

MF/P5632  
17 September 2014  
London Borough of Camden  
Regeneration and Planning  
5 Pancras Square  
London  
N1C 4AG

**Planning Portal Ref: PP-03649182**

Dear Sirs

**15-23 St Pancras Way, London, NW1 0PT**

**Dual/alternative use of the lower ground, ground and first floor to retain Class B8 (storage and distribution) / Class B1 (business) Use and introduce Class D1 (education and training) Use.**

On behalf of our client, London College of Beauty Therapy (LCBT), we write in support of a planning application for the dual/ alternative use to retain the lower ground, ground and first floors as storage or distribution (Class B8)/ business (Class B1) Use and the introduction of education and training centre Use (Class D1). The requisite application fee of £385.00 has been submitted to the Council by post.

**Site Location and Existing Use**

The property is located on the western side of St Pancras Way which possesses a strong commercial character. The properties lining the east and west sides of St Pancras way comprise a mix of commercial/industrial space as well as residential – a significant proportion of which is student accommodation. St Pancras Way runs north for approximately 0.8 miles from the junction of St Pancras Road (A5202) to the south until it meets/ turns into Kentish Town Road (A400) to the north.

The property is located within the Kings Cross/ St Pancras Conservation Area and has a Public transport accessibility level (PTAL) of good (4-5). The property comprises a 7-storey plus lower ground building for student accommodation with the inclusion of 1,100 sq.m flexible use B8/B1 accommodation. This application relates solely to the use on the lower ground, ground and first floors.

**Relevant Planning History**

Prior to the below planning permission which was implemented and completed circa 2-3 years ago the subject site prior to redevelopment comprised an industrial warehouse location.

Ref: 2005/0719/P

Registered: 1<sup>st</sup> March 2005

Description: Demolition of existing warehouse buildings and erection of a mixed use building

**Architecture Planning Interiors**

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comprising flexible Class B8 and B1 accommodation, 43 cluster flats and three studios for student accommodation.

Decision: Granted Subject to Section 106 legal agreement 23<sup>rd</sup> May 2005

We consider the property is in a secondary location for a wide range of uses and therefore consider the proposed dual/ alternative uses will work in harmony with the surrounding area.

### **The Proposal**

The lower ground, ground and first floors are vacant. London College of Beauty Therapy (LCBT) currently occupy premises in the West End and like many other central occupiers are looking for more affordable locations to meet their current needs. Our clients are currently in advance negotiations with the freeholders in order to secure a new lease and are seeking a dual/ alternative change of use to retain the lower ground, ground and first floor as storage or distribution (Class B8)/ business (Class B1) Use and introduce education and training centre (Class D1) Use.

Our client, LCBT, is one of the UK's leading vocational colleges, offering a wide range of courses in Beauty Therapy, Health & Fitness, Teacher Training and Employability Training. Due to the ever increasing competitiveness of the job market and competition for jobs LCBT are specifically having to allocate greater resources towards enhanced employment training. Furthermore they also offer apprenticeships across sectors with an average rate of progress to further education or employment of 90%.

We are attendant to the Council's likely position to resist the loss of the B8/B1 use as per the extant permission which is specifically why LCBT would wish to retain this within dual/ alternative use permission. Though the active marketing of the premises has been for a reduced period our client has received a letter submitted with this application from the freeholder's marketing agent (Christo & Co) giving an overview of market drivers' demand and availability in this area.

We would reiterate that our clients wish to seek to retain the B8 and B1 use, however in-line with Christo & Co's comments they have confirmed that during the course of marketing only 1 other offer was received, from an office occupier, and that mutually agreeable terms could not be reached.

### **Planning Policy**

The National Planning Policy Framework (NPPF) states the importance of achieving sustainable development and that there are three dimensions; economic, social and environmental.

Paragraph 7 'an economic role' describes contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.

Given the existing current dual use has been for B8/B1 and only ever implemented as B1 Use we would propose that the addition of a further alternative use to D1 (education and training) is acceptable given the premises have only been advertised as B1 yet LCBT have come forward after unsuccessful negotiations between the landlord and other potential B1 office users. Furthermore LCBT have struggled to find premises of this size in this location with extant D1 consents. The retention/relaxation of the existing uses in implementing an additional D1 use would meet the requirements set out in Paragraph 7 and demonstrate a positive contribution to the area's economy.

