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TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

SITE AT
3 LAMBOLLE PLACE
BELSIZE PARK
LONDON NW3 4PD

PLANNING APPLICATION
BY
STEPHEN STYLIANOU

PLANNING, DESIGN & ACCESS STATEMENT

NOVEMBER 2023

1. INTRODUCTION

- 1.1 This Planning, Design and Access Statement accompanies the planning application by Stephen Stylianou for the change of use of the ground floor garages to office use.
- 1.2 The application site was a family run car repair garage but closed approx 14 months ago with the business no longer viable due to changes in car design and the move towards electric vehicles.
- 1.3 The last 20 years have seen Lambolle Place change from being predominantly car repair garages to now predominantly residential.
- 1.4 Independent car repair garages have been in steady decline over recent years due to the improved reliability of new cars, longer servicing intervals, increased use of replacement parts rather than making repairs, extended warranties on new cars, increase in local car free developments and now electric vehicles have all impacted the viability of small family car repair garages.
- 1.5 This statement, which should be read in conjunction with the application drawings 10643/TP01, 10643/TP02, 10643/TP03 and 10643/TP04 assesses the planning and design merits of the proposal having regard to relevant planning policies and all other material planning considerations, and is submitted to assist Camden Council's ("the LPA") evaluation of the application.

2. THE APPLICATION SITE AND SURROUNDING AREA

- 2.1 The property lies within the Belsize Conservation Area.
- 2.2 There is no Article 4 directive on the property.
- 2.3 This part of Lambolle Place is a terrace formed of 8 properties.
5 of these properties are now fully residential through changes of use applications



OS MAP WITH RESIDENTIAL CONVERSIONS
INDICATED IN GREEN

PHOTOGRAPH OF STREET ELEVATION



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3 LAMBOLLE PLACE

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STREET VIEW LOOKING SOUTH WEST



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STREET VIEW LOOKING NORTH EAST



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3. RELEVANT PLANNING HISTORY

- 3.1 The following planning applications relate to changes of use in Lambolle Place from garage to residential or office use at ground floor.

23a Lambolle Place 2022/0776/P17 Granted 05/05/2022

Change of use of ground floor from B2 (general industrial) to E(g) (business) use

4 Lambolle Place 2020/0887/P Granted 28/04/2020

Change of use from B2 (general industrial) to B1a (office) use

7 Lambolle Place PWX0202635/R1 Granted 25/10/2002

Change of use from B1 garage at ground floor to residential

8 Lambolle Place 9400921 Granted 16/06/1994

The change of use from (B1) light industrial use to residential (C3)

5 Lambolle Place 9201223 Granted 28/10/1992

Change of use from garage to self contained flat at ground floor

6 Lambolle Place 9300390 Granted 25/1/1993

Change of use from B2 to residential C3

Although there is no planning history available, 1 Lambolle Place has also benefitted from a change of use at ground floor to residential.

4. THE APPLICATION PROPOSAL

- 4.1 This application seeks to change the existing no longer viable garage (assumed use class B2) at ground floor to provide an office (use class E) with an area of 67.3 Sq.m.
- 4.2 The proposed change of use will provide new employment opportunities that are no longer possible to provide as a car repair garage in this location.
- 4.3 The only proposed external alteration are replacement of old garage doors with new glazed timber framed windows and doors.
- 4.4 The application would have benefitted from permitted development prior to 31/7/2022.

5. PLANNING POLICY

- 5.1 The proposals have taken account of the national, regional, and local planning policy framework. The statutory Development Plan for the site comprises of the London Plan (Consolidated with alterations since 2011) (2016), Camden Local Plan (2017), and Site Allocations (2013).
- 5.2 Other documents which were of material considerations include the National Planning Policy Framework (NPPF) (2019), the Draft London Plan, and Supplementary Planning Documents and Guidance (SPDs and SPGs) prepared and adopted by both the Greater London Authority (GLA) and LB Camden.
- 5.3 The NPPF (2019) directs a presumption in favour of sustainable development which underpins the Framework. The National Planning Practice Guidance (NPPG) provides clarity and guidance on the interpretation of Policy.

