



## **Planning Statement**

On Behalf of:  
**Durley Investment Corporation**

In Respect of:  
**6 Erskine Road  
Primrose Hill  
London  
NW3 3AJ**

For:  
**Refurbishment and redevelopment of No. 6 Erskine Road for residential and  
employment uses**

Reference:  
**1145LO/R002HC**

Date:  
**September 2013**

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- 1 Camden Council's Pre-Application Response
- 2 Environmental Impact Assessment Screening Opinion

## 1.0 Introduction

- 1.1 This Statement has been prepared on behalf of Durley Investment Corporation in support of a planning application for the redevelopment of 6 Erskine Road. The site measures approximately 0.24ha and incorporates a collection of buildings with a narrow frontage onto Erskine Road.
- 1.2 The site comprises of Leeder House and the Caretaker's Lodge which both adjoin Erskine Road and are in office use. A number of commercial buildings occupy the rear of the site (namely Buildings 2, 3, 4 and 5).
- 1.3 Planning permission was granted in 2010 for the demolition and replacement of Building 5 and the refurbishment of Leeder House, Caretaker's Lodge and Buildings 2 and 3. This application was approved at planning committee on 15<sup>th</sup> December 2010 (Ref. 2010/5214/P) and remains extant (expiring 15/12/13). Planning permission was also granted in 2012 for the refurbishment and change of use of Building 4 for employment use (Ref. 2012/0284/P).
- 1.4 The accompanying structural survey highlights the very poor condition of Leeder House, which occupies part of the site located within the Primrose Hill Conservation Area and is itself seen as a non-designated Heritage Asset. The refurbishment and conversion of this building for residential use will ensure that the building remains onsite in its current form and can be enjoyed by future generations. The remaining buildings onsite will provide office / workshop accommodation.
- 1.5 The purpose of this Statement is principally to describe the development proposal for this site. The key issues relating to the planning history are considered, in addition to an assessment of current planning policy. The development proposal is then justified in terms of relevant policy guidance, which generally supports the regeneration of previously developed land and investment in the economy.
- 1.6 This submission is supported by a comprehensive set of Architectural drawings and supporting visuals, prepared by PKS Architects. As set out within the accompanying covering letter, a number of other specialist reports have also been prepared in support of this application.



## 2.0 Site Description

### The Application Site

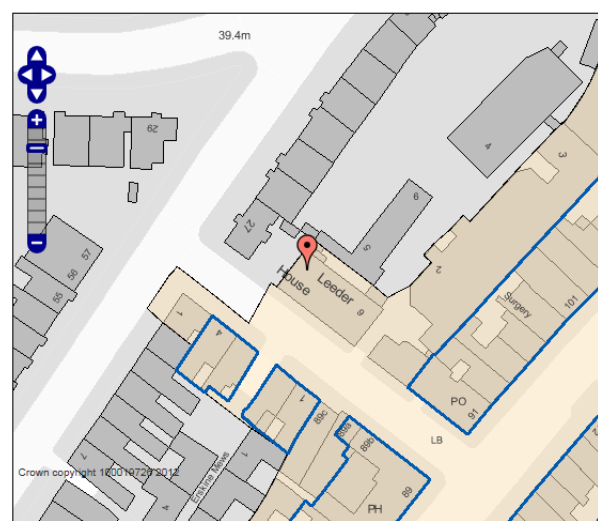
- 2.1 The application site consists of a collection of buildings situated to the east of Erskine Road. The application site totals 0.24ha (0.6 acres) and is bounded on one side by the residential and commercial properties forming Regent's Park Road and on the other, the residential properties forming King Henry's Road. Accessed via the application site, Building 4 (as indicated in blue on the accompanying Site Location Plan) forms part of the overall employment provision of this site. Building 4 was granted planning permission in 2012 for the change of use and refurbishment to form office accommodation and as the current application does not change this extant permission, Building 4 does not form part of the current application site.
- 2.2 All buildings on the application site are currently in use as either offices or small workshops (Class B1), with limited car parking provided onsite. The site has a single access / egress from Erskine Road.
- 2.3 As recognised on Camden Council's Proposals Map (below), the site lies partially within the Primrose Hill Conservation Area, however none of the buildings on site are statutory listed. The Primrose Hill Neighbourhood Centre also adjoins the site, which is a popular and vibrant shopping destination focused along Regent's Park Road. The site lies outside of London's Central Activity Zone (CAZ).

Find planning policies by clicking the map or using the address / postcode search

#### Map key

-  Conservation Area  
Primrose Hill
-  Neighbourhood Centre

For more information, or if you are unable to view the map, please contact the [Forward Planning and Projects Team](#)



(Source – Camden Council Proposals Map Nov 2010)

### **Leeder House (Building 6)**

- 2.4 Leeder House, fronting Erskine Road, forms the principal building on this site. It was constructed in the 1860's and was initially intended for industrial use, possibly connected to the adjoining timber yard. In the early 20<sup>th</sup> century the building was in use as a piano / organ factory, and is now occupied as office accommodation.

Leeder House is a four storey building characteristic of industrial buildings of this period, with high ceiling heights and large window openings. The building shares much of its classical detailing with the properties adjoining Regent's Park Road, however many layers of painted render now form the principal elevation. Internally, there are no traditional features of merit. As suggested within the accompanying building survey, this building is currently in a very poor condition.

### **Caretaker's Lodge (Building 1)**

- 2.5 This small, single storey, slate-roofed building dates back to 1894/95, and was originally used as offices, servicing the factory on the remainder of the site. At some point in time, the building would also have been used as a caretaker's residential apartment, however now it is used as a small studio / office.

### **Building 2**

- 2.6 Building 2 adjoins the south eastern boundary of the site and rear of Nos. 95 – 105 Regent's Park Road. The building was constructed in 1899 and forms a two storey, flat-roofed brick building, which has now been rendered and painted.

### **Building 3**

- 2.7 Building 3 is a later addition to the site (constructed in 1932) and consists of a brick built two storey building with a pitched roof. This building adjoins both the south eastern and northern boundaries of the application site.

## Building 5

- 2.8 Lying outside of the Conservation Area, this building dates from the late 19<sup>th</sup> Century and is a single storey pitched slate roof building. This building is rectangular in shape and adjoins the north western boundary of the site.

## The Surrounding Area

- 2.9 Forming part of the overall employment area at Erskine Road, **Building 4** is located immediately to the north east of Building 5. This building is currently within Class D2 use and occupied by Tri-Yoga, a popular leisure facility for the area. As mentioned, planning permission was granted in 2012 for the refurbishment and conversion to office accommodation and therefore works to this building do not form part of the current application submission.
- 2.10 The surrounding area is predominately residential in character, but with retailers and commercial uses provided at ground floor level along Regent's Park Road and within the identified 'neighbourhood centre'. Many of the surrounding properties form Georgian terraces and are typically three or four storeys in height.
- 2.11 Given the sites proximity to Chalk Farm Underground Station (circa 500m to the north east) and the numerous bus services provided along Chalk Farm Road, the site has a PTAL rating of 4 which suggests "good access to public transport". The site also lies circa 300m to the east of Primrose Hill which is a popular area of public open space within central London.

