

PLANNING STATEMENT

In respect of

**93-103 DRUMMOND STREET
EUSTON, NW1 2HJ**

On behalf of

CANFIELD FREEHOLD LIMITED

RPS CgMs Ref: 18949

June 2016

Secure & Stable
ADDING VALUE

QUALITY MANAGEMENT

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1 INTRODUCTION

- 1.1 This statement is prepared on behalf of our client, Canfield Freehold Limited, to accompany the planning application for a change of use at the site addressed 93 – 103 Drummond Street, Euston, NW1 2HJ, 'the site'.
- 1.2 Built form on site comprises a part 2 and part 3 storey building of irregular layout that is currently in a number of uses including office, warehouse and storage and retail floorspace. Planning permission is sought for the change of use of the building to offices (Use Class B1a).
- 1.3 The site falls within the HS2 safeguarded area and would be subject to compulsory purchase by HS2 Limited should the scheme go ahead. As part of the compulsory purchase negotiations with HS2, Canfield Freehold Limited are exploring alternative uses for the site (if HS2 did not go ahead), and are seeking planning permission for the conversion of the site to office use (Use Class B1a).
- 1.4 Pre-application advice has previously been sought on the redevelopment of the site for a student residential led mixed use scheme with commercial floorspace at ground floor. Pre-application discussions have been ongoing since May 2015, with the most recent pre-application meeting held on 22nd March 2016. As part of these discussions, the potential for the conversion to offices was discussed, with Planning Officer Michael Cassidy confirming that there was no conflict with policy and the LPA could support a change of use.
- 1.5 Section 2.0 of this statement sets out the context of the application site. The development proposal is detailed in Section 3.0, followed by details of the planning history at section 4.0. Section 5.0 assesses the relevant planning policy and Section 6.0 summarises and concludes that the proposed development complies with relevant adopted policy.

2 SITE AND SURROUNDING AREA

Description of Site

- 2.1 The site is located in a prominent position at the junction of Drummond Street and Cobourg Street. The development site covers No. 93-103 Drummond Street which is currently in commercial use and under tenancy of Calumet Photography.
- 2.2 Built form on the site comprises a part 3 and part 2 storey building of irregular layout. A small parking area is provided at the most north-western point of the site with the building set back from Cobourg Street but with active frontage at Drummond Street. Building heights in the immediate area vary from equivalent of 2-6 storeys with building heights becoming higher rise as you move closer to Euston Station.
- 2.3 Drummond Street provides for a busy thoroughfare en route to Euston Station which is a major transport hub in the area. Further to this the site is located only a short walk from Drummond Street Neighbourhood Centre. To this effect, a mix of uses surround the site including retail, commercial, leisure and residential with numerous local services inter-dispersed.
- 2.4 The site is highly accessible with a PTAL rating of 6b. A wide variety of bus stops are provided in close proximity at Hampstead Road and Euston Road whilst regular underground services are provided at Euston Station, Euston Square and Warren Street all within 600m of the site.
- 2.5 There is further an array of public open spaces in the wider vicinity of the site including St James' Gardens, Euston Square Gardens, Fitzroy Square Garden and Russell Square.

Heritage Considerations

- 2.6 The site does not comprise any locally or statutorily Listed Buildings and is not within a Conservation Area. The closest listed building is 14-15 Melton Street to the immediate northeast of the site. As this development proposal is limited to a change of use with no external alterations, the character and appearance of the listed building will not be harmed.

3 DEVELOPMENT PROPOSALS

- 3.1 Canfield Freehold Limited are seeking planning consent for the change of use of the site addressed 93 – 103 Drummond Street, Euston, NW1 2HJ from a mixed use building comprising office, workshop, warehouse and retail floor area to offices (Use Class B1a).
- 3.2 The proposed development relates expressly to a change of use of floor space and no external alterations are proposed. Drawing numbers 2049-00-DR-0061-P01 and 2049-00-DR-0060-P01 illustrate the elevations of the building, which will remain unchanged following the change of use. In addition, there are no internal alterations proposed as part of the change of use.

