

London Borough of Camden
Planning Department

7 May 2024

Dear Sir/Madam

Objection Letter – Planning Reference: 2024/1055/P

Proposal – Change of use of second and third floors from office (Use Class E) to residential use(Class C3), including a roof extension to provide 6 x new residential units (3 x one bedroom flats, 2 x two bedroom flats, 1 x three bedroom flat) and refurbishment of building exterior, alterations to Pratt Street communal entry, installation of new cycle facilities

Site - Centenary House, 96-98 Camden High Street, London, NW1 0LQ

LRJ Planning Ltd has been instructed by the leaseholders of the flats at 16 Pratt Mews and 17 Pratt Mews and the freeholders of the residential properties at 4 and 6 Pratt Street and commercial property at 6a Pratt Street to file a formal response to the above planning application that has been lodged with the Council.

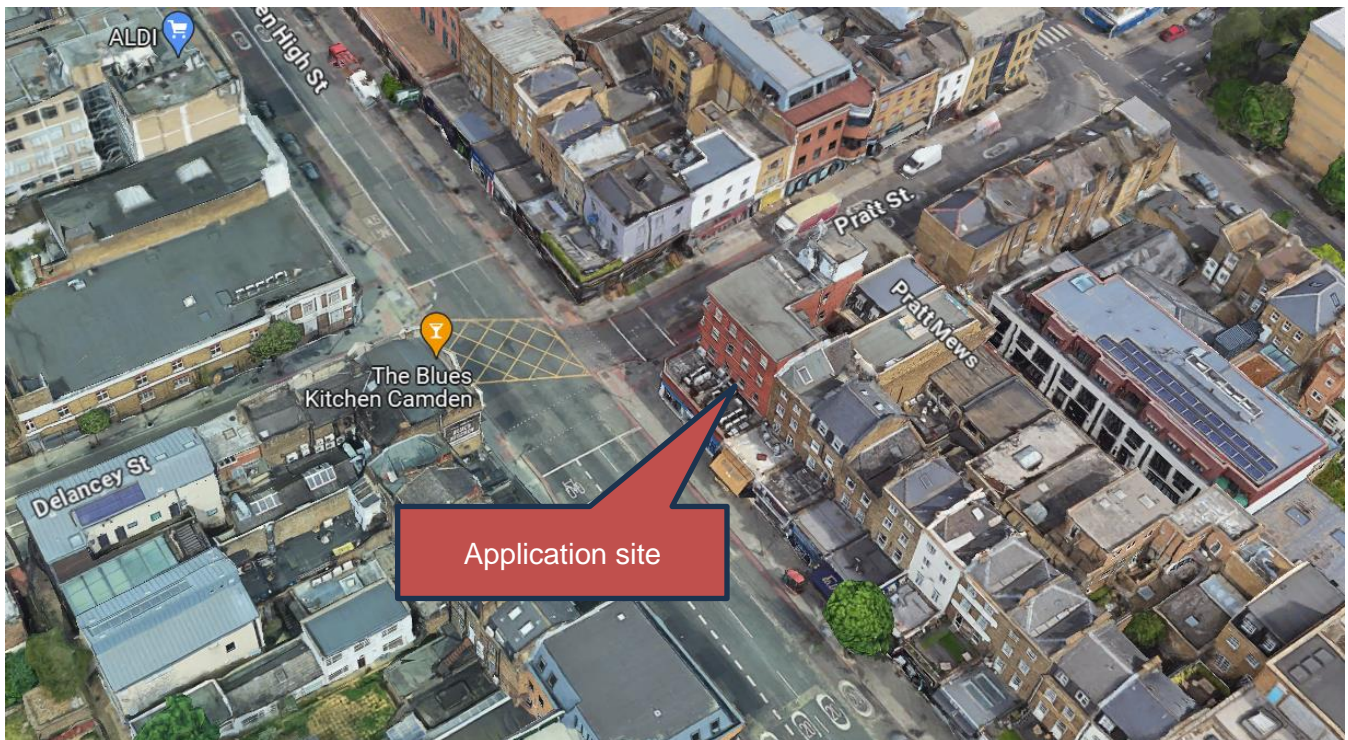
Following a review of the plans and the supporting documents with my client she has serious concerns with the application proposed and therefore strongly **OBJECTS** to the application for reasons that will be detailed below.



1.0 BACKGROUND

Due to the relationship with the application site and neighbouring buildings any increase in built form, as well as intensification in residential use at the site will be harmful to my client's neighbouring properties.

