



GERALDEVE

Town Planning Statement
Greater London House, Hampstead Road, London

On behalf of: Lazari Investments Limited

Date July 2016

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1 Executive Summary

- 1.1 Lazari Investments Limited was asked by their tenant, ASOS plc (ASOS), to provide additional Class B1 floorspace to accommodate their growing workforce. Greater London House (GLH) is partly used by ASOS for their UK headquarters and they currently employ 2,400 people within the building. ASOS is expecting to increase their workforce within the building to 3,500 in the next five years. ASOS has advised that if additional accommodation cannot be secured by November 2016, ASOS will be forced to leave Greater London House look for alternative accommodation outside of the London Borough of Camden.
- 1.2 This planning application seeks to infill the existing open air atrium of the building at upper ground and levels one and two. In addition, ancillary floorspace is proposed at the lower ground floor. The total proposed new floorspace is 3,897 sqm (GEA).
- 1.3 The proposal provides important economic benefits to Camden through the creation of an additional 1000 jobs within the building in a relatively short period of time. In addition, the development will also stimulate further indirect jobs to Camden via the “multiplier effects” through the new workers spending money locally.

2 Introduction

- 2.1 Lazari Investments Limited (Lazari) herein referred to as the 'Applicant' is a family owned and run property investment company based at Greater London House (GLH) on Hampstead Road. The property business started with the acquisition of small retail units with residential uppers and then progressed to shopping parades. In 1976, Lazari acquired a retail parade of 24 shops and upper parts in Camden High Street. This commercial property business has now expanded to the ownership of 139 separate buildings with 515 occupiers comprising over 2.816 million square feet of commercial space.
- 2.2 ASOS was launched in 2000 in north London and has grown from a tiny start-up into the UK's largest online fashion and beauty retailer. Aimed at twentysomethings, it sells more than 850 brands along with its own-label clothes. In 2006, ASOS became the first UK online store to launch catwalk videos, which prove popular. In 2012, the first international office in Sydney was opened, followed by New York and in 2013 offices opened in Lille, France, and Berlin. ASOS is one of the largest employers within Camden with an annual turnover of over one billion pounds.
- 2.3 ASOS moved to GLH in 2005. Since then they have expanded their workforce from 200 to nearly 2,500. ASOS now occupy 54% of the GLH building. The business continues to be extremely successful and ASOS has ambitions to grow and increase jobs at GLH to 3,500 within the next five years. At present, 122 Camden residents work for ASOS.
- 2.4 Lazari was asked by their tenant, ASOS in the latter part of 2015 to find additional office floorspace within the GLH building to accommodate their growing workforce. A Certificate of Lawfulness of Proposed Use or Development for the proposal was submitted to Camden Council in February 2016 as it is considered by the Applicant that the proposal does not constitute development. Camden Council refused the Certificate in June 2016 and requested a planning application be submitted in respect of the extension.
- 2.5 This planning application has therefore been solely made to accommodate the needs of ASOS. ASOS has advised that if additional office floorspace cannot be secured by November 2016, ASOS will need to find alternative accommodation outside of the London Borough of Camden as the cost of alternative accommodation

in the Borough is extremely expensive. ASOS' lease for GLH is due to expire in 2018.

- 2.6 This proposal would assist in delivering up to 1,000 new jobs within the next 5 years. In addition, it would create spin off jobs and local spend in shops in and around Camden High Street.

- 2.7 This Town Planning Statement provides a comprehensive review of national, regional and local planning policy and guidance relevant to the nature of the development proposals and assesses the degree to which the proposals would conform to the requirements of the statutory Development Plan and other material considerations, in accordance with the requirements of section 38(6) the Planning & Compulsory Purchase Act 2004.

3 Site and Context

- 3.1 Greater London House occupies an island plot, formerly Morning Crescent gardens and fronts onto Hampstead Road with Mornington Crescent wrapping around the ends and rear.
- 3.2 Originally called the Arcadia Works, it was constructed for the Carreras Tobacco Company between 1926 – 1928 in an Art Deco “Egyptian revival” style. The original building comprised of five above ground floors, each of approximately 5,800sqm arranged around four central light-wells. The building was converted to office use between 1960 – 1962, and renamed Greater London House. As part of these works three of the internal bridge links were demolished creating the two large light-wells seen today, and two additional floors, each comprising approximately 1,750m², were added to the western roof area, facing Mornington Crescent. Much of the Egyptian detailing was over-clad or removed to create a more contemporary modernist appearance. In 1996 - 1998 the building was further modernised and most of the original Egyptian detailing was reinstated or restored.
- 3.3 The building is 168m long with the Hampstead Road façade constructed of Atlas White cement. The façade is lined with a colonnade of twelve large papyriform columns which are painted in bright colours with Venetian glass decoration. It includes ornate cat motifs, Carreras is written in raised Egyptian-style lettering, there are reliefs showing the face of Bastet which are placed in circular recesses, the building benefits from a highly decorative, deep cavetto-form parapet and there are two gigantic effigies of black cats flanking the entrance.
- 3.4 Greater London House has a floor area of approximately 33,077m² and is up to 7 storeys high. It mainly contains office (B1a) in addition to a gym at lower ground floor level. The building is known to have a range of different commercial occupiers including ASOS, the British Heart Foundation, Young & Rubicam advertising agency, Wunderman, Revlon, Wonga.com, Radley + Co and other companies.
- 3.5 Access is provided from a number of entrance points on Hampstead Road and Mornington Crescent. Two ramps from Mornington Crescent lead to roller shutter doors which provide access to a large external courtyard. The courtyard (accessed from the public highway (Mornington Crescent)) contains cycle and car parking

spaces and provides the main access for servicing and deliveries.