Existing Floor Area

- 3.3 The existing building comprises a range of uses across basement, ground, first floor and second floor level. The proportion of these uses is set out in the table below.

Level	Use	Floor Area (sqm)
Basement	Office	243.60
	Warehouse	622.75
	TOTAL	866.35
Ground	Office	175.09
	Retail	359.88
	Store	49.81
	Workshop	178.92
	TOTAL	763.70
First	Office (mezzanine)	92.92
	Office (tower)	25.20
	TOTAL	118.12
Second	Office (tower)	25.20
	TOTAL	25.20
TOTAL FLOOR AREA		1774

- 3.4 In terms of the proportions of the existing uses, the building is used predominantly for purposes falling in 'B' Class uses, including Use Class B1(a) Office, Use Class B1(c) Light Industrial (workshops) and Use Class B8 Storage and Distribution (warehouse), accounting for 80% of floor area. Use Class A1 accounts for 20% of the site. The table below sets out the proportion of uses in the existing building.

Use	Floor Area (sqm)	Percentage of floor area
Office B1a	562	32%
Workshop B1c	179	10%

Warehouse/Storage B8	673	38%
Retail A1	360	20%
Total	1,774	100%

- 3.5 The proposal seeks planning permission for the conversion of the total floor area, extending to 1774sqm from mixed uses, as described above, to Offices, Use Class B1a.

4 PLANNING HISTORY

- 4.1 Planning consent was approved on 27th September 1989, LPA ref. PL/8800589/R3, for, 'the redevelopment of the site by the erection of a four storey (plus basement) building for a mixed use, comprising showroom with light industrial use and ancillary office and storage space as shown on drawing numbers L88/194/01 02 03 04A 05A & 08 revised by letters dated 13th February 1989 22nd March 1989 and 5th May 1989 and revised drawing number L88/194/09 received on 3rd August 1989 with amended cill heights and letter dated 20th September 1989'. This permission was not implemented.

5 PLANNING ASSESSMENT

5.1 Section 38(6) of the 2004 Planning and Compulsory Purchase Act requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. As such, the statutory development plan for the application site consists of:

- The London Plan Further Alterations (FALP March 2015);
- LB Camden Core Strategy (November 2010);
- LB Camden Development Policies Document (November 2010);

5.2 Furthermore, the following supporting documents published nationally and locally, comprise a material consideration in determining planning applications:

- The National Planning Policy Framework adopted in 2012
- Camden Planning Guidance adopted in 2011

5.3 Of further importance is the Euston Area Plan which was adopted in January 2015. Jointly prepared between Camden Council, the Greater London Authority (GLA) and Transport for London (TfL) the document has been devised to provide a long term planning framework to guide development up until 2031.

Emerging Planning Policy

5.4 Camden Council is currently reviewing their overarching and development management planning policies which will be captured within the Draft Camden Local Plan. The document is out to public consultation with Camden inviting comments on the content of the plan up until 17th April 2015. It should be noted that the Camden Local Plan will replace the Council's current Core Strategy and development Policies planning documents (adopted November 2010) and will cover the period from 2016 – 2031.

Site Allocation

5.5 The site of 93-103 Drummond Street is located within the boundary of the Euston Growth Area and Central London Area (Clear Zone Region) as outlined in the adopted Camden Planning Proposals Map. Beyond this the site falls within a designated view, i.e. 5A.2 Greenwich Park Wolfe statue to Tower Bridge – Right Lateral Assessment Area.