Relationship between application site and surrounding area



2.0 SUMMARY GROUNDS OF OBJECTION

The following is a summary of my client's objections to this insensitive proposal:

- i) **The principle of the development and loss of office space is unacceptable;**



- ii) **The increase in built form and the intensification in the use will have a severe harm on the residential amenity of all neighbouring properties through an unacceptable increase in overlooking, overbearing impact, loss of daylight, overshadowing and increase in noise and disturbance;**
- iii) **The substantial development at the rear will have an adverse impact on the character and appearance of the property and the setting of the Conservation Area;**
- iv) **The proposed development will result in a poor level of amenity for future occupants;**
- v) **The intensification in the use will lead to an increase in traffic on an oversubscribed roads to the detriment of highway and pedestrian safety.**

3.0 PLANNING POLICY CONTEXT

In December 2023, the Government published the latest version of National Planning Policy Framework (NPPF). The NPPF sets out the Government's planning policies for England and sets out how they are expected to be applied. The NPPF took immediate effect.

Paragraph 2 of the NPPF states that *“Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.”*

Paragraphs 7 and 8 confirm that the purpose of the planning system is to contribute to the achievement of sustainable development, which comprises economic, social and environmental dimensions.

The NPPF retains a presumption in favour of sustainable development. Paragraph 11 reaffirms that *“applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.”*



The Courts have held that Central Government’s policy is a material consideration that must be taken into account by the decision maker, as are relevant appeal decisions. The development plan pertinent to this development proposal comprises the Camden Local Plan and the London Plan. A summary of the relevant planning policies is produced at **Appendix A**.

4.0 DETAILED GROUNDS OF OBJECTION

i) Loss of office space

Policy E2 of the Local Plan refers specifically to employment premises and sites. It states that:

“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.”*

The submission recognises that premises have been continually marketed since December 2019 until December 2023 by David Menzies Associates. However, what the submission does not account for is that this period of marketing covers a significant period during covid. With workers gravitating back to offices, it is contended that the period of marketing is one that needs to be revisited to reflect the unique set of circumstances presented during covid.



The planning submission notes that *“the general feedback was that the office space was of low quality and too much work would be needed to make it appropriate.”* However, amidst these concerns, it is considered that there is the potential for improvement through refurbishment works, which would make the office space more attractive to future users. With the provision of a transformed office space into a more functional and aesthetically pleasing environment, it is contended that this would help meet the following aspiration set out in the explanation of the policy:

“Having a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility is vital to maintaining and developing Camden’s successful economy. An increase in the number and diversity of employment opportunities is fundamental to improving the competitiveness of Camden and of London. The Council wants to encourage the development of a broad economic base in the borough to help meet the varied employment needs, skills and qualifications of Camden’s workforce.”

Alternatively, this would usually, and could, be overcome by prospective tenants agreeing rent free periods at the commencement of the lease in exchange for Prospective tenants carrying out alteration and improvement works, so as to make the property suitable for their occupation. It is imperative that this is scrutinised further.

Finally, The Town and Country Planning Use Class Order Amendment of 2020 aimed to reclassify properties, including this one, under Use Class E. This reclassification would have widened the scope of permissible businesses, enabling a more diverse range of businesses to operate from the premises.

As it stands, it is contended that there are concerns about the period of marketing covering the period during covid, which represented a unique moment in time and did not accurately reflect the trading conditions at that time. Post-covid, it is evident that workers are gravitating to offices as part of a hybrid working model. With the upgrading of the office space, it is advanced that it



would make it more attractive to end users. Accordingly, there are significant concerns about the loss of office space and that the proposal is one that fails to comply with Policy E2 of the Local Plan.

ii) Severe harm on Residential Amenity

The proposal will result in the construction of a substantial development that will be sited adjacent to my client's properties, as well as other neighbouring properties.

In relation to the impact on the amenity of neighbouring properties, Paragraph 135 of the NPPF is particularly important and it states:

“Planning policies and decisions should ensure that developments:

a) 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;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and



well- being, **with a high standard of amenity for existing and future users (our emphasis)**; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

Paragraph 135 (f) of the NPPF clearly describes that decisions should ensure that developments have a high standard of amenity for future or existing users. NPPF paragraph 191 identifies that decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment.

