

Appeal under the Town and Country Planning Act 1990

on behalf of

Westcombe Homes

against the non determination by Camden Council

of an application for proposed conversion

of 2nd floor from offices (Class E)

to form five self-contained flats (Class C3).

at

2nd Floor 31-33 High Holborn
London WC1V 6AX

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1.0 Introduction

- 1.1 This statement supports an appeal to alter the internal layout and change the use of the second floor at 31-33 High Holborn. The floor has been used as offices for over ten years. The last tenants left in January 2020 and the floor was immediately marketed, but after 20 months there have been no offers for office or commercial use and hence the floor has remained vacant.
- 1.2 The appeal includes this statement, marketing evidence, the plans of the whole building existing and the proposal for the second floor. All the plans save the second floor are unaltered since 2010.
- 1.3 The application was submitted to Camden Council on 16 April 2021 and it was given reference 2021/1896/P on 25 June 2021. The Council have not issued an acknowledgement or validation notice but their web site (as copied in Appendix A) shows it to be a valid application. This has also been confirmed by email also copied in Appendix A. Since the application was received the appellant commissioned a bespoke marketing report. This was sent to the Council in July and is copied in Appendix B and C.

2.0 Planning History and Site and Surroundings

- 2.1 The site currently contains a six-storey building fronting High Holborn. It is now vacant but formerly provided limited retail on the ground floor with offices above. The site is part of the Central London Area (as defined) and is in an Archaeological Priority Zone.
- 2.2 The site is heavily constrained by a variety of ground floor and underground uses/structures that prevent extensive alterations. These constraints include the Chancery Lane deep level shelter, a BT Telephone Exchange and two underground railway structures.
- 2.3 The building is red brick with stone dressings to the windows on the High Holborn frontage. It has two strong bays surrounded by a large gable and chimneys. The remainder of the front elevation is flat with pairs of windows. There is a decorative cornice between the ground and first floor. There is a more modest cornice between the fourth and fifth floor. A stone balustrade caps the building.
- 2.4 The rear and flank elevations are more utilitarian with a mix of materials including render, red and white brick, and plain flettons. There are external staircases accessing to Fulwood Place.
- 2.5 High Holborn is an area of change with a number of mixed use redevelopments of varying architectural styles. Redevelopment of this building is not achievable by reason of the Conservation Area status and the quality of the High Holborn Street frontage. The building spans over a passageway to Fulwood Place which accesses Gray's Inn containing a formal arrangement of buildings serving the legal community. The existing building is shown overleaf:



**Front elevation (High Holborn)
Holborn**



**The passageway from High
Holborn**



Flank elevation to the passageway

3.0 Proposal

- 3.1 The proposal seeks to respond to changes in economic circumstances. The design concept flows from an evaluation of the building, planning policy and practical considerations.
- 3.2 There are no external changes arising out of the proposed change of use hence there is a maintenance of character of the building and of the area. The design is traditional and unaltered. The proposed flats meet the national minimum floorspace standards as detailed below:

1. Front two-bedroom flat (3 person) - 71 sqm
2. Front studio (1 person) - 40 sq m
3. Centre studio flat (1person) - 37.8 sq m
4. Centre 1 bed flat (2 person) - 52.9 sq m
5. Rear two-bedroom flat (3 person) - 62 sq m

Cycle storage is provided in the private ground floor lobby for each unit to encourage sustainable transport use. This is currently used by the commercial unit that is to be replaced. The existing office is insulated and heated but the development provides the opportunity to upgrade this, achieved by condition. The flat roofs adjacent to the 2nd floor flats provide an opportunity to achieve at least five air source heat pumps.

4.0 The Development Plan

- 4.1 The Development Plan for the site comprises the London Plan 2016 together with the Camden Local Plan 2017. The Holborn area is largely characterised by a mix of offices, retail and residential.

