

PDTBC/PB/JL

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12 March 2020

Submitted via the Planning Portal: PP-08539958

Dear Elaine

**TEMPLAR HOUSE, 81-87 HIGH HOLBORN, LONDON WC1V 6NU
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
APPLICATION FOR FULL PLANNING PERMISSION**

On behalf of our client, CER Investment SARL, please find enclosed an application for the refurbishment of Templar House, High Holborn, London WC1V 6NU. Full planning permission is sought for the following:

“Alterations to the ground floor and basement layouts alongside the works to building facades”

This application has been submitted via the Planning Portal under ref. PP-08539958.

Site Description

Templar House (81-87 High Holborn and 24 to 27 Eagle Street) comprises a part-nine (plus plant area) part-seven storey building (plus basement) faced with Portland stone on the High Holborn elevation and a mixture of brick and stone on the Eagle Street elevation. The side elevations are not visible from the public realm. The existing building on the Site was constructed in 1959 by Richard & McLaughlin Architects and was an infill building following bomb damage during WWII.

The building is laid out as three blocks, one fronting onto High Holborn to the south, one onto Eagle Street to the north and one forming a connecting block in between. The latter is set in from the boundaries with the adjoining sites creating courtyard spaces to the west and east.

The building comprises offices on the first to 8th floors on the building fronting High Holborn and offices on the first to 7th floors of the building fronting Eagle Street, with plant equipment located at roof level. There is retail floorspace at ground floor level fronting onto High Holborn, which is provided across five retail units. Most of the occupiers have relocated to other premises and are now vacant. Vehicle access to the Site is from Eagle Street via a ramp into the basement which is mainly used as car parking

The Site is in the Bloomsbury Conservation Area. There are no statutorily listed buildings adjacent to the site however there are listed buildings in the wider area, including the Rosewood Hotel at 247-252 High Holborn (Grade II) approximately 20m south of the Site.

Client Objectives

CER Investments SARL purchased the Site on 28 September 2019. It is their intent for Uncommon to both own, occupy and manage the office and retail floorspace. Uncommon has created a portfolio of workspaces with a focus on providing supportive working environments, with an emphasis on design-led spaces and health & wellbeing. Their aim is to promote a healthier way of working in an environment that evokes creativity and productivity.

The building to be designed and finished to the highest standards, providing an excellent working environment for members and member organisations. Key focuses include building users' wellness and improve the buildings contribution to interest and vibrancy of the area. The scheme is intended to be a destination for the public and surrounding building users, positively contributing to the retail and food and beverage offer in the borough by taking a different approach to retail, and providing a high quality user experience.

Planning History

Following a review of the available planning history for the Site, the following are considered relevant:

- Planning permission was refused on 22 March 2018 (ref. 2015/4407/P) for the redevelopment of the Site, following the demolition of the existing 9 storey mixed use building to provide a 12 storey building onto High Holborn comprising 350 sqm of retail floorspace at ground floor level, 15,499 sqm of office floor space at basement to 11th floor levels and a 14 storey building fronting Eagle Street comprising a total of 52 residential units. The proposals included new and altered improvements to public realm, landscaping, parking, bin storage and associated works.
- Planning permission was approved on 24 June 2019 (ref. 2018/5903/P) for refurbishment of the existing building, including the installation of new and replacement rooflights at ground to enclose the existing voids following conversion of underground basement car park and removal of car park ramp to create additional employment floor space (B1 use), the erection of a single storey extension at ground floor level and 8th floor level, the installation of metal railings to create a roof terrace at 8th floor level, installation of additional air conditioning units in the existing plant enclosure and alterations and replacement of the louvred screen at 7th floor level fronting Eagle Street. The proposals also sought the enlargement of the office entrance to High Holborn elevation, which included alterations to the existing retail accommodation layout and shop frontages and alterations to the ground floor openings on the rear elevation fronting onto Eagle Street.

Our client is not seeking to implement any previous express planning permissions in relation to the Site.

Proposed Development and Application Format

A pre-application meeting was undertaken with the Council on 14 February 2020, to discuss the proposed works.

