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Application No: 2016/3975/P	Consultees Name: TOM YOUNG	Consultees Addr: 19 Bassett St KENTISH TOWN NW5 4PG NW5 4PG	Received: 01/09/2016 11:40:24	Comment: OBJ	Response: As submitted, the planning application gives an insufficient account of the existing accommodation in the building.	
					It is notable that the plans of the existing lack a graphic scale. By measuring off the proposed plans on which dimensions are shown, it has been possible to take measurements from the plans of the existing.	
					A planning application should give a full account of the different types of space or floor area in the existing situation. This planning application does not.	
					A reasonable schedule of existing floor areas would be along these lines: office: 1635 sqm secure storage: 623 sqm retail: 423 sqm garage inc external vehicle space: 882 sqm internal car-park: 3524 sqm	
					The office use is B1. It is ignored by the applicant.	
					The garage use is B2. It is ignored by the applicant.	
					The storage appears to be particular i.e with vehicle access and secure. It is B8 use.	
					The car-park use is correctly marked down as "sui generis".	
					The retail use is A1 is acknowledges but the area assigned to it seems inaccurate.	
					Broadly speaking we have an existing building which, though under utilised since 2014, can support employment in a wide variety of guises.	
					The loss of potential employment space is is regrettable given the vast amount lost locally due to over-permissive change-of-use patterns, the extension of permitted development and Camden's sale of its own workshop sites in NW5 to housing developers under the so-called "Community Investment Programme".	
					It will then be appropriate in this instance to take stock of the loss of potential employment space. A very recent UCL Planning department review of Camden"s handling of industrial land in NW5 notes Camden policy ostensibly supports industrial uses:	
					"(LB Camden, 2010, p. 84). Justifications include the fact that 'Camden has strong trading links with London's CAZ and the borough's industrial warehousing businesses provide it with a range of vital goods and support services' and that premises 'suitable for industrial, manufacturing and warehousing businesses provide jobs for people who would otherwise be at high risk of being unemployed or workless' (LB Camden, 2010, p. 83)."	

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The design of the new building shows the difficulties that the architects have had making sense of the deep plan that the site"s triangular configuration creates. The single aspect north-facing flats produced (the affordable component naturally) occupy space that would be better used as replacement B1 accommodation which can be configured easily and naturally as larger spaces with vehicle access along the north side.

The proposed ground floor accommodation includes replacement retail. It isn"t subdivided to produce the same number of shops as exist now. In place of 6 units, the new scheme offers essentially 3. The problem is compounded by the fact the new units lack front-to-back depth. They measure on average 5.5m whereas the existing ones measure around 13m. Put crudely, our measurements of the new retail area put it around 320sqm, which appears to be a 100sqm reduction compared to existing provision on site. This is bad for local business and bad for employment.

Again we'd recommend reconfiguring the ground floor so new replacement shops take up more of it, particularly in the front-to-back dimension i.e by creating deeper plan units.

The housing component of the proposed development is the dominant one. It follows the pattern of a lot of recent development all over London. Firstly it's on the site of a viable employment building, and secondly the for-sale component is dominant. 1 bed flats in new private housing developments brought to market this year in NW5 start around £485K. One such development on ex-Camden Land began to be marketed in mid-August and the lowest sale price was £620K for a 1-bed unit.

None of this is affordable by anyone on a median salary or quite a long way above. The point is then whether or not the kind of residential development on offer in this planning application corresponds to real need. The affordable component does. It consists of 9 social rent flats. These, much more than the intermediate type housing offered, are what's needed.

The proposed development should therefore offer a much more "social rented housing".

Overall, we think this proposal does not meet any real social need. It lowers the amount of employment space in the area by reducing A1 area and removing all B1, B2 and B8 uses.

Unless the proposal is radically restructured to reflected local loss of employment space and need for much more social rented housing, we believe it should be rejected.