

**26-28 ROCHESTER PLACE: NW1 8JR**

**FIRST FLOOR**



**APPLICANT: BREEZE UK LIMITED**

### **THE PROPOSAL**

THE CONVERSION OF THE FIRST FLOOR FROM CLASS E OFFICES TO 9 FLATS 1 X1, 1 X 3, 7 X 2, BEDROOM FLATS WITH ASSOCIATED CYCLE AND REFUSE AND RECYCLING FACILITIES. MINOR ALTERATIONS TO ELEVATIONS

## 1. BACKGROUND

A pre-application process was undertaken with the council which included a Teams meeting and exchange of written information. On the 25<sup>th</sup> August 2024 the council provided feedback on the proposals as follows:

*“The principle of the conversion of the first floor office space, is supported, subject to compliance with marketing criteria and policies outlined in the Camden Local Plan and CPG Employment Sites and Business Premises (2021).*

*Consideration should be given to refining the internal and external design in line with the advice detailed under the Design and layout section above.*

*Key consideration will need to be given to the incorporating sustainability improvements and achieving sustainability targets.*

*Subject to satisfying the requirements outlined above the proposed works would likely be considered acceptable in terms of amenity effects”*

The application scheme has taken into account the feedback from the Council. It is important to note also that the NPPF 2024 together with the HDT 2023 were published on 12<sup>TH</sup> December 2024.

## 2. PLANNING HISTORY

2007/0524/P - Demolition of existing warehouse building (Class B8) and construction of a four storey building including car parking at basement level, commercial units (Class B1) at ground and first floors and 13 residential (Class C3) units at second and third floors. Granted Subject to a Section 106 Legal Agreement 15/02/2007

2023/0270/P - Two-storey upwards extension to an existing mixed use (residential and office) building to form 10 additional flats. Prior Approval Granted 11/10/2023

## 3. THE ASSESSMENT OF PRINCIPAL ISSUES

3.1 The principal issues were identified by the council in the pre-app as follows:

The planning considerations material to the determination of this application are as follows:

- Land use including loss of employment space and housing
- Housing
- Design/heritage/Lay out
- Amenity
- Transport
- Sustainability

3.2 This document provides background and assessment to the principal planning issues. At this stage to assist the assessment it is important to note a recent council decision at Ground floor unit 16 Rochester Mews London NW1 9JB planning reference 2023/5456/P and a current application with a reference of 2024/4541/P. These applications also provide guidance on the loss of employment issue and other matters relating to the quality of accommodation. It is also noted that the Christo and Co report expects an extra 100,000 sqft of accommodation to come onto the market locally in 2025

### **Land use including loss of employment space and housing**

3.3 Planning application 2023/5456/P and the current application 2024/4541/P at 16 Rochester Mews provides background to the office and employment market locally. It is noted an up to date marketing report is provided by Dutch and Dutch. In view of the close proximity of the sites it is clear the planning history of this site is a material factor.

3.4 The current local plan and emerging plan through Policies E1 and E2 aim to protect business premises from non business use unless it has been thoroughly explored as to whether there is a possibility the use can continue. Currently there is a requirement for a period of 24 months to be undertaken. The emerging local plan and the new policy requires a period of 12 months.

3.5 The Council has published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation (DCLP). Jan 2024. The DCLP is a material consideration and can be taken into account in the determination of planning applications which has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

3.6 The building is a mixed use building containing offices on the ground and first floor with 13 flats above on the upper floors. The proposals here involve the retention of the ground floor as offices and the conversion of the upper floors into residential use.

The offices are sub-divided into 6 suites, 3 suites on each floor. The ground floor offices are to be retained. All the suites on both floors have been subject to marketing and of relevance in assessing the future occupation of the office suites.

