

Conor McDonagh
Development Control
Planning Services
London Borough of Camden
Town Hall
Argyle Street
LONDON WC1H 8ND

*please reply to
Gill Scott
48 Rochester Place
London NW1 9JX*

01.03.2014

Dear Conor

79 Camden Road and 86-100 St Pancras Way, NW1
Application reference 2013/7646/P

This proposal would provide much needed social housing and much needed cash for the borough coffers but it removes all employment space in providing 166 small residential units in a small space while reducing the amenity of those living/working and moving around it.

Summary of our concerns *documents are attached*

1 Loss of industrial space:

The application in its demand to create mass residential fails to provide replacement industrial space; description of the site location and the existing building fail to acknowledge the industrial nature of the area and the site.

By creating no replacement industrial the proposed non-employment uses will prejudice continued industrial use in the surrounding area and make a complete mockery of the London Plan, Camden's LDF and the efforts of Inspectors, Officers and local business who have followed Camden's UDP and the LDF in the last 15 years.

2 Site and surroundings:

This building has been designed on paper without regard to the plot and surroundings. It has not been designed to sit in its environment; it is a selfish building – taking from its community, giving nothing back. The same design is used on all sides of the build.. **Rochester Place** is not a 'main' road – it is a back street. Any new build should respect that. The narrow setted mews cannot take the services/people/traffic as designed.

3 Tree removal and radical pruning in public space:

All the local trees are set on, or close to, busy streets. All have high amenity value – the effect on the existing tree-scape will be dramatic. A mature London Plane is to be removed; two others are to be much reduced by severe pruning. London Planes absorb pollution; the planned replacement does not.

4 Residential standards are not met:

Some flats are undersized according to Camden standards; standards for refuse collection and storage are not met. Life is made very difficult for the less able with difficult access arrangements.

5 Construction and management plans are non-existent for the specific site: *no other documents supplied*
Does not describe the quantities to remove, the number of loads, the routes for traffic.

What it documents is a standard set of criteria eg. where hoardings will be located; but with 13m piling and deep excavation for the basement alongside the 4m carriageway in Rochester Place – will the road be closed?

If any document has not reproduced well digitally please advise. Hard copies will be provided.

Sincerely

Gill Scott
for and on behalf of Reed's and Rochester Neighbourhood Association

1

Loss of industrial space

2013/7646/P 79 Camden Road and 86-100 St Pancras Way

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Site location

extract from Employment statement prepared by CBRE on behalf of Barratt

SITE Location

3.2 The Site covers an area of approximately 0.42 hectares (ha). It is bound to the east by Camden Road, to the south by St Pancras Road, to the west by commercial premises fronting St Pancras Way and to the north by Rochester Place.

3.3 The site is located approximately 650 metres to the north east of Camden High Street. It is outside the main Camden commercial centre and the designated Town Centre.

3.4 The buildings are surrounded on all sides by predominately residential uses, in a mixture of dense housing estates and Georgian terraced homes. Immediately to the site's north-east at 102 St Pancras Way, television studios are located and along Rochester Place and Mews a number of small units in light industrial or live-work premises are located.

A desktop planning history search has revealed that in the past 13 years there have been a number of applications for change of use light industrial and warehousing units to residential, including live-work units (which according to Camden's LDF are also treated as C3 units). These include 28 Rochester Mews (Ref: 2011/3689/P – granted November 2011, Ref: PE9800724R2 – granted March 2000) and 26 Rochester Mews (Ref: PEX0100091 – granted April 2001).

The description of the site [above], which sets the scene for the whole document (**Employment statement prepared by CBRE on behalf of Barratt**), has been selective in its description (?because it was all a desktop survey) and omits all relevant information.

The site is in the old Kentish Town Area which protected Industrial buildings in Rochester Place [UDP] until 2010. The LDF protects industrial stock using the same language – but does not indicate areas. We provide illustration of the buildings in the immediate area which are designated as 'industrial stock'. All existed in 2005; all that were in the Kentish Town Area are still in use. We also provide [page 3-4] an Officers report 2005 which describes the importance of the diminishing industrial stock of Rochester Place in a report on three industrial buildings with, then – current [2005], planning applications.

26 and 28 Rochester Mews [recorded in the Employment statement] – were not in the Kentish Town Area.

In Rochester Place, since 2000 there has been one change of use from light industrial to a small amount of office at 57-59 Rochester Place [currently has an application for change of use to residential]. There have been 27 applications at the following properties: 102 St Pancras Way and the following numbers (all in Rochester Place), 26-28 [three applications], 36-38 [three applications/2 appeals],

5 [four applications/2 appeals], 61-63 [nine applications/2 appeals], 50 [two applications/1 appeal], 60, 62, 64 [two applications], 68-74. None have allowed industrial space to be removed. One application at 26-28 Rochester Place permitted 13 flats over the industrial rebuild.

No where in any documentation is the industrial designation of Rochester Place acknowledged. Reed's and Rochester Place Neighbourhood Association [on whose behalf I write] and the Rochester CAAC have been involved with each of the applications listed. Some of the applications were for much reduced amounts of industrial space; none were permitted. We have supported Camden at every appeal; none were permitted.

By failing to correctly acknowledge the existence and size the industrial units the applicant, with the proposal, will isolate and prejudice continued industrial use at 26-28 Rochester Place and 102 St Pancras Way. (Camden LDF: DP13 – Employment premises and sites/g)

Site description

This site was built as and remains B1c/B8; it was built as industrial workshops with labs and offices on the first floor [St Pancras Way side] a successful application in 1991 enabled internal subdivisions to be made and the buildings to be used for any purpose within B1. Our drawings show the before and after partition changes.

The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories:

B1 Business – Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.

B2 General Industrial – Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).

B8 Storage or distribution – This class includes open air storage.

in extract from Employment statement prepared by CBRE on behalf of Barratt SITE Location [see page 8 this report] paras 3.5–3.8 is unrecognisable in relation to the building as we know it with the exception of para 3.9 An area of hard-standing providing good vehicles access and car parking lies to the south of the main building, along St Pancras Way.

Hilger had small factory lab units in Rochester Place at 24, 35-47, 55, 61-63, and 60 as well as 92-100 St Pancras Way in the 1930s. The large factory unit and head offices were built in 1920s on their own site after the demolition of the smaller units.

1968 Hilger moved out; Odhams moved in using the Rochester Place site as print works. In the Application, 9 March 1973, Officers will note that the building was owned by IPC Newspapers and continued use as a print works.

At some point a new four floor office block and facade was added to the area on Camden Road.

1991 ASTMS union >MSF union applied for removal of conditions which restricted office use in the building [to get all uses within B class] – and subdividing the large spaces with partition walls. Courtaulds Textiles, creating textile samples, occupied two thirds of the industrial ground floor.

Camden Council, Finance/Social/Parking services were the last occupants of the building.

The applicant describes existing use as vacant with lawful consent for Class B1a offices with some ancillary public facilities. There is no mention of all B1-B8 use. They further report vacation dates 79 Camden Road and 86 St Pancras Way in spring 2010 by Camden Social Services and 100 St Pancras Way by Camden Parking Solutions in summer 2012
Camden Council is selling its own building.