- 3.6 Greater London House is located within the Camden Town Conservation Area and is considered a positive contributor. It sits in a largely residential area with some ground floor commercial units located nearby in Camden High Street. Mornington Crescent at the rear of the site is largely Grade II listed.

- 3.7 The site is well served by public transport services, and has a Public Transport Accessibility Level of 6a given its proximity to Mornington Crescent Underground Station which is opposite the site and Camden Town Underground Station which is 400 metres to the north of the site. In addition, there are a number of bus routes which stop outside of the site. Further information is contained within the Transport Assessment prepared by RGP.

4 Planning History

- 4.1 Planning permission was granted under 12/9/2/11627(R) for the **Fencing to existing car parking area** on 03/11/1971.
- 4.2 Planning permission was refused under 8700596 for **Erection of an additional 9000sq.m of office floorspace** on 10/08/1987
- 4.3 Planning permission was refused under 8700597 for the **Erection of an additional 5000sq.m of office floorspace** on 10/08/1987
- 4.4 Planning permission was granted under **PE9700102** for the **Erection of four service risers on the elevation of the courtyards and erection of associated plant at roof level** on 17/02/1997
- 4.5 Planning permission was granted under **PE9700121R1** for **Alterations to the front elevation and forecourt area of the building comprising: the erection of a new glazed canopy over each of the main and two side entrances; the reinstatement of statues on either side of the entrance; the refurbishment of the existing decorative pillars to the front elevation; the installation of replacement windows front elevation; the creation of a new access road from Hampstead Road; the provision of full wheelchair access to the main entrance.** on 19/06/1997
- 4.6 Planning permission was granted under **PE9700631** for the **Installation of new glazing to the whole building** on 03/10/1997
- 4.7 Planning permission was granted under PE9800760 for the **Change of use of part of the basement from offices to gymnasium and restaurant** on 03/06/1999
- 4.8 Planning permission was granted under PEX0200132 for the **Construction of bridge links in the internal courtyard to create additional office (Class B1) floor space** on 08/03/2002. This proposal was not implemented.
- 4.9 Planning permission was granted under 2008/0747/P for the **Retention of two sets of double doors to provide access to a flat roof at rear fifth floor level and timber decking and planter boxes on the roof, all to facilitate use of the roof as a terrace in connection with the existing offices (Class B1)** on 02/04/2008

- 4.10 Planning permission was granted under 2008/1568/P for the **Change of use of part basement from gymnasium (Class D2) to office use (Class B1)** on 01/05/2008
- 4.11 Planning permission was granted under 2008/3361/P for **Alterations to rear boundary treatment including installation of a new gate and alterations to delivery entrance (on Mornington Crescent) including new staircases and ramp to basement level offices on the north side** on 21/08/2008
- 4.12 A Certificate of Lawfulness for a proposed development was refused under reference number 2016/0905/P in June 2016 for **“the construction of two 3 storey infill extensions at ground, 1st and 2nd floor levels within the external courtyard of the building to create an additional 3539sqm of new floorspace”**.

5 Development Proposals

- 5.1 This planning application has been submitted following the refusal of a Certificate of Lawfulness of Proposed Use or Development in June 2016.
- 5.2 Planning permission and conservation area consent is sought for:

“Removal of the existing redundant bridge link structures and erection of a Class B1 office floorspace infill within the existing open air atrium at upper ground, levels one and two, together with ancillary facilities at lower ground level, plant at roof level and cycle parking”.

- 5.3 The proposed development on the site is described in detail in the Design and Access Statement. This Planning Statement should be read in conjunction with the Design and Access Statement, the proposed plans and drawings, and the other technical reports supporting this planning application.

Scheme Outline

- 5.4 The proposed development seeks to provide the additional office floorspace which ASOS requires to ensure that they remain within the building. The proposal is on stilts and the infill is proposed at upper ground and levels one and two. A number of alterations will be made to the existing façade to accommodate the new infill. A spa facility including toilets, a spa and a gym is proposed at lower ground (the same level as the existing car park).
- 5.5 The proposal cannot be seen from the street or any other neighbouring properties.
- 5.6 The scheme proposes 3897 sqm GEA of office and ancillary floorspace and is summarised in Table one below:

Table One – Proposed floor areas

Level	Proposed floorspace GEA
Lower Ground	306m ²

Ground Floor	1359m ²
First Floor	1116m ²
Second Floor	1116m ²
Total	3897m²

Cycle Parking

- 5.7 The scheme proposes 51 cycle parking spaces would be required (i.e. 43 long-stay and 8 short-stay). cycle parking spaces which would be stored using 26 Sheffield stands.