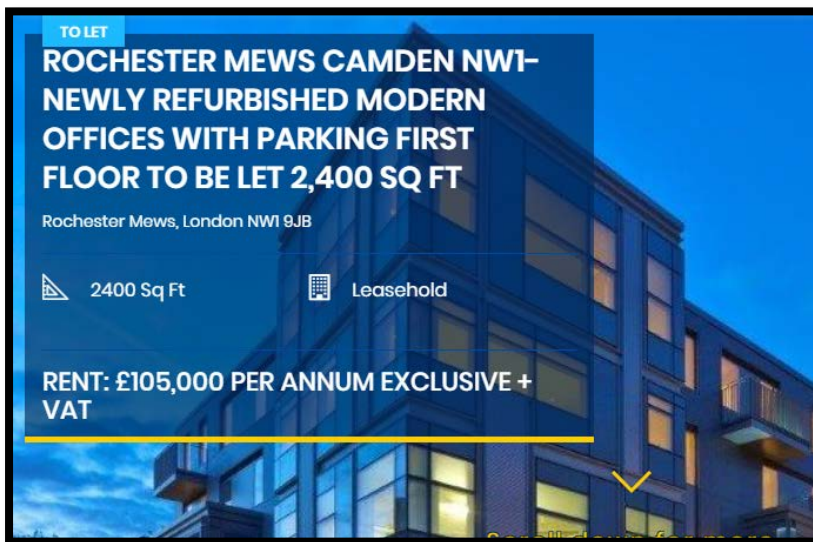
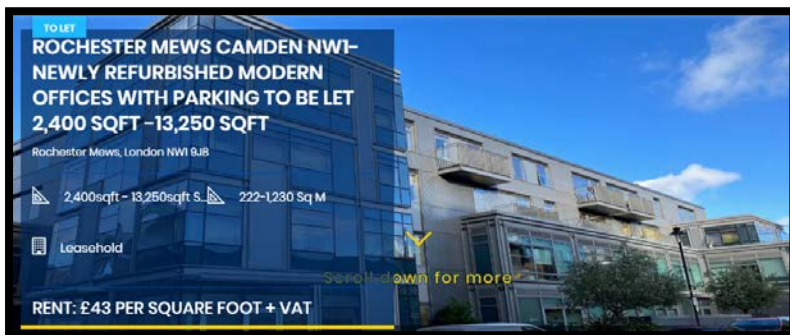
3.7 In reviewing the marketing, visiting the site and analysing the feedback from prospective tenants and experts it is clear that the freeholder will not be able to rent both the ground and first floor as offices or Class E. The freeholder wishes to maintain the ground floor offices and retain a mixed use site partly because they have retained their own offices at the property, which shows their confidence in letting the remainder of the property at ground floor. It is considered this approach would allow the ground floor to be let commercially and the first floor provide additional housing in Camden.

### **3.8 THE MARKETING:**

**METSPACE – Sept 2023 on going (Units 5 and 6) Appendix 1a**

**CHRISTO & CO –Feb 2023-on going ( all units) Unit 2 dates back 2022 see Appendix 6 and Marketing Report Appendix 1.**

**Robert Irvine and Burns –Feb 2023**



LDG- ( MARCH 2024 – On going- see marketing report Appendix 10 )



LDG have also been marketing the office suites from March 2024, LDG have produced a marketing report from November 2024 advising of the challenges and the lack of interest in the properties.

### **3.9 (AREA TO BE RETAINED AS OFFICES)**

#### **GROUND FLOOR**

##### **SUITE 1**

This unit was occupied by the Freeholder- who formerly occupied the whole ground floor their business was in the fashion industry. Due to changing circumstances the fashion business was dissolved in 2019 similar to many others in Camden.

This resulted in the creation of smaller units. The freeholder retained a smaller office within the building. (Suite 3) Suite 1 was relet in December 2019 to GreenHippo a Communications Technology Company who remained on site until August 2023

Notice to vacate was given in May 2023 and this unit has been vacant since August 2023.

