

Planning and Development Camden Council Camden Town Hall London WC1H 8ND

**FAO: Neil McDonald** 

15 November 2024

Our ref: ANE/SAV/BNE/U0005835

PP Ref: PP-13505948

Dear Sir / Madam,

St Pancras Commercial Centre, 63 Pratt Street, Camden, London, NW1 0BY Town and Country Planning Act 1990 (as amended)
Application for Planning Permission - Change of Use

We write on behalf of our client, Camden Property Holdings Limited (i.e. the Applicant), to submit an application for planning permission to change the use of the basement and ground floor levels of the light industrial floorspace located beneath the affordable housing block at St Pancras Commercial Centre (i.e. the Site) to Sui Generis for use by operator Museum of Youth Culture.

# **Site and Surroundings**

The application site is located at 63 Pratt Street in the London Borough of Camden ('LBC'), to the southeast of Camden Town and immediately to the west of the Regent's Canal within the ward of St Pancras and Somers Town. The site is an island site that is bound by Pratt Street (to the south), St Pancras Way (to the east), Georgiana Street (to the north) and Royal College Street (to the west) and covers an area of approximately 0.49 hectares.

The surrounding area is characterised by a mix of uses and architectural typologies comprising industrial, residential, and commercial uses across a combination of low-rise Victorian terraces, medium-rise post-war buildings and more modern 20<sup>th</sup> and 21<sup>st</sup> Century high-rise buildings.

As set out within the Camden Local Development Framework ('LDF'), the site does not fall directly within any designations. The site is located just outside the Central Activities Zone ('CAZ') and Central London Area, and is not within any current or forthcoming Opportunity Areas. The site is not located within a Conservation Area, but the Regent's Canal Conservation Area is nearby to the site's north and east. Historic England's online map search function also confirms that there are no nearby listed properties in the vicinity of the site.

# **Relevant Planning History**

LBC's online planning records have been reviewed and there is a moderate amount of planning history available. For the avoidance of doubt, only relevant applications have been included below:

On 24<sup>th</sup> December 2020, full planning permission (ref. 2019/4201/P) was granted for the following:

"Demolition of existing buildings (Class B1c/B8); erection of 3x buildings ranging in height from 5 to 7 storeys above ground and a single basement level comprising a mixed use development of light industrial floorspace (Class B1c/B8), office floorspace (Class B1), 33x self-contained dwellings (Class C3), flexible retail floorspace (Class A1/A3); associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works."

There was a S.106 Legal Agreement associated with above development which was also signed on 24 December 2020.

Subsequently, planning permission for minor-material amendments (ref. 2021/4720/P) was granted on 13 April 2022 for:

"Variation of conditions 2 (approved plans), 9 (externally mounted fittings) and 15 (cycle storage) of planning permission 2019/4201/P, dated 24/12/2020 (as amended by approval 2021/3447/P, dated 18/08/2021) (for: Demolition of existing buildings and erection of new buildings to reproved light industrial floorspace, provision of office space, self-contained dwellings, flexible retail space, associated access and servicing, public realm, landscaping, vehicular and cycle parking, bin storage and other ancillary and associated works), namely to allow changes at 6th and 7th floor levels of the office building to accommodate plant and additional amenity space; to allow installation of lighting to the residential balconies and entrances and to the retail unit; and to update the conditioned cycle parking requirements."

A Deed of Variation to the S.106 Legal Agreement to link the above development and amend the wording of some of the Obligations/Clauses was signed on 13 April 2022.

Planning permission for several non-material amendments have also been approved at the site in August 2021 (ref. 2021/3447/P) and December 2023 (ref. 2023/5070/P) respectively for a series of internal layout changes and minor external amendments.

A standalone Deed of Variation was the also progressed to again amend the wording of some of the Obligations/Clauses which was signed on 25 October 2023.

The Applicant has implemented the planning permissions (refs. 2019/4201/P & 2021/4720/P) and Practical Completion has been achieved following the discharge of all Planning Conditions. The final outstanding S.106 Obligations are in the process of being discharged and are nearing completion with occupation of the affordable housing block targeted for November 2024.

