

November 2016

Employment Land Report

Centric Close, Oval Road, Camden Town,
NW1 7EP

Fairview Homes Ltd



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Executive Summary

JLL has been instructed to prepare an Employment Land Report (“Report”) to provide an objective assessment of employment land use issues in the context of the proposed mixed-use redevelopment of Centric Close, Oval Road, Camden Town, NW1 7EP (“Site”). In summary, the Report concludes the following:

- The emphasis of the NPPF and the London Plan is to adopt a rigorous approach to industrial land management and manage the release of any surplus land so that it can contribute to strategic and local planning objectives, especially those to provide more housing.
- The Site is fundamentally ill-suited to its existing use and we consider this to be a site that is ultimately more suitable for mixed use office and residential development for the following reasons:
 - The site and surrounding area is not an established industrial / light industrial location and the immediate surrounding infrastructure does not support industrial, logistics and supply chain activity.
 - There is no prospect of the site forming part of an industrial warehousing cluster.
 - There is a thriving local office market in the area suitable for small and medium sized businesses.
 - The existing buildings are in a reasonable condition, but this is offset by the significant locational compromises for occupiers.
 - The access and egress arrangements are restricted and via residential routes, limiting the ability to operate HGV movements that industrial and warehousing users require.
 - The site is overlooked by residential properties and is a “bad neighbour” to these established uses.
- Until pipeline supply is delivered there will be a constrained supply of alternative available industrial and warehousing space within the borough. Evidence of demand is not therefore an accurate measure of the suitability of the site for such uses.
- We conclude that the site does not offer the required location, scale or suitable access for re-development for light industrial uses. The alternative use of the site and re-provision of a quantum of high quality flexible commercial floorspace and the associated employment opportunities for skilled labour is supported on the following grounds:
 - There is clear market demand for local office provision in this location;
 - The peripheral nature of the location suggests that the floorspace would be most appropriate for “flexible B1 floorspace”;
 - The target market for this floorspace may include a combination of local start-up businesses, co-working operators and TMT (Technology, Media & Telecommunications) companies. The proximity to public transport and to Camden High Street will aid the desirability and breadth of occupiers interested in the space.
- The provision of housing, a strategic priority for the Council, would be suited to this highly sustainable location and surrounding residential uses.

1 Introduction

Purpose of Report

- 1.1 This report has been commissioned by Fairview Homes Limited ("Fairview") to provide an objective assessment of employment land use issues in the context of the proposed residential-led mixed-use redevelopment of Centric Close, Oval Road, London, NW1 7EP ('the site').
- 1.2 The report provides a planning policy overview and a consideration of the appropriateness of the Site's location for employment uses. The report also describes the local and borough-wide market for office and industrial floorspace. An analysis of the suitability of the site for redevelopment in the context of the relevant planning policy and evidence base is set out. This assessment draws upon the expertise of JLL Development Surveyors and Planners.

The Site

- 1.3 The Site is located within the London Borough of Camden ('Camden') and currently supports a small industrial estate comprising a terrace of 6 units that extend to a total of 2,187sqm (23,543sqft) (GIA) together with hardstanding and access used for turning, loading and parking. This excludes the ancillary mezzanine floorspace of 247sqm (2,655sqft) (GIA). The units were built in 1984 and are of similar sizes, as follows:

Unit	Use class	Sqm (exc. mez) (GIA)	Sq ft (exc. mez) (GIA)	Ancillary Mezzanine Floor (Sqm) (GIA)	Ancillary Mezzanine Floor (Sqft) (GIA)	Occupier
Unit 1	B1 Light industrial	367	3,953	29	307	Speedy Hire Centres Southern Ltd
Unit 2	B1 Light industrial and B8	346	3,720	85	918	Vacant (since 31/05/16)
Unit 3	B1 Light industrial and B8	348	3,749	0	0	Vacant (since 24/12/14)
Units 4 & 5	B8	790	8,499	68	729	Vitsoe Limited (short term lease)
Unit 6	B1 Light industrial	336	3,622	65	705	Vacant (since 22/7/16)
TOTAL		2,187	23,543	247	2,659	

Source: Fairview

- 1.4 The units provide light industrial space at ground floor level with a small amount of ancillary floorspace at mezzanine level. The lawful use of the floorspace includes both B1(c) light industrial and B8 Storage and Distribution Use as classified by the Use Classes Order 1987 (as amended). The original permission for the units (25.1.80) was specifically for B1 light industrial use for the purposes of preparing, processing and printing data, which was specific to the original occupier (a computer centre). Increased flexibility has since been introduced with later permissions for a mix of B1 and B8 uses in some of the units.
- 1.5 There is currently approximately 50% vacancy and the use of short term leases for existing tenants.
- 1.6 The site is accessed via a narrow driveway between the properties on Oval Road. Oval Road is a minor residential scale road and access to the North Circular and beyond is via the A41 or A1, which are approximately 2.5km (1.6 miles) from the Site.
- 1.7 The site benefits from a Public Transport Accessibility Level (PTAL) rating of 6a (on a scale of 1 to 6 where 6 is the best), with access to Camden Town tube around 0.48 km away (0.3 miles, c. 5 minutes' walk) and Camden Road overground 1km away (0.6 miles, c.11 minutes' walk).