This Unit has been relet as of July 2024. Unfortunately, the leasee never occupied the premises themselves. However agreed a sublet without consent breaching the terms of the lease. The applicant is working with all parties to allow then to remain in occupation if a new lease, unfortunately we have been advised the company maybe going into liquidation and therefore this unit will need to be refurbished and is included in the marketing details.

##### **SUITE 2**

Notice to vacate was given June 2024 and this unit was vacated in August 2024 This unit is occupied by Oxford Films.

Oxford Films tried to sell on their lease by putting the property on the market in June 2022 with Christo and Co. At the same time they were permitted to sublet the premises similar to other tenants.

This unit is being substantially refurbished following the advice of the agents to be able to compete in the market on a level footing. To include flooring, lighting, ancillary areas such as the kitchen and reconfiguration of existing space.

##### **SUITE 3**

This unit is occupied by the Freeholder- who previously occupied the whole ground floor within the fashion industry. Due to changing circumstances the fashion business was dissolved in 2019. This resulted in the creation of smaller units. The freeholder retains a smaller office within the building.

### **3.10 FIRST FLOOR (AREA TO BE CONVERTED TO RESIDENTIAL)**

#### **SUITE 4 Vacant**

Notice to vacate was given in May 2024 and this became vacant in Nov 2024. This suite is occupied by Architects who have found since covid that more employees are working more days from home and therefore can no longer justify the space. The freeholder has offered smaller office space on the ground floor. Appendix 7 shows the contract which allowed the sub-letting of the premise by the architects F3. It is noted that this contract dates back to May 2022. Thus in effect Suite 4 has been subject to marketing by the tenant since May 2022 with the ability to sublet the premises. Therefore discussions were taking place on their

lease at that time and the landlord was aware that F3 would be vacating and therefore formed part of the marketing.

The architects notice letter stated (Appendix 2) "As discussed please accept this email as notice of option to break the lease (leaving date to be confirmed subject to lease dates).

It is with huge regret but with all the space we have (and number of desks and meeting rooms) c.4500ft we cannot justify the cost. It is impossible to motivate people back to working from the office, you will have seen most days we have 5/10 people!

We have tried to support the office use with other companies taking space (as agreed with you) but that company has since left (bar 3 people) and we have struggled to replace them. The last 3 leave in about 8 weeks.

Clearly this has been an issue with the opposite office as no one seems to be there too. Let's get together soon to discuss our exit.  
I want to thank you for all your support since 2015/16".

## SUITE 5

Notice to vacate was given in May 2023 and the property was vacated in August 2023. The last tenant was Aimey Rail, who were working on a local temporary rail contract. Christo and Co Marketing Report dated of December 2024 indicates marketing on this unit began in Feb 2023, as the freeholder was aware of the premises becoming vacant.

This property remains vacant.

## SUITE 6

Notice to vacate was given in November 2022 and vacated in March 2023. It was vacant for over 1 year. This suite was let on a 12 month license and is due to vacate in January 2025.

This unit was occupied by Stitch Architects who vacated in March 2023.

The reasons given were similar to Unit 4- see Appendix 2 – citing the reduction in staff numbers working from the office

### 3.11 Met Space commented on the 21<sup>st</sup> June 2024 ( see Appendix 2 )

After marketing the building for circa 9 months, the main resistance to clients viewing are taking space as due to location. Many of the companies who enquired did not view the office due to the proximity to the underground station. Some of the feedback from viewings was that although the building was a good quality, and the office was suitable, they felt the location was too residential and didn't offer the local amenities that other Camden offices (closer to the station, high street and markets) offered.

These comments are based on the feedback from the viewings to the property. (Appendix 2)



On the 29<sup>th</sup> May 2024 for the pre-application and which was updated for the planning application in December 2024, Christo and Co-produced a marketing report the highlights of this report can be summarised as follows:

- Christo and Co have been agents for the site for the past 14 years
- Most recent Instructions began in Jan/Feb 2023
- Confirmation of recent refurbishment
- Extensive Marketing
- Lists most recent viewings.
- Significant amount of floorspace on the market and coming onto the pipeline.