Camden provided the applicant with marketing information [by DRE] from 2011 as potential for a residential-led redevelopment following LBC's dismissal of the site for continued commercial use due to oversupply and its poor characteristics (CBRE provide a Marketing Summary by DRE – Appdx 4). The applicant highlights LBC's Memorandum (10 March 2011 which formed part of the DRE Marketing Pack) which stated 'on the basis of previous internal inspections of 79 Camden Road most of the vestiges of the previous light industrial and storage uses have disappeared, by virtue of this and noting the relatively limited servicing arrangements it is considered unlikely that the buildings [79 Camden Road and 98-100 St Pancras Way] would be viewed as suitable for reversion to alternative light industrial or distribution use' and also states that the Memorandum says **that this 'would need to be confirmed, especially in relation to the rear of the site which adjoins Rochester Place'.**



The site location and the site description are incorrectly described.

Throughout all the applications [27 applications and 7 appeals] in Rochester Place officers gave observations and reported on the industrial setting of the street and the industrial nature of the buildings. Inspectors took a dim view of inadequately described buildings and marketing evidence which incorrectly described potential and costs.

The premise of the application reports is to indicate that the site can no longer be used for B1 offices, or 'alternative uses', and therefore the site can be turned over to housing. The whole report/Employment statement by CBRE is that the site is only suitable for residential.

Respecting local character

Site location: specific design requirements

95% of the original/existing industrial stock is one floor high [ground floor/ceiling heights in excess of 3.5m – 4m+]; some have a first floor with floor/ceiling heights up to 3m]. This site was build with the same specification.

Where new build has been permitted, replacement of B1c/B8 has been a requirement with additional design specifications to match build height of any street frontage [requested by Officers and Inspectors].

The residential [over] permitted at 26-28 Rochester Place, required [requested] a set back at the residential/second/third floor level. The overall height of the residential build [over industrial new build] was also required to match height of closest buildings in industrial mews. Officers should note one flat (of 13) is occupied permanently and 12 are let as hotel apartments – despite enforcement checking (twice).

We remind officers of Camden Development Policies

LDF states at DP24


Respecting local character

24.11 Given the highly built-up nature of Camden, careful consideration of the characteristics of a site, features of local distinctiveness, and the wider context is needed in order to achieve high quality development which integrates into its surroundings.

24.12 In order to best preserve and enhance the positive elements of local character within the borough, we need to recognise and understand the factors that create it. Designs for new buildings, and alterations and extensions, should respect the character and appearance of the local area and neighbouring buildings. Within areas of distinctive character, development should reinforce those elements which create the character. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials. In areas of low quality or where no pattern prevails, development should improve the quality of an area and give a stronger identity.

24.13 Development should not undermine any existing uniformity of a street or ignore patterns or groupings of buildings. Overly large extensions can disfigure a building and upset its proportions. Extensions should therefore be subordinate to the original building in terms of scale and situation unless, exceptionally, it is demonstrated that this is not appropriate given the specific circumstances of the building. Past alterations or extensions to surrounding properties should not necessarily be regarded as a precedent for subsequent proposals for alterations and extensions.

24.13 Design and Access statements should include an assessment of local context and character, and set out how the development has been informed by, and responds to it. We have prepared a series of Conservation Area Statements, Appraisals and Management Plans which describe the character and appearance of individual conservation areas and set out how the Council considers each can be conserved and enhanced. **These should be used by developers to inform their understanding of the special character of the area, and we will take these into account when assessing development proposals in conservation areas.** Development Policy DP25 – Conserving Camden's heritage provides further guidance on the preservation and enhancement of the historic environment.

 **There is no reference to the setting of the building. The applicant statement fails to fulfill Camden's LDF request. The applicant has failed to give any information about the relationship between the proposal and the setting.**

21-28
41 - 63
36 - 37

POLICY OBSERVATION ON PLANNING APPLICATION

Date Prepared	15 June 2005	
To: DC Case officer	A. Neil McDonald, B. Stephen Lim, C. Neil McDonald	
From: FPP	Rob Farnsworth	Tel: 5964
Application Ref	A. 2005/0971/P, B. 2005/1047/P, C. 2005/1691/P	
Site address / location	A. 26-28 Rochester Place NW1 9JR B. 61-63 Rochester Place NW1 9JU C. 36-38 Rochester Place NW1 9JX	
Description of the proposal	A. The redevelopment of the site to provide 640 square meters of employment floorspace (use class B1/B8) and 14 residential units, including roof terrace, car parking, cycle parking and landscaping. B. Demolition of existing warehouse and storage premises and the erection of a part two, part three, storey building comprising 9 residential units and 2 units within Class B1 (scheme has been amended from that previously withdrawn in February 2005, ref: 2004/5026/P). C. Demolition of existing B1 recording studio and garage and redevelopment to provide a 3-storey building comprising B1 offices on the ground floor and 8 residential units (1x 3-bed house, 6 x 1-bed flats and 1 studio flat).	

SUMMARY

There are concerns that, if permitted, these proposals would undermine the mixed-use character of Rochester Place, and the contribution it makes to the mixed-use character of the wider Kentish Town Area. There are also concerns about the extent of loss of business floorspace on a site of over 1,000 sq m at 26-28 Rochester Place, and the flexibility of the proposed business spaces, particularly at 61-63 Rochester Place. The decisions on all of these proposals will be finely balanced, and, given their cumulative impact, it may be appropriate to refuse the largest scheme, the two schemes referred to in the preceding sentence, or all three schemes.

POLICY CONSIDERATIONS

The shortage of housing in the Borough, and the Council's policies to prioritise housing in re-use of redundant and underused sites, are important considerations. These issues are not discussed in detail here, as they are well known and understood, and have been referred to in earlier observations.

The issue that this observation seeks to address is the loss of business floorspace, and, notwithstanding the priority given to housing, whether the loss warrants refusal of these proposals.

Adopted UDP policies with relevance to this business space are EC3 (which seeks retention) and EC6 (welcoming flexible use). In the event of a refusal, strategic policies SEC2 (range of employment to match workforce) and SEC3 (range of premises for activities) would back-up those policies.

Replacement UDP policies with relevance to this business space are E2 (which seeks retention as per EC3, but also seeks to retain flexible design features), and E3B (which specifically seeks to retain premises in the designated Kentish Town Area suitable for light industry or local distribution). The level of objection to these policies was such that they have very limited weight, although they may have more following receipt of the Inspector's Report into the Replacement UDP Inquiry, which is hoped to be at the end of summer or autumn. It will be difficult to sustain the purpose of the Kentish Town Area designation if a large amount of business space is lost.

Supporting documents for UDP policies are the Mayor's draft SPG on Industrial Capacity (including storage and distribution) and the Roger Tym and LBC studies of industrial floorspace demand and supply (the LBC study "Industrial and warehousing land supply assessment" is particularly helpful).

The Mayor's draft SPG provides in SPG3 for the protection of locally significant industrial sites, and in SPG4 provides for criteria-based policies to manage the reuse of other industrial sites. The draft SPG indicates that a reasonable measure of industrial demand is whether the site has been vacant and marketed for at least 2 years in a way that could meet the needs of industrial users (a similar provision is in the Replacement UDP). The Mayor's draft SPG5 suggests mixed-use development should not incur a significant loss of "industrial employment capacity".