6 Planning Policy

- 6.1 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act comprises:
- 6.2 The statutory Development Plan for the application site comprises the London Plan (2015) Consolidated with Alterations since 2011. The Camden Local Development Framework (LDF) Core Strategy and Development Policies Documents were formally adopted by the Council on 8th November 2010. Other Supplementary Planning Documents (SPD's) are also produced by London Borough of Camden.
- 6.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

National Guidance – National Planning Policy Framework ('NPPF') (2012)

- 6.4 The NPPF published in March 2012 sets out the Government's economic, environmental and social planning policies for England. It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 6.5 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 6.6 The NPPF establishes the presumption in favour of sustainable development. Specifically, paragraph 19 states that the planning system should do all that it can to promote sustainable economic growth in order to create jobs and prosperity and meet the challenges of global competition alongside a low carbon future. The NPPF states that significant weight should be placed on the need to support economic growth through the planning system.

Planning Practice Guidance (PPG) (March 2014)

- 6.7 In March 2014, the Department for Communities and Local Government (DCLG) launched the web-based planning practice guidance resource. This aims to provide planning practice guidance which is useable in an up-to-date and accessible manner.
- 6.8 With regard to decision taking, the PPG is a material consideration in the determination of planning applications.

The London Plan (March 2015)

- 6.9 The London Plan is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the statutory development plan.
- 6.10 This version of the London Plan was adopted in March 2015 and consolidates the alterations to this document since 2011.

Local Planning Policy

- 6.11 The relevant development plan is the LBC Local Development Framework. The Core Strategy and Development Policies were formally adopted in November 2010. The priority land uses within Camden are housing and employment.

Allocations and Designations

- 6.12 GLH is located within Camden Town Conservation Area. The site is not located within the Central Activities Zone or Camden Town Centre.

Community Infrastructure Levy (CIL)

- 6.13 From 1 April 2012 all developments in London which result in the addition of over 100 sqm (GIA) of floorspace (with some exceptions including affordable housing) will be eligible to pay Mayoral CIL. Developments in London will be liable to pay £50 per sqm. The purpose of the Mayoral CIL is to pay for strategic transport infrastructure, nominally Crossrail.

6.14 Camden Council's CIL levy was adopted on 1st April 2015. The rate for office accommodation is £25 per sqm.

7 Key Planning Considerations

Strategic Planning Considerations

- 7.1 The proposed development is supported by strategic objectives at all levels of planning policy and guidance.
- 7.2 The National Planning Policy Framework has a clear presumption in favour of sustainable development and advises that developments should be approved where they accord with statutory policies.
- 7.3 The Planning for Growth statement emphasises the importance of securing economic growth and employment.
- 7.4 At a regional level, the London Plan prioritises sustainable development. The plan seeks to encourage efficient use of land by ensuring that development proposals achieve the maximum intensity of use compatible with the local context.
- 7.5 At a local level, the strategic objectives for LBC are contained within the adopted Core Strategy. These objectives are to create:
- 7.1 1 - A sustainable Camden that adapts to a growing population
- 2 - A strong Camden economy that includes everyone
- 3 - A connected Camden community where people lead active, healthy lives
- 4 - A safe Camden that is a vibrant part of our world city.
- 7.2 Camden's strategic employment policies are to create a sustainable Camden that adapts to a growing population and a strong Camden economy that includes everyone and to strengthen Camden's nationally-important economy while seeking to reduce inequalities within the borough, with increased access to jobs, skills, training and education opportunities.

8 Employment

- 8.1 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of business and support an economy fit for the twenty first century.
- 8.2 The London Plan recognises the need to support and develop London's economy as one of the three world cities. Policy 4.1 seeks a range of workspaces of different types, sizes and costs to meet the needs of different sectors of the economy and firms of different types and sizes.
- 8.3 Policy 4.2 supports the management and mixed use development and redevelopment of office provision to improve London's competitiveness including enhancing its varied attractions for businesses of various types and sizes including small and medium enterprises.
- 8.4 Core Strategy policy CS1 seeks to focus Camden's growth in the most suitable locations, and manage it to make sure that we deliver its opportunities and benefits and achieve sustainable development, while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.
- 8.5 Core Strategy policy CS8 considers that the Council will secure a strong economy in Camden through 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; encouraging a mix of employment facilities and types including the provision of facilities suitable for a mix of small and medium sized enterprises; support local enterprise development, employment and training schemes for Camden residents; recognise and encourage the concentrations of creative and cultural businesses in the Borough as well as supporting the development of Camden's tourism sector and recognise the importance of other employment generating uses, including retail leisure, education and health.
- 8.6 The Camden Council Employment Land Study 2014 advises in paragraph 5.5 that 'throughout our site surveys, large and headquarter (HQ) type office provision was recorded within the central London area and in particular within the Growth and Opportunity Areas of King's Cross, Euston, Tottenham Court Road and Holborn.

Outside of the central London area there is limited provision of large office floorspace suitable for occupiers seeking high grade office floorspace’.