History and use

- 1.8 The original planning permission was for Class B1 (light industrial) use on this site, which was granted in January 1980 and includes the following condition in order to control the 'bad neighbour' impacts of this industrial site on surrounding residential uses: "No process shall be carried on or machinery installed which is not such as could be carried on or installed in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust and grit."
- 1.9 Since the original permission was granted, Units 2, 3 and 5 have been permitted to be used for B8 in addition to B1. Units 4 & 5 were also granted a change of use from B1 to B8 (Storage and Warehouse) in 1998. There is a condition attached to this that states: "No loading or unloading of goods, including fuel, by vehicles arriving at or departing from the premises shall be carried out otherwise than within the curtilage of the building".

The Surrounding Area

- 1.10 The Site is situated in a predominantly residential area, being bound to the north and immediately overlooked by the 9-storey Lock House residential units permitted in 2006. The site is bound to the east by offices at 31 Oval Road; to the south east and south by period residential properties fronting Oval Road; and to the west by the railway beyond which are residential developments fronting Gloucester Avenue.
- 1.11 The surrounding buildings are a mix of modern development and attractive, historic buildings. The site is surrounded by (but not within) two conservation areas (Regents Canal and Primrose Hill) and bound to the east by a number of buildings that are identified as making a contribution to the conservation areas in which they sit. Opposite the entrance to the site is the Grade II listed Piano Factory Building at 42-43 Gloucester Crescent.
- 1.12 Local shops and services can be accessed along Camden High Street, around 0.5km (0.3 miles) to the east of the site (c. 5 minutes' walk).
- 1.13 The site and surrounding area is covered by a Controlled Parking Zone (CPZ).

The Proposed Development

- 1.14 The proposed development includes 1,219sqm (13,121sqf) (GIA) of commercial space at ground floor level. This space will be flexible and designed to accommodate small and medium sized occupiers, potentially attracting TMT businesses. The proposed floorspace will be B1a office use – a higher density employment use than the B1c and B8 uses currently on site. Using the HCA Employment Densities Guide density for TMT floorspace of 11sqm per full time employee (FTE), the development will have the capacity to accommodate around 90 FTEs.

Statement Structure

- 1.15 The structure of this report seeks to address all policy issues relating to the use of the site for employment purposes.
- 1.16 The remainder of this Report adopts the following structure:
- Section 2 presents the planning policy framework and JLL planning analysis;
 - Section 3 presents qualitative analysis and quantitative data on the office and light industrial markets in Camden;
 - Section 4 presents the marketing strategy for the proposed commercial floorspace; and
 - Section 5 presents the conclusions.

2 Relevant Planning Policy Framework

Introduction

- 2.1 This section presents the planning policy framework in relation to employment floorspace that is relevant in the London Borough of Camden ("Camden"). It considers where employment floorspace is protected and where there are opportunities for release of employment floorspace for redevelopment as an alternative use. The planning policy framework includes policies at national, strategic and local levels.
- 2.2 Regard should be had to the Government's National Planning Policy Framework ("NPPF") (2012). The NPPF provides clear guidance in relation to employment floorspace on a national scale and encourages local authorities to allow the redevelopment of employment floorspace for residential use, unless there are strong market signals to suggest the floor space is valuable in its existing use.
- 2.3 The statutory development plan applicable to the site comprises:
- The London Plan: consolidated with alterations since 2011 (March, 2016)
 - The LB Camden Core Strategy (2010); and
 - The LB Camden Development Policies (2010).
- 2.4 Camden Policy Guidance 5 - Town Centre, Retail and Employment (2013) provides advice and information on the implementation of planning policies.
- 2.5 We note that the draft Local Plan had recently been subject to public consultation, which closed on 4 April 2016. The Plan was then submitted for a public examination held by a Planning Inspector, on 24 June 2016 and public hearings are anticipated to take place in October 2016. At the time of writing, Camden is not placing material weight on this emerging document for the purposes of determining planning applications. We expect that once the Plan has undergone examination in public, the document will constitute a material consideration.
- 2.6 These policy and guidance documents and emerging policies draw on evidence based reports, produced to support the Local Plan. These evidence based reports provide an important source of information on the industrial and office markets in the borough, as set out below.