## 3.0 Planning History

- 3.1 The Council will be aware that the current application site already benefits from planning permission for an additional 1,472sqm of office accommodation (Class B1), involving the demolition and replacement of Building 5 and the refurbishment of Leeder House, the Caretaker's Lodge and Buildings 2 and 3 (Ref. **2010/5214/P**). Additionally, this permission allowed the erection of four core blocks which were required to provide circulation and servicing. This permission was granted planning consent on 15<sup>th</sup> December 2010 and remains extant until 15<sup>th</sup> December 2013.
- 3.2 On the 30<sup>th</sup> March 2012 planning permission was granted (Ref. **2011/6306/P**) for a Section 73 application to vary Condition 7 (development to be carried out in accordance with approved plans) of permission 2010/5214/P. These amendments relate to the relocation of the cycle stores and plant (due to the reduction in the size of the basement), amendment to the street elevation of the Caretaker's Lodge and alteration to the angle and location of the photovoltaic roof panels.
- 3.3 The extant permission (Ref. 2010/5214/P) formed a revised submission of an earlier redevelopment scheme for the site (Ref. **2009/0970/P**) which was refused on the 25<sup>th</sup> February 2010 for a number of reasons including; the scale and bulk of the 'Core Areas'; insufficient cycle parking facilities; inadequate servicing facilities; failure to demonstrate the proposal will not result in the loss of daylight / sunlight of adjoining properties; and *inter alia* the lack of a legal agreement securing financial contributions. Obviously, all these reasons for refusal were overcome with the granting of planning permission in 2010.
- 3.4 Also of significance, planning permission was approved on the 20<sup>th</sup> March 2012 for the change of use of Building 4, from a leisure studio (Class D2) to office use (Class B1) and development works including a three storey extension to the east elevation, the erection of a roof extension and installation of solar PVs and rooflights, alterations to doors and windows and the installation of external condensing plant within acoustic enclosure at ground floor level (Ref. **2012/0284/P**). As previously mentioned, although Building 4 is excluded from the redline boundary of the current submission, it is the intention of the applicants to implement these previously approved works as part of the overall redevelopment.

## 4.0 Development Proposal

- 4.1 The application proposal involves the change of use and refurbishment of Leeder House to form 4no. residential apartments, the demolition and replacement of Building 5 and the refurbishment of the Caretaker's Lodge, Buildings 2 and Building 3.
- 4.2 Notwithstanding the proposed use of Leeder House for residential apartments, the redevelopment proposal will generate an uplift in B1 accommodation of circa 433sqm GEA, therefore reinforcing the predominant employment function of the site. The proposals will also result in an improvement in the quality of the accommodation with new amenity areas and enhanced energy efficiency thereby promoting the long term vitality of the site for employment use. This uplift in employment floorspace excludes the additional 828 sq metres of B1 floorspace that will be created by the change of use and works to Building 4, already consented.
- 4.3 It is set out below how the current development proposal differs from the previously approved permission at the site (i.e. approved plans listed within planning permission 2011/6306/P).

### **Leeder House**

- 4.4 The principal difference between the application proposal and the extant permission is the use of Leeder House for residential purposes. The proposed dwellings range in size from 120sqm to 225sqm, providing a mix of 3no. 3-bedroom dwellings and 1no. 2-bedroom dwelling. The dwellings exceed Camden Council's residential space standards.
- 4.5 As recognised within the Building Survey, Leeder House is currently in a very poor condition and substantial refurbishment works are required in order to stabilise and bring the building up to a suitable standard. These works include the replacement of the roof, re-pointing, stabilising and rendering of existing facades, installation of a basement and extensive reconfiguration of the internal layout.
- 4.6 The only alterations to the principal elevation of Leeder House include the installation



of a window to replace a redundant doorway, the extension of window bays at ground floor level in order to allow light into the proposed lower ground living areas and the opening up of a window on the third floor. At roof level, a condenser enclosure is a new addition and photovoltaic panels will be installed (albeit these were also approved under planning permission 2011/6306/P).

- 4.7 Minor alterations are also taking place on the rear elevation of the property, including the installation of glass balconies, reconfiguration of windows to allow kitchen and WC extraction equipment and the replacement of windows at roof level to allow for the installation of a roof terrace. Additionally, an existing window opening on the buildings south east elevation is to be blocked up.
- 4.8 A private courtyard is to be incorporated at ground level, which provides amenity space for future occupants of the ground floor dwelling. This has been created as there is no longer a requirement for the core servicing area, which was approved as part of the office scheme. Adjacent to this amenity space are 2no. car parking spaces, to be allocated alongside the residential dwellings.
- 4.9 Numerous internal alterations are required in order for the building to be converted into residential use. Of particular note, the creation of a basement used partly as residential accommodation and partly for servicing, will increase the gross floorspace of the Leeder House.
- 4.10 The minor alterations made to the exterior of the building ensure that Leeder House will continue to provide a positive contribution to the Conservation Area. The building will be finished with use of off-white render to replicate its current appearance.

### **Caretaker's Lodge**

- 4.11 The refurbishment of the lodge incorporates some minor external alterations to that previously approved under 2011/6306/P, including the installation of entrance doors to the north west elevation in order to provide access to the refuse storage area. The sub-station has direct access onto Erskine Road through double doors, the principal of which was approved under 2011/6306/P.
- 4.12 The core servicing area immediately to the rear of the lodge has been slightly

reconfigured, with the roof height increasing by approximately 200mm to meet current requirements.

## **Building 2**

- 4.13 Building 2 is to be refurbished, largely in accordance with planning permission 2011/6306/P. The only proposed departure from the approved scheme is the removal of a window opening on the south west elevation and the creation of additional window openings at first floor level on the south east elevation. Alterations are also taking place at roof level adjoining the Regents Park Road boundary, in order to allow for external condensing units to be screened by the roof pitch and to allow for adequate Rights to Light of adjacent properties. This has resulted in the roof pitch of Building 2 being raised by 200mm from that previously approved, but we do not anticipate this will cause any additional impact on the amenity of neighbouring properties as supported by the accompanying Daylight / Sunlight Assessment.
- 4.14 The core servicing area located between Building 2 and 3 is also proposed to be slightly amended in line with current operational requirements.

## **Building 3**

Similar to Building 2, Building 3 is to be comprehensively refurbished and continue to be used for office purposes. The current proposal allows for a pitched roof with skylights, as opposed to the flat roof which was approved under 2011/6306/P. As a consequence of this, no photovoltaic panels are proposed on the roof of Building 3.