- 8.7 Paragraph 6.6 summarises that ‘the office market in Camden is formed by three quite distinctive sub-markets: the central London area, Camden Town and the Outer LB Camden area..... The property markets vary: the central London area with its focus on larger CAZ businesses, dominated by professional and business services, with an increasingly important creative services sector; Camden Town with its focus on small creative businesses and start-ups; and the Outer LB Camden area with its focus on smaller professional firms serving local businesses’ needs.....Within this menu of offers, perhaps the most critical issue in policy terms is to nurture growth of small, dynamic businesses, and this means having a ready stock of suitable premises available. This will be most important around the fringe of the central London area and in Camden Town’.
- 8.8 Paragraph 6.10 - Growth Sectors advises ‘As set out in Section 4.5 there is evidence that LB Camden is home to a comparatively large proportion of creative and cultural industries (CCIs). The CCI sector includes a wide range of business activities from traditional craft and design to high technology computer gaming and app development, music, fashion and media. Many of these businesses are drawn to LB Camden through the benefits of being co-located and with access to a young and entrepreneurial qualified population amongst other factors, such as the diverse residential and retail environment offered by LB Camden.
- 8.9 Camden Policy DP13 states that the Council will retain land and buildings that are suitable for continued business use and will resist a change to non-business uses.
- 8.10 This planning application seeks to provide additional floorspace for ASOS, an existing tenant within the building. ASOS sees the long-term future of its business in Greater London House and, subject to being able to accommodate its growth, would sign a lease until 2033. If the additional floorspace is not guaranteed by November 2016, ASOS will be forced to locate outside of the London Borough of Camden as their existing lease ceases in 2018.
- 8.11 ASOS currently employs 2,440 staff based at Greater London House. ASOS’s growth projections estimate that this will rise to over 3,500 by 2020. ASOS spans both the fashion and tech sectors, its employment profile reflects this with a spread

of skills and occupations, 740 of the current jobs based at Greater London House are tech jobs.

- 8.12 Employment within ASOS ranges across various sectors, from design, retail and marketing to digital and IT. ASOS also have variety of jobs across the skills profile. The company offers excellent training and development opportunities allowing people to progress through their career.
- 8.13 ASOS has a twelve month intern program offering accredited placements across the business including: marketing, buying, merchandising, garment technology, software engineering, learning and development, pattern cutting, finance and sourcing. There is also a shorter six-month intern programme.
- 8.14 Retaining growing employers within Camden creates employment opportunities for local residents. There are currently 122 employees working in ASOS that are Camden residents. The additional 1,000 jobs over the next four years will create new opportunities for more Camden residents.
- 8.15 Furthermore, ASOS' business presence spans across the five continents and beyond its stable workforce, ASOS welcomes large number of international visitors such as suppliers, consultants, employees on a daily basis thus raising the profile of the Borough of Camden not only as a touristic venue but also as a place of international business.
- 8.16 The increase in employment accommodated by this proposal would generate additional spending of £2.3 million per annum within the local area. Further details are contained within an Economic Statement prepared by Quod.
- 8.17 In summary, this proposal is important to the Camden economy. If this application is not approved by November 2016, ASOS will be likely to leave the Borough and 2,400 jobs, including 122 Camden local jobs will be lost, in addition to the 1,000 new jobs proposed. Camden's Employment Land Study notes that in order to nurture growth in businesses, there needs to be land available in and around the fringe of the central London area and in Camden Town. The proposal therefore meets National, London Plan and Local policy.

9 Mixed Use

9.1 Policy DP1 'Mixed Use Development' contained within the Camden Development Policies, 2010 states:

"The Council will seek a mix of uses in development where appropriate in all parts of the borough, including a contribution towards the supply of housing. In the Central London Area (except Hatton Garden) and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where more than 200 sq m (gross) additional floorspace is provided, we will expect up to 50% of all additional floorspace to be housing. As an exception to this approach, in the designated Hatton Garden area, where more than 200 sq m (gross) additional floorspace is provided, we will expect up to 50% of all additional floorspace in the form of secondary uses, including a contribution to housing and a contribution to affordable premises suitable for the jewellery industry.

The Council will expect any secondary uses to be provided on site, particularly where 1,000sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment-in-lieu." Our emphasis

9.2 This proposal is not located within the Central London Area or a town centre. Therefore the residential requirement of 50% is not applicable.