National Guidance

- 2.7 The National Planning Policy Framework (NPPF) was adopted on 27 March 2012. The NPPF makes strong policy statements regarding the redevelopment of employment land for residential purposes, encouraging local authorities to allow the redevelopment of low quality floorspace in 'B Class Uses' for residential use unless there are strong market signals to suggest the floor space is valuable in its existing use.
- 2.8 The key sections in the NPPF that have been considered include:
- **Building a strong, competitive economy:** *"Aims to ensure that the planning system does everything it can to support sustainable economic growth. Planning policies should support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances."* (Paragraph 21)
 - **Para 22:** *"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."*

- **Para 51** – *“Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.”*

Regional Policy

- 2.9 The London Plan, 2016 (consolidated with alterations since 2011) presents the strategic planning policy in relation to the subject site and forms part of the statutory development plan. Relevant policies from The London Plan are referenced below:
- 2.10 **Policy 2.9 (Inner London):** Aims to work to realise the potential of inner London in ways that sustain and enhance its recent economic and demographic growth while also improving its distinctive environment.
- 2.11 **Policy 4.1 (Developing London’s Economy):** Sets out the Mayor’s aim to (inter alia) support the development of a diverse economy in London, ensuring the availability of sufficient and suitable workspaces for larger and form small and medium sized enterprises. It also confirms support to sustain the continuing regeneration of inner London.
- 2.12 **Policy 4.2 (Offices):** Supports the management and mixed use development and redevelopment of office provision to improve London’s competitiveness and to address the wider objectives of the Plan. LDFs should develop strategies to manage long term, structural changes in the office market, encouraging renewal and modernisation in viable locations and supporting changes of surplus office space to other uses.
- 2.13 **Policy 4.4 (Managing Industrial Land and Premises)** The Mayor will work with boroughs and other partners to:
- *“Adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space;*
 - *Plan, monitor and manage release of surplus land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.”*
- 2.14 **Map 4.1 Borough level groupings for transfer of industrial land to other uses:** Camden is identified as a “Restricted Transfer” Borough, where limited loss of industrial land is advised (a ‘Restricted Transfer’ borough is considered to ‘typically have low levels of industrial land relative to demand’).
- 2.15 The site is not in a Strategic Industrial Location or Local Industrial Location and benefits from no strategic regional employment designations.

Local Policy and Guidance

- 2.16 The Site is within the administrative boundary of the London Borough of Camden. As stated above, the Local Development Plan consists of the Camden Core Strategy (2010) and Camden Development Policies (2010). The Camden Planning Guidance 5 (as amended) (September 2013) provides additional guidance and advice to support the policies of the statutory Development Plan.
- 2.17 The adopted LB Planning Policies Map (2010) identifies the site as within Designated View 2A.2 Parliament Hill summit to the Palace of Westminster - Viewing Corridor. The site is also surrounded by but not within two Conservation Areas – Primrose Hill to the east and west, and Regent’s Canal to the north.
- 2.18 A new Local Plan has recently been submitted and is expected to undergo examination in public in October 2016.

Camden Core Strategy

- 2.19 Core Strategy Policy CS8 (Promoting a Successful and Inclusive Economy) protects the borough's Industrial Area and safeguards existing employment sites and premises in the borough where these "meet the needs of modern industry and other employers". Camden's identified 'Industry Area' lies between Kentish Town and Gospel Oak and is particularly suited for continued employment use due to the absence of housing in this area (Core Strategy para 8.15). Centric Close is not within the main Industry Area.

Camden Development Policies

- 2.20 Policy DP13 (Employment Premises and Sites) aims to retain industrial buildings that are suitable for continued business uses and will resist a change to non-business use unless:

- a) *'It can be demonstrated to the Council that a site or building is no longer suitable for its existing business use; and*
- b) *There is evidence that the possibility of retaining, reusing or redeveloping the site or building for a similar or alternative business use has been fully explored over an appropriate period of time.'*

- 2.21 Policy DP13 states that where a change of use has been justified to the Council's satisfaction the borough will seek to retain some business use on site, *'with a higher priority for retaining flexible space that is suitable for a variety of business uses'*. 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.

- 2.22 Policy DP13 also notes that where premises or sites are suitable for continued business use, mixed use schemes will be sought provided that:

- *The level of employment floorspace is maintained or increased;*
- *They include other priority uses, such as housing and affordable housing;*
- *Premises suitable for new, small or medium enterprises are provided;*
- *Floorspace suitable for either light industrial, industry or warehousing uses is re-provided where the site has been used for these uses or for offices in premises that are suitable for other business uses; and*
- *The proposed non-employment use will not prejudice continued industrial use in the surrounding area.*

- 2.23 In relation to these criteria, the proposals include provision of a higher density employment floorspace and will not therefore reduce the capacity of the site for employment. The proposed floorspace is office floorspace, suitable for new small or medium enterprises – in line with policy requirements. The development will also include housing which is a priority use. In relation to the surrounding area, this site is not part of an industrial cluster and therefore cannot prejudice industrial uses in the area.