The LBC study found that there were 620 sites where industry and warehousing were the main use, of which 66 were in the Kentish Town Area. The total site area with industry and warehousing as main use was 562,116 sq m. The part within the Kentish Town Area amounts to 49,594 sq m. The Roger Tym study indicates that, in general terms, there is a demand for light industry and local distribution space in Camden, and that occupiers generally have to compromise on their preferred type of space to achieve a Camden or Central London location.

57-59 Rochester Place has been viewed by the various applicants as a precedent. A scheme there was permitted on 23 April 2003, which was prior to the initial designation of the Kentish Town Area in the Deposit Draft Replacement UDP (this went to the Executive on 28 May 2003), and prior to the completion of the LBC and Roger Tym studies in December 2004. The policy background and evidence base has clearly changed subsequent to the granting of permission. That scheme also related to a less significant site (smaller than site C), area 320 sq m, containing previously existing B1 industrial space of 270 sq m, and proposing replacement B1 industrial space of 90 sq m. The decision based on the specific circumstances of that application cannot be taken to justify permitting the 3 proposals under consideration in this observation.

small-scale intimate development, containing a mix of light industrial and residential units", but also notes with respect to 30-38 that "The bulk, massing and form of its elevation has a detrimental impact on the street". The site is less than 1% of the industrial and warehousing site area in the (limited weight) Kentish Town Area. The replacement business space offered is again sunk below street level, and lit primarily by a skylight. It could benefit from additional street frontage, although the financial appraisal suggests that reducing the ground floor residential element to a single unit would reduce development profit to 8%.

CONCLUSION

These three schemes would result in the cumulative loss of a significant proportion of industrial and warehousing space in Rochester Place and the Kentish Town Area designation. Only site C is in the Rochester Place Conservation Area, and the Conservation Area Statement would seem to support its redevelopment. The Kentish Town Area designation has limited weight through the UDP process, although two recent appeals (including one relating to site C) have upheld the case for retaining business space in this area.

Under adopted UDP policy EC3, site A would appear to be the best suited for continued business use, especially given that it exceeds 1,000 sq.m. I am not aware of any evidence of the site being marketed, which would be required by the Mayor's draft SPG and Replacement UDP, notwithstanding their limited weight. The above factors alone could warrant refusal of the site A scheme. This is also the scheme involving the retention of the lowest proportion of business space, but it should be acknowledged that the replacement business space it provides is the best of the three schemes.

Sites B and C perform less well under policy EC3 criteria, and the pair of schemes together would involve less site and floorspace loss than would development of site A. In terms of business space retention, it would seem to be perverse to permit development of site A if any other scheme is to be refused. Site C is the smallest site, the one for which most marketing evidence has been offered, and the one that appears to require the most refurbishment to allow re-letting. Subject to the Council being satisfied that the highest possible proportion of business floorspace has been retained in this scheme, I believe that it would be difficult to sustain refusal of the scheme for site C on land-use policy grounds.

On my measurement, site B is half as big as site C again. There would appear to have been problems with the previous warehouse use of the site. My interpretation of adopted policy EC3 is that an alternative employment use should be considered before residential, although this sequence is clearer in the replacement policy E2. The replacement business floorspace offered is only 37% of the existing, and appears to be awkward to access (although the architect will argue, in natural light terms at least, that it is better than the existing space). I think that refusal could be warranted on the basis of the inadequacy of the replacement floorspace, but the financial appraisal suggests it may not be possible to achieve anything better.

Collectively, the three schemes significantly impact on the site area available for industry and warehousing in the Kentish Town Area. The biggest impact is from site A, although this scheme also offers the best replacement space. The most awkward replacement space is at site B. The least impact is from site C, where 48% of the business floorspace would be retained. It may be appropriate to refuse all three schemes, but site A is the site where a refusal is most likely to be justified on adopted UDP policy, and site C is the site where a permission is most likely to be justified.

Signed off by

Date

15/06/2005

Officers should note the obs above were written in 2005:

- site A: following four additional applications was sold [twice] redeveloped/rebuilt as two floors of 'industrial' B1/B8 with two floors of residential over. The 'industrial' was built [2007] and with a tenant [fashion industry] in mind was occupied on the day the build was handed over.
- site B: following nine applications and two appeals was sold 2012, refurbished in 2013 and occupied as industrial and will be extended at first floor level for more studio space.
- site C: following three applications and two appeals was sold 2007, refurbished and occupied as a workshop.

In 2005 the LBC [Roger Tym's] study found that there were in Camden, 620 sites [562,116 sq.m.] where industry and warehousing were the main use, of which 66 [49,594 sq.m.] were in the Kentish Town Area. The three Rochester Place sites [above] collectively occupied almost 5% [2,973 sq.m.] of the site area in the Kentish Town Area. A further **3,000 sq.m. were/are in the application site 79 Camden Road/100 St Pancras Way.**

London Plan (Consolidated with Alterations since 2004)**Industrial Capacity**

SPG 10 – Variety of industrial capacity and provision for small and medium sized industrial enterprises in implementing London Plan policies, the Mayor will and boroughs, the LDA, TfL and other partners are asked to:

- (i) manage the stock of industrial premises so that it provides a competitive offer for different types of occupier including logistics, utilities, waste management, transport functions and other related industrial activities. This will entail both improving the quality of provision to meet users' different needs, including those of SMEs and clusters of related activities, and maintaining lower cost capacity or making provision for those requiring affordable business premises to meet local needs;
- (ii) protect industrial sites and premises which meet demonstrable demand for lower cost industrial accommodation;
- (iii) promote the provision of small industrial units and managed workspaces suitable for small and medium sized enterprises (SMEs) and start-up companies;
- (iv) encourage design of industrial premises that enables easy subdivision at a later date as the space requirements of different occupiers change;
- (v) secure provision of small and affordable industrial units in appropriate locations as part of larger mixed-use schemes, including commercial developments and residential schemes where careful siting, design and access arrangements can satisfactorily overcome environmental concerns.

Camden LDF**DP13 – Employment premises and sites**

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.

The Council will support the provision of live/work premises provided they do not:

- h) result in the loss of any permanent residential units; or
- i) result in the loss of sites in business or employment use where there is potential for that use to continue.

CS8 – Promoting a successful and inclusive Camden economy

The Council will secure a strong economy in Camden and seeks to ensure that no one is excluded from its success. We will:

- a) promote the provision of 444,000 sq m of permitted office floorspace at King's Cross as well as in the range of 70,000 sq m of office provision at Euston with further provision in the other growth areas and Central London to meet the forecast demand of 615,000 sq m to 2026;
- b) support Camden's industries by:
 - safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers;
 - safeguarding the borough's main Industry Area; and
 - promoting and protecting the jewellery industry in Hatton Garden;
- c) expect a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace;
- d) support local enterprise development, employment and training schemes for Camden residents;
- e) recognise and encourage the concentrations of creative and cultural businesses in the borough as well as supporting the development of Camden's tourism sector whilst ensuring that any new facilities meet the other strategic objectives of the Core Strategy; and
- f) recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.