#### **Background and Proposals**

Following initial rounds of extensive dialogue with LBCs Inclusive Economy Team, the principal provider to take the affordable workspace was earmarked to be the UCL entrepreneurship hub at King's Cross, known as 'The Hatchery', whose operation falls under the permitted light industrial use. However, despite being in advanced discussions with The Hatchery, they ultimately decided to go with an alternative location to relocate their premises to. Another lengthy process to attract other conventional affordable workspace operators that would have fallen under light industrial use was subsequently led by Storey Consulting (Construction Employment & Skills Specialists) in consultation with LBCs Inclusive Economy Team, but which received little interest, and an alternative strategy was therefore ultimately progressed.

Led by Storey Consulting, the Applicant subsequently engaged with an alternative operator being the Museum of Youth Culture ('MoYC'), whose goal if this application is successful, is to establish one of the UK's first museums dedicated to preserving and celebrating the history of teenagers and young people, whilst inspiring the next generation of young creatives. This application therefore seeks a change of use of the ground and basement floors of the premises that have been earmarked for affordable workspace located beneath the affordable housing block, from the permitted light industrial use to Sui Generis for use by the MoYC. A Site Location Plan prepared by Caruso St John Architects is submitted with this application and shows the application site outlined in red, and the ownership of the Applicant in the context of the wider development outlined in blue.

The incoming operator, the MoYC, will provide a vibrant community hub dedicated to celebrating youth culture. As part of their operation, the MoYC will offer various programmes, including exhibitions, educational workshops, and community events - all aimed at engaging and empowering local young people. Key features of the MoYC include the provision of permanent and temporary exhibition space, a library and associated work/breakout space, archive and conservation space, a café/bar and museum shop. Their offer will include youth engagement and educational programmes, talks and events, cinema screenings and other ad-hoc events. The MoYC therefore operates on a multi-use basis which provides a fusion of cultural, educational and community floorspace. The bespoke operation of the MoYC has been discussed with LBC and it has been agreed that it would fall under Sui Generis. The operational considerations of the MoYC are summarised later in this Covering Letter and then set out in further detail within the supporting 'Operational Management Strategy' prepared by the MoYC.

Please refer to the accompanying 'Affordable Workspace Strategy' prepared by Storey Consulting for further details of why the MoYC would constitute an appropriate affordable workspace occupier, how they align with the mission/objectives of Camden's Affordable Workspace Strategy, and will increase employment/training and youth enterprise opportunities that will generate socio-economic benefits for local people.

This proposal does not involve any external alterations to the building and will be entirely within its existing footprint. As such, no additional floorspace will be added, and therefore the proposal is not CIL liable, nor does it create one or more residential dwelling (Class C3) at the unit.

Accordingly, planning permission is sought for the following development:

"The change of use of the basement and ground floor levels of the premises from light industrial use to Sui Generis for use by the Museum of Youth Culture only at St Pancras Commercial Centre".

Further land use considerations are set out within the following sections of this Covering Letter.

## **Pre-application Correspondence**

Extensive pre-application discussions have been undertaken with LBC prior to the submission of this application. Informal correspondence and meetings have been had with Senior Officers within LBCs Planning Department (i.e. Planning Applications Team Manager Neil McDonald) and also Camden's Inclusive Economy Team (i.e. Business Growth Manager Patrick Jones) including a Pre-application Meeting to discuss the MoYC and intended change of use proposals on 08 August 2024. The meeting was attended by Gerald Eve (Planning Consultants) and Storey Consulting (Construction Employment & Skills Specialists).

At the Pre-application Meeting the following key points in relation to planning matters were discussed:

- <u>Procedural Mechanism</u> it was agreed that a standalone change of use application was the most
  appropriate procedural route to formalise the MoYC taking the affordable workspace and that this
  would be made personal to the MoYC so that were they to vacate the space it would revert back to
  the approved light industrial use.
- <u>Land Use</u> it was agreed that the land use of the MoYC would fall under Sui Generis given its bespoke operation that would not fall under a conventional museum use (Class F1) or any other use classes.

At the Pre-application Meeting, Officers within LBC's Planning Department and Inclusive Economy Team also specifically requested that the following points were incorporated into any forthcoming change of use application:

- Commentary in relation to the previous discussions had with other affordable workspace operators and why these did not materialise, including the dialogue had with Camden's Inclusive Economy Team throughout the process.
- Discussion and reasoning as to why the MoYC would constitute an appropriate affordable workspace occupier compared to more conventional occupiers, and which would ensure the same socioeconomic goals are achieved.
- Reasoning that showcases the MoYC align with the mission/objectives of Camden's Affordable Workspace Strategy (October, 2023).
- Discussion surrounding how the MoYC would increase employment/training and youth enterprise opportunities, including reference to the socio-economic benefits arising from them as an occupier.
- Clarification of how the MoYC would operate at the premises and the measures implemented to ensure that they do not negatively impact surrounding amenity.

