



Ref: A081576/L001  
Date: 15 March 2013

**Mr Neil Quinn**  
Planning Department  
London Borough of Camden  
Camden Town Hall Extension  
Argyle Street  
London  
WC1H 8ND

Dear Mr Quinn

**Planning Application Ref: 2012/6635/P  
8-16 Cromer Street, London, WC1H 8LH**

**Introduction**

I write in relation to the above retrospective planning application which is under consideration the Local Planning Authority (LPA). WYG has been instructed by the owners of 81-16 Cromer St to provide specialist planning input following concerns raised during the determination of the application.

Following our discussion on the telephone on 13 April 2013, and having reviewed email correspondence between Coupdeville Architects and the LPA, I have agreed to provide you with information that seeks to justify the conversion of the office premises (Class B1) into a Live/Work unit in light of the Council's adopted Policy DP13: Employment Premises and Sites.

**Background and Previous Use**

My client purchased the site in June 2012 in order to expand their Toronto based record company to the UK. Play Records has operated for over 15 years in Canada, and their highly successful record label has worked with a number of first class music professionals.

Prior to the purchase of the premises, the building had been empty for at least 12 months. The premises were previously occupied by a solicitor's firm which have since moved to alternative accommodation. The property was marketed for office use by LDG Commercial ([www.ldg.co.uk/commercial-lettings](http://www.ldg.co.uk/commercial-lettings)). During discussions the client had with the agents at the time, it was understood that the property had been marketed for extensively prior to their purchase.

Notwithstanding this, my client purchased the premises primarily to act as a base for their expanding business operation and in that regard, it is considered that the use of an element of the building for residential purpose is incidental to the main operation of the building.

**Planning Policy Justification**

The proposed change of use from Class B1 to Sui Generis (live/work) use is assessed against Policy DP13 of the Camden Development Polices DPD (adopted November 2010). The policy seeks to limit applications which result in the change of use to non-business uses unless two criteria can be met:



- a) It can be demonstrated that the building is no longer suitable for its existing business use; and
- b) There is evidence that the retention or reuse for similar or alternative business use has been fully explored over an appropriate period of time.

Moreover, Policy DP13 supports the provision of live/work premises provided:

- a) There is no loss of any permanently residential units; or
- b) There is no loss of sites in business use where there is potential for that use to continue

The supporting text to the policy recognises the valuable contribution that live/work premises can make to the range of business premises in the area and furthermore, it allows buildings to be retained in business use were otherwise that use may be lost.

Camden Core Strategy "Policy CS8: Promoting a successful and inclusive Camden economy" is particularly relevant and it is considered that proposal entirely meets the objectives of this policy, which "aims to make sure that the borough's economy will be stronger and more diverse".

### **Justification for the Proposed Use**

The starting point for consideration of the acceptability of the proposed use is that the proposal seeks to retain an active business use that meets the objectives of Camden's employment policy. That is, to provide a range of employment premises to suit the different needs of businesses for space, location, accessibility. Paragraph 13.1 of the Development Policies DPD states that providing a range of business units "is vital to maintaining and developing Camden's economy".

The proposed business use is one which is particularly unique. The building covers three floors and extends to a floor area of approximately 500 sqm. At basement level, Play Records (or Play Deeper as their UK branch is known), propose to construct a state-of-the-art recording studio. The company has already invested significant sums in upgrading the building with the objective is to attract high-end clients from the film, TV and music industry, to use the studios for the recording and production of music. The basement level will also accommodate a reception area, which will function as a "meet and greet" area for clients. The remainder will be occupied by three recording studios and supporting washroom facilities.

The use of the premises for business purposes is not a typical office format. The operation will be in active business use anywhere from eight to up to 24 hours a day, and often at weekends. Clients will be able to book the facilities for block periods, typically for a day or two, but it is not unusual for some clients to require the facilities for up to a week, a month or more. They require comfort, safety and convenience such as a fully equipped kitchen and even overnight sleeping when necessary. Play Deeper have designed a unique environment that has addressed these requirements and will enhance the area whilst meeting the objectives that are guiding the re-development of the King's Cross area.

It is expected that the business will employ five permanent staff, with additional supplementary staff of up to five personnel at any one time. In addition, clients will often bring their support teams with them when booking the facility. Accordingly, it would not be uncommon for up to 20 people to be using the facilities available during their booking period.