Policy E2 Employment premises and sites states:

The Council will encourage the provision of employment premises and sites in the borough. We will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.

We 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.

We will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that:

- c. the level of employment floorspace is increased or at least maintained;*
- d. the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy;*
- e. it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy and will be to a sustainable location;*
- f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;*
- g. the scheme would increase employment opportunities for local residents, including training and apprenticeships;*
- h. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and*
- i. for larger employment sites, any redevelopment is part of a comprehensive scheme.*

- 4.2 The site has been marketed since January 2020 (as demonstrated in Appendix B and C) and has received no offers. The post-Covid era and the change to the Use Classes Order has changed the approach to the office and its use and arguably renders office employment protection policies out of date. A recent published survey from property agents Cushman & Wakefield analysed responses from more than 40,000 individuals globally about their work-from-home experiences during the Covid-19 pandemic. Survey respondents represent approximately 30 companies across nearly 20 industries. Three quarters of respondents agree or strongly agree that they are collaborating effectively with colleagues in the current environment - up 10% from data gathered during the pre-Covid-19 period - and 73% said they would **like their companies to embrace long-term or permanent flexible working policies.**
- 4.3 This has led KPMG to conclude Covid-19 has prompted businesses to look closely at their real estate, including office space usage in premium locations like London. A new JLL report on the impact of Covid-19 on flexible space outlines the future of such space both now and after the pandemic subsides. The report indicates that flexible space will take a different form than it has in the past. This change will result in the de-densification of main office space and a move towards a 'hubs and clubs' model that provides office locations closer to where people live.
- 4.4 The JLL report notes that they expect to see a fundamental shift in the way office space is used. A greater focus on spaces which emphasise collaboration is also likely to emerge as office space is redesigned and repurposed. As tenants return to their offices, business continuity and operational resilience will be top priorities - and since flexible space is fast and easy to acquire, companies are likely to turn to flexible solutions to support portfolio reductions and cost-saving strategies

during this time of economic uncertainty. These arrangements reduce the demand for space allowing it to be re-purposed.

- 4.5 The office has long provided a place for concentrated work and is increasingly becoming a place for collaboration, connection, innovation and social interaction. In a revived post-pandemic market where adaptability is high on the corporate agenda, the purpose of the 'hub' office is centred around collaboration and flexible space.
- 4.6 Levy Real Estate note that even before Covid the City Fringe was slowing down. They note:

The City Fringe has been one of London's standout performers over the past decade, but recent months have been less positive. The coronavirus crisis has chalked off demand, with few lettings occurring since the pandemic began. The submarket's vacancy rate was already rising before the crisis, albeit from low levels. Net absorption has been negative over the past year, largely due to the Royal Bank of Scotland consolidating its offices on Bishopsgate, while the 110,000-SF Kaleidoscope scheme delivered unlet at the end of 2019. While TMT demand might prove more resilient than some other sectors in the aftermath of the crisis, leasing is likely to remain sluggish in the near term, while the many co-working firms operating here are likely to see their business models put under pressure. When combined with a rise in speculative construction, this should lead to vacancies rising further in the next couple of years.

In addition to the risk the coronavirus crisis poses to the business models of such firms, a high level of co-working space also presents a challenge to landlords of smaller buildings in the City Fringe, as start ups and SMEs gravitate to this co-working space instead. Brexit also poses a challenge to demand here. Any restrictions on EU immigration would shrink the pool of tech talent available, which could lead some firms to consider setting up operations on the continent instead.

This and the other factors shown in the whole report leads to the conclusion that:

Demand for office space has weakened significantly across Central London as a result of the coronavirus crisis. Few lettings have occurred within the area in recent months as many firms continue to work from home and business leaders re-evaluate space needs. The submarket's vacancy rate, which had already been edging upwards before the crisis began, is likely to continue rising over the next couple of years as muted demand meets rising supply and rents should start to fall as a consequence.