## **Building 5**

- 4.15 Building 5 is to be demolished and replaced with a building of similar size and appearance to that previously approved. Window configuration on the south eastern elevation and the internal basement layout has been amended to reflect current requirements, however these are not considered to be material changes which affect the principal of development. In addition, the amount of photovoltaic panels on the roof has been reduced from that previously approved.

- 4.16 The core servicing area located between Buildings 4 and 5 has also been amended with an extension to the entrance lobby. Although the footprint of the building has slightly increased at ground level, this is below the existing retaining wall and consequently will not impact upon the amenity of adjoining neighbours. Additionally, windows are no longer proposed adjoining the King Henry's Road boundary, thus reducing the amount of potential overlooking when compared with the extant permission.
- 4.17 Although a comprehensive floorspace schedule has been prepared by PKS Architects, a summary table has been provided below:

	<b>Existing GEA (sqm)</b>	<b>Proposed GEA (sqm)</b>
Leeder House	821.0	950.7
Building 1	89.6	69.7
Building 2	1042.9	1551.7
Building 3	288.3	316.7
Building 5	341.5	1078.1

- 4.18 In summary, the development proposal involves the comprehensive refurbishment and redevelopment of 6 Erskine Road. Although there have been some minor design alterations, the proposal remains broadly similar to that previously approved, with the main departure being the change of use of Leeder House from offices (Class B1) to 4no. residential dwellings (Class C3).

## 5.0 Pre-Application Discussions

- 5.1 Prior to the submission of this application, a meeting took place on 5<sup>th</sup> June 2013 between the applicant's design team and Eimear Heavey (Senior Planning Officer) and Catherine Bond (Principal Planning Officer – Conservation and Heritage) of Camden Council. The intention of the meeting was to discuss the viability of the extant permission and possible redevelopment options.
- 5.2 Considering the current state of repair of Leeder House, it was initially the developer's intention to demolish the existing building and replace with a facsimile containing 4no. residential apartments. The majority of discussions within the meeting focused upon the demolition of this non-designated heritage asset within the Conservation Area.
- 5.3 As can be seen from the Council's formal response provided at **Appendix 1**, the demolition of Leeder House was not supported by the Council as the building is believed to be "*...a positive contributor to the Conservation Area*". It was however established that the principle of residential accommodation on this site is acceptable, providing it can be demonstrated that the requirements of local planning policy can be met. No concerns were raised over the refurbishment of the remainder of the site indicating these works are acceptable in principle.
- 5.4 As a direct result of these pre-application discussions, it is now the intention to retain Leeder House and convert the building to residential purposes (with minor amendments to rear elevation) alongside the major structural repairs which are required to ensure the future stability of this building.
- 5.5 In addition to the meeting with the Council, a pre-application exhibition was held on the 3<sup>rd</sup> September for members of the public and interested stakeholders to comment on the proposed development. Details of this can be found in the accompanying Statement of Community Involvement.
- 5.6 On the 26<sup>th</sup> July 2013 an Environmental Impact Assessment Screening Opinion was requested on behalf of the applicant. A formal response was received from Camden Council on the 15<sup>th</sup> August 2013, stating that due to the scale of the proposal an

Environmental Impact Assessment is not required in this instance. A copy of this confirmation is provided at **Appendix 2**.

## 6.0 Planning Policy Guidance

- 6.1 Applications for planning permission should be considered against policies contained within the National Planning Policy Framework (NPPF), the London Plan (July 2011) and Camden Council's *Development Plan*, principally consisting of the adopted Local Development Framework (November 2010) and Camden Planning Guidance (CPG). Relevant planning policies are considered in detail below:

### National Planning Policy

- 6.2 The National Planning Policy Framework (NPPF) was published in March 2012 and supersedes all previous national planning policy guidance documents. The NPPF sets out the Government's requirements and objectives for the planning system in England.
- 6.3 The NPPF provides a positive framework for decision making. At the core of the new Framework is the presumption in favour of sustainable development. The Government believe sustainable development can provide an economic benefit to the country (by contributing to a strong, responsive and competitive economy), social benefits (supporting vibrant and healthy communities) and an environmental role (by protecting and enhancing our natural, built and historic environment).
- 6.4 When determining planning applications, this presumption requires Local Authorities to approve development proposals that accord with the development plan without delay. The NPPF confirms that Local Planning Authorities should look for solutions rather than problems and work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.
- 6.5 Of particular relevance to this proposal, the Framework states that the Government is committed to ensuring that the planning system does everything it can to secure economic growth in order to create jobs and prosperity. Local planning policies should support existing business sectors, identify priority areas for economic regeneration and *inter alia* facilitate flexible working practices such as the integration of residential and commercial uses (**Para 21**).

- 6.6 The Framework makes clear that housing proposals should be considered in the context of the presumption in favour of sustainable development. An objective of the Government is to "... *deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities...*" (Para 50).
- 6.7 It is encouraged that empty housing and buildings should be bought back into residential use and local authorities should normally approve planning applications involving the change of use from commercial buildings (currently in the B use classes) to residential.
- 6.8 The NPPF makes explicit that local plans should encourage brownfield sites to be brought back into effective use, provided that the site is not of high environmental value. Local authorities can consider setting local targets for the use of brownfield land.

### **The London Plan**

- 6.9 The site is located within "*Inner London*" where the Mayor, boroughs and other stakeholders should "... *work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinctive environment, neighbourhoods and public realm, supporting and sustaining existing and new communities, addressing its unique concentrations of deprivation, and improving quality of life and health for those living, working, studying or visiting there.*" (**Para 2.9**).
- 6.10 The Mayor supports the continued provision of housing with an average target of at least 32,210 net additional dwelling being provided across London each year (**Policy 3.3**). Redevelopment of brownfield land is encouraged, providing new housing meets the minimum space standards and has been designed to a high quality.
- 6.11 The Mayor seeks to "*promote and enhance the continued development of strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost.*" (**Policy 4.1**). In particular, the Mayor will "*sustain the continuing regeneration of inner London and redress its persistent concentrations of deprivation.*"

- 6.12 Of particular interest to this development proposal, the Mayor is generally supportive of mixed use development and encourages the consolidation and enhancement of the quality of existing office stock in viable locations (**Policy 4.8**).
- 6.13 In conclusion, the London Plan supports brown-field, mixed-use redevelopment proposals such as this. Residential accommodation is encouraged to meet demand, whilst the Mayor encourages the renewal and modernisation of existing office accommodation in order to improve its quality and flexibility.