9.3 DP1 further states that in considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:

- a) The character of the development, the site and the area;
- b) site size, the extent of the additional floorspace, and constraints on including a mix of uses;
- c) the need for an active street frontages and natural surveillance;
- d) the economics and financial viability of the development including any particular

costs associated with it;

e) whether the sole or primary use proposed is housing;

f) whether secondary uses would be incompatible with the character of the primary use;

g) whether an extension to the gross floorspace is needed for an existing user:

h) whether the development is publicly funded;

i) any other planning objectives considered to be a priority for the site.(our emphasis)

9.4 The policy tests are considered below and it is considered, having regard to the wording of the policy that a residential requirement should not be applied in this instance.

a) The character of the development, the site and the area

9.5 The proposed development is to be located within the existing open air atrium/lightwell of the GLH building. The GLH building is the largest, bulkiest building in the area.

b) Site size, the extent of the additional floorspace, and constraints on including a mix of uses;

9.6 The proposal would not be seen from the street; the proposal represents a 10% increase in floor area.

9.7 As acknowledged in the Core Strategy, the Council gives priority to housing but not to the extent that this priority should override the need to protect some non-residential uses across the borough. It is also noted that priority for housing needs to be considered in the context of the characteristics of specific areas, sites and properties. The supporting text to Policy DP1 recognises that there are a number of circumstances where a mix of uses may not be sought. This includes situations where a secondary use is not compatible with the primary use. In this instance, a residential use would not be compatible within the GLH building as the building is fully let to commercial tenants.

9.8 Given the nature and character of the Site and the important role it plays in contributing to the commercial well-being of Camden, the Site is not considered to be an appropriate location to accommodate a mix of uses that includes residential because this would detrimentally impact on the commercial viability of this purpose built commercial building. Furthermore, GLH has an Article 4 direction placed on the building which prevents a change of use from employment to residential land uses. Clearly, Camden Council considers that this is a commercial building where its employment land use needs to be protected.

9.9 There is limited capacity to accommodate additional residential development on the site and where opportunities to optimise the layout and scale of buildings and to increase floorspace do arise, the overarching priority has been to ensure the future success and viability of ASOS and therefore this planning application seeks to provide additional employment floorspace rather than residential floorspace.

c) The need for active street frontages and natural surveillance

9.10 The proposal cannot be seen from the street as the proposal would be situated within an existing open air atrium/lightwell.

d) The economics and financial viability of the development including any particular costs associated with it

9.11 This planning application has only been submitted as ASOS, an existing tenant requires additional floorspace for their growing workforce. Due to the design of the existing building, residential accommodation could not be provided within the building as residential accommodation is not suitable within an atrium which is overlooked by office floorspace. Furthermore, the existing roof comprises plant accommodation and the building is already the largest, bulkiest building in the area and therefore, in design terms, it would not be appropriate to include residential at roof level.

9.12 Housing is not compatible with the proposed primary use of the site which is a fully let commercial building. Paragraph 1.22 of Policy DP1 states that: "the Council will not seek housing or other secondary uses where they are not compatible with the primary use". The provision of residential accommodation on site would impact detrimentally on the commercial viability of the building by either displacing existing tenants to make floorspace available for residential accommodation or would impact on appearance of this imposing building.

e) Whether the sole or primary use proposed is housing

9.13 No housing is proposed as part of the mix of uses on site.

f) whether secondary uses would be incompatible with the character of the primary use;

9.14 It is considered that the provision of residential within the site would be incompatible with the primary employment use on the site. The building is fully let and residential accommodation cannot be provided at roof level as the existing building is already the bulkiest building in the area.

g) whether an extension to the gross floorspace is needed for an existing user;

9.15 This planning application has only been made to accommodate ASOS, an existing user within the building.

h) whether the development is publicly funded;

9.16 The proposal is privately funded.

i) any other planning objectives considered to be a priority for the site.

9.17 The Core Strategy sets out the need to protect and enhance existing employment sites. The site is extremely well connected in terms of public transport accessibility. Core Strategy policy CS1 seeks to focus Camden's growth in the most suitable locations, and manage it to make sure that Camden delivers its opportunities and benefits and achieves sustainable development, while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit. This planning application seeks to achieve this.

9.18 Core Strategy policy CS8 considers that the Council will secure a strong economy in Camden through 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; encouraging a mix of employment facilities and types including the provision of facilities suitable for a mix of small and medium sized enterprises; support local enterprise development, employment and training schemes for Camden residents; recognise and encourage the concentrations of creative and

cultural businesses in the Borough. This planning application seeks to achieve this and ASOS is committed to employment and training schemes.

9.19 Policy DP13 seeks to encourage and protect employment sites and an Article 4 direction seeks to ensure that the existing building cannot be converted into residential under Permitted Development rights.

9.20 It is therefore concluded, that under criteria b), g) and i) of policy DP1, a mix of uses, including a contribution to the supply of housing, should not be sought as part of this application proposal.

9.21 Turning to the second and third cascades within policy DP1, the policy states:

"The Council will expect any secondary uses to be provided on site, particularly where 1,000sqm (gross) of additional floorspace or more is proposed. Where inclusion of a secondary use is appropriate for the area and cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment-in-lieu."

9.22 For the reasons set out above, and following a dialogue with Camden officers, it is considered that a residential requirement is not appropriate for this application.

9.23 Notwithstanding this, as part of the pre application discussion with Camden Council officers, the applicant provided evidence to demonstrate that they do not currently own any sites within Camden that are capable of coming forward for residential within a similar timescale. Most of the properties owned by the applicant are commercial and fully let on long leases.

9.24 The third cascade of the policy relates to a payment in lieu. Following a discussion with Camden officers, it has been agreed that a financial payment (to be agreed) could be paid to the Council, but only if ASOS was to leave the Borough within a period to be agreed as part of the s106 agreement following the grant of a planning permission.