- 2.24 Paragraph 13.3 of the supporting text for Policy DP13 goes on to set out a number of criteria that will be taken into account when assessing applications for a change of use to a non-business use, and whether a business use can continue on site. These criteria include the relationship with nearby land uses (such as residential), the road network serving the site and the proximity to other employment uses. The site is assessed against each of these criteria in **Appendix 2** of this report. In relation to these criteria, we highlight the following points:

- The site is not within or adjacent to core recognised industrial and warehouse location;
- There is no prospect of the site forming part of an industrial warehousing cluster;
- The surrounding infrastructure does not support the needs of a modern logistics and supply chain activity;

- The surrounding area is a residential location with some provision of small-medium office space. The current industrial use is a “bad neighbour” to these established uses.
- Access to either A501 (Euston Road) or A41 is challenging and the subject site is located within a network of residential grade roads.
- A range of unit sizes is not provided – and none of the units cater for small businesses (<100 sqm).

- 2.25 Paragraph 13.4 of the supporting text for Policy DP13 states that redevelopment of employment land for another business use (including for offices), should ‘*seek to retain physical features that will enable the flexible use of the premises for a range of business purposes.*’
- 2.26 Paragraph 13.5 of the supporting text for Policy DP13 also states that Camden will seek marketing evidence to justify a change of use to non-business uses. We contend that the evidence set out in this report confirms that the lack of general supply in the Borough is creating demand for unsuitable sites. The unsuitability of this site for continued light industrial use has been confirmed against the Council’s policy criteria. Therefore, there are strong arguments to suggest that it would not be appropriate to undertake a marketing exercise.
- 2.27 The proposed redevelopment of this site fulfils the policy aim of DP13 and will seek to re-provide a suitable quantum of high quality employment floorspace as part of any redevelopment. This employment floorspace will take the form of flexible commercial floorspace that will be designed to meet the identified demand highlighted by agents active in the local markets.
- 2.28 Paragraph 13.6 of the supporting text for Policy DP13 states that in instances where the Council accept the principle of redevelopment of an employment site, ‘the Council will consider redevelopment schemes which maintain the employment floorspace and provide other priority uses, such as housing’.

Camden Planning Guidance 5

- 2.29 Camden Planning Guidance 5 identifies three main categories of employment sites in the borough. With Category 1 sites presented as those of higher quality and Category 3 sites being those of lower quality.
- 2.30 The criteria for categorising sites is presented below:

Category 1 Sites

- purpose built accommodation;
- predominantly single storey premises;
- clear, high ceiling heights;
- high loading bays and doors (min 5.5m or 18ft high);
- access for large delivery and servicing vehicles both into and around
- the site;
- 24 hour operation with unrestricted loading access; and
- minimal risk that the 24-hour operation will adversely harm the amenity of neighbouring properties

Category 2 Sites

- good access for servicing and delivery;

- slightly more restricted hours of operation than Category 1 sites;
- roller shutter doors;
- clear, high floor to ceiling heights (3-5m);
- lots of natural light;
- level access – normally ground floor;
- flexible neighbouring uses;
- limited number of upper floors with goods lift access; and
- some off street parking.

Category 3 Sites

- small, isolated premises;
- poor access - narrow streets, small doors, steps;
- no goods lifts;
- little or no space for servicing;
- incompatible neighbouring uses (most often residential); and
- lower ground or basement level.

- 2.31 An assessment of the site against these categories shows that there is a clear separation between the suitability of the premises on site, which are generally in fair condition, and the suitability of the site's location for industrial uses. The shortfalls in terms of location are identified as the close proximity to neighbouring residential properties and access. The existing development is acknowledged to present a risk to residential amenity, with restrictive planning conditions attached in attempts to minimise the impact on surrounding residential occupiers from industrial use on this site. Residential properties surround the site and would be a potential point of conflict for many industrial occupiers.
- 2.32 The site also suffers from restricted access, with direct access only onto Oval Road, a residential street with on-street parking. Furthermore, the site is isolated in relation to other industrial/ light industrial uses, with the surrounding area characterised by residential use and local office provision. This is indicative of the general unsuitability of the location for industrial and distribution and warehousing use.
- 2.33 Please see **Appendix 2** for a traffic light assessment of the compliance with Category 1, 2 and 3 Sites.
- 2.34 Our assessment of the site under Camden Planning Guidance 5 places it predominantly within the Category 2 criteria, however the site also scores highly against Category 3. The site does not accord with many of the Category 1 criteria, and fails on locational aspects such as; the proximity to other related uses; access for large vehicles; and the proximity to uses which would restrict 24 hour operation and cause conflict with neighbours – an important concern for occupiers.
- 2.35 Significantly, the categorisation for sites recognises the importance of the locational aspects over the nature of the units themselves, with around half of criteria checking locational factors. Indeed, a site in poor condition but in an ideal location is suitable for redevelopment to retain industrial uses, whereas a site such as Centric Close in a compromised location but with usable accommodation is concluded under Camden Planning Guidance criterion to have potential for redevelopment for more suitable business uses.