- 4.7 In a report by Fitch Ratings dated 27 May 2020 they report that the Corona Virus pandemic will irreversibly change your opinion of this market by causing step change in working practices in the information services sector. Anti-Covid 19 measures have forced many businesses to have all or most of their staff working home simultaneously. This has accelerated technological development, systems quality testing, lowered cultural and managerial barriers to home working and reshaped within and between businesses. All of these factors lead to lower demand for City Centre office property. They have increased EMEA CMBS Office

Structural Vacancy assumptions in many markets due to opportunities for remote working combined with cost pressures from weaker economic conditions. This increase assumes structural vacancy is focused on expensive and highly centralised office markets in large cities like London and Paris.

4.8 These considerations lead to an overall conclusion that most expert commentators believe that there will be a decrease in demand for office accommodation throughout the Central London core. The subject property is not a highly attractive office and as shown over the past eighteen months the demand for this unit is poor. With current demand falling significantly this unit is effectively un-lettable.

4.9 Demand for office space has weakened significantly across Central London as a result of the coronavirus crisis. Few lettings have occurred within the area in recent months as many firms continue to work from home and business leaders re-evaluate space needs. The submarket's vacancy rate, which had already been edging upwards before the crisis began, is likely to continue rising over the next couple of years as muted demand meets rising supply and rents should start to fall as a consequence.

4.10 Hence it can be seen in the context of this proposal and the locality that:

- The premises have not let since before the Covid crisis
- Demand for office space has weakened significantly and has continued to do so between August 2020 and Autumn 2021
- Few lettings have occurred within the area in recent months
- Business leaders are already re-evaluating office space needs
- The vacancy rate was already rising before Covid
- The vacancy rate is likely to continue rising
- Rents are likely to fall affecting viability
- Brexit will create further uncertainty.

By contrast flat demand remains strong and there is a committed developer on site who is willing to invest further. We suggest therefore the policy test is passed.

4.11 Paragraph 2.31 of the Local Plan identifies the Council aspirations for the Holborn area and states:

The Council's aspirations for the Holborn area include:

- ***provision of a mix of land uses, with offices and housing as the predominate uses; and***
- ***provision of appropriate retail, food, drink and entertainment and service uses in the area's Central London Frontage in accordance with the supplementary planning document Camden Planning Guidance on town centres, taking opportunities to introduce ground floor town centre uses where the continuity of the frontage is currently broken;***
- ***development of a decentralised energy network;***

- **improvements to the street environment, in particular the pedestrian environment to and around Holborn Underground station;**
- **improved linkages and connections with the City of London, the Tottenham Court Road area and other neighbouring areas;**
- **making walking and 'way-finding' easier;**
- **the provision of improved cycling facilities, particularly for visitors;**
- **working with partners including TfL to relieve congestion at Holborn Underground station, including the Holborn station capacity upgrade;**
- **appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;**
- **high quality, sustainable design that respects its surroundings and conserves and enhances the area's heritage assets and wider historic environment; and**
- **improving community safety, including opportunities for crime and anti social behaviour.**

4.12 The proposal maintains a mixed use of the building with retail on the ground floor on the High Holborn frontage and perpetuates the design of the approved building. It will make a contribution to maximising housing supply as required by Policy H1, which states:

The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes.

We will seek to exceed the target for additional homes, particularly self-contained homes by:

- a. regarding self-contained housing as the priority land-use of the Local Plan;***
- b. working to return vacant homes to use and ensure that new homes are occupied;***
- c. resisting alternative development of sites identified for housing or self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for housing; and***
- d. where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site.***

We will monitor the delivery of additional housing against the housing target, and will seek to maintain supply at the rate necessary to exceed the target. In seeking to maintain the housing supply, the Council will adjust the type and mix of housing sought, having regard to the financial viability of development, the sales or capital value of different house types and tenures, and the needs of different groups.