9.25 To summarise, the proposal is not located within the Central London Area or in a town centre. It has been demonstrated that is not appropriate for residential to be provided in connection with the proposed office extension which is being built for a specific tenant. ASOS has advised Camden Council that if the additional floorspace is not permitted and work is not commenced by November 2016, ASOS will be seeking

alternative accommodation which is likely to be in another Borough. Camden would therefore lose 3,500 jobs by 2020 in an industry which Camden is seeking to promote.

10 Sustainability

- 10.1 An Energy Statement and Sustainability Statement prepared by GLP have been submitted to accompany the planning application. This assesses how the Proposal accords with policies and principles for sustainable development and energy efficiency. The Strategy focuses on relevant policies and guidance contained in the NPPF, London Plan and Camden's adopted policies.

National Planning Policy

- 10.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a 'golden thread' running through both plan-making and decision-taking (paragraph 14).
- 10.3 One of the 12 core principles of the NPPF is to support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).

London Plan Policy

- 10.4 London Plan Policy 5.1 focuses specifically on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this. Developments are required to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions (Be Lean), adopting sustainable design and construction measures and prioritising decentralised energy (Be Clean), including renewables (Be Green).
- 10.5 Policy 5.5 of the London Plan states that the Mayor expects 25% of the heating power used in London to be generated through the use of localised decentralised energy systems by 2025.
- 10.6 Decentralised Energy; Heating, Cooling and Power is addressed through Policy 5.5 in the London Plan which requires all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions.
- 10.7 London Plan Policy 5.7 relates to renewable energy and states that within the

framework of the energy hierarchy, major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation where feasible.

- 10.8 Furthermore, the London Plan has a requirement to reduce carbon emissions by 35% over a Part L2A 2010 baseline for new buildings during the period 2013-2016.
- 10.9 In support of the policies of the London Plan, the Mayor's SPG on Sustainable Design and Construction provides the context for all developments and provides a mechanism for addressing climate change impacts through new developments.

Local Planning Policy

- 10.10 Camden Core Strategy policy CS13 advises that the council will require all developments to take measures to minimise the effects of and adapt to climate change.
- 10.11 Development Policies policy DP22 requires development to incorporate sustainable design and construction measures including providing green and brown roofs; expecting non-domestic development to achieve 'very good' BREEAM assessments and 'excellent' from 2016; and ensuring schemes include appropriate climate change adaptation measures, such as:
- summer shading and planting;
 - limiting run-off;
 - reducing water consumption;
 - reducing air pollution; and
 - not locating vulnerable uses in basements in flood-prone areas.
- 10.12 In accordance with policy 5.1 of the London Plan, the Energy Statement proposes the following energy efficient measures. Regard should be had to the fact that this Proposal seeks to upgrade existing buildings as well as introduce new buildings across the site. It should be noted that the London Plan target of a 40% carbon emissions reduction against Part L2A 2010, would equate to a 28% reduction over the minimum improvement over the L2A 2013 Target Emission Rate. This proposal

achieves a 22% reduction.

Use Less Energy – ‘Be Lean’

10.13 The proposal includes:

- a) The mechanical ventilation requirements to the offices will incorporate thermal wheel air to air heat recovery.
- b) Air Permeability
- c) Good U values
- d) Low Energy Lighting and Lighting Control
- e) High efficiency hot water heaters to the Lower Ground Floor spa and toilet facilities.
- f) Low level flushing and water consumption in the toilets and showers

Supply energy efficiently – ‘Be Clean’

10.14 The proposal includes Air Source Heat Pumps and low energy technologies.

Use renewable energy – ‘Be Green’

10.15 The proposal includes 300 sqm of PV’s which equate to a 22% reduction in CO2 emissions.

10.16 The Proposal will meet BREEAM ‘Very Good’ under BREEAM UK Refurbishment & Fit-out 2014. The current design proposals achieve a score of 67.12%. The Energy section of BREEAM also exceeds Camden’s benchmark of 60% with this realising 65% ratio of Credits achieved.

11 Design

11.1 The Design and Access Statement sets out the design approach for the Proposal which has been discussed with Camden Council officers and other relevant stakeholders.

National Planning Policy

11.2 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 56 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

11.3 The NPPF goes on to state at paragraph 58, that planning policies and decisions should aim to ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- c) Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
- d) Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- e) Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- f) Are visually attractive as a result of good architecture and appropriate landscaping.

London Plan Policy

- 11.4 The London Plan at Policy 2.10 seeks to sustain and enhance the distinctive environment and heritage of London, recognising both its strategic components and other features including distinctive buildings and historic heritage, through high quality design and urban management.
- 11.5 Policy 7.1 advises that new development should be designed so that the layout, tenure mix of uses and interface with the surrounding land will improve people's access to community infrastructure.
- 11.6 Policy 7.2 requires all new development in London to achieve the highest standards of accessible and inclusive design.
- 11.7 Policy 7.3 states that development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.