At the Pre-application Meeting LBC Officers also outlined that a Deed of Variation ('DoV') to the S.106 Agreement would need to be progressed concurrently to the change of use application and that all the affordable workspace provisions included in the original S.106 agreement for the wider redevelopment in relation to the floor area (i.e. 20% of the total light industrial floorspace), rental level (i.e. 60% of the market value for 10-years following occupation), and other associated matters, will need to continue to be secured as part of this. The Applicant Team acknowledged this and have instructed their Solicitors to progress the DoV concurrently to the determination of this change of use application.

Following the Pre-application Meeting with LBC Officers, Storey Consulting continued discussions with LBC's Inclusive Economy Team on the affordable workspace strategy in order to get to a position where all parties were happy with the proposal for the MoYC to take the affordable workspace. Following an extensive series of discussions and associated correspondence where multiple updates were incorporated, LBC's Inclusive Economy Team confirmed acceptance of and signed-off the Affordable Workspace Strategy via email on 08 October 2024. As part of this process, the Inclusive Economy Team confirmed that they would accept the Affordable Workspace Strategy once submitted as part of the change of use application. The 'Affordable Workspace Strategy', prepared by Storey Consulting, is submitted in support of this application and needs to be read in full for a detailed understanding of the key considerations with respect to the affordable workspace and the MoYC as the incoming operator.

All of the above-mentioned points are summarised within this Covering Letter and set out in further detail within the accompanying information submitted as part of this change of use application. All supporting documentation should be read in conjunction with this Covering Letter for a full understanding of the proposals sought under this application.

#### **Planning Policy Context**

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the proposals should be assessed against the development plan unless material considerations indicate otherwise. Where there is a difference in policy, Section 38(5) requires that the most recently adopted policy takes precedence.

We have assessed the proposals in the context of the LBC's Development Plan. The Development Plan comprises the adopted Camden Local Plan (2017) and the London Plan (2021). The National Planning Policy Framework ('NPPF') and the Planning Practice Guidance ('PPG') are also material considerations. Policies within Camden's Supplementary Planning Guidance ('SPGs') are also all relevant material considerations.

In terms of emerging policy, LBC are in the process of reviewing their Local Plan. The updated new Local Plan is currently in the early stages of development with LBC consulting on the draft new Local Plan (Regulation 18 consultation) between the 17 January and 13 March 2024. The updated new Local Plan is expected to be adopted in the summer of 2026. Therefore, at this stage, in line with paragraph 48 of the NPPF, limited weight should be applied to the policies within the emerging draft new Local Plan. As such, only relevant policies within the adopted Local Plan (2017) are considered as part of this application.

# **Planning Considerations and Assessment**

#### Land Use Considerations - Employment and Industrial Floorspace

At a national level, the National Planning Policy Framework ('NPPF') advises [inter-alia] that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century. Paragraph 80 of the NPPF states [inter-alia] that significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs.

At a regional level, London Plan Policy 4.1 promotes the continued development of a strong, sustainable and increasingly diverse economy across parts of London. It seeks to ensure the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and SME's, including the voluntary and community sectors and maximise the benefits from new infrastructure to secure sustainable growth and development.

London Plan Policy E4 states that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained, whilst NLP Policy E7 outlines their potential for intensification, co-location and substitution.

At a local level, Camden Local Plan Policy E2 encourages the provision of employment premises in the borough and seeks to protect existing employment premises or sites that are suitable for continued business use.

Camden Employment Sites and Business Premises CPG (March 2018) outlines how Camden seeks to protect existing employment sites and premises that meet the needs of businesses and employers and seeks to ensure Camden offers a range of types and sizes of employment space. The CPG also states that the Council will use section 106 planning agreements to secure local employment and training initiatives.

#### Land Use Considerations - Cultural, Educational and Community Floorspace

Paragraph 97 of the NPPF outlines the requirement to provide recreational and cultural facilities and services that communities need. This includes the provision and use of shared spaces and community facilities,

including cultural buildings. Local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.

Policy HC5 of the London plan sets out that proposal should support the development of new cultural venues. The supporting text recognises that the capital's cultural offer is often informed by cultural facilities including museums.