5.6 The site falls within the 'Drummond street and Hampstead Road' Character Area in the Euston Area Plan with the area described as below:

5.7 *'The Drummond Street area has a well preserved grid of historic regency terraces containing a mix of residential and commercial uses within a tight-knit historic urban grain. It has a vibrant, distinctive character, and Drummond Street itself is recognised for its specialist ethnic shops and restaurants. To the north of the Drummond Street area, St James's Gardens is a historic open*

space that contains the Grade II listed structures that relate to its history as a burial ground and the National Temperance Hospital which has local heritage value. Hampstead Road forms the western boundary to this sub-area, and provides an important north-south route between Euston Road and Mornington Crescent/ Camden Town and a strategic route between the north of the borough and central London’.

- 5.8 The site is also safeguarded for High Speed 2.

Principle of Loss of Current Use

- 5.9 The National Planning Policy Framework (the Framework) was published on 27 March 2012 setting out the Government’s planning policies for England and how these are expected to be applied. It has been created to provide a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans which reflect the needs and priorities of their communities.
- 5.10 Paragraph 22 of the Framework states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.
- 5.11 The Camden Core Strategy Policy CS8 seeks to ensure that the borough retains a strong economy and states that *“the Council will support Camden’s industries by safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers.”* Policy DP13 provides more detailed information as to how the aims of Core Strategy Policy CS8 will be implemented and sets out the Council’s policy on employment premises and sites. It is stated that *“The Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business’* unless certain criteria are met.
- 5.12 Policy CS8 goes on to say 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.
- 5.13 The Camden Core Strategy Policy CS7 states that the Council will promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors by various means, including protecting and promoting small and independent shops, and resisting the loss of shops where this would cause harm to the character and function of a centre.
- 5.14 Camden Development Plan Policy DP12 - Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses states the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. Town centre uses include shops and markets (Use Class A1), financial and professional services (A2), cafes and restaurants (A3), drinking establishments (A4), hot

food takeaways (A5), offices (B1a), hotels (C1), community uses (D1), including neighbourhood police facilities, leisure uses (D2), and a number of other uses not in any use class.

- 5.15 Camden Planning Guidance 5 – Town Centres, Retail and Employment states Central London Frontages have an important retail function and planning permission will not be granted for the net loss of retail (Use Class A1) floorspace where it will damage the character and function of a Central London Frontage in line with Policy DP12 in Camden Development Policies. The site is not a 'Central London Frontage'.

Assessment of Loss of Current Use

- 5.16 The current use of the site comprises a mix of uses including office, workshop, warehouse, storage and retail space, although the predominant uses fall within 'B Class' uses (77% of floor area). Notwithstanding the mixed use of the site, therefore necessitating planning permission for a change of use, permitted development rights exist to allow the lawful change of use from Use Class B8 to B1.
- 5.17 Core Strategy Policy CS8 does seek to protect industrial uses that are suitable and viable for continued use, however given the location of the site within the Central London Area, industrial and warehousing uses are largely incompatible with surrounding uses and activity. The Euston Area Plan seeks to promote employment, with between 180,000 sqm and approximately 280,000 sqm of new employment/economic floorspace, providing between 7,700 and approximately 14,100 jobs encouraging knowledge based, research and creative uses to strengthen Euston's existing role as a knowledge and research hub.
- 5.18 The site is located with the Central London Area wherein offices (Use Class B1a) are considered to be an acceptable use, notwithstanding the loss of a small amount of retail (Use Class A1) floorspace. The development would not be harmful to the vitality and viability of the area as the use of the site as office will continue to provide jobs with this locality, in line with the ethos of the Core Strategy policies CS7 and CS8.
- 5.19 Planning Officer Michael Cassidy confirmed at a pre-application meeting held on the 22nd March 2016 that the LPA would be supportive of a change of use to office.

Principle of Office Use (Use Class B1a)

- 5.20 When determining planning applications, the Framework directs LPAs to apply a presumption in favour of sustainable development; the 'golden thread' which is expected to run through plan-making and decision-taking. Policy 14 of the Framework notes that the presumption in favour of development for decision taking means "approving development proposals that accord with the development plan without delay". This is re-iterated within policy 196 of the Framework.
- 5.21 Chapter 1 of the Framework, Building a strong, competitive economy, states that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.
- 5.22 Chapter 2 of the Framework states that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of

centres over the plan period, including allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability.