- 4.13 The proposal as it now stands also maximises self-contained accommodation as required by Policy H2, which states:

To support the aims of Policy H1, where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses.

- In all parts of the borough the Council will encourage the inclusion of self-contained homes in non-residential development.***
- In the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200sqm (GIA), we will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations.***

In the specified areas, the Council will consider whether self-contained housing is required as part of a mix of uses taking into account:

- a. the character of the development, the site and the area;***
- b. site size, and any constraints on developing the site for a mix of uses;***
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;***
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and***
- e. whether the development is publicly funded or serves a public purpose.***

Where housing is required as part of a mix of uses, we will require self contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed. Where the Council is satisfied that providing on-site housing is not practical or housing would more appropriately be provided off-site, we will seek provision of housing on an alternative site nearby, or exceptionally a payment-in-lieu.

- 4.14 Turning to the design, the impact of development is assessed against Policy A1, which states:

Managing the impact of development
The Council will seek to protect the quality of life of occupiers and neighbours.
We will grant permission for development unless this causes unacceptable harm to amenity.

- We will:***
- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;***

b. seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
d. require mitigation measures where necessary.

The factors we will consider include:

e. visual privacy, outlook;
f. sunlight, daylight and overshadowing;
g. artificial lighting levels;
h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
i. impacts of the construction phase, including the use of Construction Management Plans;
j. noise and vibration levels;
k. odour, fumes and dust;
l. microclimate;
m. contaminated land; and
n. impact upon water and wastewater infrastructure.

4.15 The residential units pass these tests

5.0 National Policy and Guidelines

5.1 The Government published the latest version of the revised National Planning Policy Framework in 2021. One of the key drivers for the revision was the need to deliver a sufficient supply of homes. For decision taking, there is a presumption in the Framework in favour of sustainable development and “*Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.*”

5.2 Turning to the specific subject areas, the NPPF states:

To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

5.3 A new provision of the NPPF is an emphasis on small sites, and the guidance notes:

68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

5.4 The proposal is an example of this type of small site and provides an opportunity to create good homes which are responsive to local needs.

5.5 The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development. 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 and should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live. The proposal does not affect the external environment and thus it sustains and enhances the significance of the heritage assets and puts it to viable uses consistent with their conservation (paragraph 191). There is no harm to, or loss of, the significance of a designated heritage asset.

5.6 As regard the office use the NPPF notes the need for both flexibility and creativity:

80. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

5.7 Paragraph 81d notes how plans should be able to respond to changing circumstances:

Planning policies should:

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

5.8 The pandemic is such a circumstance, requiring such a rapid response. Whereas the office market is now uncertain, housing is an assured user.

- 5.9 The economic and land use changes arising from Covid arguably mean parts of the Local Plan are out of date and thus paragraph 11d would seem appropriate. It states:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: (my underlining)

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 5.10 Parts of these plans may be considered out of date in that they wholly or partly pre-date the changes to the Use Classes Order that came into effect in August 2021. A key relevant consideration is that offices are now Class E and can now change to the uses below without planning permission:

- a) Shop other than for the sale of hot food
- b) Food and drink which is mostly consumed on the premises
- c) The following kinds of services principally to visiting members of the public
 - i. financial services
 - ii. professional services (other than medical services)
 - iii. any other services which it is appropriate to provide in a commercial, business or service locality
- d) Indoor sport and recreation (not swimming pools, ice rinks or motorised vehicles or firearms)
- e) Medical services not attached to the residence of the practitioner
- f) Non-residential creche, day centre or nursery
- g)
 - i) office
 - ii) the research and development of products or processes or
 - iii) any industrial process, (which can be carried out in any residential area without causing detriment to the amenity of the area).

Decisions which thus seek to retain offices can thus no longer be sustained.

6.0 Other material considerations

- 6.1 The appeal is lodged on grounds that key aspects of policy are now out of date and the most likely means to secure new direct and indirect employment is through carefully considered, expanded residential. The policy was drafted in an era where offices were a separate use class. Offices such as these can no longer be protected.

