

PD12929/PB/JL

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5 Pancras Square,
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N1C 4AG

04 September 2020

Submitted via the Planning Portal: PP-08956764

Dear Elaine

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

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:

“Temporary Change of use of three retail units from Class E to Marketing Suite (Sui Generis)”

Specifically, it is proposed that the temporary change of use should apply until August 2021. This period of time corresponds with the Applicant’s requirements for a marketing suite relating to the progression of their pending applications for the wider refurbishment of the Site, as submitted to the London Borough of Camden, under application refs. 2020/1310/P, 2020/1350/P and 2020/1351/P.

In support of this application, and in addition to this covering statement please find enclosed the following documents for your consideration:

- The requisite Application Forms, duly signed and dated;
- Covering Letter (i.e. this letter), prepared by Montagu Evans;
- Site Location Plan, prepared by Cousins & Cousins;
- Existing and Proposed Plans, prepared by Cousins & Cousins
- Design and Access Statement, prepared by Cousins & Cousins; and
- CIL Additional Information Form, prepared by Montagu Evans on behalf of the Applicant.

This application has been submitted via the Planning Portal under ref. PP-08956764, and the application fee of £462.00 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.

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 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.

The Site, subject of this application, comprises two vacant retail units, the lawful use being Class E. This application relates solely to the ground floor of the property. All other parts of the building are unaffected and separate access will be maintained as existing

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.

Background and Client Objectives

CER Investments SARL purchased Templar House 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 and 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 redevelopment of the wider site, as submitted to the London Borough of Camden under application refs. 2020/1310/P, 2020/1350/P and 2020/1351/P seeks to create a commercial offering which is not just a destination for the public and surrounding building users, but also positively contributes 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 is considered relevant.

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.

For the avoidance of doubt, our client is not seeking to implement any of the previous express planning permissions relating to the Site and has subsequently submitted three applications which are being determined by the Council currently, as follows:

- 2020/1310/P
 - Alterations to the ground floor of the High Holborn façade including installation of new glazed shopfronts, applied window vinyl lettering, retractable awnings, external seating areas and new 'Templar House' inset lettering on existing fascia in association with the use of the basement and ground floor as A1 and A3 uses (Sui Generis use class), alterations to the ground floor of the Eagle Street façade to include new fixed glazing, new entrance door, and louvre doors.
- 2020/1350/P
 - Installation of new plant equipment and associated acoustic screening at 7th, 8th and 9th floor levels fronting High Holborn, the link block and Eagle Street, kitchen extract duct, extensions

to the existing lift cores, a new single storey WC block at 8th floor level and creation of external enclosed and covered terrace with associated railings at roof level fronting High Holborn.

- 2020/1351/P
 - Replacement of all single glazed windows with double glazed windows on High Holborn and Eagle Street facade, reinstatement of two high level 7th and 8th floor windows to the High Holborn facade, installation of 2 glazed canopies at ground floor level to enclose the existing voids following conversion of underground basement car park and removal of car park ramp to create additional employment floor space, installation of ground floor windows and fire escape doors on the west flank elevation, bricking up of windows on the eastern and western side elevations of the link building, erection of a single storey side extensions at ground floor level, and illumination of the High Holborn elevation all in association with the existing office use.

It is anticipated that planning permission will be granted for these applications in September 2020.

Proposed Development

The proposed development seeks to change the use of the three ground floor units from retail (Use Class E) to marketing suite (*Sui Generis*) for a temporary period up to July 2021, or a time otherwise agreed in writing. The permission is intended to be made personal to the Applicant so that when this use is no longer required or the period expires, it can revert back to its lawful use.

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 Considerations

This section assesses the development proposals against the key planning policy considerations contained within the adopted policies, and supplementary planning guidance documents (as relevant).

Temporary Change of Use

The suitability of this use within the designated Central London Frontage is the key policy consideration and most particularly the expectations noted under Policies TC1 (Quantity and Location of Retail Development) and TC2 (Camden’s centres and other shopping areas) to maintain and promote the vibrancy of this location. 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 or

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).

It is of course that A1-A5 no longer exist – class A1 and A3 are now defined as Class E, and A4 and A5 are *Sui Generis*. Therefore, the current Development Plan policies cannot be directly translated to the new classes. However in presenting this application we have considered how the proposals fit with the spirit of what the Local Planning Authority were intending to achieve when they first proposed the policy.

We would therefore 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.

In this context, at ground floor level there are currently 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 positioning of and high quality fit-out of a proposed marketing suite in this location, would introduce activities which are considered to be similar to a retail use in respect of the steady stream of footfall that it will bring to the area in the form of prospective occupiers for the refurbished building. The unit will thus maintain a very active frontage comparable to any other retail use.

Further to this, the proposals are likely to have a positive impact on this element of the High Holborn frontage, particularly as there are a number of vacant units on-site, given the addition of this 'destination'. This is likely to lead to an increase in activity in this location, contributing to the vibrancy of the street and surroundings. The forthcoming development to which the marketing suite relates will also carry significant benefits in terms of increasing activity in the area and given the development site is the same as the application unit, it is considered to be an ideal location.

Clearly therefore, the proposed marketing suite maintains and improves the overall character of the High Holborn frontage even though it strictly falls outside of the defined retail uses that the policies normally protect. But, as has been clearly noted above this use would maintain an active frontage and offer some of the key characteristics as a destination that could attract individuals to the area. As such, it is clearly an appropriate town centre function and should be considered as an acceptable use in this instance.

In order to further support the long term health and growth of this location, the Applicant is willing and able to restrict the use of the marketing suite to both their specific 'usage' requirements and also in terms of the time Period for which the permission remains valid. Given this proposal to allow the marketing suite on a temporary and personal basis, we would suggest that the Council impose conditions on the consent which details these restrictions. We have set out the suggested wording below:

Proposed Draft Conditions

1. The temporary marketing suite use shall conclude on 01 August 2021, or upon the cessation of the marketing use, whichever is the earlier, and the use of the premises shall then revert to its approved lawful use.

Reason: To provide the Council with comfort over the proposed uses of the units in the long term.

Finally, from a design perspective 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 two. The approach is consistent with the works sought under application ref. and

2020/1310/P and this will allow the temporary marketing suite to seamlessly integrate with the wider refurbishment in due course upon completion of the wider package of works.

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 for a temporary marketing suite at ground floor level.

A marketing suite displays many of the same characteristics as a Class E retail unit. It will attract visiting members of the general public who will enter and exit the unit. The proposals would also benefit the proposed future 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 and would 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.

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) of this office in the first instance.

Yours sincerely,



Montagu Evans LLP
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