As agreed in this meeting, the works for which permission is sought will be submitted as three separate applications to align with the procurement and sequencing of the works. These are driven by a desire to bring the building back in to functional and operational use at the earliest opportunity.

This application therefore solely relates to the alterations to the ground floor and basement layouts to the High Holborn block, and the proposed works to the building facades, on both High Holborn and Eagle Street Blocks.

Due to the nature of the alterations sought in each application, the submitted drawings and DAS may show elements which do not relate to this submission. For the avoidance of doubt, this application is seeking the alterations to the ground floor layouts and the relevant façade alterations only.

Further information on the content of each application is in the Design and Access Statement (DAS) prepared by Cousins & Cousins Architects if needed.

The Development Plan

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) requires special attention to be given to the desirability of preserving or enhancing the character or appearance of that area when exercising planning functions.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that “*where in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material consideration indicates otherwise*”. The parts of the development plan of relevance to this application are:

- The London Plan (2016); and
- The Camden Local Plan (2017) and associated policies map, with alterations (2017).

The Site is subject to the following allocations/designations:

- Located in the Central Activities Zone (CAZ);
- Located in the Holborn Intensification Area;
- Located in the High Holborn/Kingsway Central London Frontage; and is
- Located in the Bloomsbury Conservation Area.

Planning Policy Assessment

1. Alterations to the High Holborn basement and ground floor layouts

At ground floor level there are five retail units, with frontages directly onto High Holborn, although the majority of the units have now relocated and are vacant, are in poor condition and need updating. The existing retail floor space is confined to the ground floor, with ancillary storage at basement level below.

As the Site is located in the High Holborn / Kingsway Central London Frontage, Policy TC2 (Camden's centres and other shopping areas) is relevant which aims to protect and enhance the role and unique character of each of Camden's centres. Further, the Council will ensure that development of shopping, services, food and drink and entertainment does not cause harm to the character, function, vitality and viability of a centre.

Local Plan Policy TC4 (Town Centre Uses) seeks a provision of an appropriate amount of retail and food and drink uses along Central London frontages. The Town Centres and Retail CPG (March, 2019) also requires at least 50% of units to be Class A1 (when assessing applications for the loss of Class A1 retail) and for no more than 25% being in food drink or entertainment use (A3, A4 and A5). We would suggest that whilst guidance requires the above split to be considered, it should only be used as a guide to making a balanced judgement, taking all of the relevant factors into account. As such, the impact the proposals would have on the character, function, vitality and viability of the area is of relevance.

The proposals seek to open up the ground floor to provide a mix of retail facilities in one central space that also incorporates a larger, more open office entrance. The intention is to create a space that can support a number of retailers in an open plan retail space which is likely to be aimed at emerging brands by providing an 'incubator' space with high levels at footfall to seek to encourage them to thrive, prior to finding permanent premises. This will be combined with the office entrance, so that amenities can be shared between the local community, office users and the public. Uncommon have confirmed that all of the proposed retail space will be open to the public, and we propose that opening hours are managed via an appropriately-worded compliance condition.

As the office space is designed to attract co-working tenants, the increased vibrancy at street level due to the density of occupation of the building is likely to attract visitors and make movements to and from the building more regular than the existing situation. Access will be provided via three large entrances from High Holborn; the retained primary entrance and two secondary doors either side. The open nature of the plan and installation of glazing will improve visibility and legibility.

Application ref. 2018/5903/P approved a reduction in the number of individual retail units and overall floorspace to 291 sq m. This quantum is being maintained, alongside the considerable benefit of opening up and providing additional retail offers and amenity space at basement level, providing an additional 325 sq m which was also approved under ref. 2018/5903/P. The retail in the basement will be linked through from the ground floor with a double-height void, which will encourage retail users to descend down, creating a usable and attractive retail space. We consider that the overall quantum of retail floorspace and basement level which is the same as approved is accepted and raises no issue therefore.

The proposals result in the loss of 281.15 sq m of retail floorspace compared to the existing arrangement. This space is to be pre-provided as office floorspace, and the creation of this quantum accords with the aims of Local Plan Policies E1 (Economic Development) and E2 (Employment premises and sites). As there is no net uplift in floorspace, the requirements of Policy H2 (Maximising the supply of self-contained housing from mixed use schemes) are not triggered.