### **Adopted Local Planning Policy**

- 6.14 The principal documents for consideration in the determination of planning applications within Camden are the adopted Core Strategy (November 2010) and the Camden Development Policies (November 2010). These documents form part of the overarching Local Development Framework (LDF), which also consists of the Site Allocations DPD, Fitzrovia AAP and *inter alia* Euston Area Plan.
- 6.15 Upon adoption in November 2010 the LDF replaced the Unitary Development Plan (2006). All policies contained within the UDP have now expired, except Policy LU1 (Schedule of Land Use Proposals) which still forms part of Camden's *Development Plan* until it is formally replaced by the Site Allocations DPD. Considering the application site is not included as an allocated land use, Policy LU1 is not applicable.
- 6.16 The adopted local planning policies of relevance to this redevelopment proposal are described below in detail:

#### Core Strategy

- 6.17 The Core Strategy sets the overarching policy framework for the borough. Apart from lying partially within a Conservation Area and immediately adjoining a Neighbourhood Centre, the site has no specific policy designations. The site falls outside of the specified 'growth areas' (Central London, Town Centres, Kings Cross, Euston, Tottenham Court Road, Holborn and West Hampstead Interchange) and consequently this area is not the focus of major development, rather an area where the Council will allow "more limited change".



The Council "...will ensure that development in the areas of more limited change respects the character of its surroundings, conserves heritage and other important features and provides environmental improvements and other local benefits where appropriate" (**Policy CS4 – Areas of More Limited Change**).

6.18 The Council promote the most efficient use of land and buildings by:

- seeking development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;
- resisting development that makes inefficient use of Camden's limited land;
- expecting development that will significantly increase the demand of travel to be located in growth areas and other highly accessible parts of the borough;
- expecting high density development in Central London, town centres and other locations well served by public transport; and
- expecting the provision of a mix of uses in suitable schemes, in particular in the most accessible parts of the borough, including an element of housing where possible. (**Policy CS1 - Distribution and Growth**)

6.19 The redevelopment of the Erskine Road site for employment and residential purposes constitutes an efficient use of land within this relatively constrained site. The quality of design is extremely high, taking precedent from the existing buildings onsite and the surrounding area. Consequently, it is contended that the development proposal meets the requirements of Policy CS1 and CS4 of the Core Strategy.

6.20 When considering proposals for residential development, regard must be given to **Policy CS6 (Providing Quality Homes)** which generally states that the Council will support proposals for new self-contained housing of different sizes and types, in order to meet different occupier requirements and housing supply targets.

6.21 Camden Council seek to "*safeguard existing employment sites and premises in the borough that meet the needs of modern industry and other employers*" (**Policy CS8 - Promoting a Successful and Inclusive Camden Economy**). The Council encourage a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed and affordable workspace.

- 6.22 A substantial amount of additional office floorspace is allocated within King's Cross, Euston, Central London and the other growth areas. This provision is considered sufficient to meet the future supply of offices within the Borough and consequently, *"the Council will consider proposals for other uses of older office premises if they involve the provision of permanent housing (in particular, affordable housing) and community uses"* (**Para. 8.8**). Therefore, the loss of the existing office floorspace resulting from the refurbishment of Leeder House is considered acceptable in policy terms, given that the building is to be used as permanent housing. This is reinforced by the upgraded and additional employment provision for SME's being facilitated elsewhere on the site.
- 6.23 The Council seek to minimise the provision of private car parking in new development, particularly through car free developments in accessible locations (Central London, Town Centres and other areas that are well-served by public transport) and car capped developments where the provision of additional on-street parking would be harmful to parking conditions (**Policy CS11 - Promoting Sustainable and Efficient Travel**).
- 6.24 **Policy CS14 (Promoting High Quality Places and Conserving our Heritage)** identifies that development proposals should be of the highest standard of design that respect local context and character, whilst preserving and enhancing Camden's rich and diverse heritage assets. As detailed within the accompanying Heritage Assessment, the development proposal is of a high quality design respectful of the character and appearance of the Conservation Area.

#### Camden Development Policies

- 6.25 The *Development Policies* document (adopted November 2010) provides detailed guidance on what development is considered acceptable within the borough. The planning policies of most relevance to this development proposal are described in detail below.
- 6.26 The Council encourage mixed use developments in all parts of the borough, including a contribution towards the supply of housing (**Policy DP1 – Mixed Use Development**). In particular, the Council seek to maximise the supply of additional homes in the borough by *"expecting the maximum appropriate contribution to supply*

*of housing on sites that are underused or vacant, taking into account any other uses that are needed on the site” (Policy DP2 – Making Full Use of Camden’s Capacity for Housing).*

- 6.27 A contribution towards the supply of affordable housing is required on development sites with a capacity for 10 or more additional dwellings, which is typically considered to be sites over 1,000 sqm (gross) (**Policy DP3 – Contributions to the Supply of Affordable Housing**). The specific level of affordable housing will be negotiated on an individual site basis with use of a sliding scale (10% for developments with capacity of 10 dwellings to 50% for developments with a capacity for 50 dwellings). Consideration of Policy DP3 and affordable housing is provided later in this statement.
- 6.28 The Council encourage the provision of a range of dwelling sizes (**Policy DP5 - Homes of Different Sizes**), with all new homes meeting the lifetime homes standards and 10% of dwellings meeting the wheelchair housing standards (**Policy DP6 – Lifetime Homes and Wheelchair Housing**). As previously mentioned, a housing mix of 2 and 3 bedroom properties has been incorporated onto this site, all of which will meet the lifetime homes standards.
- 6.29 When considering the redevelopment of employment sites, **Policy DP13 (Employment Premises and Sites)** states:

*“The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business unless:*

- a) it can be demonstrated to the Council’s satisfaction that a site or building is no longer suitable for its existing business use; and*
- b) there is evidence that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative business use has been fully explored over an appropriate period of time.*

*Where a change of use has been justified to the Council’s satisfaction, we will seek to maintain some business use on site, with a higher priority for retaining flexible space that is suitable for a variety of business uses.*

*When it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential uses or*

*community uses, except in Hatton Garden where we will expect mixed use developments that include light industrial premises suitable for use as jewellery workshops.*

*Where premises or sites are suitable for continued business use, the Council will consider redevelopment proposals for mixed use schemes provided that:*

- c) the level of employment floorspace is maintained or increased;*
- d) they include other priority uses, such as housing and affordable housing;*
- e) premises suitable for new, small or medium enterprises are provided;*
- f) floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses;*
- g) the proposed non-employment uses will not prejudice continued industrial use in the surrounding area."*

6.30 Whilst it is not claimed that Leeder House is unsuitable for continued office use as the building is currently occupied, in all other aspects, the current proposals accord with the aims of Policy DP13 given that there is an overall increase in employment floorspace suitable for SME's being provided on the wider site, and the replacement with permanent residential dwellings is encouraged by the Council. Additionally, the recent changes to the General Permitted Development Order allow for the change of use of offices to residential accommodation without the need for planning permission. This is explored in more detail later in the Statement.