- 2.36 The requirement under Policy DP13 for marketing of a site to be undertaken to demonstrate that employment premises are no longer viable in existing use is set out in Camden Policy Guidance 5. We contend that the replacement of the existing employment floorspace with alternative employment floorspace more suitable for the site is the appropriate approach to this site's redevelopment. The provision of marketing evidence would not address the fundamental policy concerns with the continuation of the existing use on this site.

Emerging Local Policy and Guidance

Draft Local Plan (2016)

- 2.37 At the time of writing, LB Camden is not placing material weight on this emerging document for the purposes of determining planning applications.
- 2.38 Policy E1 (Economic Development) 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. The Council will:
- support businesses of all sizes, in particular start-ups, small and medium- sized enterprises;
 - maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;
 - support local enterprise development, employment and training schemes for Camden residents;
 - encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;
 - support the development of Camden's health and education sectors and promote the development of the knowledge quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan;
 - direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000 sqm of office floorspace between 2014 and 2031;
 - support Camden's industries by:
 - safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers;
 - supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;
 - safeguarding the borough's main Industry Area;
 - promoting and protecting the jewellery industry in Hatton Garden;
 - expect the provision of high speed digital infrastructure in all employment developments; and
 - recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.
- 2.39 In relation to this site, the proposals are in line with policy E1 and include provision of new office floorspace which is a higher density employment use and better suited to this location. Provision will be made for small and medium sized businesses. The site is not within Camden's main Industry Area nor is it within a cluster of industrial uses, therefore the proposed change of use would not impact on the functioning of Camden's key industrial areas.

2.40 Policy E2 (Employment Premises and Sites) notes that the Council will encourage the provision of employment premises and sites in the borough. They will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.

- The Council will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:
 - the site or building is no longer suitable for its existing business use; and
 - that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.
- We will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that:
 - the level of employment floorspace is increased or at least maintained;
 - the redevelopment retains existing businesses on the site as far as possible, and in particular industrial and warehouse/logistic uses that support the functioning of the CAZ or the local economy;
 - it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to CAZ functions or Camden's local economy;
 - the proposed premises include floorspace suitable for start-ups, small and medium enterprises, such as managed affordable workspace where viable;
 - the scheme would increase employment opportunities for local residents, including training and apprenticeships;
 - the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site; and
 - for larger employment sites, any redevelopment is part of a comprehensive scheme.

2.41 Policy E2 restates existing Policy DM13; emphasising that the Council will resist the development of businesses premises for non-business uses unless the site is shown to be unsuitable and there is no potential to reuse or redevelop the site for business uses. As stated above, there are a number of grounds on which the site has been shown to be unsuitable for continued business use. The site is surrounded by residential uses which are not compatible with industrial and B8 uses. Access to the site is via narrow industrial streets.

2.42 The proposals include new commercial space that will be suitable for small and medium sized businesses and will provide for higher density employment use, which is supported by the aims of emerging Policies E1 and E2, as set out above. Despite some reduction in the quantum of employment floorspace, this will provide the site with a greater capacity for employment generating uses. Housing is again emphasised as a priority use where it is accepted that some non-business uses may be provided as part of redevelopment.

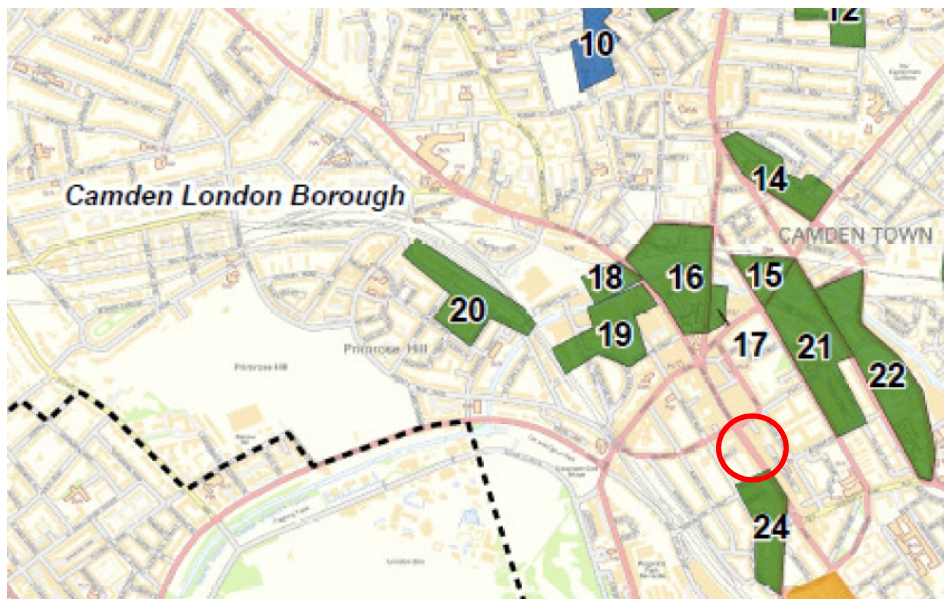
Other Material Considerations & Evidence Base