National Planning Policy

- 5.4 At the national level, the Government published its Revised National Planning Policy Framework (NPPF) on 12 February 2019. The NPPF provides an overarching framework for the production of local policy documents.
- 5.5 The NPPF adopts a “presumption in favour of sustainable development” for the purposes of achieving sustainable development. Sustainable development is defined through three, interdependent objectives:

An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity, and by identifying and coordinating the provision of infrastructure.

A social objective – to support strong vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with assessable services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;

And

An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making efficient use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 5.6 Appendix 2 of the NPPF defines Town Centre Uses as the following: "Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."
- 5.7 Paragraph 80 of the revised National Planning Policy Framework (NPPF) states that significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
- 5.8 Paragraph 82 of the revised NPPF states that planning policies and decisions should recognise and address the specific requirements of different sectors in all locations. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries.
- 5.9 Paragraph 85 states that planning policy should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed to meet anticipated needs for retail, leisure, office and other main town centre uses over this period.
- 5.10 Paragraph 85 also emphasises that planning 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 adaption. Indeed, town centres should meet the anticipated needs for use classes and respective market demands.
- 5.11 Paragraph 112 states that local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.

London Plan (Consolidated with alterations since 2011) (2016)

- 5.12 The London Plan provides the overall strategic plan for London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2036. It forms part of the development plan and guides decisions on planning applications by the London Borough's.
- 5.13 Policy 2.1 'Inner London' refers to decision-makers enhancing London's global presence through development in business. Policy 2.9 'Inner London' seeks economic and demographic growth in inner London.
- 5.14 Policy 4.1 'Developing London's Economy' refers to the continued development of a strong, sustainable and diverse economy with sufficient and suitable workspaces providing a range of employment opportunities. The policy seeks the continued regeneration of inner London and its promotion as a suitable location for European and other international agencies and businesses.
- 5.15 Policy 4.2 'Offices' seeks the improvement of London's competitiveness and attractiveness through enhancement in the central London office market.
- 5.16 The London Plan is supported by a number of Supplementary Planning Guidance (SPG) and Best Practice Guidance documents which will be referred to in this Planning Statement as appropriate. This includes the following:

Sustainable Design and Construction SPD (2014) sets out guidance on the implementation of London Plan policies relating to sustainable design and construction, as well as how to deal with a range of other matters relating to environmental sustainability.

Local Planning Policy

- 5.17 Policies within Camden's Local Plan (2017) are considered to be of most relevance to this application are set out below and considered further in the subsequent section of this Statement:

- 5.18 Policy G1 'Delivery and location of growth' states Development will take place throughout the borough with the most significant growth expected to be delivered through development at highly accessible locations, in particular Central London and the town centres of Finchley Road / Swiss Cottage. Furthermore, Growth in Camden will be expected to help contribute towards achieving the strategic objectives of the Local Plan and help deliver the Council's priorities including delivery of 695,000sqm of office floor space by 2031.
- 5.19 Policy E1 'Economic Development' highlights that the council will support proposals for the intensification of employment sites and premises where these provide additional employment.
- 5.20 Policy E2 'Employment premises and sites' will encourage the provision of employment premises and sites in the borough. Higher intensity redevelopment of premises or sites that are suitable for continued business will be acceptable provided that the level of employment floor space is increased or at least maintained.
- 5.21 Policy A1 highlights that the Council will seek to protect the quality of life of occupiers and neighbours which include factors such as sunlight daylight and overshadowing, noise and vibration levels and artificial lighting levels.
- 5.22 Policy A4 'Noise and vibration' states that the Council will seek to ensure that noise and vibration is controlled and managed. As such, permission for noise generating development, including any plant and machinery, will only be permitted if it can be operated without causing harm to amenity. The council will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.
- 5.23 Policy D1 'Design' highlights that the council will seek to secure high quality design in development. As such, the development must, amongst other things, respect local context and character, be secure and designed to minimise crime and antisocial behaviour and comprise details and materials that are of high quality and complement the local character.
- 5.24 Policy D2 'Heritage' states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. Consequently, the Council will not permit the loss of or substantial harm to a designated heritage asset and further will resist development that would cause harm to significance of a listed building through an effect on its setting. The council will resist development outside of a conservation area that causes harm to the character or appearance of that conservation area.
- 5.25 Policy CC1 'Climate change' mitigation indicates that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. As such, the council will support and encourage sensitive energy efficiency improvements to existing buildings.
- 5.26 Policy CC2 'Adapting to climate change' states that all development should adopt appropriate climate change adaptation measures such as not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems; incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation.
- 5.27 Policy CC3 'Water and Flooding' seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible. Development should utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible.
- 5.28 Policy TC4 'Town Centre uses' indicates that the Council will ensure that the development of 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.
- 5.29 Policy T2 'Parking and car-free development' states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.