Industrial and light-industrial premises

8.10 Camden has one of the lowest stocks of industrial and warehousing space among London boroughs. Our stock includes a few modern, purpose-built premises, a large number of older purpose-built units, railway arches, mews and converted residential spaces. These are spread across the borough with a number of concentrations in areas such as **Kentish Town**, West Hampstead, Kilburn and Gospel Oak. The Camden Employment Land Review 2008 found that the cost of industrial locations in Camden is high, indicating that supply does not meet demand. However, there has been pressure to redevelop the borough's stock of land used for employment purposes, particularly manufacturing and industry, for higher value uses, principally housing. Once employment land in the borough has been developed for an alternative use it is very unlikely it will ever be returned to industrial use. There has been virtually no new provision of such premises in the borough for many years.

8.11 Camden has strong trading links with London's Central Activities Zone (CAZ) and the borough's industrial and warehousing businesses provide it with a range of vital goods and support services. To make sure Camden's new and existing businesses support, and benefit from, the Central London economy, we need to ensure that sites and premises of adequate quality are provided. If suitable premises are not available in Camden these types of services will increasingly be located further away from Central London, with increases in travel and congestion and a potentially negative economic affect on important Central London functions.

8.12 Premises suitable for industrial, manufacturing and warehousing businesses provide jobs for people who would otherwise be at high risk of being unemployed or workless. The Camden Employment Land Review 2008, using data from the National Employer Survey 2003 and the Annual Business Inquiry 2006, found that the skills required for these sectors are fundamentally different from other sectors with similar qualification level requirements, such as retail, leisure and hospitality. Therefore, it is unlikely that the retail or hospitality sectors will provide straightforward alternative job opportunities for people losing industrial/warehousing jobs in the borough.

8.13 In response to the factors outlined above, the Council will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use. This will help to provide premises for new and expanding businesses, support the Central London economy and secure job opportunities for local people who may find difficulties finding alternative work. In addition, we will promote development that includes space for industrial uses to serve the Central London business market. Please refer to our Camden Development Policies document for our detailed approach to the protection of industrial premises and sites.

8.14 The Council's approach to industrial land is consistent with the Mayor of London's Industrial Capacity Supplementary Planning Guidance 2008, which recognises the limited amount of industrial land relative to demand in Camden and so includes the borough in the "Restricted Transfer" category where boroughs are encouraged to adopt a more restrictive approach to the change of industrial sites to other uses.

Employment Statement prepared by CBRE on behalf of Barratt

EXECUTIVE SUMMARY

This Employment Statement has been prepared to accompany the planning application for the redevelopment of 79 Camden Road and 86 – 100 St Pancras Way (“the site”) on behalf of Barratt West London (“BWL”) (“the applicant”).

- The Statement considers whether the existing office B1(a) floorspace at the site remains suitable for continued use, or has potential for alternative employment uses within the B use class, having regard to market signals and the relative need for different land uses.
- The existing buildings are in poor condition. A Feasibility Cost Study considers the existing condition of the buildings on the site and the essential works required to (1) enable re-occupation and compliance with relevant standards; and (2) a more comprehensive refurbishment option to bring the office accommodation to a standard deemed suitable to meet occupier requirements as offices.
- Continued use of the property for offices (B1(a)) will require substantial works of refurbishment to address disrepair. The estimated costs associated with these options indicate that substantial investment would be required. The required scope of works are not considered financially viable having regard to the specialist advice received from local market agents, Currell Commercial, on the likely market rent and very limited occupier demand that exists. Meanwhile ongoing maintenance costs and above average overheads would further deter office occupiers.
- Camden own policy evidence base and the local market commentary indicate that the site is not an appropriate pitch for a large, commercial occupier. Consequently, there are insufficient larger lettings or sales in the local market to obtain development finance for a speculative office redevelopment.
- The existing structure does not lend itself to conversion for alternative employment uses (light industrial and warehousing) and the site is heavily compromised in terms of servicing accessing arrangements. Consequently, demand for new industrial or warehousing at the site is limited. Given low market rents and limited demand, new development would be impossible to finance as there is no viable return on investment.
- The feasibility of incorporating office floorspace into the redevelopment proposals would result in compromises to the quality of office floor achievable and the overall amount of residential and affordable accommodation that can be provided upon the site with significant implications upon the viability of the overall scheme.
- Thus, having regard to the specialist advice received (and appended to this Statement) due to the nature of the existing buildings (in relation to their age, layout, size, condition) and the site's location, it is not considered suitable for continued office use (Class B1(a)) or alternative employment uses (Class B1(b), (c), B2 and B8).
- The loss of employment floorspace at the site is therefore entirely justified and consistent with strategic planning policies and objectives (within the NPPF, London Plan and Camden's LDF). Employment statement

Suitability for Continued Office Use

SITE Location

3.2 The Site covers an area of approximately 0.42 hectares (ha). It is bound to the east by Camden Road, to the south by St Pancras Road, to the west by commercial premises fronting St Pancras Way and to the north by Rochester Place.

3.3 The site is located approximately 650 metres to the north east of Camden High Street. It is outside the main Camden commercial centre and the designated Town Centre.

3.4 The buildings are surrounded on all sides by predominately residential uses, in a mixture of dense housing estates and Georgian terraced homes. Immediately to the site's north-east at 102 St Pancras Way, television studios are located and along Rochester Place and Mews a number of small units in light industrial or live-work premises are located.

A desktop planning history search has revealed that in the past 13 years there have been a number of applications for change of use light industrial and warehousing units to residential, including live-work units (which according to Camden's LDF are also treated as C3 units).

These include 28 Rochester Mews (Ref: 2011/3689/P – granted November 2011, Ref: PE9800724R2 – granted March 2000) and 26 Rochester Mews (Ref: PEX0100091 – granted April 2001).

Suitability for Continued Office Use *continued***SITE Description**

3.5 The majority of the site is occupied by a series of amalgamated buildings, which have been developed and connected over time.

3.6 The main building ("86 – 100 St Pancras Way"), fronting St Pancras Way, comprises a 3 storey central block, plus lower ground with two subservient wings of two storey, with lower ground. The west and east extensions are understood to have been added circa. 1939 and 1948, respectively. The central block has one, two and three storey elements behind it, which create a continuous mostly one storey frontage along Rochester Place.

3.7 The original structure is predominately of load-bearing masonry with intermediate floors of in-situ cast concrete construction. The extension to the rear has been formed in steel frame construction with a flat roof deck of woodwool / 'Stramit' board construction.

3.8 The main building is linked via a two storey 1960s extension to 79 Camden Road. This is four storey, with lower ground, 1960s block which forms a continuous built edge along this facade. It is predominately of in-situ cast concrete frame construction with intermediate floors of terracotta pot and in-situ cast concrete.

3.9 An area of hard-standing providing good vehicles access and car parking lies to the south of the main building, along St Pancras Way.