Camden Employment Land Study (2014)

2.43 The 2014 ELR concludes that there is likely to be a requirement for 694,543 sqm of net additional floorspace to 2031 and a contraction of demand of around 10,023 sqm of industrial floorspace (or approximately -2.2ha of land).

2.44 The report recommended a sensitive protection of employment land and premises to ensure that those which have little prospect of use for employment purposes and not left vacant.

- 2.45 The site is identified as lying within a non-designated employment cluster C19. We note that this 'cluster' covers a large area and the other employment uses within this area are not light industrial uses; consisting mainly of offices and a Holiday Inn hotel, separated by surrounding residential uses. The majority of these employment uses are located away from the site along Jamestown Road to the north east.



Source Camden ELR

Camden Business Premises Study 2011

- 2.46 This study explored the features of employment space in Camden and fed into the employment related SPDs. The report concludes that there is little available industrial stock in the Borough, which is causing some occupiers to compromise and to unsuitable sites (Para 2.22)
- 2.47 The study categorises employment sites, broadly along the same lines as that set out in the Camden Planning Guidance 5. The report states that the two crucial factors for consideration are the access arrangements (particularly for HGVs) and the neighbouring uses (Para 2.34). Centric Close is concluded not to well in relation to either. In relation to access, the site is accessed directly via a narrow residential street with on-street parking. The distance from and route into strategic roads network is also convoluted, with a distance of c. 2km (1.3 miles) between the site and the nearest strategic road – Euston Road (A501). In relation to neighbouring uses, the site has residential uses lying close to and overlooking the site on two borders. This includes the flats at 35 Oval Road which overlook the whole site to the north and are separated by a narrow strip of land in addition to the large residential properties located along the site's western boundary that overlook the site to the rear. The report states that even where 24 hour operation is permitted, commercial occupiers fear liability resulting from neighbour complaints (Para 2.34).
- 2.48 The report identifies Centric Close as a good example of a site that is well integrated with residential uses and would be suitable for development for mixed use including residential uses, retaining industrial use where possible (Para 2.60).

Permitted Development Rights

- 2.49 The General Permitted Development Order (GPDO) has introduced greater flexibility and allows changes of use from Class B8 (storage and distribution) to Class C3 (residential dwellings) subject to prior approval under the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016, Part 3, Class P). The GPDO also includes provision for the permitted change of use of B8 space to B1 (business/ office) use. Although this has not been pursued in relation to any industrial unit on this site, the GPDO illustrates the general direction of national policy and is a material consideration. The GPDO 2016 aims to allow flexible use of employment space to support local economies where these are in suitable locations and would not impact negatively on the wider employment area.