6. MATERIAL PLANNING CONSIDERATIONS

- 6.1 This section of the Planning Statement sets out the main planning issues arising from the application proposals with reference to the planning policy framework set out in the previous chapter. Principle of Development Loss of Industrial Use - Class B2 (Garages)
- 6.2 Local Plan Policy E1 indicates that the Council will seek to support businesses of all sizes, in particular SMEs; maintain a stock of premises that are suitable for a variety of business activities, sizes and resources; and (supporting para 5.31) support Camden's industries by safeguarding existing employment sites and premises in the Borough that meet the needs of industry.
- 6.3 The application site is considered to be within lawful B2 use under section 191(2) of the TCPA. As such, the General Permitted Development (England) Order, 2015 authorises a change of use under permitted development rights at the subject site from B2 (general industrial) to B8 (storage or distribution.) The site, therefore, can be used as storage without building operations that would require planning permission.
- 6.4 The former car garage is vacant and it is the applicant's intention to convert this redundant space into office use. It is clear that the loss of garage has effectively been established in this location. The proposed use of the site as office space will transform the existing vacant space into a high quality co working space to maximise the potential of the space, which has been vacant since September 2020.
- 6.5 The presumption in Policy E1 that industrial sites be safeguarded therefore falls away in this instance, given that the premises could convert to B8 storage and distribution in any event. Having regards to the other provisions of Policy E1: a the business operation on the site is not lost, rather enhanced through higher employment density, better quality design and the flexible space allows for a number of SMEs on site in a co-working environment.
- 6.6 Having regards to Local Plan Policy E2, as the proposals consider the change of use from one business use to another and the GPDO Class I permits conversion from B2 to B8 it is established that it is lawful to convert from garage to storage. It is not considered necessary to address its policy provisions in parts (a) and (b). How the proposals address Parts (c) – (i) are considered below. These parts of the policy state:
- c) The level of employment floor space is increased or at least maintained;
 - d) The change of use retains businesses use on the site providing uses that support the functioning of 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 floor space suitable for start-ups and small 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) The proposals are not considered to be applicable.
- 6.7 In assessing the suitability of the change of use, the level of employment floor space is maintained