3.12 The applicants have continually invested in their offices and products to compete in the market place – Appendix 8 shows the recent investment in the office suites.

### **Detailed Camden Employment Policy**

3.13 Camden Local Plan (CLP) Policy E2 states that the Council will resist the development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction that: 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. Policy E1 states that the Council will support businesses of all sizes, maintain a stock of premises that are suitable for a variety of business activities, and safeguard existing employment sites and premises in the borough.

3.14 CPG Employment Sites and Business Premises states that the Council will require evidence of a marketing exercise to support any application involving the loss of employment uses. The minimum expectation for marketing exercises includes the use of a reputable agent, a visible letting board, marketing material published on the internet on popular online property websites, the lawful existing use featuring on any material, continuous marketing over a 2- year period, reasonable advertised rents for the local market and reasonable lease terms. In addition, a commentary on the number and details of enquiries received, including viewings and details of why the interest was not pursued, should be provided.

3.15 Draft Local Plan Policy IE2: Offices the most relevant aspects of the policy are listed below:

A. The Council will manage and protect the stock of offices in the borough to ensure that suitable and viable accommodation is retained, and that businesses, residents and social enterprises are able to access workspaces that meet their requirements. This includes ensuring a sufficient supply of space for research and development uses. Provision of additional floorspace

B. Managing the supply of offices

C. The loss of offices in the borough will only be considered acceptable where: i. A comprehensive marketing campaign has been undertaken of at least 12 months which uses a variety of agents and is based on a realistic rent. The marketing evidence should demonstrate that suitable economic uses have been fully explored and evidenced to the Council's satisfaction, with consideration given to the following:

- a. Refurbishment and modernisation of the premises to enhance its attractiveness to potential occupiers ;( **see Appendix 8 showing investment in the office product**)
- b. Discounted rents, incentives (e.g. rent-free periods) and flexible leasing arrangements;

**The offices have been specifically designed/refurbished to allow for smaller units and combination of units with the ability to combine units on each floor and also the ground and first floor together. Rents have been reduced in the process.**

- c. The feasibility of reconfiguring the premises to meet the demands of smaller businesses, including studios, start-ups and micro businesses. ii. Where the condition of the premises is cited as a reason for insufficient interest in the property, the Council may request viability evidence to demonstrate it is not possible for refurbishment works to be undertaken. ( **see report Appendix 1 Christo and Co advising on different marketing techniques used**)

### 3.16 SUMMARY ON EMPLOYMENT/OFFICE ISSUE:

3.17 The scheme would result in the retention of the ground floor (7352 sqft) as Class E currently office use but the loss of the first floor office use (8287 sqft). The units have been subject to a substantial period and variety of marketing by a number of local and varying respected agents.

3.18 Evidence is that securing tenants for the office space in this location is increasingly difficult to find following very close to years of marketing. Marketing for Suite 2 dates back to June 2022 initiated by the tenants and continued by the freeholder. In addition Suite 4 has been subletting since May 2022, a form of marketing. The feedback has in particular identified the location of the site as an issue – distance to tube station and residential locality and distance to services as constraints.

The planning history at 16 Rochester Mews substantiates the marketing carried out. This location appears less favourable to many business users.

The building has been marketed by more than one agent and has available office space of different sizes. There has also been a sizeable upgrade to the accommodation.

The scheme building will continue to provide employment on the ground floor.