7.0 Conclusion

- 7.1 The case outlined in this statement is that:

- No overlooking, noise or lighting impacts would occur that are materially greater than the extant consent
- The legislative and market conditions no longer support the policies of the London and Local Plans as regard protecting offices
- Continued business use is likely to result in long term vacancy.

7.2 Notwithstanding the above, no harm has been proven. The residential uses are a needed asset.

7.3 It has been shown that the appeal site constitutes an addition which is consistent with current policy, both in principle and detailed design. The proposal is in keeping with the character of the area and would not damage the employment prospects of the wider locality.

7.4 The proposal meets the policy aspirations of both the Development Plan and National Policy.

7.5 Given the overall compliance with Policy the Inspector is respectfully asked to grant permission with conditions as appropriate.

APPENDIX A ; Evidence of receipt and validation by LBC

Environment

- Planning and Building Development
 - Planning Applications
 - Planning Appeals Search

Details Page for Planning Application - 2021/1896/P

Site Address 2nd Floor 31-33 High Holborn London WC1V 6AX

Documents for this application

[View drawings, comments and other documents for this application](#)

Application Progress Summary

Please note that if the **Comments Until** date shown is before the **Application Registered** date this is because either:

- we are not required to consult on the application (you can check this in our [Statement of Community Involvement](#)); or
- the formal consultation period has not yet started by the application being advertised in the local newspaper or site notice(s) being put up at the application site.

Application Registered	25-06-2021
Comments Until	25-07-2021
Date of Committee	
Decision	
Appeal Lodged	
Appeal Decision	

Application Details

Application Number	2021/1896/P
Site Address	2nd Floor 31-33 High Holborn London WC1V 6AX
Application Type	Full Planning Permission
Development Type	Residential Conversion
Proposal	Proposed conversion of 2nd floor from offices (Class E) to form five self-contained flats (Class C3).
Current Status	REGISTERED
Applicant	Mr Kamal Pankhania
Agent	Brian Madge Ltd
Wards	Holborn & Covent Garden

RE: 2021/1896/P **31-33 High Holborn**

Fri, Jun 25, 2021 4:03 pm

Nora-Andreea Constantinescu (Nora-Andreea.Constantinescu@camden.gov.uk) To: you + 2 more [Details](#)
Dear Brian,

Thank you for your email.
I have now validated the application.

Can you please clarify what parts of the building are already in residential use and what remains as commercial?
Also, in appendix A there is the particulars information as part of the marketing exercise however no result. Can you please provide a letter from a marketing consultant to confirm these findings?

Best Regards,
Nora
Nora-Andreea Constantinescu
Senior Planning Officer

Telephone: 02079745758

APPENDIX B – January 2020 Marketing details



31-33 HIGH
HOLBORN

LONDON WC1

2,690 to 5,380sqft
HIGH QUALITY OFFICE SPACE TO LET





31-33 HIGH HOLBORN

LONDON WC1

LOCATION

This prominent building on the north side of High Holborn is immediately opposite its junction with Chancery Lane, making it right in the heart of Holborn. Chancery Lane (Central Line) Underground Station is close by.



Computer generated image



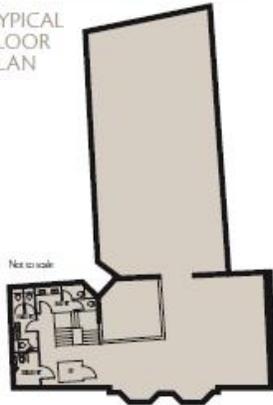
DESCRIPTION

The building is undergoing a comprehensive refurbishment to provide 2 floors of high quality offices accessed via a self contained entrance.