Local Planning Policy

- 11.8 At a local level, Core Strategy policy CS14 seeks to ensure that new developments are attractive, safe and easy to use.
- 11.9 The aim of policy Development Policies DP24 is to require all developments to be of the highest standard of design.
- 11.10 The design brief was prepared to provide ASOS with high quality, flexible office space which benefits from good levels of natural light and is connected to their existing tenanted areas. The proposal includes the demolition of two redundant external bridge structures which are located within the open air atrium/lightwell and the creation of a new office infill that will maintain smaller lightwells within the external courtyard which, in turn would provide adequate ventilation for the car park located at lower ground level.
- 11.11 The proposal seeks to enhance the existing building which is regarded as a positive contributor in the Camden Town Conservation Area. The proposal is a lightweight steel and glass structure on stilts which has been designed to complement the existing building. At lower ground level, a new WC facility together

with showers and a spa and gym will be provided for ASOS.

- 11.12 The proposal will be connected to the existing ASOS floors by removing a number of existing windows to create openings into the existing office floorspace. Roof lights will be provided at the third floor to provide light into the new infill extension.
- 11.13 A new accommodation stair will be located within the southern lightwell and two new lifts will be installed at the northern lightwell. The proposal is fully accessible.
- 11.14 From a safety perspective, entrance into the proposed site can only be gained through the existing controlled access doors within the existing building. The new lifts provided at lower ground will only allow ASOS employees to enter their tenanted floors via controlled access.
- 11.15 It is considered that the proposal meets relevant National, London Plan and local planning policy.

12 Transport

- 12.1 Paragraph 29 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 12.2 Paragraph 37 states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, leisure, education and other activities.
- 12.3 At paragraph 41 the NPPF supports that local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice
- 12.4 At a regional level, London Plan policy 6.3 states that “development Proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed”. The policy also indicates that transport assessments will be required in accordance with TfL’s Transport Assessment Best Practice guidance for major planning applications.
- 12.5 Policy 6.9 states that “the Mayor will work with all relevant partners to bring about a significant increase in cycling in London
- 12.6 Policy 6.10 indicates that “the Mayor will work with all relevant partners to bring about a significant increase in walking in London, by emphasising the quality of the pedestrian environment, including the use of shared space principle –promoting simplified streetscape, de-cluttering and access for all”.
- 12.7 The Mayor’s Transport Strategy, 2010 sets out policies and Proposals to achieve the goals set out in the Plan. The Mayor’s Transport Strategy sets a vision of London as an exemplary sustainable world city.
- 12.8 At a local level, Core Strategy policy CS11 seeks to promote the delivery of transport infrastructure and the availability of sustainable transport choices.
- 12.9 Development policy DP16 seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links.

- 12.10 Development Policy DP17 seeks to promote walking, cycling and public transport.
- 12.11 Development policy DP18 advises that the Council will seek to ensure that developments provide the minimum necessary car parking provision and expects that schemes within the Central London Area and the town centres of Camden town, Finchley Road, Swiss cottage, Kentish High road and west Hampstead should be car free with the exception of disabled parking.
- 12.12 A Transport Assessment and Draft Travel Plan have been prepared by RGP as part of the planning application. The site is highly accessible as it is situated opposite Mornington Crescent Underground station. Mornington Crescent is served by a very high frequency of approximately 50 bus services per hour in each direction during peak times. The closest National Rail stations to the site are Euston, approximately 1km to the south, and St Pancras, approximately 1.25km to the south-east.
- 12.13 There are a number of Santander cycle hire stations situated in close proximity to the site, including Harrington Square 1 & 2 hire stations on the site frontage on Hampstead Road (A400) providing a total of 65 bicycles which are available for public use.
- 12.14 The proposals would generate an increase of 1,030 two-way movements by all modes over the course of a typical weekday (07:00-19:00). This would comprise 113 two-way movements during the AM peak hour and 117 two-way movements during the PM peak hour.
- 12.15 The majority of journeys would be undertaken on foot (461 two-way movements, or 45% of the total journeys) or by public transport (447 two-way movements, or 43% of the total journeys).
- 12.16 A total of 26 two-way movements would be made by bicycle each day. This would comprise 4 two-way cycle movements during the AM peak hour and 3 two-way cycle movements during the PM peak hour.
- 12.17 Following a review of public transport routes and services in the nearby vicinity of the Site, the development proposals would have a negligible impact on the capacity of these services.

Car Parking

12.18 Additional car parking is not proposed.

Cycle Parking

12.19 The proposals would provide additional cycle parking in accordance with the London Plan standards. Based on these standards, 51 cycle parking spaces would be required (i.e. 43 long-stay and 8 short-stay). These would be provided in the form of 26 Sheffield style cycle stands conveniently located within the existing car park in a safe and secure location which benefits from CCTV surveillance. The proposal also includes shower facilities.

Construction

12.20 A Draft Construction Management Plan has been prepared by JLL. The construction of the proposal would take place in one phase lasting approximately 54 weeks. Construction would take place within the existing perimeter of the building and a site office would be erected within the overall site boundary.

Air Quality

12.21 Under Policy 7.14 of London Plan, “Improving air quality”, boroughs should implement the Mayor’s Air Quality Strategy and work towards achieving reductions in pollutant emissions.