## 4.0 PROVISION OF HOUSING

4.1 The Housing Delivery Test (HDT) is an annual measurement of housing completions introduced by the government. It measures whether development plan requirements (or, in some cases, local housing need calculated by the government's standard method) have been met over the last 3 years. The government's recently published figure in 2022, when the government's measurement for Camden was 69% - which means that Camden's development plan policies are treated as being out-of-date in relation to housing proposals, the presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and there is a need to place great weight on the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole. The NPPF has been updated on 12 Dec 2024 and its emphasis on housing provision only serves to add weight to the planning case in favour of the proposals. **It is noted that the 2023 HDT were also published on the 12 December 2023,**



this shows the HDT figure for Camden had reduced to 53% and therefore the housing delivery position has worsened.

**The 20 authorities that will see the largest increases in their local housing need requirement**

Rank	Local Authority Name	LHN under the previous standard method	LHN under the new standard method	Extra homes per year
1	Kensington and Chelsea	847	5,107	4,260
2	North Yorkshire	1,361	4,077	2,716
3	Westminster	1,862	4,341	2,480
4	Richmond upon Thames	777	2,513	1,737
5	Cornwall	2,707	4,421	1,713
6	Wiltshire	1,917	3,525	1,608
7	Bromley	1,463	3,001	1,539
8	Cheshire East	977	2,461	1,484
9	Buckinghamshire	2,912	4,319	1,407
10	Cheshire West and Chester	532	1,914	1,382
11	Hammersmith and Fulham	1,580	2,783	1,203
12	Camden	1,962	3,137	1,175
13	East Riding of Yorkshire	817	1,924	1,108
14	Westmorland and Furness	227	1,331	1,105
15	Somerset	2,669	3,769	1,100
16	Northumberland	549	1,649	1,099
17	Wandsworth	3,315	4,383	1,069
18	Islington	1,465	2,460	995
19	Shropshire	1,070	1,994	924
20	Elmbridge	653	1,562	909

While the 500 per cent hike to Kensington and Chelsea's LHN figure is the third largest of any local planning

Figure 1 Planning [bulletins@em.planningresource.co.uk](mailto:bulletins@em.planningresource.co.uk) 16.12.2024

**4.2 The NPPF of the 12<sup>th</sup> December 2024** clearly supports the proposals. Section 2 emphasises the importance and approving sustainable development, in this case the development would be in a sustainable location, it would make effective use of the land, and achieve a well-designed place to live in.

Section 3 deals with decision making and the importance of engaging in pre-application discussions. Section 5 emphasises the importance of maintaining supply of homes and Section 6 provides support for a strong economy. In this case the scheme provides for much need housing and maintains office use on the ground floor.

Section 7 promotes Town Centres in this case the conversion of this secondary location to housing will allow office use to be directed to town centres which bring it with it a host of economic and sustainable benefits for Town centres. Section 9 promotes Sustainable Transport which scheme complies with.

**Section 11 paragraph 125 of the NPPF is of particular relevance:**

**Para 125 (d) promote and support the development of underutilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively**

**And**

**Para 128 (a) use retail and employment land for homes in areas of high housing demand provided this would not undermine key economic sectors or sites or the vitality and viability of town centres**

4.3 If the application site is taken on its own the following policy would also apply. London Plan Policy H2 'Small sites' states that boroughs should pro-actively support well-designed new homes on small sites and for London to deliver more of the housing it needs, small sites below 0.25 hectares in size must make a substantially greater contribution to new supply across the city. The policy makes clear that Boroughs should proactively support increasing the contribution of such sites to meeting London's housing need, which this a strategic priority requiring positive and proactive planning decisions.

4.4 The scheme would provide the following units:

UNIT	TYPE	FLOOR AREA M2	
1	1 BED ROOM	55	
2	2 BEDROOM	87	
3	2 BEDROOM	108	
4	2 BEDROOM	102	
5	3 BEDROOM	121	
6	2 BEDROOM	80	
7	2 BEDROOM	81	
8	2 BEDROOM	96	
9	2 BEDROOM	77	

4.5 London Plan Policy H1 and Table 4.1, set a 10-year housing target for Camden of 10,380 additional homes from 2019/20 to 2028/29.