6.31 **Policy DP17 (Walking, Cycling and Public Transport)** reinforces Policy CS11 of the Core Strategy in that the Council will resist development that would be dependent on travel by private motor vehicles. The Council seek to ensure the provision of the minimum amount of car parking necessary, with maximum standards (for both cars and bicycles) detailed at Appendix 2 (**Policy DP18 - Parking Standards and Limiting the Availability of Car Parking**).

6.32 The Council require the highest standards of design for all new development, with consideration of the following:

- "a) character, setting, context and the form and scale of neighbouring buildings;*

- b) the character and proportions of the existing building, where alterations and extensions are proposed;*
- c) the quality of materials to be used;*
- d) the provision of visually interesting frontages at street level;*
- e) the appropriate location for building services equipment;*
- f) existing natural features, such as topography and trees;*
- g) the provision of appropriate hard and soft landscaping including boundary treatments;*
- h) the provision of appropriate amenity space; and*
- i) accessibility” (Policy DP24 - Securing High Quality Design)*

6.33 The alterations and refurbishment of the existing employment units to the rear, will improve the quality of the employment stock, whilst the refurbishment and change of use of Leeder House ensure that the site has an attractive street presence. Consequently, it is contended that the design has been thoughtfully considered, meeting the requirements of Policy DP24.

6.34 **Policy DP25 (Conserving Camden’s Heritage)** identifies that development proposals should take account of Conservation Area Statements, appraisals and management plans to ensure that development preserves and enhances the character and appearance of the area. With the exception of Building 5 which lies outside of the Conservation Area, all buildings on the site are being refurbished for their continued use, thus enhancing the character and appearance of the Conservation Area. This is described in further detail within the accompanying Heritage Statement.

6.35 The Council will only grant permission for development which does not cause harm to the amenity of neighbours. Consideration should also be given to privacy and overlooking, overshadowing and outlook, sunlight and daylight, noise and vibration, odours, fumes and dust, microclimate and inclusion of attenuation measures. New development will also be expected to provide an acceptable standard of internal arrangement, dwelling / room sizes and amenity space facilities for storage of waste, recycling and disposal of waste, bicycle storage and outdoor space (**Policy DP25 - Managing the impact of development on occupiers and neighbours**).

6.36 The refurbishment of Leeder House for residential purposes and expansion of the Class B1 accommodation has specifically been designed with consideration to the

amenity of adjoining neighbours. The proposed Class B1 elements of the development accord with the previously approved scheme and where changes have been introduced, these are either neutral or improve the relationship with adjoining properties. All residential floorspace meets the space standards specified by the Council, and will improve the supply of family sized accommodation within this part of the borough. The residential balconies have specifically been designed to overlook the site and provide sufficient separation distance to adjacent dwellings.

6.37 **Policy DP31 (Provision of, and improvements to, open space and outdoor sport and recreational facilities)** identifies that developments involving 5 or more additional dwellings, or 500sqm or more of floorspace that are likely to increase the resident, worker or visitor population will be expected to provide an open space contribution. Although no provision has been made onsite, the site lies within 300m of Primrose Hill which provides adequate open space for all to enjoy.

6.38 In conclusion, Camden's adopted planning policy supports mixed use developments which incorporate an element of residential floorspace. Sufficient office accommodation has been designated within the designated growth areas and therefore the loss of office floorspace in Leeder House is not considered to have a significant impact upon wider employment provision within the borough. In fact, even with the loss of employment provision within Leeder House, the development proposal provides an overall increase in Class B1 accommodation appropriate for SME's. Consequently, it is contended that the principle of redeveloping this site is entirely acceptable.

## 7.0 Planning Assessment

7.1 The following section provides an assessment of the proposed development. Given that the Council has already granted planning permission for a similar physical form of development of the site, it has been acknowledged that a comprehensive redevelopment scheme is acceptable in principle. In this context, the below focuses primarily on the differences from the approved scheme.

### **The Proposed Mix of Uses**

7.2 The principle of refurbishment of Buildings 2, 3 and the Caretaker's Lodge and the demolition and replacement of Building 5 for employment purposes has already been established with the granting of planning permission in 2010 (Ref. 2010/5214/P). The current proposals for these buildings remain largely unchanged from those previously approved, albeit with a few minor design alterations. Consequently, the main focus for debate is likely to be the change of use of Leeder House from offices to form 4no. residential dwellings.

7.3 As recognised within adopted planning policy, Camden Council typically supports proposals resulting in the mixed use regeneration of brownfield sites. Although the Council generally seeks the retention of existing employment floorspace, if it can be demonstrated that amongst other criteria, there will be no overall loss in employment floorspace then the Council may allow the conversion to permanent residential dwellings.

7.4 Although it is recognised that Leeder House is still *suitable* as office floorspace (particularly when considering the extant permission on the site), it is contended that the use of Leeder House for residential purposes provides a better mix of uses for the site. Erskine Road is a predominately residential street and the proposed change of use will allow Leeder House to play a similar function at street level. The remaining buildings on the site have been within employment use for a number of years and are of unconventional design to accommodation residential dwellings, therefore better suited as Class B1 floorspace.

7.5 Leeder House should also not be considered in isolation, but rather as part of the wider development which would continue to accommodate a significant level of

employment floorspace. Although the change of use of Leeder House would result in the loss of Class B1 floorspace, the refurbishments and other works taking place on the remainder of the site ensure that there is an overall uplift of office accommodation of approximately 433sqm (GEA). This uplift in floorspace could potentially increase employment numbers on the site, thus providing wider benefits to the local community. Consequently, the site (red-line boundary) will accommodate a total of 3,016sqm (GEA) of Class B1 floorspace. In addition a further 828sqm of Class B1 floorspace will be provided within the refurbished Building 4 (Ref. 2012/0284/P). This is in addition to the uplift in office floorspace resulting from works covered by the current planning application.

- 7.6 It should also be noted that recent changes to the General Permitted Development Order 1995 allow for the change of use of offices (Class B1a) to residential dwellings (Class C3) without the requirement of planning permission. This legislative change reduces the weight that can be afforded to Development Plan Policy DP13 and confirms that the replacement of employment floorspace with permanent residential accommodation is entirely acceptable at both a national and local level.
- 7.7 Consequently, whilst it cannot be said that Leeder House is no longer *suitable* for employment use (Policy DP13 criterion a), the 'loss' of employment floorspace resulting from the change of use of Leeder House is acceptable in terms of Policy DP13 overall, given the significant provision of upgraded and additional employment floorspace elsewhere on site. In all other respects therefore, the scheme accords with the objectives of local and national planning policy (in particular Policy DP13) and the site will provide an appropriate mix of uses.

### **Amenity of Surrounding Properties**

- 7.8 Given that the scale, height and massing of the proposed employment units has not materially differed from that previously approved under planning permission 2010/5214/P, the impact of these buildings upon surrounding amenity remains similar. When considering the daylight / sunlight implications of the extant permission, the planning officer stated that *"the proposals would have a limited impact on all but a small number of individual windows.... Overall it is considered that this impact is acceptable and the scheme complies with DP26 with respect to light amenity"* (Para 6.28 of Officer's Report 2010/5214/P) and it is our view that this is still applicable.