Policy S3 of the London Plan sets out that proposals should ensure there is a sufficient supply of good quality education facilities to meet demand and offer educational choice.

Local Plan Policy C2 states that the Council will work with its partners to ensure that the community facilities are developed and modernised to meet the changing needs of the community. In particular, it states that the Council will seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments and will facilitate multi-purpose community facilities and secure sharing or extended use of facilities that can be accessed by the wider community.

Local Plan Policy E1 states that the Council will support the development of Camden's [inter-alia] education sector and promote the development of the Knowledge Quarter around Euston and King's Cross.

#### **Land Use Assessment**

As referenced above, the proposal does not involve any external alterations to the building and is entirely within its existing footprint with no changes to floorspace therefore being proposed.

The lawful use of the existing premises, which have recently been built out and achieved Practical Completion, is as light industrial floorspace. When the initial application was submitted in August 2019, the previous land use regime under the Use Classes Order (1987) was still in effect, and which included both approved uses comprising Class B1c (Industrial Processes) and Class B8 (Storage or Distribution) within it. Since then, a new land use regime has come into effect under the Use Classes Order (2020), and which has seen the previously permitted Class B1c (Industrial Processes) sub-use replaced with the new Class E(g)(iii) (Industrial Processes). For the avoidance of doubt, Class B8 (Storage or Distribution) remains valid and in effect under the current land use regime. Therefore, this application is technically seeking the change of use of the ground and basement floors of the premises from the permitted light industrial use (Use Classes E(g)(iii)/B8), to Sui Generis for use by the MoYC, but for the avoidance of doubt the existing permitted use is just referred to as "light industrial use" throughout this Covering Letter.

Whilst there are no restrictive conditions attached to the planning permissions that have been implemented (refs. 2019/4201/P & 2021/4720/P) which explicitly prohibit the loss of light industrial and employment floorspace, such uses are protected through planning policies across all levels as set out above. Given the protections in place and sensitivities around the loss of the permitted light industrial uses, the land use strategy proposed is that any should planning permission be granted as part of this change of use application, then it will be made personal to the MoYC, and that were they to vacate the space it would then revert back to the historic/permitted light industrial use. This can be agreed by way of an appropriately worded Planning Condition to be attached to any forthcoming Decision Notice, or as a new Obligation/Clause to be added into the Deed of Variation to the Legal Agreement that will be required. The exact procedure for how this is dealt with and the specific wording to be used can be discussed and agreed with Officers during the determination

of the application. This land use strategy should hopefully allay any potential concerns that Camden Council might have with setting a precedent and which was briefly mentioned during pre-application discussions.

The proposed incoming operator, the MoYC, would constitute an appropriate affordable workspace occupier when compared to more conventional occupiers, and would as part of their offer provide a range of socioeconomic and other associated benefits for local people. The MoYC will provide a vibrant community hub dedicated to celebrating youth culture, and as part of their operation will offer various programmes, including exhibitions, educational workshops, and community events - all aimed at engaging and empowering local young people. Some of the key features of the MoYC is the provision of permanent and temporary exhibition space, a library and associated work/breakout space, archive and conservation space, a café/bar and museum shop. Their offer will also include youth engagement and educational programmes, talks and events, cinema screenings and other ad-hoc events. Please refer to the accompanying 'Affordable Workspace Strategy' prepared by Storey Consulting for further details of why the MoYC would constitute an appropriate affordable workspace occupier. This includes further detail of how the MoYC align with the mission/objectives of Camden's Affordable Workspace Strategy, and how they will increase employment/training initiatives and youth enterprise opportunities that will generate (amongst other things) socio-economic benefits and other opportunities for local young people. It is also important to note that Camden Council's Inclusive Economy Team, namely the Business Growth Manager Patrick Jones, have confirmed acceptance of the MoYC as the incoming operator to take the affordable workspace via email on 08 October 2024 and have been actively involved in pre-application discussions throughout the process.

In addition to the obvious socio-economic benefits noted above and set out in further detail within the accompanying 'Affordable Workspace Strategy', the proposal would also provide significant benefits to the Borough in terms of providing a new cultural, educational and community focussed facility that would predominantly serve local residents, namely young people. The MoYC will actively seek to become a valued member of the community through engagement in local initiatives which can bring a range of wider benefits to the Borough, specifically to young people who may be disadvantaged and in need. The provision of such local educational and cultural initiatives would become evident later in the development cycle, subject to planning permission being secured and once the MoYC became embedded in the local community. This will also help to stimulate a sense of community and provide valuable social infrastructure, including in the education sector, which is in accordance with Camden Council's planning policy objectives.