- 6.8 The garage ceased trading from the premises in September 2022 as demand for this service in this location fell away. As the site has been vacant for over 14 months, it is considered to be a viable development opportunity to accommodate some form of business and employment use. Thereby these proposals are relevant in the context of continuing the business function of the site.
- 6.9 The existing floor space on site comprises 67.3 sqm GIA. The proposals seek to maintain the existing amount of business floor space.
The employment creation from the change of use class from B2 to E office would exceed those previously on site when the garage was in operation.
- 6.10 In light of this, and that the proposed new office falls under Class E of the Use Classes Order, the site will continue to be used for business purposes which accords with Part C of Policy E2 which requires schemes to seek to retain or reuse some space for continued use for business. As the change of use will create a new office falling under Class E the proposed change of use is wholly acceptable.
- 6.11 The existing premises are not being redevelopment, and are vacant. It is therefore not possible to retain the existing business at the site. The decision to close this garage and cease trading is a telling indication that the premises are no longer suited for the previous operation. Over the years combining factors including improved reliability of new cars, longer servicing intervals, increased use of replacement parts rather than making repairs, extended warranties on new cars, increase in local car free developments, controlled parking, and now electric vehicles have all impacted the viability of small family car repair garages.
As such, the proposals satisfy part d of policy E2.
- 6.12 As noted above, there is no need to relocate any businesses as part of the proposals. As such, the proposals satisfy part e of Policy E2.
- 6.13 Crucially, the development proposals are intended to be sympathetic to increasing residential of the street and importantly will not remove the employment function of the site as the proposed new office space will introduce new jobs at the site. The scheme would increase employment opportunities for local residents, including training and apprenticeships;
- 6.14 The employment creation from the office would exceed those previously on site when the garage was in operation.
- 6.15 The office space will increase the employment opportunities for local people, from the construction phase through to the operational phase. As such, it is considered that the proposals satisfy part g of Policy E2.
- 6.16 The proposals are not of a scale, or the site physical characteristics such that the provision of other uses other than residential would be a viable or sustainable proposition.
- 6.17 Overall the proposals will improve the space as a whole whilst ensuring it remains sympathetic to its surroundings. As such, it is considered the scheme satisfies part I of Policy E2. Summary
- 6.18 A business operation will remain at the site and the office accommodation proposed is wholly suitable for this location. Notwithstanding the assessment above, it is crucial to note that these proposals are instead of GPDO I which could establish a proposed lawful use of the site as B8 Storage / distribution. This highlights that the loss of garage is acceptable as that change of use is permitted under the GPDO.
- 6.19 The planning application in this case will enable for improved office accommodation to be delivered in a more sustainable building.
- 6.20 The proposals seek enhance the sites location through the introduction of new high quality office floor space (Class E) which accords with London Plan and Local Plan objectives. The change of use complies with London Plan policy 2.9 which seeks economic growth in inner London. The London Plan Policy 2.10 seeks enhancement and development of the London office market to ensure London's continued competitiveness and attractiveness.

- 6.21 The proposals accord with the Local Plan aspirations for the provision of 695,000sqm of commercial office space in Camden by 2031. Furthermore, Local Plan Policy E1 'Economic Development' highlights that the council will support proposals for the intensification of employment sites and premises where these provide additional employment.
- 6.22 It is apparent that the proposed office (Class E use) responds directly to the prevailing policy position. The new office space will be delivered at a high quality specification with facilities which will maximise the potential for the premises, thus contributing positively the continued vitality and viability of the area. The introduction of new office floor space is supported at all levels, and the delivery of approximately 67 sqm of new office floor space will provide an uplift in job opportunities at the site.
- 6.23 Given the foregoing, the introduction of office floor space at a highly accessible inner London location should be supported.

Design and Heritage

- 6.24 The proposals consist of minor internal alterations, comprising new accessible kitchen space and toilet, Replacement doors to enhance the thermal properties of the new office space. The works are necessary to facilitate the use of the property as a new high quality office.
- 6.25 With regard to the acceptability of the proposed works, the proposed design complies with relevant policy at all levels. Policy D1 states that the Council will seek to secure high quality design in new development. As part of this, new design is expected to respect local context and character, preserve or enhance the historic environment, and integrate well with the surrounding streets and open spaces, amongst other requirements. In addition, the proposed internal alterations will allow the development to be inclusive and accessible for all.
- 6.26 With regard to relevant heritage and conservation considerations, Policy D1 states further, that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets. The proposed change of use is considered to be a positive enhancement to the conservation area.
- 6.27 Policy A1 'Managing the impact of development' requires development to protect the quality of life of occupiers and neighbours. New development will be permitted provided that the amenity of communities, occupiers, and neighbours is protected. A number of factors will be considered, including; visual privacy, and outlook, sunlight, daylight and overshadowing, artificial lighting levels, and noise and vibrations levels. The loss of the garage over 14 months ago has already reduced noise levels in Lambolle Place and as such the proposals are considered to be a positive enhancement to this now predominantly residential street.
- 6.28 We consider the proposed new office at the site more suitable than an industrial operation given the site's location immediately below residential properties.
- 6.29 The Council will expect developments to provide, as a minimum, the number of cycle parking spaces as set out in the London Plan. Section 8.6 of Camden's Transport CPG (2018) states that the Council will seek an additional 20% spaces over and above the London Plan standard to support the expected future growth of cycling for those that live and work in Camden.
- 6.30 Cycle parking facilities will be provided in a secure bike rack located in secure front garden of the site. This ensures that employees commuting by cycle will have space to store their bikes safely and securely. The number of cycle parking spaces accords with the London Plan standards.
- 6.31 At the local level, Policy S29 states that all development should ensure that the need to secure a healthy and safe environment is addressed and developments should also maximise opportunities to contribute to health and well-being. Implementing the change of use from B2 to E will not result in a harmful impact to the surrounding occupiers.