The proposed street activity and footfall is far more attractive to new retailers and consumers, and therefore whilst there is a reduction in the overall provision of retail floorspace, the improvement in its quality would ensure the requirements of Local Plan Policy TC2 are met. In the context of Local Plan TC4 (Town Centre Uses), we would consider that as the majority of the units on-site are currently vacant, the refurbishment of the building as a whole would create additional footfall in the area and would help to maintain vibrancy and choice in the Central London frontage. On balance the proposal is therefore acceptable.

2. Façade Alterations to the High Holborn and Eagle Street Blocks

Policies D1 (Design) and D2 (Heritage) of the Camden Local Plan are aimed at achieving the highest standard of design in all developments. Policy D1 (Design) requires development to be of the highest architectural and urban quality, which improves the function, appearance and character of the area, and Policy D2 (Heritage) outlines that the Council will preserve, and where appropriate enhance Camden's heritage assets and their settings.

In addition, Policy D3 (Shopfronts) requires a high standard of design in new and altered shopfronts and confirms that the Council will resist the removal of shop windows without a suitable replacement. When determining proposals for shopfront development the Council will consider:

- a) *“the design of the shopfront or feature, including its details and materials;*
- b) *the existing character, architectural and historic merit and design of the building and its shopfront;*
- c) *the relationship between the shopfront and the upper floors of the building and surrounding properties, including the relationship between the shopfront and any forecourt or lightwell;*
- d) *the general characteristics of shopfronts in the area;*
- e) *community safety and the contribution made by shopfronts to natural surveillance; and*
- f) *the degree of accessibility.”*

Policy D4 (Advertisements) outlines that the Council will require advertisements to preserve or enhance the character of their setting and host building, and must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail. Proposals will be supported where advertisements preserve the character and amenity of the area and preserve or enhance heritage assets and conservation areas. Advertisements will be resisted that contribute to an unsightly proliferation of signage in the area, contribute to street clutter in the public realm and cause light pollution to nearby residential properties amongst other considerations.

High Holborn

To the High Holborn frontage, a number of minor alterations are sought, which are being undertaken to increase the vitality and interest which this building contributes to its immediate setting and the Conservation Area. The existing High Holborn frontage currently has a different design for each retail unit at ground floor level, many of which are now vacant and in poor condition. This variety results in a lack of continuity and removes all visual connection or association with the original building fabric, detracting from the character and appearance of the Conservation Area.

The proposed number of access doors in to the building is reduced from five to three, however the new entrances are clear and defined, allowing multiple opportunities to enter the open-plan retail space, providing access to both retail and commercial spaces. The works seek to introduce a continuous materiality and design to provide a uniform aesthetic and increase the quality of the space to the immediate pedestrian area, providing an identity and connection between the retail and office spaces in the building. The increase in glazing will also improve visual connection to the ground floor retail, enabling views through the lower ground floor spaces, to encourage public use, a key objective of the works.

Additionally, the installation of outdoor seating along High Holborn to accompany the internal retail space will offer shelter via retractable canopies to the seating area, and will aid wayfinding of the building by distinguishing between entrances. The awning box and fixings will be integrated in to the construction of the new windows, resulting in no fixings to the existing High Holborn stonework. This element was raised in the pre-application meeting with the Council, who welcomed the inclusion of this so long as the external seating is temporary and can be moved inside when not in use.

When assessed against Policies D1 (Design) and D2 (Heritage) we consider the proposed works considerably enhance the character and appearance of the Conservation Area. The proposed works are high quality and provide the façade with an identity and connection with the wider streetscape which it is currently lacking. Whilst the existing High Holborn façade is noted as a positive contributor to the Bloomsbury Conservation Area, the works seek to remedy the unattractive and poorly maintained shopfronts and should therefore be viewed favourably.