The floor areas are as follows:-

2nd Floor:	2,690 sqft	250 sq m
1st Floor:	2,690 sqft	250 sq m
Total (approx)	5,380 sqft	500 sq m

TYPICAL FLOOR PLAN



Not to scale

TERMS

Lease: New FRI lease direct from the Landlord
Rent: upon application

VIEWINGS Strictly by appointment with the joint sole letting agents.

AMENITIES

- Open plan floors
- New air conditioning
- New raised floors
- Modern ground floor entrance
- Passenger lift
- Roof terrace (not demised)

A DEVELOPMENT BY



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APPENDIX C – MARKETING REPORT



**Report on 31-33 High Holborn,
London, WC1V 6AX**

**On behalf of
Westcombe Group**

29th July 2021

Introduction

I have been requested to provide a report on the viability of 31-33 High Holborn being used for office purposes (User Class E (g)(i)), as part of a proposed pre-application for a change of use of the building to residential use (C3(a)).

Qualifications of Neil Warwick BSC MRICS

I am a partner of Kinney Green chartered surveyors. I qualified as a Chartered Surveyor in 1992 and have spent the majority of my professional life specialising in commercial property in the Midtown area of central London. I have significant experience in office lettings, in particular advising landlords on the specifications of works and equipment to be included in office accommodation to make them as attractive as possible to prospective tenants in the letting and sales market. I work closely with the Midtown Business Improvement District and I am an active member of the property group within that.

Location

The property, 31-33 High Holborn, is situated immediately opposite the junction of Chancery Lane. Located in the heart of Midtown the nearest underground stations are Chancery Lane (Central Line), only 1 minute walk away, Farringdon and Blackfriars which provide excellent transportation links with Thameslink and District and Circle Line Underground Station. There are also a number of bus routes within the vicinity.

Description

The 2nd floor at 31-33 High Holborn currently presents as an office (Class E (g)(i)). The floor has a previous tenant's fit out which has been lightly refurbished to attract interested parties. There are 3 meeting rooms, a kitchenette, comms room and open plan area with approximately 36 desks. The floor has the following approximate net internal floor area:-

Floor	Sq ft	(m ²)
2 nd	2,683	(249.26)
Total	2,683	(249.26)

Key Facts

- The building's façade presents with period features. The common parts are in need of modernisation and redecoration.
- The property is located in a prime position and its exterior is very attractive. Unfortunately, the common parts are not conducive to a modern office.
- The 2nd floor itself presents well with 3 meeting rooms in situ, a kitchenette and it is fitted with furniture throughout.
- Due to the amount of competition within the area, newly refurbished, newly developed and fully fitted to CAT A + are the only office units achieving lettings.
- We have been marketing the 2nd floor at 31-33 High Holborn since October 2019. It should be noted that COVID-19 has created disruption throughout the property market. Prior to COVID-19, Brexit has also caused an issue to the amount of occupiers committing to an office. Many Tenants are searching for flexibility within leases as well as convenience.
- The common parts would benefit from a passenger lift. Whilst there is a DDA compliant lift in situ this is mainly for wheelchair users. Whilst marketing we have received negative feedback on the specification and speed of the lift as otherwise it is a 2nd floor walk-up. A new lift would be difficult to install and costly.
- There is a shower and some lockers located on the 2nd floor. Many occupiers are also seeking for bike racks to accompany this amenity.
- The 2nd floor has good natural light to front rear and part side elevations.
- The Energy Efficiency of the building has recently been assessed at E-107 which is close to being unlettable. Tenants are increasingly becoming more conscious about the

sustainability of their premises and will ask a Landlord whether they have any plans to undertake works to improve the Energy Efficiency. Many occupiers will take this into consideration when choosing their next office.

Marketing since October 2019

The 2nd floor was placed on the market to let as a fully fitted, plug and play office in October 2019.