12.22 At a local level, Core Strategy policy CS11 promotes sustainable and efficient travel and policy CS16 seeks to improve Camden’s health and wellbeing.

12.23 Under Development Policies Policy DP32 the Council in assessing proposals will require air quality assessments where development could potentially cause harm to the air quality

12.24 An Air Quality Assessment has been prepared by Phlorum and the report concludes that the construction of the proposed development could give rise to emissions that may cause some dust soiling effects on adjacent uses. However, by adopting appropriate mitigation measures to reduce emissions and their potential impact, there should be no significant residual effects.

12.25 The proposed development is considered to comply with the requirements of the NPPF, LBC policy and the London Plan as it is not expected to expose any new or existing receptors to unacceptable air quality. It is also expected to be Air Quality Neutral, with reference to the GLA guidance.

13 Planning Obligations and CIL

- 13.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 13.2 Regulation 122 of the Community Infrastructure Levy Regulations provides that “a planning obligation may only constitute a reason for granting planning permission if the obligation is:
- a) necessary to make the development acceptable in planning terms; and**
 - b) directly related to the development; and**
 - c) fairly and reasonably related to the scale and kind of the development.”**

National Planning Policy Framework

- 13.3 Paragraph 203 of the NPPF states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 13.4 Paragraph 205 states that where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.
- 13.5 Paragraph 206 states that planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

London Plan Policy

- 13.6 Under Policy 8.2 of the London Plan, “Planning obligations” boroughs should

include appropriate strategic as well as local needs in their policies for planning obligations.

- 13.7 Policy 8.2 further states that boroughs, when negotiating planning obligations, should seek a contribution that is fairly and reasonably related in scale and in kind to the proposed development and its impact on the wider area.
- 13.8 The use of planning obligations is specifically required through Core Strategy policy
- 13.9 CS19 'delivering and monitoring the core strategy' although a whole range of individual development policies may be used to justify an obligation.
- 13.10 Core Strategy policy CS19 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to; support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and mitigate the impact of development.
- 13.11 The Applicant confirms that they will enter into a Legal Agreement with the Council to secure the reasonable and necessary planning obligations associated with the development in accordance with Regulation 122 of the CIL Regulations, the NPPF and Core Strategy Policy CS19.
- 13.12 The package of s106 obligations for this Proposal are likely to include:
- a. Service Management Plan
 - b. Construction Management Plan
 - c. Travel Plan
 - d. Employment and Training
 - e. Apprenticeships
 - f. Open Space contribution
- 13.13 The development will require Mayoral CIL and Camden CIL payments in accordance with the Community Infrastructure Levy Regulations 2010 as

amended.

13.14 Camden Council's CIL levy was adopted on 1st April 2015. The rate for office accommodation is £25 per sqm. The proposed Camden CIL contribution excluding indexation is £95,950. Mayoral CIL (excluding indexation) is £191,900.

14 Summary and Conclusions

- 14.1 Lazari was asked by their tenant, ASOS in the latter part of 2015 to find additional office floorspace within the GLH building to accommodate their growing workforce. A Certificate of Lawfulness of Proposed Use or Development for the proposal was submitted to Camden Council in February 2016 as it is considered by the Applicant that the proposal does not constitute development. Camden Council refused the Certificate in June 2016 and requested a planning application be submitted in respect of the extension.
- 14.2 ASOS has advised that if additional office floorspace cannot be secured by November 2016, ASOS will need to find alternative accommodation outside of the London Borough of Camden as the cost of alternative accommodation in the Borough is extremely expensive.
- 14.3 The proposal has been discussed with Camden Council officers for a number of months. The proposal would provide circa 1,000 new jobs for Camden within the next five years. The design of the proposal seeks to complement the existing building which is a positive contributor. The proposal cannot be seen from the street as it is an infill scheme.
- 14.4 The proposal seeks to meet the strategic policies of the Camden Plan through the creation of new jobs in a fashion and technological company in a sustainable location. ASOS started in Camden as a small start-up business and due to its success has rapidly grown into an international brand and one of the largest employees in Camden, generating a turnover of over a billion pounds
- 14.5 Employment within ASOS ranges across various sectors, from design, retail and marketing to digital and IT. ASOS also have variety of jobs across the skills profile. The company offers excellent training and development opportunities allowing people to progress through their career.
- 14.6 ASOS has a twelve month intern program offering accredited placements across the business including: marketing, buying, merchandising, garment technology, software engineering, learning and development, pattern cutting, finance and sourcing. There is also a shorter six-month intern programme. ASOS also undertakes a number of charitable events across the Camden Borough.

- 14.7 The proposal would generate an additional £2.3 million per annum within the local area in addition to other economic benefits which are highlighted in the Economic Statement.
- 14.8 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, the application Proposals meets the objectives of the Development Plan including relevant London Plan, Camden Council's Core Strategy and Development Management policies. There are many other material planning considerations of significant weight that justify the grant of planning permission.
- 14.9 This statement therefore concludes that the Proposal complies with the aims and objectives of national, regional and local planning policy and should be granted planning permission accordingly.