

Regeneration and Planning
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall
Judd Street
London
WC1H 9JE

26th July 2016

Dear Mr Diver

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
10-12A ST. GEORGE'S MEWS (REF:2016/3559/P) &
FLAT 5, 136 GLOUCESTER AVENUE (REF:2016/3556/P)

On behalf of a number of commercial and residential occupiers of St. George's Mews, Primrose Hill, we hereby submit a formal objection in respect of the above two linked change of use planning applications in Primrose Hill, Camden. A list of the objectors' addresses and their signatures is appended to the end of this letter.

The first application (of principal concern to the objectors) relates to 10-12A St. George's Mews and is for "*Change of use from offices (B1a) to a 3 bed, 6 person residential unit (C3); associated alterations*" (ref: 2016/3559/P). The second linked application is for Flat 5, 136 Gloucester Avenue London and seeks a "*Change of use from a self-contained 3 bed residential unit (C3) to office (B1a) (no external alterations)*" (ref: 2016/3556/P).

The applications have been linked to facilitate a land-use swap, resulting in the loss of office floorspace at the Mews, to which the existing local businesses and residents at the Mews object strongly.

Both applications, individually, are contrary to policy (as acknowledged by the applicant in their submission, however the principal justification provided to support the schemes is that the proposed "land swap" represents an improvement over the existing situation in terms of the location and quality of employment floorspace and proposed residential accommodation respectively.

It is considered that this argument is fundamentally flawed and that the loss of the existing business accommodation in the Mews is detrimental to current and future local employment, whilst no real justification for the change of use at Gloucester Avenue has been provided.

Key Issues

The applicant suggests in their submissions that the proposed land swap approach addresses any conflict with planning policy relating to land use. However, irrespective of the fact that there may be no loss of B1a floorspace locally, it is crucial that any such proposal does not adversely affect employment provision and the Council must consider the benefits and disbenefits of such a swap, taking into account the existing arrangements, location, type of accommodation provided, flexibility of the spaces and indeed current occupation levels.

The following key points must be considered as part of the Council's assessment of the scheme:

Existing Uses

- Are the existing uses appropriate to their setting?
- Are the existing uses viable / suitable for continued occupation?

Proposed Uses

- Would the relocation of office floorspace improve or harm local employment?
- Would the relocation of residential floorspace be beneficial to local provision?

Existing Uses

The appropriateness of the existing residential use of the Gloucester Avenue property has already been established by virtue of the very recent grant of permission for "change of use of the building from offices and workshops (Class B1) to 2 x 3 bedroom dwellings (Class C3)" in 2012 (ref: 2012/4188/P).

The application presented a robust and convincing planning argument insisting that 136 Gloucester Avenue was unsuitable as commercial premises and therefore residential use would be appropriate. At the time (only four years ago) the following arguments were accepted by the Council when granting permission in obtaining the change of use from office to residential at Gloucester Avenue:

- The site is not located in or adjacent to an Industry Area in the LDF or other area suitable for large scale general industry or warehousing;
- It is not easily accessible to the Transport for London Road Network or London Distributor Roads;
- Its servicing potential is limited to relatively smaller service vehicles due to the width and height restrictions on the access way and servicing space is also somewhat limited;
- It is located close to residential uses (though some other Class B uses remain in Gloucester Avenue to the rear of residential premises);
- It generally is not in a reasonable condition
- It does not provide a range of unit sizes.

The premises were considered to fall within “category 3” as defined by the Council’s planning guidance on employment (CPG5) which states that *“Category 3 sites are heavily compromised and may not be suitable for continued industrial use when they become vacant or need significant investment, although they could be suitable for office B1A space.”* In addition the applicant argued (and the Council agreed) that the premises had been vacant for 2 years, was not attractive to tenants, is not “purpose built” except for some extensions to the building, and that the building would require significant investment to bring up to modern standards.

Based on all of the above points, the Council granted planning permission for the change of use from office to residential, and the conversion works were undertaken by the owner accordingly.

There is no reason to suggest that the existing residential use has now become inappropriate since this change of use occurred, or that the use cannot continue. Furthermore, no evidence has been presented which demonstrates that an office use is in fact more appropriate in this location (this is discussed further later in this letter).

Although there is no recent planning history for the St George’s Mews site to compare with the Gloucester Avenue site, it is clear using the same criteria as those above that the property is better suited for employment use for the following reasons:

- The building is purpose built for office use - Unlike the Gloucester Avenue site, 10-12 St George’s Mews is a purpose built office building and has been used as such continuously.
- The existing accommodation is in reasonable/good condition – whilst the building would not be considered “class A” accommodation the offices are by no means in a poor state of repair and are ideally suited to the size and type of occupants which have a demand for space in the area.
- It provides a range of unit sizes - Both local and national policy seeks to retain and provide employment space for small growing businesses and the St George’s Mews building and indeed its neighbours provide an ideal setting for such commercial occupants.
- It is fully occupied with no long term vacancies - The building is currently occupied by five separate tenants (SR Productions , Wixen Music, Triyoga, Jon Korn, Mr Smith), none of whom are looking to relocate and would ideally prefer to remain in this location if possible.