5.23 London Plan Policy 4.2 – Offices, states that the Mayor will encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility and seek increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities. Paragraph 4.11 of the London Plan states that results from the 2009 London Office Policy Review indicate that office based employment may grow by some 303,000 between 2011 and 2031. On the basis of this; a central assumption for office employment.

5.24 Policy CS8 - Promoting a successful and inclusive Camden economy states that the Council will secure a strong economy in Camden and seeks to ensure that no-one is excluded from its success and 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;

f) recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.

5.25 The Camden Employment Land Review 2008 forecasts that the demand for offices will increase by 615,000 sqm between 2006 and 2026. To meet this demand, the Council will direct new business development to the growth areas of King's Cross, Euston, Holborn and Tottenham Court Road, elsewhere in Central London, the town centres.

Assessment of Office Use (Use Class B1a)

5.26 Adopted local and national planning policy supports office uses within town centre locations. Core Strategy Policy CS8 highlights that Camden is the third largest employment centre in

London after the City and Westminster, and eighth largest in the UK (Annual Business Inquiry 2007).

- 5.27 The change of use of the floor area at the site will provide additional, high-quality office space within a sustainable location, wherein office use is promoted and encouraged. Emerging Policy E1 Economic Development (Camden Local Plan 2016) states that the Council will secure a strong economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses by directing new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sq m of office floorspace between 2014 and 2031. The proposed change of use to office within Central London will accord with this policy.

Amenity

- 5.28 The Framework at paragraph 17 sets out twelve Core Planning Principles, one of which states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
- 5.29 Core Strategy Policy CS1 - Distribution of growth states that the Council will promote the most efficient use of land and buildings in Camden by: d) 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. CS5 - Managing the impact of growth and development states that the Council will manage the impact of growth and development in Camden through various means, including protecting and enhancing our environment and heritage and the amenity and quality of life of local communities.
- 5.30 Policy DP26 - Managing the impact of development on occupiers and neighbours states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors that will be considered include:
- a) visual privacy and overlooking;
 - b) overshadowing and outlook;
 - c) sunlight, daylight and artificial light levels;
 - d) noise and vibration levels;
 - e) odour, fumes and dust;
 - f) microclimate;
 - g) the inclusion of appropriate attenuation measures. We will also require developments to provide:
 - h) an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
 - i) facilities for the storage, recycling and disposal of waste; j) facilities for bicycle storage; and
 - k) outdoor space for private or communal amenity space, wherever practical.

- 5.31 Policy 7.15 of the London Plan Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes, outlines a range of strategies for managing development that council impact on amenity in terms of noise impacts, including avoiding significant adverse noise impacts on health and quality of life as a result of new development and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses.

Assessment of Amenity

- 5.32 The existing use of the site is as a commercial space, which exists without conflict within adjoining properties. The application seeks permission for a change of use from a range of commercial uses to office use (Use Class B1a). Office use is generally the lowest impact in terms of noise and typically represents a lesser noise source than the workshop or storage and distribution. In this regard, the impact on surrounding properties in terms of noise will not be any greater than the existing arrangement.
- 5.33 As the proposal relates expressly to a change of use, rather than any external alterations, there will be no impact on the surrounding properties or wider setting in terms of visual bulk and scale, access to light, or privacy levels.
- 5.34 Accordingly, the proposed change of use will not have any impact on the amenity of surrounding occupiers and complies with adopted local and national planning policy.