- 6.32 The impact created through the development will be more favourable to the current the situation, and therefore in accordance with policy maximising opportunities to improve the site and contribute to health and wellbeing. The addition of cycle parking for office workers will further discourage the use of cars in the area, increasing the health and safety of the environment in the immediate area.
- 6.33 Policy S28 Design states development must incorporate exemplary standards of sustainable and inclusive urban design and architecture. The proposed new office will maintain the high standards of inclusive design. The new employees will have level access to the office via the existing front garden.
- 6.34 Policy CC1 Climate change mitigation indicates that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 6.35 In accordance with the Sustainable, Design and Construction SPG, the scheme is required to achieve a 35% carbon reduction target as set out in The London Plan Policy 5.2 and draft London Plan Policy SI2.
- 6.36 The proposals will exceed the 35% carbon reduction over the existing building scenario as required by London Plan Policy 5.2 and draft London Plan Policy SI2, by reducing the carbon emissions. The site constraints mean that other on-site renewable options are not feasible, however as noted above the scheme overall results in a significant reduction in carbon emissions beyond the target sought by the London Plan. As such, the proposals comprise sensitive energy efficiency improvements to the existing building and should be deemed acceptable.
- 6.37 Policy CC3 Water and flooding of the Camden Local Plan states that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. Furthermore, the Sustainable Design and Construction SPG 2014 highlights that Major developments for pre-developed sites must achieve at least 50% attenuation of pre-development surface water runoff at peak times. The proposals will not alter the existing drainage and as such will not increase flood risk elsewhere.

7. Conclusion

- 7.1 This Planning Statement has been prepared in support of a full planning application submitted to the London Borough of Camden for the proposed use of the existing premises as office accommodation (Class E), including internal refurbishment works to create a modern, high quality office space.
- 7.2 It is intended that the proposed development will make effective use of the site located in a highly accessible inner London location. The change of use will provide new high quality office floor space in line with the relevant planning policies. The proposed new office will be delivered at a high specification, and supported with cycle facilities that will improve its attractiveness, and assist with the new unit being permanently occupied.
- 7.3 The proposals would serve to improve the existing conservation area and therefore would serve to improve the existing streetscape. The new office unit will not have an impact on the existing residential properties in Lambolle Place. The development would result in notable carbon emission reductions over existing.

- 7.4 Overall it is considered that the proposed scheme provides a number of important elements that will bring significant planning and regeneration benefits to the area including:

The development proposals will result in a more efficient use of this highly accessible site, to the benefit of the local area and will ensure that the site becomes occupied with a new business which will enhance the vitality and viability of the area.

A highly sustainable and energy conserving development is proposed;

The proposed design aims to optimise the vacant unit with a new accessible ground floor office space.

The change of use of the premises could create a far greater employment density when compared to the former garage unit.

The change of use of the site will contribute to Camden's objectively assessed need to provide 695,000sqm by 2031, responding to the requirements of planning policy.

- 7.5 This Planning Statement illustrates the planning case in support of the proposals in the context with the relevant national and local planning policy.
- 7.6 This practice looks forward to early discussions with the case officer on the merits of the proposal, and to the application being brought forward for approval in due course.

Robert Savage & Associates.

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