Existing Floorspace

3.10 schedule of the existing floor areas:

Accommodation Schedule (GIA) total 7,188 sq.m 77,372 sq.ft

79 Camden Road *Sub-Total 4,982 sq.m 53,626 sq.ft*

Basement 421 sq.m 4,532 sq.ft

Ground 914 sq.m 9,838 sq.ft; Ground (PCT) 681 sq.m 7,330 sq.ft

First 1,246 sq.m 13,412 sq.ft

Second 1,005 sq.m 10,818 sq.ft

Third 715 sq.m 7,696 sq.ft

100 St Pancras Way *Sub-Total 2,206 sq.m 23,745 sq.ft*

Basement 316 sq.m 3,401 sq.ft

Ground 1,366 sq.m 14,704 sq.ft

First 390 sq.m 4,198 sq.ft

Second 134 sq.m 1,442

OFFICERS: there are no plans provided but an application for a site advertisement CA/1778/AD/1923 – 8 March 1982 'offers for LET' 72,000sq.ft commercial building with high office content.

DRE Marketing Campaign

4.48 As above-mentioned, the site was marketed by DRE from 2011 as potential for a residential-led redevelopment following LBC's to dismiss the site for continued commercial use due to oversupply and its poor characteristics (A Marketing Summary by DRE is provided at Appendix 4).

SUMMARY

4.65 In accordance with Policy DP13 (a), this section has reviewed the suitability of the site for its existing business use (B1(a) offices). The existing buildings, in particular 79 Camden Road and 86-98 St Pancras Way, are vacant as a consequence of the poor structural and internal condition of the buildings and were key reasons for the Council vacating the premises.

4.66 Whilst the office market has improved, given the quantum and quality of accommodation on the market and in the development pipeline, and the site's location, Currell Commercial concluded that:

"It will be impossible to find an occupier for the whole building and very difficult to achieve smaller lettings that will fill the whole of the buildings to make it viable" (Currell Commercial Viability Report Paragraph 7.7)

4.67 It is considered that either comprehensive refurbishment or light refurbishment would be economically unviable in current market conditions and having regard to the nature and location of the site.

5.0 Potential for Alternative Employment Uses

5.1 Assesses the suitability and economic viability of the site for light industrial and warehousing uses (B1 (b), (c), B2 and B8).

5.2 It assesses two scenarios:

- Option 1: Refurbishment of Existing Building; and
- Option 2: Demolition and Rebuild for industrial uses.

REQUIRED UPGRADES

5.3 In its present condition the existing building could not be used for light industrial and warehousing uses. This Section examines potential for refurbishment and alteration.

5.4 The explanatory text accompanying Camden's Policy DP13 lists the typical features that enable flexible use of employment sites for other business uses (light industrial and warehousing, including:

- Clear and flexible floorspace with few supporting columns;
- Adequate floor to ceiling heights;
- Wide doors/ corridors;
- Loading facilities;
- Large amounts of natural light;
- Availability of a range of unit sizes; and
- Space for servicing by/parking of commercial vehicles.

5.5 Where sites are not considered serviceable (allowing access for large commercial vehicles and freedom of operation without unduly restricted hours) Camden's Business Premises Study (2011) and CPG5 consider they are heavily compromised and should be released.

Continued Shortfalls

5.6 Both the DRE Note ("Change of Use to Permanent Residential – May 2011") (Appendix 6) and Feasibility Cost Report (Appendix 2) assess the building against these features.

5.7 The DRE Note assesses the specification of the building against the DP13 list (see Table 2 of Appendix 6). It is not considered to benefit from any of the abovementioned Policy DP13 typical features that enable flexible use of employment sites for light industrial and warehousing.

The analysis leads it to conclude that:

"the property not does lend itself to conversion for B1(b) (Research and Development) or B1(c) (Light Industry). Most of the remnants of the previous light industrial and storage uses have disappeared.

The existing structure does not lend itself to conversion for B1 (b), (c). In addition to the poor conversion potential, the Property suffers from poor servicing and access arrangements" (our emphasis added)

5.8 This is also the view reached in LBC's own Memorandum (10th March 2011) which formed part of the DRE Marketing Pack and explicitly stated:

"on the basis of previous internal inspections of 79 Camden Road most of the vestiges of the previous light industrial and storage uses have disappeared, by virtue of this and noting the relatively limited servicing arrangements it is considered unlikely that the buildings [79 Camden Road and 98-100 St Pancras Way] would be viewed as suitable for reversion to alternative light industrial or distribution use" (our emphasis added)

5.9 The Memorandum does however set out that this would need to be confirmed, especially in relation to the rear of the site which adjoins Rochester Place (see additional commentary below).

Rochester Place Frontage

5.10 The applicant's own Feasibility Cost Study (Appendix 2) indicates that light industrial use buildings would typically be designed to structural dimensions in excess of those required by office use. Only the ground floor space along Rochester Place would potentially be suited to light industrial use, having regard to the existing storey heights.

5.11 However, it is considered that vehicular access to this part of the site for deliveries and servicing would heavily compromise any reuse for light industrial and warehousing. Whilst Rochester Place, previously benefitted from separate access, including vehicular servicing access, this was removed as part of the works associated with the 2002 consent for temporary change of use of 79 Camden Road for a doctor's surgery.

5.12 The DRE Note also concludes that:

"This part of the Property has limited potential for employment use. As is the case elsewhere on the Property there are difficulties with access (including turning circles) from both light and heavy goods vehicles. The junction at Rochester Place and Camden Road suffers from poor visibility (fixed bus stop) onto a four lane red route".

CURRENT MARKET CONDITIONS AND DEMAND**Market Supply**

5.13 **Currell's** Viability Report explains that the majority of available light industrial and warehousing space within Camden is situated in three main postcodes, NW1, WC1 and NW5. These comprise more established light industrial / warehousing locations and are where the majority of light industrial and warehouse operators wish to be sited.

5.14 The site is in close proximity to a number of industrial locations recognised in the Council's Employment Land Review (February 2008). These include the industrial area north of Kentish Town ("Kentish Town Road/ Regis Road" - less than 1.5 kilometres from the site) and the St Pancras Area (including Camley Street).

5.15 The Review sets out the Kentish Town Road/ Regis Road areas benefits from: Critical mass; Good management; Near full occupancy; A range of occupiers; and Being the only large area of land in the Borough contained a mix of uses but no housing.

Market Demand

5.16 **Currell's** market commentary explains that it would be difficult to attract an operator in a "location that is not a recognised pitch" (Viability Report Paragraph 9.4). The proximity of more desirable sites and locations in proximity to the site further compounds the potential of the site for light industrial / warehousing occupiers.

MARKETABILITY OF THE SITE**Local Market Agents' Marketability Analysis**

5.17 Moreover, the Currell Commercial Report (Section 9) sets out the existing buildings and site would be difficult to attract light industrial and warehouse operators due to:

- Distinct lack of established B2 and B8 facilities in that location;
- Constraints to access for a large number of lorries and transport carriers;
- Insufficient access for servicing;
- Poor ground floor access;
- Low floor to ceiling heights;
- Multi-storey nature of building on several levels; and
- Surrounding residential occupiers.

DRE Marketing Campaign

5.18 As described in Section 4 of this Statement and DRE's Marketing Summary (Appendix 4), no offers were received on the basis of retaining any employment uses at the site.