Transport and Highways

- 5.35 Policy 30 of the NPPF states encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion, stating that local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
- 5.36 The London Plan (Policy 6.1) encourages closer integration of transport and development by:
- encouraging patterns and nodes of development that reduce the need to travel, especially by car;
 - seeking to improve the accessibility of public transport, walking and cycling;
 - supporting development that generates high levels of trips at locations with high levels of trips at locations with high public transport accessibility and / or capacity.

Cycle Parking

- 5.37 Policy 6.9 of the London Plan indicates that developments should provide secure, integrated and accessible cycle parking facilities. The London Plan Table 6.3 sets out the relevant cycle parking standards, stating that central London officer space (Use Class B1) should provide 1 space per 90 sqm (long stay) and 1 space per 500sqm short stay cycle parking.

Car Parking

- 5.38 Car parking standards are provided within the Camden Development Policies 2010-2025 Local Development Framework. The car parking standards for B1 (office) require one space per disabled employee or, from a threshold of 2,500sqm, 1 space per 20,000sqm or part thereof – whichever is the greater. In terms of visitor parking, adopted standards require that from a threshold of 2,500sqm a minimum of 1 if any visitors are expected, plus any additional spaces needed to bring the total number up to 5% of the visitors likely to be present at any time. Parking for service vehicles is only required above a floor area threshold of 2,500 sqm and is not applicable.

Servicing / Refuse Collection

- 5.39 The servicing for the site, including refuse collection and deliveries will be in accordance with the existing arrangements, with refuse vehicles undertaking collections directly from Drummond Street and the majority of deliveries being undertaken from the existing on-street loading bay located on Drummond Street directly outside the Application Site.

Assessment of Transport and Highways

- 5.40 A Transport Statement prepared by RPS accompanies this report and sets out the relevant standards for car and cycle parking, detailing the adherence of the proposed development to adopted policy. The statement also reviews the impact on the wider highway network in terms of trip generation and reviews the provision for servicing/refuse collection. In conclusion, the development.
- 5.41 In summary, it is proposed to formalise the existing six car parking spaces and for one of these to be designed for disabled users, however no additional parking will be provided, reflecting the excellent accessibility of the site in relation to non-car modes of travel. The proposed parking provision therefore, falls below maximum standards and is in accordance with the requirements of the London Plan. A total of 37 long stay cycle parking spaces will be provided, in addition to 3 short stay spaces, in accordance with the London Plan minimum standards.
- 5.42 Owing to the highly accessible nature of the site, which benefits from a PTAL rating of 6b, it is anticipated that the majority of trips to and from the site would be made by highly sustainable modes of transport. It can therefore be concluded that the proposed change of use of the site would not have a severe residual impact on the operation of the local transport and highway networks, in accordance with the requirements of the NPPF.

6 CONCLUSIONS

- 6.1 Canfield Freehold Limited seek planning permission for the change of use at the site addressed 93 – 103 Drummond Street, Euston, NW1 2HJ, to Offices (Use Class B1a).
- 6.2 The building on site comprises a part 3 and part 2 storey building of irregular layout that is used for a range of uses including office space, warehouse and storage and retail.
- 6.3 Pre-application advice has previously been sought on the redevelopment of the site for a student residential led mixed use scheme incorporating a mix of studios and cluster flats with basement level and commercial floorspace at ground floor. Pre-application discussions have been ongoing since May 2015, with the most recent pre-application meeting held on 22nd March 2016. As part of the most recent discussions, the potential for the conversion to office was discussed, with Planning Officer Michael Cassidy confirming that there was no conflict with policy and the LPA could support a change of use.
- 6.4 The development will not result in any external alterations to the building or changes to the appearance of the site. Accordingly, there will be no impact on bulk, massing or design. Development of office and employment space within the Central London Area is encouraged, in line with the ethos of the Core Strategy and Development Management Policies, to promote the economy and keep up with demand for employment land, identified by The Camden Employment Land Review 2008.
- 6.5 Overall, the development is considered to meet strategic planning policy objectives and is in general conformity with other policies and material considerations. It is therefore considered that the development should be supported.