JLL Policy Commentary

- 2.50 With regard to national policy, the emphasis is on encouraging local authorities to allow the release of employment floorspace for residential redevelopment where appropriate –i.e to reflect changing demand, where a site is no longer suitable and where this may address strategic housing needs. Evidence of strong economic reasons why such redevelopment would be inappropriate is required to support refusal of such applications.
- 2.51 The key local policy tests in relation to retention of employment uses are set out in the Core Strategy Policy CS8; Camden Development Policy DP13 (Employment Premises and Sites); and the Camden Planning Guidance 5.
- 2.52 Policy DP13 aims to retain business uses and will resist a change to non-business use unless it can be demonstrated a site is not suitable for its existing business use; and there is evidence that the possibility of retaining, reusing or redeveloping the site for a similar or alternative business use has been fully explored over an appropriate period of time. With regard to this policy test, the key features of this site indicate a lack of suitability for continued use for industrial uses, including:
- The site is not within or adjacent to core recognised industrial and warehouse location;
 - There is no prospect of the site forming part of an industrial warehousing cluster;
 - The access and egress arrangements are restricted for industrial and warehousing uses;
 - The surrounding infrastructure does not support the needs of a modern logistics and supply chain activity;
 - The site is surrounded by residential properties and is a “bad neighbour” to these established uses.
- 2.53 Policy DP13 and Camden Policy Guidance 5 require marketing of a site to be undertaken to demonstrate that employment premises are no longer viable in existing use. We contend that the provision of new employment floorspace uses that are more suitable for the site is the appropriate approach to this site's redevelopment. The provision of marketing evidence would not address the fundamental policy concerns with the continuation of the existing use on this site.
- 2.54 Another of the key tests in Policy DP13 relates to whether any non-business use, which is proposed on a former employment site, would prejudice continued industrial and employment activity in the area surrounding the subject site. The site does not form part of an industrial employment cluster and whilst the site is adjacent to two buildings that provide office accommodation. We do not consider that the proposed mixed use redevelopment could have any negative impact on these uses.
- 2.55 Policy DP13 also proposes that where employment sites are developed for non-business uses, the potential for an element of business floorspace, re-provided as part of a mixed use development should be explored. The proposed development will seek to re-provide 1,219sqm (13,121sqft) GIA of high quality, flexible commercial floorspace that is designed to specifically address identified demand.
- 2.56 If fully occupied, the existing quantum of Class B1c floorspace (adjusted to 1,497sqm NIA inclusive of existing mezzanines) could provide for the equivalent of 32 FTE roles assuming a density of 47sqm NIA floorspace per Full Time Employee (FTE) in line with the most recent HCA Employment Densities Guide (2015). The existing quantum of Class B8 floorspace adjusted to 901sqm GEA inclusive of existing mezzanines) could provide for the equivalent of 12 FTE roles assuming a density of 70sqm GEA floorspace per Full Time Employee (FTE) in line with the most recent HCA Employment Densities Guide (2015). In total the existing floorspace could provide 45 FTE roles on this basis. Note the adjustment referred to above accounts for the differing basis of measurement for the individual uses in line with the HCA Guidance.
- 2.57 By contrast, the proposed Class B1a floorspace (1,219sqm GIA / 1,060sqm NIA) will provide a far higher density of employment, forecast to be one FTE role per 11sqm NIA. This would deliver capacity for 88 FTE roles. As such, the replacement floorspace will provide a valuable contribution to the employment floorspace stock in Camden in qualitative terms **providing for an additional 43 FTE roles**, which is substantial and almost double the estimated employment capacity of the existing site.

- 2.58 The proposals will also provide a significant additional housing contribution for the borough, which is a key priority both at the local and strategic level. Redevelopment to mixed use commercial and residential use would therefore be in line with the policy aspirations of the Borough and also the overarching aims of the NPPF, supporting sustainable development of this brownfield site.

3 Local Market Commentary – Office & Industrial

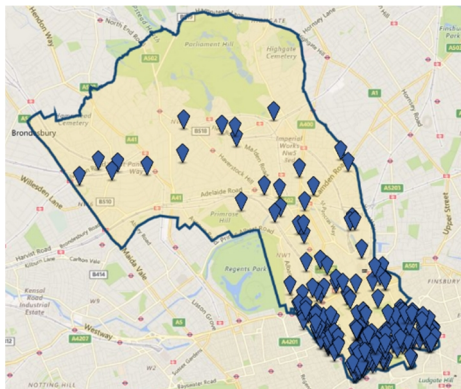
Introduction

- 3.1 The following paragraphs provide an overview of the office and industrial markets within Camden. The evidence in this section is gathered from JLL in house research; alongside Co-Star and EGi the two most credible online sources of data on commercial property market transactions.

The Geography of Employment Floorspace Markets in Camden

- 3.2 The employment markets in the north of Camden are very different from those in the south of the borough. The north of the borough caters for more local occupiers and businesses whilst the south of the borough is linked to London's role as a global centre for financial and business services. There are few large employment clusters in the borough (which lie mainly to the south), with most employment space provided as individual sites or smaller pockets of activity.
- 3.3 Camden's industrial market is very small. The loss of industrial uses has been concentrated in the south of the borough, much of which has been attributed to regeneration such as the Kings Cross redevelopment. Due to the relative lack of capacity in Camden's industrial market, it is recognised that occupiers are taking up space with significant compromises on key factors such as access and proximity to neighbouring residential properties¹.
- 3.4 The location and access of industrial units is considered more important as a factor than the quality of the space. Whilst locations such as Centric Close are in proximity to central London, the immediate access via narrow residential streets with on-street parking is restrictive.
- 3.5 The majority of office space in Camden is located in the NW1 postcode, in which the site sits. This postcode includes large office floorplates located around Kings Cross and Euston. There is an increasing concentration of office space to the south of the borough which lies in the central London office markets – as shown on the map below.

Figure 4.1: Camden – offices to let



Source: Costar

- 3.6 Notwithstanding the agglomeration of employment floorspace in the south of Camden, there are smaller more localised pockets of employment activity towards the north of the borough. There are significant clusters of employment uses in town centres such as Camden and Kentish Town.