The introduction of built form, that would span significantly to all boundaries of the site would have a significant adverse effect on the level of amenity enjoyed by neighbouring properties. The proposal would have the following significant harmful effects:

- Increased sense of overlooking and loss of privacy;
- Loss of day light, outlook, extensive overshadowing;
- Overbearing impact.

Loss of Privacy

The plans detail the provision of a substantial built form within the site that will allow direct overlooking from into private areas at the rear of neighbouring properties including at Pratt Mews. The lack of a sufficient separation distance compounds this and the loss of privacy will arise throughout all times of the day and night.

Overbearing Impact

As a result of the proximity of the built form close to the boundary and its overall, size, scale, mass and poor design, it will appear as an imposing and obtrusive structure from my client's properties that



will clearly have an unacceptable overbearing impact. It is evident that due to the vertical and lateral spread of the substantial development it will appear as visually oppressive.

Loss of daylight /sunlight and overshadowing

The submission references the Premier Inn hotel being erected across the way, yet curiously omitted any mention of the mews situated behind their structure. This oversight is quite significant, as the mews will suffer from excessive overshadowing, diminishing its prominence considerably in contrast to the ambitious development plans. Regrettably, a similar fate awaits the residences situated further down Pratt St, at the Mews, which are located directly to the rear of the proposed development as they too will be overshadowed and potentially marginalised by the looming presence of the proposed construction.

Given the substantial size of the development in respect of my client's property and the path of the sun, it is imperative that a Daylight/Sunlight and Shadowing Assessment is provided in support of the application to demonstrate that there will be no impact on my client's properties at 4 and 6 Pratt Street. The Assessment provided has excluded these properties.

The Council does not have any cogent evidence to demonstrate that there will be no unacceptable loss of light, outlook or excessive overshadowing at my client's properties.

Overall, there are a number of inaccuracies within the supporting documentation, as well as fundamental omissions in respect of technical evidence. The introduction of built form and close to the boundary with neighbouring properties would have a significant adverse effect on the level of amenity enjoyed by my client, through extensive overlooking, overshadowing, overbearing impact, loss of outlook and daylight. The proposed development impacts on my clients right to a private family life and home under Article 8 of the Human Rights Act 1998. The proposal is therefore contrary to the NPPF as well as local planning policy.



ii) Severe impact on character and appearance of the property and Conservation Area

Under section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council is obliged to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest. The NPPF advises that 'significance derives not only from the asset's physical presence but also from its setting'.

Local and national planning policies seek to protect and enhance the character and appearance of Listed Buildings and Conservation Areas and development that is contrary to those aims will be resisted.

It is contended that this insensitive proposal and the significant interventions that are proposed will inflict significant harm on the character and appearance of the property, as well as that of the Camden Town Conservation Area.

Following a review of the plans, it is clear that the proposed development would significantly increase the mass and the amount of built form at this prominent site at the junction of Camden High Street and Pratt Street. The substantial works proposed are not characteristic of this area. It would comprise a dominant and imposing form of development within this part of the Conservation Area.

The development will be of a very poor quality and one that fails to respect the character, local vernacular and nature of the surrounding form of development. The proposal will appear as completely at odds with the simple form of the immediately adjacent properties. It will be extremely prominent from all neighbouring properties to the detriment of their visual amenity. The resulting development will therefore appear as incongruous, and would have a detrimental impact on the character and appearance of the property and street scene. Ultimately, it will result in the overdevelopment of the site and inflict harm on this part of the Conservation Area.

Overall, due to the proposed mass of the development, along with the nature of the



intensification of the use it will be unacceptably harmful to the character and appearance of the property, as well as the setting of the Conservation Area. There are no public benefits that outweigh this harm. The proposal is therefore contrary to local and national planning policy.

iii) Poor level of amenity for future occupants

The occupants of the flats also do not have suitable access to a reasonable level of private outdoor amenity space that further weighs against the proposal. Overall, it is clear that the proposal is one that will fail to provide a high standard of residential accommodation for any current or future occupants, contrary to the requirements of local and national planning policy.

iv) Effect on Highway Safety

The NPPF at paragraph 115 identifies that planning permission refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The provision of a substantial development has the potential to result in a significant increase in traffic to and from the site. The intensification of the use of the site and the absence of a sufficient level of off-street parking will place unnecessary pressure on this part of the highway network.

Given that the entrance to the flats is situated on Pratt Street, adjacent to the bustling intersection with Camden High Street, it is evident that this area already experiences a high volume of both vehicular and pedestrian traffic. The intensification in the residential use of this building addition of residents from the proposed development is likely to exacerbate this situation, potentially resulting in increased congestion.



