

PB/GA/PD10641
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12 August 2016

Obote Hope
Planning Department
Camden Council
5 Pancras Road
London
N1C 4AG

Dear Obote,

**19 John Street, London, WC2
Planning Application**

We are in receipt of your email dated 2nd August 2016 and have been asked to respond to the queries that you have raised in respect of the employment aspects of the application.

We note that you refer to criteria a) and b) of DP13 in isolation. We note that the policy goes on to state:

"When it can be demonstrated that a site is not suitable for any business use other than B1(a) offices, the Council may allow a change to permanent residential uses or community uses, except in Hatton Garden where we will expect mixed use developments that include light industrial premises suitable for use as jewellery workshops."

The policy places weight on protecting industrial premises capable of a full range of B class uses, as is evidenced by paragraphs 13.3 and 13.4.

The building's listed status and the land locked nature of the site means that it has no flexibility or potential to be used for other B class uses (Industrial / Storage and distribution).

Furthermore it does not provide good quality office accommodation. The report submitted with the application sets out the deficiencies of the listed building's suitability for office purposes and more importantly the insensitive alterations which have occurred in order for this to take place, to the detriment of the building's architectural and historical interest.

The Council's adopted CPG5 provides a clear criteria against which the building's suitability for office accommodation will be assessed and this has been provided in full.

"There are a number of considerations that we will take into account when assessing applications for a change of use from office to a non-business use, specifically:

- *the criteria listed in paragraph 13.3 of policy DP13 of the Camden Development Policies;*
- *the age of the premises. Some older premises may be more suitable to conversion;*
- *whether the premises include features required by tenants seeking modern office accommodation;*
- *the quality of the premises and whether it is purpose built accommodation. Poor quality premises that require significant investment to bring up to modern standards may be suitable for conversion;*
- *whether there are existing tenants in the building, and whether these tenants intend to relocate;*

the location of the premises and evidence of demand for office space in this location; and

- *whether the premises currently provide accommodation for small and medium businesses.*

When it would be difficult to make an assessment using the above, we may also ask for additional evidence in the form of a marketing assessment. Paragraph 6.18 below provides more information on marketing.”

Therefore it is evident that marketing for office accommodation is not a specific requirement and its requirement has to be balanced against the premises suitability for employment uses. It is only asked for if it is not possible to make a determination as to the premises quality using the criteria set out.

As set out in our employment report we do consider that it is not difficult to make an assessment of the suitability of the building for employment purposes.

I would also draw your attention to the letter from Local Agent's Farebrother, which is appended to our report and explains the current office market and why SME's would not find this building attractive.

This building has been vacant since November 2015 and the proposals are to convert the premises back to a single family dwelling house, which is the purpose for which the building was originally designed. There are substantial benefits to the heritage asset as a result of this conversion. The circumstances of this case are very similar to those at 35 Great James Street (granted on 22 June 2016, reference: 2015/6812/P) and under that application no marketing was required or requested.

Based on the submitted report, we consider that the application has provided a sufficient assessment of the premises and their suitability for continued office use against the adopted policies within the development plan.

Yours sincerely,



Montagu Evans LLP