The marketing initiatives put in place included the following:-

- Letting board at the front of the building
- Marketing particulars including colour photography internal and external.
- YouTube video highlighting the fit out of the floor.
- Mailing – to local occupiers including all Barristers Chambers.
- Email campaign – to the Office Agents Society on a regular basis.
- Website listings – property details listed on the Kinney Green website, Co-Star and other commercial property sites.

Possible interest in the property since October 2019

Despite the floor being marketed for 1 year and 9 months, there has been little or no interest from potential office tenants to take a lease of the floor.

We have been quoting £55.00 per sq ft per annum exclusive. The previous transaction within the building achieved £52.50 per sq ft which was our guide for the 2nd floor. Due to the current market we have made it clear that the rent is negotiable.

Comparable Properties on the Market

The market has been unpredictable since October 2019, and there are currently 129 available properties of 2,000 – 3,000 sq ft within Midtown alone.

Here is a list of some of the properties which we believe to be the most comparable to the 2nd floor at 31-33 High Holborn that are currently on the market with an indication of how long they have been available to let:-

- 35 High Holborn, whole building with floors from 1,237 – 3,542 sq ft. Fully fitted and newly refurbished by the Landlord for a term until October 2024. Quoting from £49.50 per sq ft. Available since 9th March 2021.
- Harmsworth House, 13-15 Bouverie Street, 6th floor measuring 2,345 sq ft. Available directly from the Landlord for a term until October 2025. Fully fitted floor with furniture. Quoting £45 per sq ft inclusive of service charge. Available since 11th October 2019.
- 167 Fleet Street, 5th floor – 2,800 and 3rd floor – 2,800 sq ft, newly refurbished open plan floors. New lease directly from the Landlord. Quoting £55.00 per sq ft however it is openly marketed as being able to agree highly competitive terms. Available since 8th January 2019.
- 24 High Holborn, 6th floor – 2,400 sq ft, 5th floor – 2,637 sq ft. A new lease directly from the Landlord. Quoting £65.00 per sq ft. They are able to provide a new flexible fully fitted office. It should be noted that the building has undergone a refurbishment. Available since February 2019.
- 210 High Holborn, 5th floor - 2,400 sq ft. Available by way of an assignment or sublease for a term expiring in May 2024. Quoting £47.50 per sq ft. Currently presents as plug and play space from the previous tenants fit out. Actively marketing that they will agree competitive terms. Available since January 2021.

The majority of properties available in the market are offering fitted out, plug and play space. Some properties mentioned have been newly refurbished with manned receptions however these are still comparable given their location. Whilst considering the above many refurbishments can include a new reception area, new comfort cooling or air conditioning, modern cabling, bike racks, showers and lockers which will all be a priority to a relocating tenant. To attract all occupiers, many Landlords are now providing their own fully fitted floors on top of building refurbishments to try and compete with serviced offices to warrant that they are able to get a tenant in occupation as swiftly as possible and eliminating the Licence to Alter.

There are many more examples of what is available in the market however there is also an abundance of residential in the vicinity which are proven to be sought after.

Conclusion

Kinney Green has been marketing this building since October 2019 and we have received hardly any interest. If we are able to provide a refurbishment to the common parts, we hope this will aid first impressions to an incoming tenant making it beneficial to marketing. Unfortunately, this is costly and may not be possible to provide the type of accommodation that the market demands.

The current property market is unpredictable due to the global pandemic, which we cannot ignore. Whilst some people are starting to return back to the office I cannot see serious interest in this type of office accommodation for the foreseeable future.

Due to the amount of residential in the immediate area, there will always be demand for flats and the loss of office accommodation at 31-33 High Holborn would not be detrimental businesses in the vicinity.

Caveat

This report is exclusively for the addressee in relation to their planning proposals at 31-33 High Holborn and is not to be used for any other purpose. At the time of writing the country has just lifted national restrictions due to the COVID-19 pandemic.

If you require any further information or would like to discuss any of the points raised above, please do not hesitate to contact me.

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Kinney Green

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