The proposed 9 new dwellings within a sustainable location on brownfield land would contribute towards the strategic objectives of the CLP and contribute to the borough's housing, which must be given significant weight.

4.6 CLP Policy H7 aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainability communities and reduce mismatches between housing needs and existing supply. The proposal would provide 7 x 2-bedroom units which are regarded as high priority on the dwelling size priorities table and would be consistent with Policy H7

## **AFFORDABLE HOUSING**

4.7 CLP Policy H4 seeks to maximise the provision of affordable housing. Any development with an uplift of 100sqm GIA or more will be expected to provide an affordable housing contribution. A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home at a rate of £5,000 per sqm of new floorspace, This payment would be secured through a S.106 legal agreement if planning permission were granted. The absence of an agreed S106 Legal agreement securing this contribution warrants a reason for refusal.

4.8 The applicants have commissioned a report by KemptonCarr on the viability of the development to contribute to affordable provision via a section 106 agreement. The full report is attached Appendix 12 to this application. The scheme is a build to rent to scheme. All existing units are on a rental basis. The report indicates and concludes that the scheme would not make a profit and therefore would not be able to make a contribution at the time of this application submission.

## DESIGN AND LAY-OUT

4.9 In line with LP policy D6 and CLP policies H6 and D1, housing should be of high quality, adequately sized homes and rooms should be provided, and dual-aspect dwellings should be maximised. CLP policy A2 encourages opportunities to provide private amenity space which is reflected in a requirement to provide amenity space in LP policy D6. CLP policy A1 seeks to protect the amenity of occupiers in relation to several factors, including privacy, outlook, light, and noise. CLP policy A4 says suitable noise and vibration measures should be incorporated in new noise-sensitive development.

4.10 The Council's design policies are aimed at achieving the highest standard of design in all developments. The following considerations contained within policy D1 are relevant to the application: development should respect local context and character; comprise details and materials that are of high quality and complement the local character; and respond to natural features.

In the pre-application note it is stated that comments from Council's Design Officer have been circulated in a separate document. Generally, the design of the units is considered acceptable, however it is suggested some improvements could be made.

**4.11 Comments from Design Officer:** *The proposed internal floor areas of the units, exceed the Nationally Described Space Standards minimum floor areas of 70m<sup>2</sup> and 95m<sup>2</sup> for two and three bedroom units respectively.*

*Given the units have generous floor areas which are generally well in excess of the Nationally Described Space Standards minimum floor areas, are provided with quality outlook, and noting the constraints of providing balconies to the existing building, the non provision of outdoor living spaces / balconies would likely be acceptable.*

*Overall, the floor plates are generously sized with few constraints, to allow for a mix of unit sizes and typologies, which provided spacious, high-quality units. The proposed floor plans should be reviewed to consider the advice outlined in the attached guidance from Council's Design Officer.*

*Since these comments were made the following amendments have been made:*

- The mix has been altered to 1 x1 bedroom and 2 x 2 bedrooms. As mentioned in the pre-application notes the sizes of the flats clearly exceed the minimum standards and would allow for some flexibility in the lay-outs to provide informal study areas and even in some rooms 2 bed spaces.
- Proposed scheme has seven out of nine dual aspect dwellings. Pre-application comment regarding flat 27 not being dual aspect is incorrect (now flat 5) There is a window on the east elevation and glazing on the west elevation for this unit.
- Flat 25 (now flat 9) has been re-designed as a two bed, with less circulation and open plan living
- Flat 28 (now flat 6) has been re-configured so all the bedrooms are accessed of a more generous entrance lobby.
- Two windows on the north east elevation have increased in size to meet daylight requirements. These windows are obscured to a height of 1.6m to mitigate overlooking the rear gardens along Rochester Road.
- Window moved over and increased in size along elevation C, flat 9 bedroom, and two new windows added too flat 2 looking onto the development.
- Elsewhere the principle openings have been retained, simply re-organising the windows to suite the residential layouts as illustrated on the elevation

A daylight and sunlight report has also been attached which shows with some minor revisions to two windows in the in the north-east elevation that the scheme has good compliance.

