan (2017) and associated documents are the key consideration. Consideration then turns to other material consideration such as adopted supplementary guidance, national guidance, business requirements/operational needs etc.

Camden Local Plan (2017)

The pertinent policies are set out below.

Policy TC2 'Camden's centres and other shopping areas' states: *"The Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. We will:*

- a. seek to protect and enhance the role and unique character of each of Camden's centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located;*
- b. provide for and maintain, a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy and choice;*
- c. make sure that food, drink, entertainment and other town centre uses do not have a harmful impact on residents and the local area and focusing such uses in King's Cross and Euston*

Growth areas, Central London Frontages, and Town Centres (Refer to Policy TC4 Town centre uses);

- d. support and protect Camden's Neighbourhood Centres, markets and areas of specialist shopping, local shops; and*
- e. pursue the individual planning objectives for each centre, as set out in supplementary planning document Camden Planning Guidance on town centres and retail, and through the delivery of environmental, design, transport and public safety measures.*

The Council has designated primary and secondary frontages in its centres, which are shown on the Local Plan Policies Map. We will:

- f. protect the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre; and*
- g. protect the secondary frontages as locations for shops (A1) together with a broader range of other town centre uses to create centres with a range of shops, services, and food, drink and entertainment uses which support the viability and vitality of the centre.*

The Council's expectations for the mix and balance of uses within frontages for each designated centre are set out in Appendix 4."

Appendix 4 (Centre Frontages) of the Local Plan states that within the primary frontage of Holborn, the following parameters apply for use classes:

- *"Minimum proportion of A1 shops in each individual frontage" should be 50%, and*
- *"Maximum proportion of A3, A4, and A5 uses combined in each individual frontage" should be 25%".*

Policy TC4 'Town centre uses' – *"The Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.*

We will consider:

- a. the effect of development on shopping provision and the character of the centre in which it is located;*
- b. the cumulative impact of food, drink and entertainment uses, taking into account the number and distribution of existing uses and non-implemented planning permissions and any record of harm caused by such uses;*

- c. *the Council's expectations for the mix and balance of uses within frontages for each centre are set out in Appendix 4;*
- d. *the individual planning objectives for each centre, as set out in the supplementary planning document Camden Planning Guidance on town centres and retail...";*

Town Centres and Retail Camden Planning Guidance (2017)

Camden Council has adopted this planning guidance document to assist planning officers in assessing proposed changes to commercial properties. Whilst this policy document is not part of the statutory development plan it is a material consideration.

Paragraph 3.27 states, under the heading 'Holborn': *"The Council seeks to protect the retail function of this Central London Frontage. Planning permission will not be granted for development involving the loss of A1 retail uses which results in A1 retail uses falling below 50% of the total premises in each individual frontage."*

Paragraphs 1.7 to 1.12 provide guidance on 'How to calculate frontages'.

Paragraph 1.9 states: *"A frontage will start at a road junction or where there are ground floor residential uses in the run, at the beginning of the first two consecutive non-residential uses at ground floor level. Frontages may continue around corners, or across entrances to premises above or rear and may include isolated ground floor residential uses, but are always ended at roadways that interrupt the run of premises."*

Paragraph 1.10 states: *"The percentage is calculated as the number of premises in the specified use as a percentage of the total number of premises within the frontage. All calculations should be based upon the existing lawful use of the properties and valid planning permissions with potential to be implemented."*



Figure 2 - Frontages map of High Holborn from 'Town Centres and Retail Camden Planning Guidance' (2018) – The primary frontages are outlined in red.

National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's planning policies for England and how these should be applied. Paragraphs 85 – 90 relate to 'ensuring the vitality of town centres'. Paragraph 85 states *"Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation"*.

Paragraph 86 states *"Main town centre uses should be located in town centres"*. A building society use falls within the definition of a "main town centre use", and therefore meets this policy requirement. The proposed use will encourage footfall and improve the vitality of the high street.

Planning Case

From information provided by the current occupier the unit is operating under the Use Class A1. It would normally be the case that a change of use from A1 to A2 would be permitted development under schedule 2 part 3 of the General Permitted Development Order (2015). However, in this case there is an Article 4 Direction (2018) which removes such rights. It has been necessary to submit a full planning

application to ensure the appropriate planning permission is in place for Skipton Building Society to operate from 71 High Holborn.

A building society is a “main town centre use”, and therefore as supported by the NPPF and associated guidance, recognising it is an important part of any viable and vibrant town centre. Importantly, Skiptons Building Society business model is based on face to face customer service and therefore providing “bricks and mortar” facilities is critical. The clear benefit to the wider area is that this approach encourages footfall in the area thereby contributing positively to town centre vitality and viability.

For the reasons set out below, the proposed development is in accordance with the expectations for the mix and balance of uses within frontages for Holborn as set out in Local Plan policy TC2 and appendix 4 of the Local Plan. In addition, the proposed building society use will not cause harm to the character, function, vitality and viability of the centre, the local area or the amenity of neighbours in accordance with Local Plan policy TC4.