- 7.9 A minor variation from the extant permission in terms of height and scale is the raising in roof height of Building 2, by approximately 200mm. This design alteration came about given the need to amend the roof layout to avoid potential Rights to Light complications with the adjoining properties along Regents Park Road. Therefore, although there is a slight increase in the proposed roof height, it is actually contended that the application proposal provides a better design solution for adjoining residents, as confirmed by the accompanying Daylight and Sunlight Assessment.
- 7.10 The second variation from the extant permission relating to massing, is the removal of the core servicing area between Leeder House and Building 5. Given that it is proposed that Leeder House be in residential use, there is no longer the need for this core facility.
- 7.11 Window locations are broadly similar to the extant permission and consequently the level of overlooking of neighbouring properties will remain similar to the existing. Windows proposed on the north elevation of the Core Servicing Area to Building 5 have been removed as part of the current proposal, and hence the potential overlooking of properties located along King Henry's Road has been reduced. Given that Leeder House has a perpendicular relationship to the properties located along King Henry's Road and Regents Park Road, there will be no direct overlooking from the proposed habitable rooms into existing properties.
- 7.12 As encouraged by local planning policy, balconies have been introduced onto the first, second and third floor of Leeder House in order to provide private amenity space for future occupants. The balconies have specifically been located to minimise the level of overlooking to existing properties along King Henry's Road. Additionally, given their setback distance of circa 15m and the perpendicular relationship to the closest residential windows it is not envisaged that the balconies will significantly impact upon surrounding residential amenity. Rather, the balconies have been designed to survey the remainder of the site.
- 7.13 When read in connection with the accompanying daylight / sunlight assessment, it is therefore contended that the impact upon surrounding residential amenity will be acceptable and slightly improved when compared to the extant permission.

### **Design Considerations**

- 7.14 The development scheme has been designed to an extremely high standard in order to reflect the special character and appearance of the Conservation Area in which it is partially located. The surrounding area is extremely heterogeneous with numerous historical buildings providing a variety of architectural styles.
- 7.15 As established, in its current form, Leeder House is in a poor state of structural repair and in need of major refurbishment. The building's historic merit lies within its height, massing and rendered appearance, which contrasts with the surrounding area. The refurbishment will retain all of these features and ensure that this building provides a positive contribution to the Conservation Area in years to come. This is discussed in further detail within the accompanying Heritage Assessment.
- 7.16 The residential properties to be incorporated within Leeder House have been designed to exceed the Council's residential space standards. Each property has access to private outdoor space and a lift is provided internally to provide disabled access to the upper floors. In accordance with local planning policy, a mix of dwelling sizes has been provided (3 x 2 beds, 1 x 3 bed).
- 7.17 In conclusion, it is contended that the design proposal is respectful of the immediate setting, whilst ensuring an attractive frontage in this prominent location.

### **Affordable Housing**

- 7.18 As identified, local planning policy requires a contribution towards the supply of affordable housing on developments with a capacity for 10 or more additional dwellings. Paragraph 3.8 of the Camden Development Policies Document states that the Council consider that residential developments of 1,000 sqm (gross) are capable of accommodating 10 family dwellings and therefore would be expected to contribute towards the provision of affordable housing. Developments adding less than 1,000 sqm (gross) residential floorspace may be expected to contribute if other considerations suggest the site has capacity.
- 7.19 Considering that Leeder House has a gross floorspace of 950.7 sqm (i.e. under the 1000 sqm threshold) and the 4no. residential apartment are constrained by the

envelope of the existing building, it is contended that a contribution towards affordable housing is not required in this instance. This has been confirmed by Eimear Heavey (Planning Officer, Camden Council).

### **Parking, Servicing and Refuse Facilities**

- 7.20 On-site car parking provision has been restricted to 2no. spaces for the residential units and 1no. disabled space to be used in connection with the employment floorspace. This provision is within the Council's maximum standards and therefore is considered to be entirely acceptable.
- 7.21 Cycle parking for the residential units is provided within the proposed basement of Leeder House, whilst refuse storage is incorporated within the Caretaker's Lodge. The employment units have separate cycle parking provision within the basement of Building 5, however share the refuse and recycling facilities contained within the Caretaker's Lodge. All refuse and servicing will be achieved directly from Erskine Road, which will not have a negative impact upon highway safety considering Erskine Road is not a busy thoroughfare.

## 8.0 Summary and Conclusions

- 8.1 This Statement has been prepared in support of a planning application for the re-development of 6 Erskine Road, Primrose Hill.
- 8.2 The Council has already granted planning permission for the regeneration of the site (Ref. 2010/5214/P) and consequently the principle of redevelopment has already been established. It is contended that the current proposal provides a better mix of uses than the extant planning permission and is acceptable in national and local planning policy terms.
- 8.3 The current proposals are similar to the extant permission in that Buildings 2, 3 and the Caretaker's Lodge are to be refurbished to provide modern employment facilities, whilst Building 5 is to be demolished and replaced with a new 3-storey building, also used for office accommodation. The principle of undertaking these works has been established with the granting of planning permission 2010/5214/P and only minor design alterations distinguish these from the extant permission.
- 8.4 The main departure from the extant permission relates to Leeder House, where it is now proposed to refurbish and change the use of the building from office to 4no. residential apartments. This will ensure that the building continues to provide a positive contribution to the character and appearance of the Conservation Area.
- 8.5 The scheme generally satisfies national and local planning policy which supports the regeneration of previously developed land and investment in the economy. As such, the proposal fully accords with the presumption in favour of sustainable development as set out within the National Planning Policy Framework. It will not result in any significant or demonstrable adverse impacts upon neighbouring amenity, moreover it will provide an uplift in employment floorspace and incorporate residential dwellings to meet local demand.
- 8.6 The proposed refurbishment works will essentially extend the life of the buildings on this site and ensure that it continues to provide a positive contribution to the Conservation Area and operate as a predominately employment-led site for the foreseeable future.

8.7 In light of the above, it is respectfully requested that this application is granted planning permission.

## **Appendix 1 – Camden Council’s Pre-Application Response**

**Date:** 4 July 2013  
**Our Ref:** 2013/3064/PRE  
**Contact:** Eimear Heavey

**Direct Line:** 020 7974 2949

**Email:** [Eimear.Heavey@camden.gov.uk](mailto:Eimear.Heavey@camden.gov.uk)

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Henry Courtier  
DPP  
4th Floor  
Hamilton House  
Mabledon Place  
London  
WC1H 9BB

Dear Henry Courtier

**Re.Planning Pre-application advice meeting ref. 2013/3064/PRE  
6 Erskine Road  
London  
NW3 3AJ**

### **Redevelopment of site**

I refer to our pre-application meeting held on June 5<sup>th</sup> about the above proposal.