Moreover, if delivery vehicles are expected to utilise Pratt Mews as a turning point, this presents an additional concern. The influx of such vehicles would not only contribute to a disproportionate and excessive amount of traffic but also pose a significant obstruction to various front doors in the vicinity. Properties such as Nos.4 and 6 Pratt St, as well as 16 and 17 Pratt Mews, would be particularly affected, with residents facing difficulties in accessing their homes due to the congestion caused by delivery vehicles maneuvering in the area.

This anticipated surge in traffic and obstruction of access points highlights the pressing need for thorough consideration and mitigation measures to address these concerns. Failure to do so could result in a considerable disruption to the daily lives of residents and exacerbate existing challenges.

The increase in traffic that will be generated is likely to result in an increase in manoeuvres on the surrounding roads, and with the poor servicing and delivery arrangements will lead to a detriment of the safety and free flow of traffic.

Finally, the introduction of additional cycle storage and guest cycle parking poses a significant concern, as it threatens to impede our client's access to the front doors of neighbouring properties and undermine our established rights of way over their garage. These essential pathways, crucial for our daily routines and property maintenance, risk being obstructed by the influx of bicycles and related infrastructure.

Furthermore, the management of waste within the garage presents a parallel set of challenges. The disposal process is likely to exacerbate the aforementioned issues, potentially leading to congestion and hindrance in our access routes. Such disruptions could not only inconvenience residents but also compromise the functionality and safety of the entire area.

Therefore, it is imperative that careful consideration be given to the placement and management of these facilities to ensure they do not unduly encroach upon our client's rights and disrupt the harmonious functioning of their community.



Overall, it is considered that the submission is deficient and lack critical information to enable a sound planning decision to be made. The proposal will lead to an increase in traffic and lack of parking, thereby increasing the conflict between all road users, contrary to local and national planning policy.

5.0 SUMMARY

There are compelling reasons why this planning application should be refused as the proposal comprises inappropriate development.

In particular the following harm will result:

- **Loss of office space** – Insufficient justification has been provided on the attempts to retain the office space. Critically, the marketing period covered a period during covid and it appears with the refurbishment of the space this would make it more attractive to potential end users. Further to this a rent free period to allow prospective tenants the opportunity to refurbish the space would make it more attractive.
- **Adverse impact on neighbour amenity** – The proposal will have a harmful impact on the amenity of neighbouring properties through a loss of daylight and outlook, as well an unacceptable loss of privacy. The increase in the intensity of the use will result in an increase in in noise and disturbance.
- **Adverse impact on setting of Conservation Area** – The substantial nature of the development proposed that result in a remodeled dwelling is visually harmful to the character and appearance of the property and this part of the Conservation Area. There are no public benefits that outweigh this harm.
- **Poor level of amenity for future occupants** - The lack of a sufficient level of private amenity space for current and future occupants is a failure within the scheme.
- **Unacceptable impact on highway safety** – The proposal will result in severe harm to highway and pedestrian safety as a result of the increase in traffic on a sensitive part of the highway network.



Overall, this proposal is contrary to both local and national planning policies and does not comprise sustainable development. Therefore, it is respectfully requested that the planning application is refused.

Yours faithfully

Lloyd Jones MRTPI

Director



APPENDIX A

The Development Plan

The development plan pertinent to this development proposal comprises the London Camden Local Plan and the London Plan.

Camden Local Plan

- Policy H1: Maximising housing supply
- Policy H4: Maximising the supply of affordable housing
- Policy H6: Housing choice and mix
- Policy H7: Large and small homes
- Policy E2: Employment premises and sites
- Policy A1: Managing the impact of development
- Policy A4: Noise and vibration
- Policy D1: Design
- Policy D2: Heritage
- Policy CC1: Climate change mitigation
- Policy CC2: Adapting to climate change
- Policy CC3: Water and flooding
- Policy CC4: Air quality
- Policy CC5: Waste
- Policy T2: Parking and car-free development

London Plan

- Policy GG2 Making the best use of land
- Policy GG4 Delivering the homes Londoners need
- Policy D4 Delivering good design



- Policy D5 Inclusive Design
- Policy D6 Housing quality and standards
- Policy D12 Fire Safety
- Policy H1 Increasing Housing Supply
- Policy H2 Small Sites
- Policy T5 Cycling
- Policy T6 Car Parking