- It is well suited to the creative industries - The TBR Office to Residential Impact Study (2014) notes that the Primrose Hill Area has a strong demand for creative industry space
- A number of other commercial premises exist within the mews – the northern side of the mews is entirely commercial and as such the office use has no negative impact on neighbours. Rather, the clustering of these smaller premises can often be beneficial to occupants as businesses have the potential to collaborate / cross-trade in what has become a local community.

To summarise, the existing use of the St George's Mews building is entirely appropriate in its setting, provides accommodation which is ideal for small and growing businesses and there is no evidence to suggest that its continued use is not viable. As it stands the building is fully occupied and existing occupiers are keen to remain in this location.

Proposed

The arguments now presented to convert the Gloucester Avenue site back to office use fly completely in the face of the previous recent application.

Whilst previously the site was poorly located, inaccessible for deliveries, and expensive to refurbish (see 2012 committee report), suddenly the site can accommodate delivery vehicles and is "a highly attractive proposition" irrespective of the fact that it would require full conversion from residential to office use.

The Planning Statement suggests at 5.4.2 that "*The Gloucester Avenue site, with a few minor internal alterations, could be ready for occupation in a matter of weeks.*" The offices at St. George's Mews are already ready for occupation and are presently occupied.

As the residential conversion at Gloucester Avenue has only recently been completed, there is a sustainability argument for the current uses to remain in their current locations. Developing a perfectly habitable modern dwelling in with flawed land-swap justification is not sustainable development.

Whilst market demands change over time it is difficult to see how the location and access characteristics have improved the site's desirability for office use. Irrespective of this, it is our view that the proposed use for this purpose is on balance less appropriate than the continued use of the Mews premises.

It would appear from the submissions that the main driver for the applications is to create residential accommodation with a "Mews" address, regardless of the impact upon employment floorspace. The justification for this is scant.

The applicant's planning statement justifies the changes of use with two paragraphs, stating that there is no loss of floorspace and as such no conflict with policy. That is not the case.

Firstly, from the information available to us from sales particulars and VOA records we believe that the area schedules contained within the submissions are incorrect with regards to net internal areas. The existing Mews premises provide a total of 247sqm NIA whilst the area schedule on page 23 of the Design and Access Statement refers to only 227sqm NIA. It would appear that, amongst other elements, one of the ground floor offices has been excluded from the calculation.

Using the correct figure it becomes apparent that the proposed Gloucester Avenue scheme, which provides only 211sqm net internal area, equates to a 15% reduction in useable office floorspace compared to the Mews premises. This level of net to gross efficiency (74%) is symptomatic of a building that is not purpose built for office use.

The quantitative amount of gross internal floorspace is the only direct similarity between the buildings, whereas the characteristics of each site are very different, despite being located in relatively close proximity to each other.

The attraction of the Mews is potentially greater than the Gloucester Avenue property, due to its purpose built nature and flexibility / mix of unit sizes. This is perhaps evident from the fact that the premises are fully occupied by five separate tenants with none expecting to relocate in the near future.

According to the applicant *"St George's Mews is, clearly, an ideal candidate for conversion to housing"*. No reasoning is given for this statement and in fact we would strongly disagree with the suggestion. As stated above, the northern side of the mews is entirely in commercial use but this is not acknowledged and appears to have been overlooked.

St. George's Mews is located in an area afforded protection under an Article 4 Direction, preventing the conversion of office floorspace to Residential use which can otherwise be undertaken via permitted rights. The move to place an article 4 directions on the whole Mews thus safeguards this local employment cluster.

Given that the majority of uses in the vicinity are compatible with residential use, the conversion of this floorspace to residential may not cause significant harm in terms of its occupants, however taking into account of the arguments above it is clear that a continued B1a use in this location would be more appropriate given the other commercial uses in the immediate context.

Conclusion

For the reasons set out within this letter, it is considered that the proposed “land use swap” between the two sites is inappropriate. Whilst the applicant argues that the office space is re-provided in a *quantitative* sense, the relocation of the office floorspace would result in accommodation which is less flexible for businesses of varying sizes, is not purpose built, and with less of an attachment to what at present is a local community / cluster of small firms.

The continued use of the St George’s Mews site for office use represents the best option for provision of this amount of floorspace, within purpose built premises that are of reasonable quality, are fully occupied and are located within a local cluster of other small businesses. There is no reason to suggest that this cannot continue.

Conversely, the change of use of the Gloucester Avenue site to office use would appear to be less appropriate. Recent reports prepared as part of the 2012 application already make it clear that the site is not ideally located for office use and that it had struggled with long term vacancy.