Set out in this letter is a detailed note of the principal issues discussed at the meeting and advice on planning obligations and what you need to do in order to submit a valid planning application for your proposal. The letter also provides details of local groups that you may wish to notify or consult on your proposals in advance of submitting your application.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter or the attached document please do not hesitate to contact **Eimear Heavey** on **020 7974 2949**.

Thank you for using Camden's pre-application advice service.

Yours sincerely

Eimear Heavey

This document has been broken into sections for the ease of dealing with each of the planning considerations. The sections do sometimes overlap and will need to be read collectively in order to provide a comprehensive response.

### **Planning policy**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that developments must be determined in accordance with the development plan unless material considerations indicate otherwise.

The document which makes up the development plan is Camden's Local Development Framework (LDF). There are a number of documents making up the LDF, but those primarily of concern in this instance are the Core Strategy (2011), and the Development Policies (2011). Other documents which are of relevance include the Camden Planning Guidance (CPG).

Finally, the National Planning Policy Framework (NPPF), published in 2012, is an important consideration as is the London Plan (2011).

### **Site and surroundings**

The site currently comprises small business units in the main Leeder House building which fronts Erskine Road along with various smaller scale 'mews' buildings to the rear. The units all appear to be occupied, generally within the B1 use class, however building 4 is currently occupied by TriYoga, a leisure facility within use class D2.

Leeder House, and units 1, 2 and 3 on the eastern side of the service yard fall within the Primrose Hill Conservation Area for which a Conservation Area Statement was adopted in January 2001. Leeder House, along with the adjacent building to the rear of 91 Regents Park Road (unit 1), are identified within the CA Statement as making a positive contribution. The service yard itself, along with units 4, 5 and 6 fall outside of the conservation area.

Historic records show that Leeder House was originally occupied by a cabinet maker and Organ manufacturing business and that the buildings making up the rest of the site (units 1-6) were built roughly at the same time, or shortly after (although some rebuilding may have occurred over the years). In outward appearance at least, they would appear to comprise a homogeneous group making it somewhat confusing as to the boundary of the conservation area bisecting the site.

In addition to their architectural appearance, the buildings by way of their business/light industrial usage, also contribute to the mixed use nature of the area which is stated in the CA Statement as making up part of the area's particular character.

### **Recent Planning History**

**2012/0284/P:** Change of use of Block 4 from leisure studio (Class D2) to office use (Class B1), erection of roof extension and installation of PVs and rooflights, 3-storey extension to east elevation, alterations to doors and windows and installation of external condensing plant in acoustic enclosure at ground floor level north of the building.

**2010/5214/P:** Planning permission granted in Nov 2011 for '*Extension of existing office accommodation (Class B1) to accommodate an additional (1473sqm) floorspace including the demolition and replacement of Block 5 with a part 2/part 3-storey building plus enlarged basement, a roof extension and alterations to the elevation of Block 3, roof extension and alterations to elevations of Block 3, alterations to the rear elevations of Leeder House and the caretakers' lodge and erection of four core blocks (providing circulation and services) between the caretakers lodge and Block 2 (3-storey), between Blocks 2 & 3 (3-storey), between Leeder house and Block 5 (5-storey) and between Blocks 4 & 5 (3-storeys)*'.



**2009/0970/P:** Planning permission was **refused** in Feb 2010 for “*Extension to existing office accommodation within use class B1 to include the demolition and replacement of Block 5 with a part 2/part 3-storey building plus enlarged basement, a roof extension and alterations to the elevation of Block 2, roof extension and alterations to elevations of Block 3, alterations to the rear elevations of Leeder House and the caretakers' lodge and erection of four core blocks (providing circulation and services) between the caretakers lodge and Block 2 (3-storey), between Blocks 2 & 3 (3-storey), between Leeder house and Block 5 (5-storey) and between Blocks 4 & 5 (3-storeys).*”

**1999:** Permission granted (PE9900293) for Block 4 (i.e. the building which is the subject of this application) for a change of use to D1 uses, subject to restricted hours of operation and noise controls.

### **Proposed Scheme**

The scheme proposed as part of this pre-application discussion involves the following aspects:

- The total demolition of Leeder House and the erection of a facsimile, replacement building;
- The new building will be utilised for 4 residential flats;
- The demolition and replacement of building 5;
- The refurbishment of the Caretakers lodge and buildings 2 and 3;

It is noted that this proposal does not include any developments to Building 4, however planning permission was granted last year for a change of use to B1 along with various extensions and alterations (See planning history above).

### **Demolition of Leeder House**

As mentioned previously, Leeder house is within the Conservation Area and has been identified as a positive contributor to the Conservation Area (CA). The Council has always held the view that positive contributors to the CA should be retained within development proposals.

In terms of the NPPF, Leeder House is considered to be a Heritage Asset (a positive contributor) within the Designated Heritage asset (the CA). Para 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated Heritage asset, great weight should be given to the asset's conservation. This paragraph also states that the significance of a designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset.

As it is proposed to demolish the Heritage asset, para 133 of the NPPF is relevant. It states that consent should be refused by the local authority unless it can be demonstrated that the loss is necessary to achieve substantial public benefits that outweigh the loss of the building, or all of the following criteria can be met:

- The nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium terms through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the loss of the building is outweighed by the benefit of bringing the site back into use.

The Heritage statement which accompanies this pre-application enquiry concludes that the building is of low significance to the area; it is noted that Leeder House was afforded positive contributor status in the Primrose Hill CA statement and as such is considered to be of considerable significance to the area. Although the building has been rendered, this has not caused so much deterioration in its appearance as to remove its classification from the CA statement. The current building reflects in its form and detail important attempts, developing in the nineteenth century, to design

industrial buildings within new idioms. This is clearly still attested by the building's overall symmetry, the pattern of fenestration, and robust detailing. The history of the building reinforces and supports the arguments in favour of its positive contribution.

A structural statement was also submitted as part of this enquiry and it states that since last inspection in 2007, the building has deteriorated and a number of fractures to the masonry brickwork to the front, rear and gable elevations. It concludes that 'it may be more economical to reconstruct the elevations rather than undertaking extensive repairs and upgrading works'. Having informally consulted the Borough's engineer for this area, it is apparent that this is not a building at risk and no complaints have been received regarding this property.

Whilst it may be true that the building has deteriorated to some degree over time, it is unclear if there has been any investment or attempt to upgrade the building over the years. This is an area which the Council would require further information/investigation on. Nonetheless it is unlikely that the issues outlined in this structural statement would warrant the demolition of a heritage asset.