The London Plan under Policy 3.18 *Education Facilities* under point C states that:

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*Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to education purposes. Paragraph 3.108 highlights the importance of Further Education (FE) and that access to this is important for both the large proportion of Londoners who do not go into higher education and, in some places, for sixth form provision. FE colleges provide a key role in skills development and lifelong learning and will assist with Londoners' employment. They also provide valuable community facilities and services, and the Mayor will support the protection and enhancement of FE colleges and facilities.*

We consider by virtue of the proposal that it directly accords with Policy 3.18 and due weight and consideration should be given to this application.

Paragraph 4.12 states that:

*Informed by recommendations of the Outer London Commission (OLC), the Mayor encourages the renewal and modernisation of the office stock in viable locations in outer and inner London and urges boroughs to manage changes of surplus office space to other uses, providing overall capacity is sustained to meet London's long-term office needs.*

The proposal to retain the existing use classes B8/ B1 but introduce a further alternative Use class, D1, demonstrates that consideration has been given to paragraph 4.12 by affording protection to the buildings ability to revert back to an office use class should LCBT decide not to renew or extend the terms of their lease currently being negotiated.

Policy CS 8 of Camden's Core Strategy *Promoting a successful and inclusive Camden economy* recognises the importance of other employment generating uses and seeks to ensure that no-one is excluded from its success. Policy CS8 states in point (c) that the Council will expect a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, furthermore point (f) recognises the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.

We consider that a dual/alternative change of use with specific consideration to our client's business activities will accord with the above policy two-fold; firstly it will help to form part of the mix of employment facilities within the St Pancras Way area as required by point (c) and secondly we would expect support from the Council in-line with point (f) on the basis that LCBT specifically promote training courses in order to equip their students with the best possible skills to help them to successfully secure the best possible employment opportunities following their study and completion of courses.

Paragraph 8.15 *industry Area* states that:

*the Council will retain this industry Area for industrial and warehousing uses by resisting any proposals that would lead to the loss of sites in Use classes B1 (b), B1 (c), B2 and B8 and sui generis uses of a similar nature. Development should not prejudice the nature of the industry Area by introducing inappropriate or conflicting uses.*

Due to our client wishing to retain the existing uses alongside the introduction of an educational and training use we consider that the concerns raised above have been dually addressed. Furthermore having undertaken a site visit of the premises which included a thorough exploration of the surrounding form and character of St Pancras Way we would comment that the existing site access

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may not be suitable for the larger types of service vehicles associated with B8 activities, it is subsequently considered that the occupation of LCBT would be more akin with the mix of activities associated with St Pancras Way and will be capable of operating in an increasing residential location without having an adverse impact on residential amenity.

Paragraph 8.22 entitled *Supporting local employment training schemes and enterprise development* recognises that:

*there is often a mismatch in the skills needed by the borough's employers and the skills of many members of the community and highlights the need to improve access to training which will increase employment opportunities for Camden residents by reducing this mismatch ergo equipping candidates with the skills needed to fill jobs both locally and further afield.*

We consider that by virtue of this proposal and LCBT's current and continued future business activities that a positive contribution can be made in supporting the needs and objectives set out within paragraph 8.22 of the Camden Core Strategy 2010-2025.

Policy DP13 of Camden local Development Framework, Camden development Policies states that:

*the council will retain land and buildings that are suitable for continued business use and will resist a change to non-business, however, where premises or sites are suitable for continued business use, the council will consider redevelopment proposals for mixed use schemes provided that the proposed non-employment uses will not prejudice continued industrial use in the surrounding area.*

Having regard to the above policy we consider that the proposed dual/ alternative use and proposed future occupation of the premises by LCBT will not prejudice the current use of the premises or continued industrial uses in the surrounding area.

### **Design and Access Statement**

As stated within the Communities and Local Governments 'Guidance on information requirements and validation' March 2010, a design and access statement is not required for a material change of use of land or buildings.

Nevertheless, we can confirm that main access into the property will remain as existing from St Pancras Way. This application seeks the dual/alternative use of the lower ground, ground and first floors only.

### **Summary**

Our client seeks permission for a dual/ alternative change of use to retain the lower ground, ground and first floors as storage or distribution (Class B8)/ business (Class B1) Use and the introduction of education and training centre Use (Class D1). We consider the dual/ alternative use to retain B8/ B1 use will ensure continued consideration for local plan policy and the long term commercial viability of the building to revert back to this use at the end of LCBT's term. The proposed B8/ B1/ D1 Use is considered an acceptable use within this location.

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We trust the enclosed information is sufficient for the application to be validated however should you have any questions please do not hesitate to contact the undersigned.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Miles Frewin', with a stylized flourish at the end.

Miles Frewin  
Rolfe Judd Planning Limited

cc      Eileen Cavalier (LCBT)  
         Colin Becker (Metrus)