ECONOMIC VIABILITY OF REFURBISHMENT OR REDEVELOPMENT

5.19 The above analysis demonstrates that the existing premises are not suitable for refurbishment for alternative employment uses. Accordingly, use of the site for light industrial or warehousing would require comprehensive redevelopment and rebuild.

5.20 The rental value for B2 and B8 uses is typically £9 per sq ft.

5.21 The local market agents therefore conclude that a:

"new development impossible to finance as there would not be a viable return on the investment" (Currell Commercial Viability Report Paragraph 9.5)

5.22 This position is recognised in Camden's own evidence base, which recognises that once heavily compromised industrial sites become obsolete or need major repair, "the investment that would make them fit for purpose again is not financially viable" (Camden Business Premises Study, 2011).

SUMMARY

5.23 In accordance with Policy DP13 (b), this section has reviewed the possibility of retaining, reusing or redeveloping the site for similar or alternative businesses uses (B1 (b), (c) B2 and B8).

By virtue of the site's location, the nature and structure of the existing buildings, access arrangements and surrounding uses, the site is not considered suitable for re-use for such uses.

5.24 The above and appended analysis clearly demonstrates that it would be classified as Category 3 "heavily compromised" site (according to Camden's Business Premises Study (2011) and CPG5) and thus should be released.

5.25 Any redevelopment of the site for these uses is considered to be impossible to finance as there would be no viable return on the investment.



The description of the site location and the existing building fail to acknowledge the industrial nature of the area and the site.

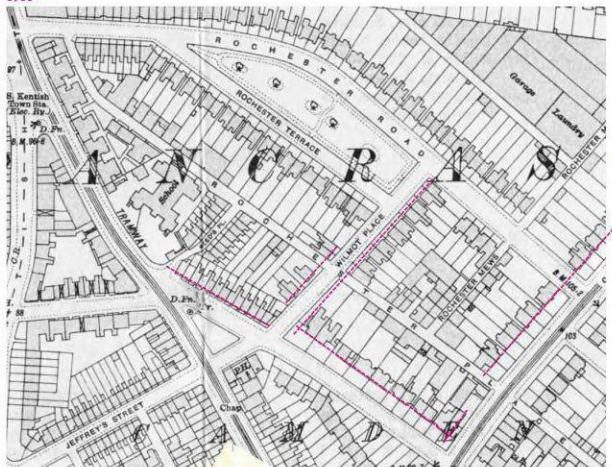
The failure to create replacement industrial with all non-employment uses [residential] will prejudice continued industrial use in the surrounding area.



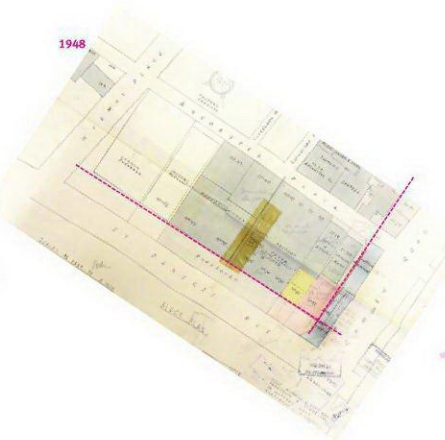
Site and surroundings: Industrial setting

It should be noted by Officers that Rochester Place was/is at the heart of the Kentish Town Area. Until 2010 its industrial buildings were protected by Camden's UDP

1916



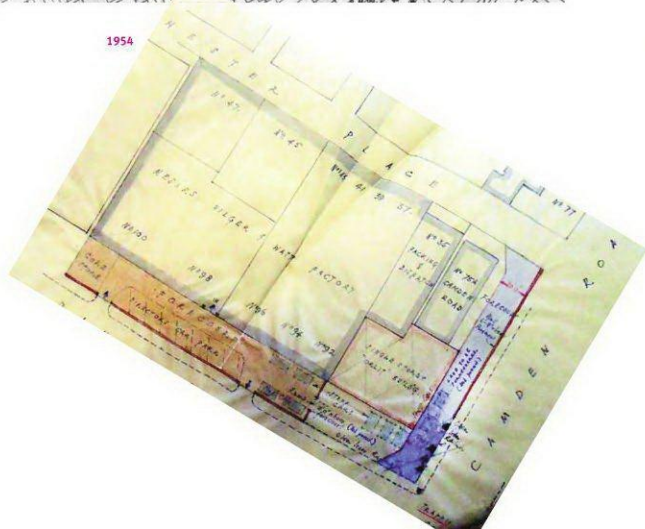
1948



1952 Ordnance survey



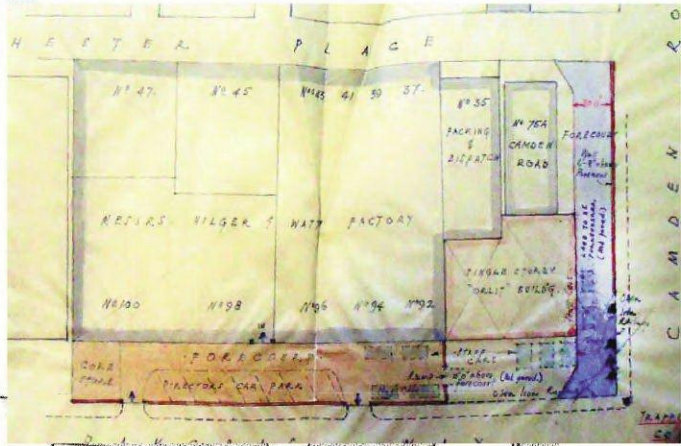
1954



1991



1954



1991



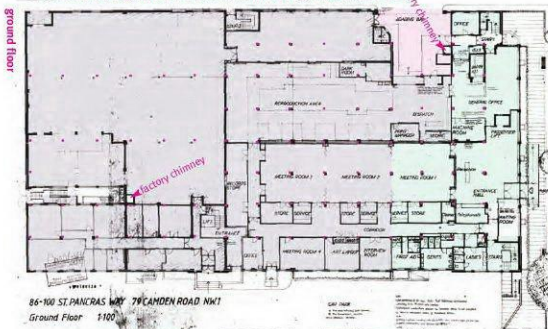
1991

plans show the first floor office extensions proposed
areas show the original offices in the Hilger head office