Rather than the premises lay vacant given the inability to attract other conventional light industrial affordable workspace occupiers, it is considered essential that the premises are put into active use. Not only will the MoYC provide a valuable new service and differentiated offer to this part of Camden, but it would positively contribute to the mixed character and function of the area, and help to revitalise this part of the site through increasing footfall to the area. As such, the MoYC has the ability to bring new visitors to the area and will contribute to the vibrancy and vitality of this part of the Borough and should therefore be welcomed in this regard.

It is important to note that in line with the historic use of the site and that permitted under the extant permissions, the Applicant is also committed to ensuring as much of the space is taken by conventional light industrial occupiers, should they be available at the appropriate time in the future.

As highlighted in the pre-application section of this Covering Letter, a DoV to the S.106 Agreement will be progressed alongside this change of use application. This will ensure that all the affordable workspace provisions included in the original S.106 agreement (dated 24 December 2020) in relation to the floor area (i.e. 20% of the total Light Industrial floorspace), rental level (i.e. 60% of the market value for 10-years following occupation) and other associated matters, will continue to be secured as part of this. The Applicant

Team have instructed their Solicitors to progress the DoV concurrently to the determination of this change of use application and who will be in touch with Camden's Legal Team at the appropriate time.

In summary, the proposals would bring these currently vacant premises into viable commercial use, would help to support the vibrancy and vitality of the area including the Knowledge Quarter, and make a positive contribution to the mix of uses and character of this part of Camden through the provision of a differentiated cultural, educational and community use for the material benefit of the Borough and its residents.

Based on the above assessment, it is considered that the proposals are acceptable in terms of land use given continued compliance with relevant national, regional and local planning policies.

#### **Amenity and Operational Considerations**

At a national level, the NPPF attaches great importance to securing a good standard of amenity for all existing and future occupants of land and buildings.

The NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of [inter-alia] noise pollution.

Paragraph 191 of the NPPF states that planning decisions should 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, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Part a) goes onto state that new development should mitigate and reduce potential adverse impacts resulting from noise, and avoid noise giving rise to significant adverse impacts on health and quality of life.

At a regional level, Policy 7.15 of the London Plan states that development proposals should seek to reduce noise

At a local level, Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed and that planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity.

## **Amenity and Operational Assessment**

A key comment made by Camden Council's Planning Team during pre-application discussions was how the MoYC would operate at the premises and ensure that they did not negatively impact surrounding amenity. This section therefore seeks to summarise the key operational and amenity considerations of the proposals, which are set out in further detail within the 'Operational Management Strategy' prepared by the MoYC and which should be read in conjunction with this Covering Letter for a detailed understanding of these considerations.

It is relevant to note that the previous operation of the site was for entirely light industrial and storage use, which would have included a greater quantum of significant noise generating activities compared to what has been built out under the approved development. Despite this, it is recognised that the immediate and surrounding area comprises a mix of uses which includes some residential occupiers. Therefore, the Applicant is alive to the need to safeguard the amenity of immediate and neighbouring residents and other surrounding occupiers. Whilst the new building fabric is designed to be acoustically insulated in order to minimise the emission of noise and vibration, the incoming operator (i.e. the MoYC) will at all times accord with the

standard maximum noise levels set out by Camden Council. The internal fitout of the building will incorporate the highest levels of acoustic performance and will see the installation of appropriate noise insulation and other acoustic attenuation measures to minimise sound reverberations and other noise generating sources in order to safeguard surrounding residential amenity, particularly to occupiers of the affordable housing block above the premises.

The MoYC will ensure that they are a good neighbour and are aware that they will be custodians of the area and so will make every effort to ensure that their operation preserves surrounding amenity as much as possible. The proposed opening hours of the MoYC would be 07:00 to 22:00 Monday - Saturday and 09:00-19:00 on Sundays. A limited number of extended opening hours are proposed no more than once a week (until 23:00 on Thursdays - Saturday's only) for events directly associated with the MoYC for the local community. Appropriately trained staff will be on hand to ensure that suitable measures to control noise and disturbance outside of the building are implemented and that it is minimised as far as possible. Contact details of the MoYC's Site Management Team will be provided to all immediate and surrounding residents ahead of them occupying the space so that there is a clear line of communication for any complaints to be made to and be appropriately dealt with. Further operational details, including how any noise and disturbance caused by visitors will be controlled and minimised to protect surrounding amenity, are contained within the accompanying 'Operational Management Strategy' prepared by the MoYC.