## HERITAGE AND DESIGN

4.12 Local Plan Policy D1 (Design) is aimed at achieving the highest standard of design in all developments, requiring development to be of the highest architectural and urban design quality, which improves the function, appearance and character of the area.

Subject to suitable matching materials it is not considered the fenestration alterations have any material impact on the design of the building or the adjoining conservation area.

## AMENITY

4.13 The pre-application feedback stated:

*Local Plan Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for redevelopment that would not harm the amenity of neighbouring residents. This includes privacy, outlook, daylight, sunlight and noise. CPG Amenity provides specific guidance with regards to privacy and outlook. The proposed part change of use is not considered to give rise to any amenity impacts to neighbouring residential occupiers. Notwithstanding, where improvements could be made to limit overlooking into the properties to the rear on Wilmot Place, these should be incorporated into the scheme.*

*A Daylight/Sunlight report should be provided, to confirm all of the habitable rooms of the proposed units would receive adequate light.*

## RESPONSE

A daylight and sunlight report has been provided to show good internal compliance.

It is noted two windows would be increased in size in the north east elevation. In order to protect adjoining residential amenity obscure glazing is shown up to a height of 1.6m and fixed shut up to that height. It is considered this would safeguard adjoining residential amenity while providing a suitable living environment to the residential accommodation.

The proposals do not provide external amenity space however a terrace area is shown to Flat 5 at the rear of the development. The terrace is 12 sqm and would face towards the rear gardens of Wilmot Place.

The scheme would use existing plant and therefore there would be no new noise concerns.

## SUSTAINABILITY

4.14 Policy CC1 requires all development to reduce carbon dioxide emissions, supports and encourages sensitive energy efficiency improvements to existing buildings and expects all developments to optimise resource efficiency.

Policy CC2 requires all development to adopt appropriate climate change adaptation measures.

Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible, through the incorporation of water efficiency measures.

An Energy and Sustainability Statement has been provided by Two Eighty Consulting which provides an executive summary which is repeated below to show compliance with local and national policy.

Executive Summary This Energy and Sustainability Statement reports how the proposed scheme at 26-28 Rochester Place, London, NW1 9JB has responded to local policy requirements regarding sustainability, energy and climate change.

This assessment is prepared to support the planning application for the conversion of the existing office use at the first floor to 9 no. residential (C3) apartments.

This assessment has been prepared in line with the Greater London Authority's (GLA) Energy Planning Guidance (June 2022). The scheme complies with all relevant policies for minor development with regards to Energy and Sustainability set by the GLA's London Plan (2021) for and Camden's Local Plan (2017).

The energy strategy follows the energy hierarchy; Be Lean, Be Clean, Be Green to maximise the carbon reduction. The proposed energy strategy is set out in this report and the scheme **achieves an on-site CO2 reduction of 61% beyond Part L (2021).**

The site has also been modelled in SBEM software to assess its current annual operational regulated emissions as the existing office space. By comparison to the existing use-class, **the proposed residential scheme demonstrates a 73% CO2 reduction** by comparison to the existing commercial units on the first floor.

With regards to sustainability, the scheme aspires to reduce its environmental impact by incorporating sustainable measures across the design. Additional sustainability measures that will be integrated are contained in the body of this report. \*

## TRANSPORT

### 4.15 Cycle parking:

In line with Policy T1 of the Camden Local Plan, Council expects cycle parking at developments to be provided in accordance with the standards set out in the London Plan. For 1 bedroom 1 person units, the requirement is for 1 space per unit, whilst for 1 bedroom 2 person units it is 1.5 spaces per unit and for units with 2 or more bedroom units the requirement is for 2 spaces per unit. The proposed 9 x units would require 18 x cycle spaces to provide at the site.