Not only would the changes of use result in the disruption of 5 businesses being forced to relocate, the costs of conversion of the existing residential property to office use would surely far exceed the cost of refurbishment of the existing office space at the Mews? An improved space at the Mews has the potential to provide much better (and indeed more flexible) office accommodation than at Gloucester Avenue.

The changes of use would also result in extensive and unnecessary disruption to existing businesses and residents in both locations. This will be particularly detrimental to the existing therapeutic enterprises that have operated very successfully from the Mews for over 30 years. Given the characteristics of the mews it is surprising that no consideration has been given to this aspect of the proposals as part of the submission.

To summarise, the existing purpose built offices at St. George’s Mews provide flexible accommodation suitable for small and medium sized companies of varying sizes, in accordance with the objectives of CPG. It is our view that there is insufficient evidence to suggest that the proposed conversion of the Gloucester Avenue site represents an improvement over the existing office accommodation at St. George’s Mews. On the contrary, recent evidence provided to the Council in relation to Gloucester Avenue indicates the opposite.

We therefore suggest that it is not only logical and practical to retain the existing uses in their current locations, there would be a planning harm with respect to the retention of employment sites if permission is granted.

For all of these reasons, we would respectfully request that the Council refuses the two applications accordingly.

This is a matter of great importance for our clients and we would therefore appreciate being kept updated as to the likely outcome of the applications – particularly if these are to be heard by committee.

Kind regards

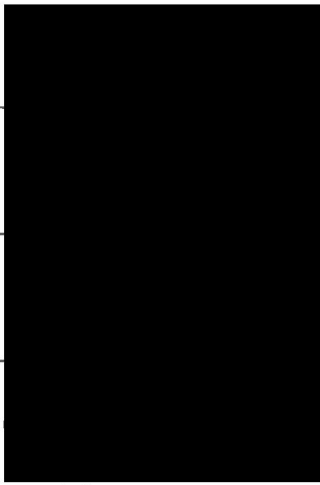
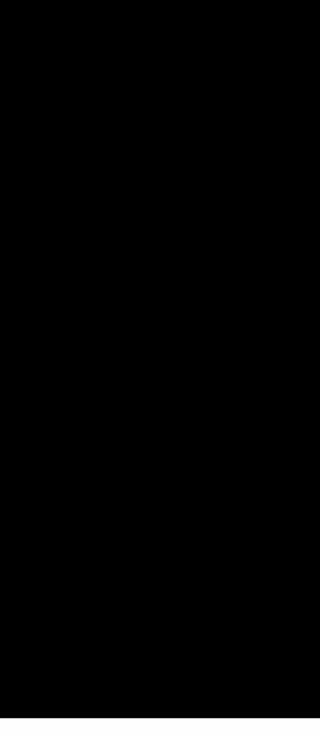
Yours sincerely




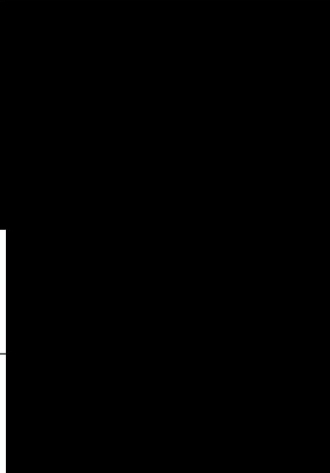
Matt Bailey
BSc (Hons) DipTP MRTPI
Director

On behalf of: see overleaf for list of addresses and signatures

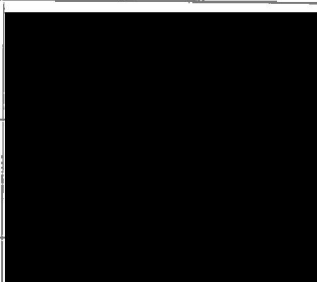
JULY 2016 - OBJECTION TO APPLICATIONS
10-12A ST. GEORGE'S MEWS (REF:2016/3559/P)
FLAT 5, 136 GLOUCESTER AVENUE (REF:2016/3556/P)

Name	Address	Signature
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LOUISE SAM	9 ST. GEORGE'S MEWS LONDON NW1 8XE	
JONATHAN SATTIN	10/11 St George's Mews London NW1	
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TAMZIN MUIR	10/11 St George's Mews London NW1	
FLAVIA CERRONE	10/11 St George's Mews, London NW1	
Jennifer Piceinillo	St. georges mews	
Gemma Brookbank.	St georges mews.	
Nison Lam.	"	

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Name	Address	Signature
NIALL KELLY	10 ST. GEORGE'S MEWS	
Marian Delibes,	10 St George's Mews	
FRANNIE O'CONNELL	10 ST GEORGE'S MEWS	
WARRA WHITING	10 ST GEORGE'S MEWS	
KRISTIAN JENSEN	~	
SIVA GUDLIAGIS. KATIE	10 St George's Mews	
JOANNA GILBERT	10 St George's Mews	

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Name	Address	Signature
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