The ground floor (middle floor), acts as a mixed planning use area. There is a large meeting/dining area, where clients can discuss working matters and undertaken business meetings, whilst the supporting kitchen area allows clients to use the facilities for self catering. Clients are free to bring with them their own chef and catering team if required. There is also space to accommodate overnight guests in this area as well as providing clients with an area to relax, watch television during break periods and listen to music with the additional DJ and amplifying equipment available.



The first floor (top floor) is solely the living quarters of the owners and accommodates a bedroom, bathroom and storage facilities. Accordingly, we estimate the use of the premises will be 50% Class B1 Business Use, with 50% Class C2 Residential use. However, from the perspective of the greater intensity use, we consider that the primary use of the premises is for Class B1 use. The living arrangements are a pre-cursor to the complex and unique nature of the business and its clients.

The surrounding local area is one which lends itself perfectly to a live/work space. Bus services can be accessed within a short one minute walk to Greys Inn Road, and the premises are within five minutes on foot to Kings Cross and St Pancras Stations. From here, excellent links are provided both to the wider Central London area, Greater London, and beyond to Northern Europe. The location is within close proximity of Eurostar facilities was a key consideration for Play Deeper, when selecting their preferred location to expand their operation.

Cromer Street itself accommodates a wide variety of uses. From The Lucas Arms public house next door, office uses directly opposite and across Greys Inn Road opposite the entrance to Cromer Street, and a large area of high density residential uses opposite, and adjacent to the building. The west end of Cromer Street provides supporting retail and service uses such as a dental surgery and convenience shopping facilities. A doctor's surgery lies just around the corner on Greys Inn Road (number 231).

In light of the above, it is concluded that the proposed use entirely meets the Council's planning policy objectives for providing a range of business premises to support the Borough's diverse business needs. Furthermore, the residential element is considered to be appropriate given the surrounding uses and proximity to public transport and local retail and service facilities.

### **Alternative Accommodation in the Local Area**

Whilst it is considered that the change of use application to allow the conversion of the premises to live/work use is consistent with the Council's employment policy particularly given the unique operation offered by Play Deeper which as explained lends itself to "in-house" living facilities, it is pertinent to examine the availability of office accommodation for businesses wishing to locate to the local area.

Kings Cross itself is one of Europe's' growth areas for offices, and a number of "blue chip" companies are being attracted to the area. However, for smaller businesses, there is also a substantial level of stock and a wide variety of accommodation available. A search on Property Agent Estates Gazette's website (<http://www.estatesgazette.com/propertylink/>) for office accommodation within half a mile of the local postcode area highlights 15 available options. These range from small serviced office suites within purpose built offices blocks with modern facilities to converted period buildings and larger open plan large floor plate premises. Widening the search to 1 mile increases the level of availability substantially to 115 available properties.

In light of the above, it is clear that the change of use of the application site will not result in a situation where there is insufficient available office stock within the local area to support a wide variety of business needs.

### **Conclusion**

We have been instructed to assist the owners of 8-16 Cromer St in relation to the retrospective planning application at their premises to allow the change of use from Class B1 to Sui Generis live/work use.

We have reviewed the Council's planning policies in relation to its employment strategy and provided a detailed synopsis of the proposed use of the premises. The use is a unique concept, which lends itself



ideally to in house living accommodation, which is required to the lengthy and irregular hours that the premises will be in use and the owners will be required to be working. Accordingly, we consider that this provides strong merit to permit the loss of a small area of the premises to residential use particularly given the investment to owners are making into the local economy.

In addition, the application site is entirely suitable for residential use being within close proximity to high quality transport links and local retail and service uses. Finally, there is a significant surplus of available office accommodation in the local area and beyond that meets a wide range of business needs.

On balance, we therefore conclude that the proposals accord with Policy DP13. The supporting text to that policy notes that the Council "aims to make sure that the borough's economy will be stronger and more diverse while helping more residents to have the skills, education and training to take up local job opportunities and bridge Camden's skills gap" (Paragraph 13.2). The exciting nature of the business and employment opportunities brought forwards by our client's occupation of this building is fully in keeping with the spirit of these aims and objectives.

In light of the above, we would encourage the Council grants planning permission for the change of use application as soon as possible so that the landowner can continue the building work to prepare the premises for its intended use.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'M Plotnek', with a horizontal line underneath.

Max Plotnek  
**Associate - Planning**  
For and on behalf of WYG

cc. C Smith / Z Brown-Smith – Play Records