The proposed basement plan shows a cycle store providing 48 spaces in two tier racks at the bottom of the car park ramp for the existing and proposed uses, and 12 spaces in 6 x Sheffield stands. The 48 x cycle parking is made up of 13 spaces for the existing 13 residential units, 5 spaces for the ground floor offices, 24 spaces for the 10 x proposed fourth and fifth floor apartments (provided for under prior approval consent 2023/0270/P, dated 11/10/2023), and 18 spaces for the 9 flats proposed.

The proposed cycle facilities are therefore considered sufficient.

### 4.16 Car-free:

**PRE-APP ADVICE:**

In accordance with Policy T2 of the Camden Local Plan, which seeks car free development across the Borough, the new residential units would be secured as on-street Residents parking permit (car) free by means of a Section 106 Agreement. This will prevent the future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport. The submitted ground floor plan shows an area of car parking at the rear of the property which should not be used for the purposes of residential car parking. It will be necessary to prevent the use of these spaces by occupants of the residential units. Pedestrian, Cycling and Environmental contribution:

Given the uplift in the number of residential units and pedestrian and cycling activity at the site, a Pedestrian, Cycling and Environmental contribution of £16,000 towards the provisions of improved pedestrian and cycling facilities in the vicinity of the site, would be secured as part of the Section 106 Agreement.

**RESPONSE:**

**This is agreed and the contribution will form part of the section 106 agreement.**

**4.17 Refuse and Recycling****PRE APP ADVICE:**

You are advised to design in adequate facilities for recycling and the storage and disposal of waste. Further information can be found in CPG Sustainability. Camden Local Plan Policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables are provided in all developments. Any proposal should demonstrate that the development would include facilities for the storage and collection of waste and recycling – this may be evidenced through the provision of a Waste Management Plan.

**Response:** The plans indicate an expansion of the existing 5 green and 1 black euro bins (1100 litres) to 1 extra green bin and 1 black bin.

The current pick up is once a week and with these additions the continued operation of once a week would suffice to meet the council standards. This approach is explained in detail IN section 4.6 of the design and access statement.

**4.18 Biodiversity Net Gain (BNG)****PRE APP ADVICE:**

The development may be exempt from BNG if the proposal does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat. Please see the following link for further information including the documents that would be required to be submitted in the event that BNG is required to be delivered and secured as part of the proposal: <https://www.gov.uk/guidance/understanding-biodiversity-net-gain>.



**Response:** In **this** case, the development is a change of use of internal space and therefore there is impact of on site habitat and therefore would be exempt from BNG.

## 5.0 CONCLUSION

5.1 The pre-app advice concluded “The principle of the conversion of the first floor office space, is supported, subject to compliance with marketing criteria and policies outlined in the Camden Local Plan and CPG Employment Sites and Business Premises (2021)”. :

5.2 The marketing of the site and the suites subject to the proposed change of use has been exhaustive and over a 2 year period.

5.3 The marketing was undertaken by different agents 4 in total. The freeholder made substantial upgrades to the accommodation. The lay-out of the accommodation has been flexible together with the pricing arrangements.

The proposals would introduce properties with a high demand. The site would continue to provide employment.

5.4 It is noted that at this time the scheme would not offer an affordable housing payment but would bring to the market much needed high priority accommodation. The scheme impacts would be minimal.

## APPENDICES:

1. Marketing Report by Christo and Co Dec 2024
- 1a. Marketing Updates from Metsspace June and Dec 2024.
2. Feedback From Tenants
3. Feedback From Viewings

4. Marketing Timeline
5. Local Agents Feedback (Lester)
6. Marketing Unit 2 (Christo and Co)
7. Sub-letting Suite 4
8. Refurbishment Schedule
9. Local Agents Assessment ( E.Charles)
10. LDG Marketing Update
11. Affordable Housing Reports