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Date: 30/12/2022
Our ref: 2022/5223/PRE
Contact: Nora-Andreea Constantinescu
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Dear Peter Biggs,

Re: 27 Great Queen Street, WC2B 5BB

Thank you for submitting a pre-planning application enquiry in relation to planning application 2022/0905/P for the above property which was received on 19/12/2022 together with the payment of £1,138.00. A meeting took place on 08/12/2022 at Council Offices with Planning and Inclusive Economy Officers where some preliminary advice was provided. The current letter summarises this advice and provides further guidance on land use issues, particularly on the loss of employment in this location.

Development description

Change of use of building from office (Class use E) to sui-generis (private members club).

Land use

- The proposed change of use part of planning application 2022/0905/P is not supported in the current form due to lack of marketing evidence to demonstrate there is no interest in the premises in their current use, in line with policy E2. The applicant questions whether the proposed use should even trigger policy E2 given it is still an employment generated use.
- Whilst the proposed use may provide some jobs, the local plan makes clear (at paragraph 5.5) that “employment” uses for the purpose of these policies are offices, industrial, distribution, and similar uses such as builders’ merchants. Paragraph 5.33 acknowledges that other uses not deemed “employment” for the purposes of these policies can still provide jobs, but that these uses, including leisure, are supported by other policies in the plan.
- Policy E1 confirms we will safeguard existing employment sites (such as offices) and support intensification if there are other employment benefits, in line with policy E2.
- Policy E2 states that the council 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; (not proposed)

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; (not proposed)

- 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; (partially achieved)*
- f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable; (not proposed)*
- g. the scheme would increase employment opportunities for local residents, including training and apprenticeships; (not proposed)*
- 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; (not proposed)*
- i. for larger employment sites, any redevelopment is part of a comprehensive scheme. (N/A)*

- Based on the existing floor area of 291.15sqm the premises can accommodate a range of 24 jobs in professional services and public sector, 26 jobs in tech, 29 jobs in finance & insurance or 22 jobs in corporate sub-sector. Whilst the proposed private members club in sui-generis use would provide some level of employment, this would be for only 8 jobs, with limited benefits to the local community. In light of the above, the proposed use would not respond to the requirements of policy E1 and E2 and therefore in order to address the loss of employment space in this location the applicant is requested to provide a clear package of local benefits.
- At the meeting a number of potential benefits have been discussed to be proposed by Savage Club and/or the applicant UGLE Property Investment Committee. The benefits would be secured via s106 legal agreement as part of planning application 2022/0905/P, which is pending consideration. Below there is a list of local benefits package:
 - Savage Club to offer free rehearsal space to the local community, including to schools (to be agreed through Camden Learning) – ideally quantified in some way (see [Camden Town Hall example](#) of space bookable by community groups for a specific number of days per year – definition 2.13 on page 9 – open to suggestions re how to do this)
 - Savage Club to promote opportunities for their membership to engage with Camden initiatives such as Camden Apprenticeships and Camden STEAM (see [S106 for Belgrove House](#) – page 48 – Employment and Training Plan (End Use).
 - Savage Club to facilitate delivery of a set number of apprenticeships and work experience placements through their membership per year (see clause 2.9 on page 51/52 of the [Camden Town Hall S106](#) for typical wording for end use apprenticeships and 2.10 for the work experience clauses)
 - UGLE to work with Good Work Camden and the Kings Cross Construction Skills Centre to promote vacancies to local job seekers
 - UGLE to work with Camden Apprenticeships and the Kings Cross Construction Skills Centre to deliver a number of apprenticeships and with Camden STEAM to deliver a set number of work experience placements.

Recommendations

- As it stands the proposal would not be supported due to unjustified loss of employment space and no clear benefits package for employment and jobs with the local community.
- You are advised to consider several benefits from this list and make a proposal to the council with the overall package. You could also think creatively about how you can support employment on the site, and in the local area, perhaps through members and their professions. Once received, Officers will assess this and advise of further steps.

Please see appendix 1 for supplementary information and relevant policies.

If you have any queries about the above letter or the attached document please do not hesitate to contact Nora Constantinescu (0207 974 5758)

Please Note: This document represents an initial informal officer view of your proposal based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

Thank you for using Camden's pre-application advice service; I trust this is of assistance in progressing your proposal.

Yours sincerely,

Nora Constantinescu

Senior Planning Officer
Planning Solutions Team

Appendix 1:

Relevant policies and guidance:

- **National Planning Policy Framework 2021**
- **The London Plan 2021**
- **Camden Local Plan 2017**
 - Policy G1 Delivery and location of growth
 - Policy DM1 – Delivery and monitoring
 - Policy E1 – Economic development
 - Policy E2 – Employment premises and sites
 - Policy D1 - Design
 - Policy D2 - Heritage
 - Policy A1 - Managing the impact of development
 - Policy A4 – Noise and vibration
- **Camden Supplementary Guidance 2021**
 - CPG – Employment sites and business premises
 - CPG – Developer contributions
 - CPG - Design
 - CPG – Energy efficiency and adaptation