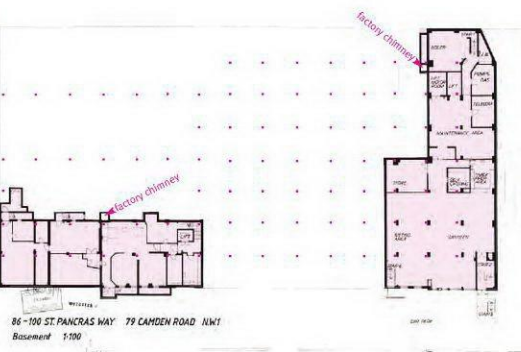
first floor

areas show the original and the extensions to the Hilger factory 1954-91



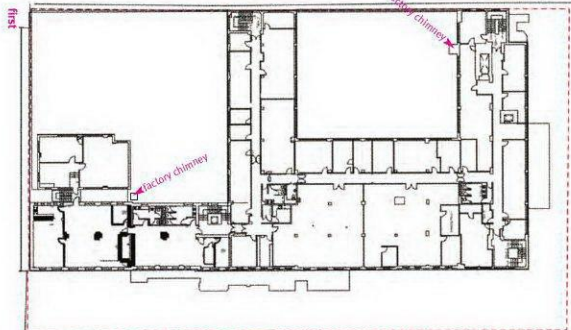
ground floor

lower ground

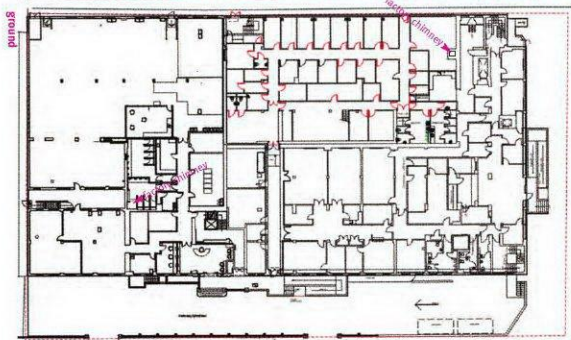


2013

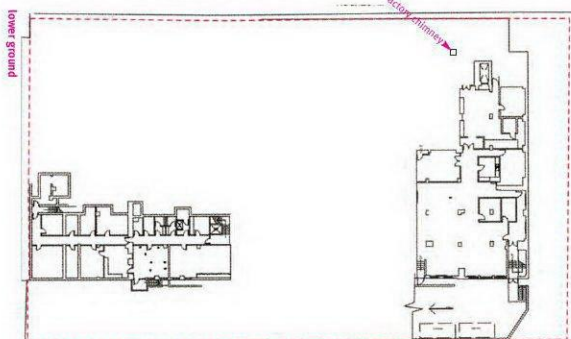
existing plans supplied by the applicant – show office divisions used by Camden Council during their occupation



first



ground

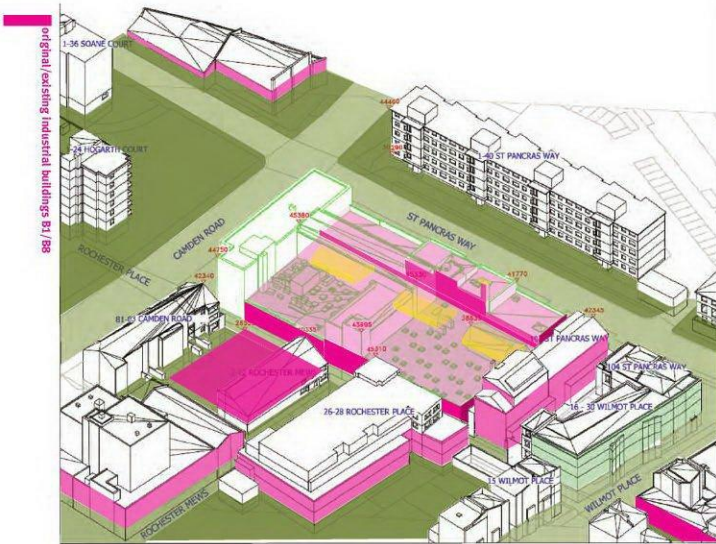


lower ground

Hilger site

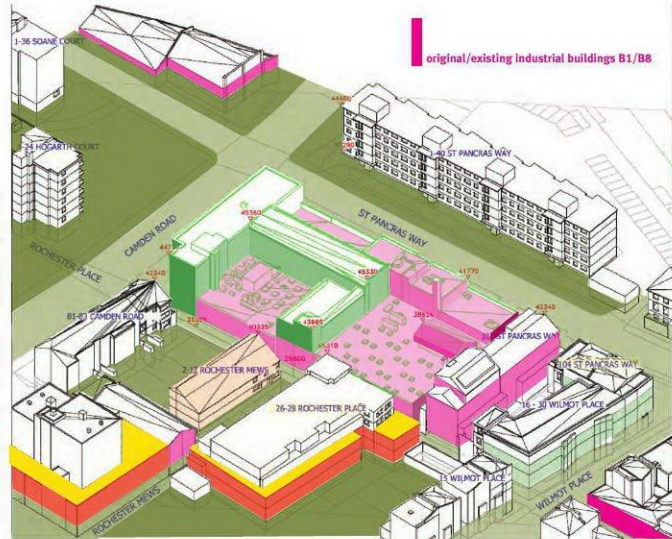
It should be noted by Officers that this site is B1/B8. The applicant has provided plans of existing build; the 1991 plans show how [and when] the building was sub-divided into office space for the ASTMS union. The original supporting pillars are clearly visible [marked] supporting high ceilings, as are architectural features, chimneys, basements, entrances, loading bays [on Rochester Place and St Pancras Way] windows – good light proved at ground level and original London stock brick work. Features that were repeated in Hilgers other buildings in the street.





When the application site was built, by Hilger, 1920s the surrounding buildings were all B1c/B8.

The office extensions added in the 1960s-70s



office extension 1960s
Government office 2000s conversion/extension to housing

original/existing industrial buildings B1/B8

original/existing industrial buildings B1/B8

existing industrial buildings rebuilt/replaced by B1/B8
site work which requires an industrial licence
council housing built on derelict Hilger land

B1/B8 light industrial/warehousing Flats over light industrial/warehousing

purpose built social housing conversion to social housing



Design & Access statement: p24 – existing storey height



Design & Access statement: p25 – existing uses and character



Existing Storeys Design & Access statement: p44 – existing storey height/uses



Superimposed over the applicant drawing we show detail of original/existing industrial buildings B1c/B8

The Kentish Town Area protected Industrial buildings in Rochester Place [JDP until 2010]. The LDF protects industrial stock using the same language – but not by area.

95% of the original/existing industrial stock is one floor high [ground floor/ceiling heights in excess of 3.5m – 4m+]; some have a first floor with floor/ceiling heights upto 3m].

Since 2000 where new build has been permitted, replacement of B1c/B8 has been a requirement to the build height of the street frontage [requested by Officers and Inspectors].

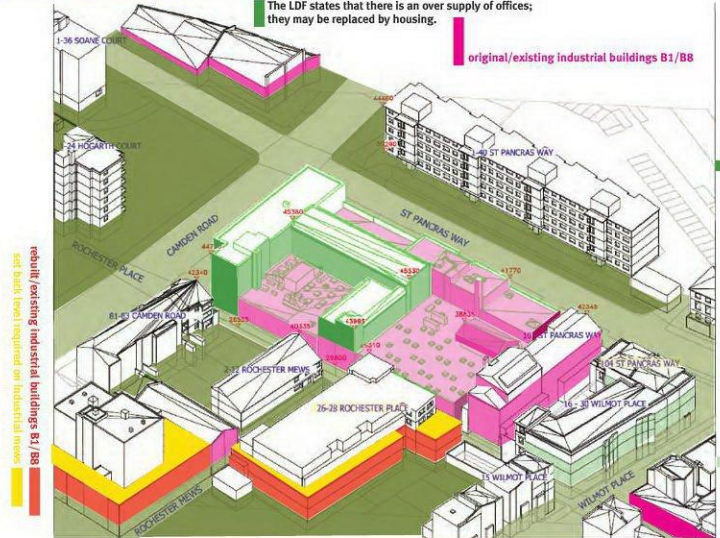
Where addition floors [over] have been proposed, and permitted, a set back has been requested at second floor level. The overall height of the residential build [over industrial new build] has been required to match height of closest buildings in industrial mews.