As stated in the previous sections of this Covering Letter, the proposal does not include any extensions or create any additional floorspace. Therefore, as this proposal relates solely to a change of use, it will have no impact on daylight/sunlight/sense of enclosure or loss of views to any neighbouring or nearby residential or surrounding occupiers.

In summary, given the site's location, building composition and intended operation, it is considered that the MoYC would not harm the surrounding amenity of residents or occupiers and would have a negligible impact (if any).

Based on the above assessment, it is considered that the proposals are acceptable in amenity terms given compliance with relevant national, regional and local planning policies.

## **Transport and Servicing Considerations**

Camden Local Plan policy A4 outlines that the Council will seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

Camden Local Plan policy T4 states that the Council will promote the sustainable movement of goods and materials.

Camden Council's Transport CPG provides information on all types of detailed transport issues within the borough including [inter-alia] assessing delivery and servicing.

# **Transport and Servicing Assessment**

Servicing and deliveries will remain in accordance with the approved arrangements and will generally take place via the dedicated on-site loading facilities using the internal servicing street which is accessed from Pratt Street and exited from St Pancras Way. A small proportion of servicing and deliveries will take place on-street, from Georgiana Street, where appropriate. Servicing of the premises will take place between the permitted delivery times of 06:00 - 20:00. Servicing outside of these times will only be allowed via the internal street which will be gated with access only provided through the intercom system. Overnight deliveries will not be

undertaken, unless by prior arrangement and in special circumstances. To ensure there is no significant conflict in delivery schedules between land-uses, a delivery schedule will be established with a booking system introduced to distribute deliveries throughout the day. It is important to note that the MoYC intends to update parts of its exhibitions on a semi-regular basis. For such exhibition updates, servicing vehicles will usually be no bigger than transit vans and will be undertaken during daytime hours in line with the servicing measures set out above. Any larger exhibition changes that occur will be spread over different days to alleviate any potential disruption as far as possible. Given the limited servicing arrangements and number of deliveries forecast for the proposal, which will generally be the same as the existing approved arrangements, it is considered that the proposed servicing is appropriate and will not materially impact on the capacity or operation of the local highway network or pedestrian environment.

In summary, the proposals will generally accord with existing approved servicing arrangements and have been carefully considered to ensure that adequate levels of servicing are enabled which minimise their impact and will therefore not materially impact on the operation/capacity and safety of the local highway network or pedestrian environment.

Based on the above assessment, it is considered that the proposals are acceptable in terms of transport and servicing given compliance with relevant national, regional and local planning policies.

# Summary

Based on the above planning policy assessment, the proposal would accord with the relevant national, regional and local planning policies on land use, amenity and transport and servicing.

Overall, it is therefore considered that the proposal should be welcomed by Camden Council and planning permission should be granted accordingly.

# **Application Documentation**

In accordance with the validation requirements of Camden Council and following pre-application discussions with Officers on the scope of submission material, alongside this Covering Letter, we enclose the following documentation for consideration under this change of use application:

- Covering Letter (dated 15 November 2024), prepared by Gerald Eve LLP;
- Completed Planning Portal Application Forms (dated 15 November 2024), prepared by Gerald Eve LLP;
- Completed CIL Liability Form (dated 15 November 2024), prepared by Gerald Eve LLP;
- Site Location Plan (dated 07 August 2018), prepared by Caruso St John Architects;
- Proposed Floorplans (dated N.D), prepared by Caruso St John Architects;
- Affordable Workspace Strategy (dated N.D), prepared by Storey Consulting; and
- Operational Management Strategy (dated 15 November 2024), prepared by the Museum of Youth Culture.

The application fee of £648.00 (including £70.00 Planning Portal fee) has been paid by the Applicant concurrent to the submission of this application.

We look forward to confirmation of the registration and subsequent validation of this application shortly. In the meantime, should you have any queries, please do not hesitate to contact Sam Aviss (020 3486 3524) or Belinda Neilson (020 3486 3782) of this office.

Yours faithfully,

Gerald Eve UP

**Gerald Eve LLP** 

Enc. As above via the Planning Portal