The proposed development has been considered against the Town Centres and Retail Camden Planning Guidance (2018). To assess the impact of the proposed change of use, the planning case will analyse the effect of the change in relation to paragraph 3.27 of the Town Centres and Retail Camden Planning Guidance. Paragraph 3.27 states *“Planning permission will not be granted for development involving the loss of A1 retail uses which results in A1 retail uses falling below 50% of the total premises in each individual frontage”*.

Using the “How to calculate frontage” guidance as set out in Town Centres and Retail Camden Planning Guidance paragraph 1.9, the individual frontage in this case would be the adjoining premises from 71 High Holborn to 51 High Holborn bookended by Red Lion Street to the west and Brownlow Street to the east.

Paragraph 1.9 states that *“Frontages may continue around corners, or across entrances to premises above or rear and may include isolated ground floor residential uses, but are always ended at roadways that interrupt the run of premises”*.

This row of buildings are adjoining, however the frontage does span across three ground floor office receptions and one pedestrian alleyway allowing access to the rear of no.71 and no.57 High Holborn. The frontage is consistent with the definition above.

Paragraph 1.9 also states that "A frontage will start at a road junction or where there are ground floor residential uses in the run, at the beginning of the first two consecutive non-residential uses at ground floor level... but are always ended at roadways that interrupt the run of premises."

This is the case here with the frontage running from no.71 clearly demarked by Red Lion Street to the west and running until no.51 where Brownlow Street interrupts the frontage.

Below is a Google Map extract of the frontage. This image is followed by our review of the current uses present.



Figure 3 – Google Street View image showing the frontages of 71 to 55 High Holborn

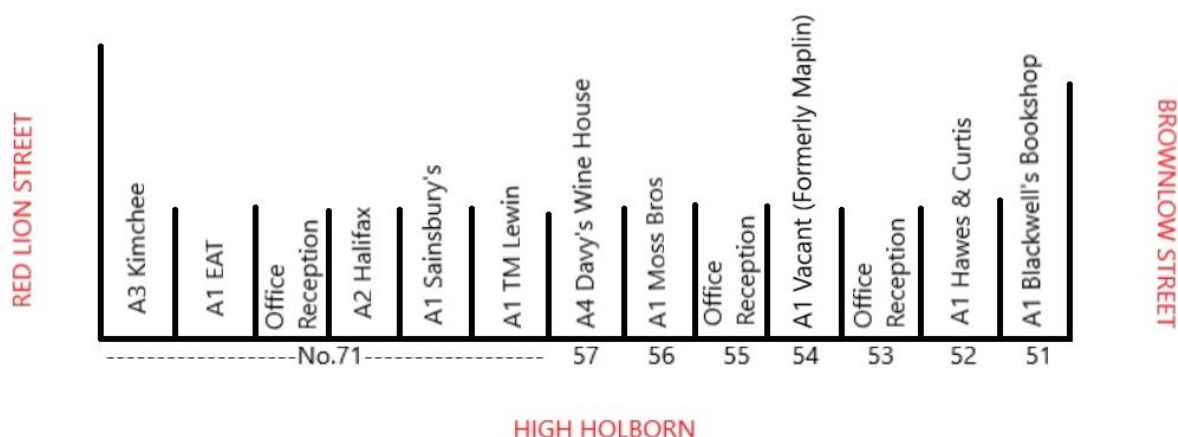


Figure 4 - Present uses within the individual frontage

The guidance set out in Paragraph 1.10 in Town Centres and Retail Camden Planning Guidance (2018), has been used to calculate the percentages of uses within the frontage. This row of adjoining properties comprises of ten ground floor commercial units and three office receptions servicing upper floor office space. As can be seen below, we have undertaken a review of the existing uses on the individual frontage.

Present uses:

- A1 = 70%
- A2 = 10%
- A3 = 10%
- A4 = 10%

At present, out of the ten commercial units, seven are considered to be A1 use, the exceptions being Kimchee (A3), Halifax Bank (A2) and Davy's Wine House (A4).

After implementation of the proposed change of use:

- A1 = 60%
- A2 = 20%
- A3 = 10%
- A4 = 10%

At present 70% of the units are considered A1 including the application site, changing the use of the application site from A1 to A2 will result in 60% of the uses on this individual frontage being of A1 use. Figure 4 demonstrates the present uses for the adjoining frontage of premises as required by the protocol outlined in paragraph 1.10 of Town Centres and Retail Camden Planning Guidance (2018).

20% of the uses in the frontage will remain in A3/A4/A5 use which is below the 25% maximum proportion in Appendix 4 (Centre Frontages) of the Local Plan.

The proposed use would not have a detrimental effect on the vitality of the high street and meets the requirements of the use mix set out in the planning policy outlined above.

It is considered that the proposed use is also acceptable in terms of impact on the amenity of neighbouring occupiers in line with 'Policy TC4 Town centre uses' of the 'Camden Local Plan' (2017).

In conclusion, the proposed use is considered to be a main town centre use which will encourage footfall making a positive contribution to the vitality to this part of High Holborn. Importantly, it fully meets the policy tests set out in the Camden Local Plan (2017). The scheme is therefore considered acceptable in principle and should be supported.

I trust this is sufficient for you to validate the planning application. If you do require any additional information or advice, please do not hesitate to get in touch.

Yours sincerely



Lauren Knox

Principal Planner

On behalf of WYG