The ground floor of the application site was built as B1c/B8; it remains B1c/B8.

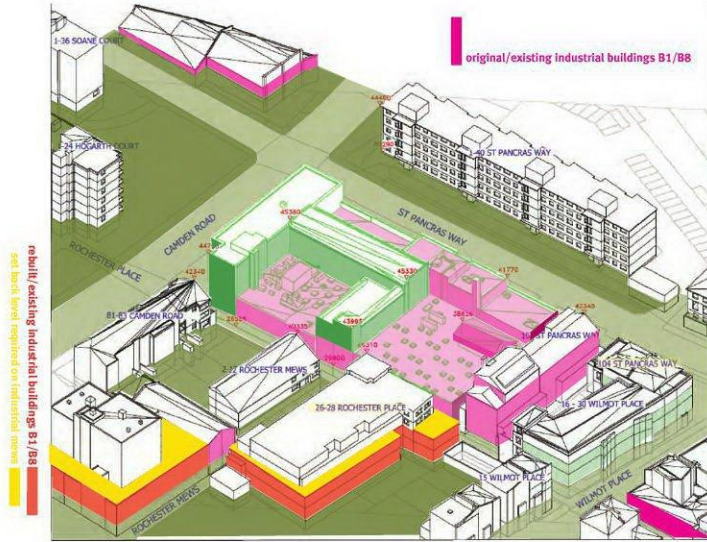
The LDF states that B1c/B8 can be replaced with B1c/B8 and can be extended.

The LDF states that there is an over supply of offices; they may be replaced by housing.

original/existing industrial buildings B1/B8



office extension 1960s
Government office
extension
to housing



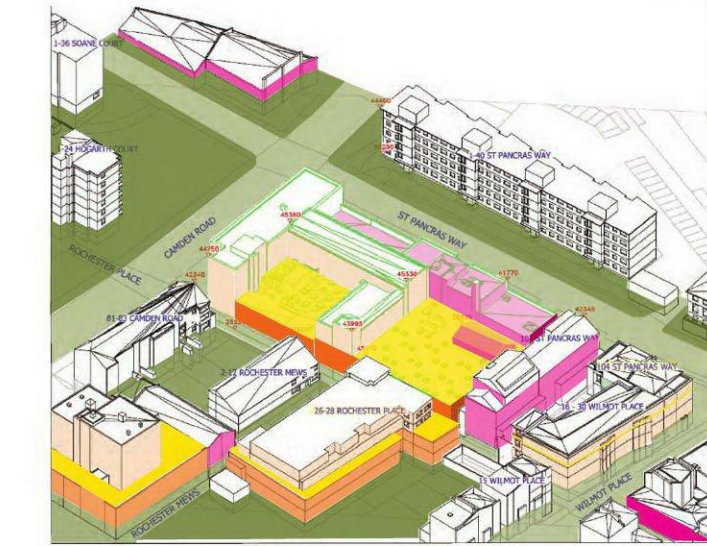
original/existing industrial buildings B1/B8

rebuild/existing industrial buildings B1/B8
set back level requires on replacement mass

office extension 1960s
Government office
2000s conversion / extension
to housing

The ground floor of the application site was built as B1c/B8; it remains B1c/B8. The LDF states that B1c/B8 should be replaced with B1c/B8 and can be extended.

The LDF states that there is an over supply of offices; they may be replaced by housing. The green area may, legitimately, be changed to residential

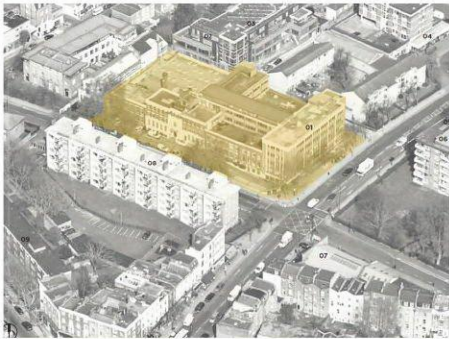


rebuild/existing industrial buildings B1/B8
set back level requires on replacement mass

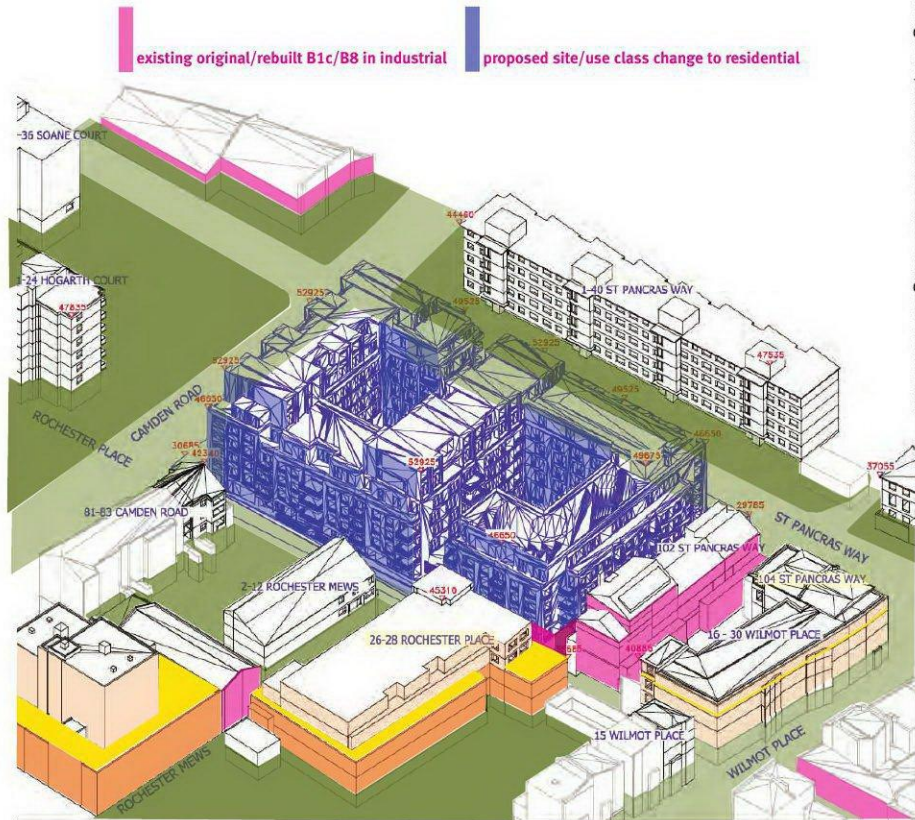
Replacement B1c/B8 in the area has been extended vertically, with set-back.

Housing, a vertical extension, with set-back.

The 1960s office extension to the application site could be converted to, or replaced by housing – without contension.



Proposed Storeys - October 2013



existing original/rebuilt B1c/B8 in industrial

proposed site/use class change to residential

rebuild B1c/B8 in industrial mews
set back required in industrial mews
residential over industrial

104 St Pancras Way conversion office to
residential - included set back extension