DTZ have undertaken a viability study of the current planning consent on the site and conclude that it would not be financially viable for a developer to implement the current scheme but that it may be economically viable if it were possible to substantially reduce the build costs or increase the density on the site or to introduce residential, a more valueable use on the site.

Notwithstanding any potential viability issues with the current planning consent, it would still need to be justified in terms of the NPPF that the proposed demolition of Leeder House is either necessary in order to achieve substantial public benefits or comply with all of the criteria set out above. Given the fact that the building is currently fully occupied and no marketing details have been submitted to indicate that there have been problems letting the building it is unlikely that the propose demolition of Leeder House would satisfy the criteria set out in the NPPF.

In light of the above the Council is unlikely to support the principle of demolition of Leeder House.

### **Design and amenity Issues**

Should the principle of demolition and new-build be established, a contemporary but contextual style of architecture is likely to be considered appropriate for this location. The proposed rebuilding of it in facsimile does not exactly return the 'heritage asset' to the Conservation Area. Consequently it is unlikely to be supported by officers.

Building height on the Erskine Road frontage should generally be lower than, and at no point exceed that of the existing Leeder House, which significantly exceeds the scale of its surroundings.

The proposed alterations to the caretakers lodge and core servicing area appear to be minor as do the alterations to building 2, however it would need to be demonstrated that the window openings and roof alterations do not impact on neighbour amenity in terms of overlooking or loss of privacy. As such I would request that an amended daylight sunlight report be submitted in the event of any application. The proposed introduction of a pitched roof in place of a flat roof on building 3 should not cause any potential issues however it would need to be demonstrated that no loss of light would occur to neighbouring properties.

### **Land Use**

Had the proposed demolition of Leeder House been deemed acceptable in principle, the introduction of 4 residential units in place of B1 office space would need to be assessed. As this would be a new building, it would not be considered a straight change of use from office to residential under permitted development rights.

Given that the premises is currently in use as B1 space the justification for its loss would need to be fully justified in line with Policies CS8 and DP13. Such justification

would need to demonstrate that the site is no longer suitable AND include evidence that the possibility of redeveloping the site for a similar use has been fully explored. The Council is keen to encourage more space in use Classes B1c and B8 for which there is a demonstrable shortage in the Borough – particularly in the Camden/Chalk Farm area where this site is close to. When it can be demonstrated that the site is not suitable for any other business use other than B1 offices, the Council may allow a change to permanent residential uses.

Meanwhile Policy DP2 states that the Council will seek to maximise the supply of additional homes in the borough by expecting the maximum appropriate contribution to supply of housing on sites that are vacant or underused, taking into account any other uses that are needed on the site. Furthermore, Policy DP5 seeks to contribute to the creation of mixed and inclusive communities by securing a range of self contained homes of different sizes that meet the dwelling size priorities set out in the policy.

Notwithstanding the above, and the fact that there would be an overall increase in flexible B1 space as a result of this development, the recent change in the permitted development rights which supports the change of use from office to residential in areas outside of the Central Activities Zone (CAZ); there is an overall shortage of housing in the borough and the erection of additional housing, particularly large family sized units, as proposed here, is likely to be welcomed.

### **Affordable housing**

The proposed GEA of Leeder House is expected to be 953.9sqm and in terms of Affordable housing, Policy DP3 states that the Council will expect all developments with a capacity for 10 or more dwellings to make a contribution to the supply of affordable housing. The amount of housing is then calculated on a sliding scale. Eg a site of 1000sq metres is capable of providing 10% AH, a site of 2000sq metres is capable of providing 20% AH etc. In this instance it would equate to approx. 9%AH.

### **Sustainability**

Developments involving 5 or more dwellings and/or 500sqm (gross internal) floorspace or more are required to submit an energy statement which demonstrates how Co2 emissions will be reduced. Given that a new building is proposed as part of this scheme, this statement is required. See Camden Planning Guidance (CPG3) for more info on what to include in the energy statement. As a guide, at least 10% of the project cost should be spent on the energy improvements.

Developments involving a change of use or a conversion of 5 or more dwellings or 500sqm will be expected to achieve 60% of the unweighted credits on the energy category in their Ecohomes or BREEAM assessment, whichever is applicable. (I am unaware of the floorspace size of this development but it an Ecohomes assessment will be required).

It would be also useful to look into the potential for using CHP (Combined Heat and Power) or installing a CHP for the entire site or else make a contribution towards a decentralised network.

All developments should aim for at least 10% of the total value of materials used to be derived from recycled and reused sources.

### **Mayors Community Infrastructure Levy (CIL)**

The proposal would be liable for the Mayor of London's CIL as the proposal involves 4 additional residential units. Based on the Mayor's CIL charging schedule and the information given on the plans, the charge is likely to be approx. £47k (950sqm x £50). This would be collected by Camden after the scheme is implemented. Other contributions may also be required such as open space and education.

### **Transport Impacts**

I understand a Travel plan was submitted as part of the previous consent and I would suggest that an updated plan is submitted in the event of an application. The

transport department are likely to request a construction management plan be secured by S106 to manage the overall development. In the event of an application being approved it would be beneficial for this to include the works to Building 4.

### **Planning application process and supporting information**

In light of the information outlined above, the principle of demolition of Leeder house is not likely to be supported by the but that is not to say an application cannot be submitted and determined without prejudice. If an application were to be submitted all of the information I have set out above should accompany the application form.

### **Conclusion**

The main difference between this application and the 2010 application for this site is the proposed demolition of Leeder house and the introduction of residential in place of office space. The principle of demolition would need to be fully justified in terms of the NPPF prior to any further aspects of the scheme being assessed.

## **Appendix 2 – EIA Screening Opinion**

## Henry Courtier

---

**From:** Heavey, Eimear <Eimear.Heavey@camden.gov.uk>  
**Sent:** 15 August 2013 15:14  
**To:** Henry Courtier  
**Subject:** EIA screening

Dear Henry,

Please see below regarding the EIA screening report.

An Environmental Impact Assessment (EIA) Screening Opinion has been submitted for consideration in respect of the redevelopment of the site at 6 Erskine Road

### Assessment

The 2011 EIA Regs define EIA development as being either:

- (a) Schedule 1 development; or
- (b) Schedule 2 development which is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development does not fall within any of the descriptions given in Schedule 1 and thus cannot be considered a Schedule 1 development.

The proposal would therefore fall within Schedule 2 10(b) as an “*urban development project...*”, where the applicable threshold and criteria is the development area being above 0.5ha. In this instance the site area is 0.24ha and therefore an EIA is not required.

### Conclusion:

The proposed development falls within Category 10(b) of Schedule 2 of the Regulations and is therefore a development, which may require an Environmental Impact Assessment.

Although the development is, by definition, Schedule 2 development, it is not considered to be EIA development as defined by Regulation 2(1) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011.

Regards,

Eimear Heavey  
Senior Planning Officer  
Regeneration and Planning  
Culture and Environment  
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