The advertisement strategy which has been devised to provide symmetry and continuity to the elevation has been developed in accordance with the requirements of Policy D3 (Shopfronts) and Policy D4 (Advertisements) so it relates to the elevation and improves overall contribution to the Bloomsbury Conservation Area. The submission presents the design intent and strategy, showing approximate locations and dimensions. Further details will be submitted in a subsequent application and broadly the proposed elements include:

- Replacement of the existing ‘Templar House’ metal lettering with engraving to match the font and proportions of the existing sign;
- The addition of a new, lit projecting sign and inset threshold signage to improve the legibility of the key entrances and to encourage users through the main entrance;
- Manifestations to the glazed doors and fixed windows, made from white vinyl to offer an additional retail signage strategy, and offer a temporary solution that can be removed without damaging the building fabric; and
- Retractable awnings which provide a further opportunity for branding.

Further details are set out in the DAS and the proposed elevations, however the rationalised façade, balanced symmetry of the elevation, dedicated signage strategy and use of high quality materials would not be of detriment to the Bloomsbury Conservation Area but provides significant benefits compared to the existing and consented position.

Eagle Street

The proposals seek to refurbish and alter the Eagle Street façade to positively respond to the internal amendments to the building. The façade will be reordered to respond to the appearance of the wider building, and louvred panelling will be incorporated in order to subtly articulate the doorways and openings needed.

At present, the Block and associated elevation serves a range of back of house and utilities services in a layout which is not in-keeping with the remainder of the building, and the lack of visual quality encourages misuse and anti-social behaviour. This is considered to be of detriment to the character and appearance of the Bloomsbury Conservation Area.

The proposals seek to re-work the openings on the façade, to create secondary reception space to benefit the wider office use, along with a package of works which seeks to better reflect the contribution which the elevation makes to the utilitarian character of the Eagle Street. It is considered that the façade as proposed will provide a uniform aesthetic and increase the quality of the feel of the space to the immediate pedestrian area on Eagle Street, of benefit to the Conservation Area.

Policy A1 (Managing the impact of development) seeks to assess the impact of development on the amenity of residential properties in the area. The proposed works to the ground floor of the building fronting Eagle Street relate to elevation changes and would not have an impact on the amenity of the neighbouring occupiers in terms of loss of daylight, sunlight, overlooking or sense of enclosure. Further, it should be noted that the proposal also removes vehicular access from the existing site, helping to reduce the quantity of vehicular movements and therefore noise and pollution from the area.

The proposed amends to this elevation were discussed with officers at the recent pre-application meeting, who commented that the works are a considerable improvement over the existing and consented position. Officers confirmed that the alterations would not harm the character or appearance of the building or the conservation area and are therefore acceptable, subject to the provision of additional detail regarding materials and finishes which have been provided as part of the submission documents. Further details have been provided in the DAS.

Conclusion

This supporting letter has been prepared in support of the planning application at Templar House, High Holborn, on behalf of our Client, CER Investment SARL which forms part of the wider package of works which seek to bring the currently vacant building back into operational use at the earliest opportunity.

The proposals benefit the occupancy of the building as a whole, would create additional footfall in the area and would help to maintain vibrancy and choice in this part of Holborn. The reduction of retail and the addition of a vibrant office entrance is a welcome addition to the commercial nature of this area, providing an opportunity to increase the vibrancy and vitality of the area and in no way detract from the retail objectives of this location.

From a legislative and planning policy perspective the proposals accord with the Development Plan for the London Borough of Camden, resulting in an improvement to the quality of the building's appearance and the contribution which it makes to the character and appearance of the Bloomsbury Conservation Area.

Application Submission and Administrative Matters

To assist with the determination of this application, a suite of technical documents has been submitted in support of this application, and details of these documents are set out in the accompanying Schedule of Submitted Information (Document Ref. TH-1) and the Schedule of Application Drawings (Document Ref. TH-2), both prepared by Montagu Evans.

This application has been submitted via the Planning Portal, and the application fee of £702.00 has been calculated in accordance with The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) 2019.

Payment has been made to the Planning Portal directly.

Closing

We trust that the information submitted is sufficient and allows you to validate the application.

Should you require any further clarification, information or assistance please do not hesitate to contact James Leuenberger (james.leuenberger@montagu-evans.co.uk / 020 3962 6458) or Paul Burley (020 7866 8602/ paul.burley@montagu-evans.co.uk) at this office in the first instance.



Yours sincerely,

Montagu Evans

Montagu Evans LLP
Enc.