¹ Camden Business Space Study 2008

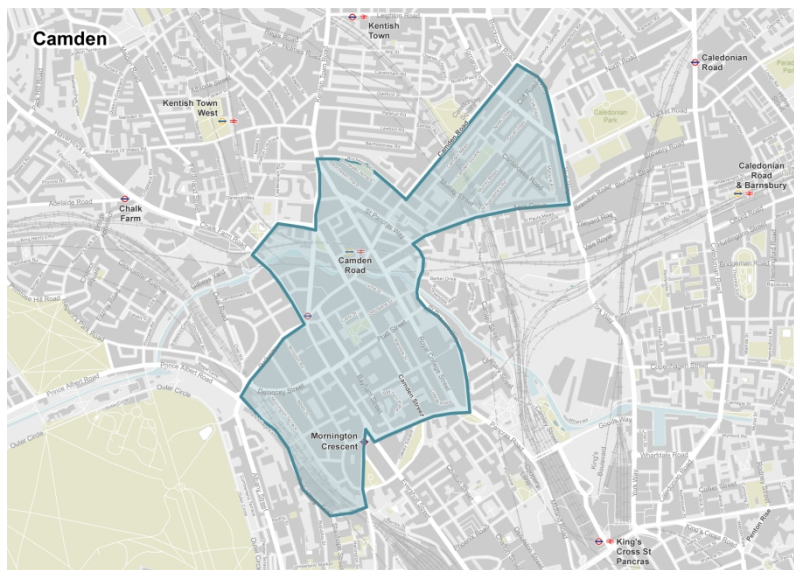
- 3.7 Outside of the Central Activities Zone (CAZ) and the town centres, office provision in Camden is generally for small and medium sized businesses or co-working spaces. The 2014 Camden ELR confirmed that small businesses contribute significantly to employment within the borough, comprising 83% of companies registered within the borough.

Office Supply and Demand

Supply

- 3.8 JLL in-house research has produced an overview of the Camden office market for Q4 2015. The 'Camden' market is defined as per the map below – excluding the larger offices to the south and capturing the local office market around Camden Town.

JLL Camden Office Market Area



Source: JLL

- 3.9 Total availability in Camden decreased 46%, to 791 sqm (8,514 sq ft) in the final quarter of 2015 due to a fall in second-hand space available. This total equated to an overall and grade A vacancy rate of 0.7%. The overall rate remains below the 10-year annual average of 5.8% and the Grade A rate is also below its 10-year annual average of 4.0%. This low vacancy rate is testament to the strength of the market in the right locations across the borough. It may also point to a shortage of supply.
- 3.10 In the context of the wider market, West End availability increased by just 0.1% quarter-on-quarter and remained at 222,967 sqm (2.4 million sq ft), with the overall vacancy rate remaining unchanged at 2.6% and Grade A increasing to 2.1% compared to 2.0% in Q3. Camden accounted for 0.4% of total availability in Q4 2015.
- 3.11 Across the whole borough, total available office space to let in November 2016 in Camden was 309,480 sqm (3.3 million sqft), (source: Costar). There is also 13,586 sqm (146,238 sqft) of office space in Camden currently available for sale.
- 3.12 Total available supply in the immediate localised market of NW1 for office space to let shows that there is currently a large amount of available floorspace. Much of this is made up of large office spaces on Euston Road and around Euston Station, which represents the submarket offering typically larger office floorplates. Because of this, the more localised figure shown for the 0.5 mile radius is more indicative of the market features for the site at Centric Close.
- 3.13 Within a 0.5 mile radius of the site, excluding the Euston office market area, there are generally smaller office spaces available. The current supply within this local area makes up around 37% of the whole NW1 provision of offices to let, as set out in the tables below. Supply in this area is currently focussed on the High Street. The figure for this local area is somewhat skewed by the inclusion of a large office space currently in the pipeline at 32 Jamestown Road (6,116 sqm / 65,835 sqft), where the local office supply is also strong.

Table 4.1: Supply summary

NW1 supply	0.5 mile radius supply	0.5 mile radius market supply share
33,044 sqm (355,687 sqft)	12,215 sqm (131,479 sqft)	37%

Table 4.2: Office supply to let within 0.5 miles of the site

Address	Size (sqm)	Size (sq ft)	Tenure	Agent
10A Belmont St	730	7,863	Leasehold	Monmouth Dean
140-146 Camden St	2,510	27,014	Leasehold	Goldstein Leigh
63-65 Camden High St	19	208	Leasehold	Christo & Co
125-133 Camden High St	615	6,624	Leasehold	Lambert Smith Hampton Ltd
Eglon Mews	1,003	10,800	Leasehold	The Pilcher Hershman Partnership
1-8 Harmood Grove	141	1,518	Leasehold	The LDG Partnership
32 Jamestown Rd	6,116	65,835	Leasehold	Edward Charles & Partners
31 Oval Rd	163	1,750	Leasehold	Bruce Commercial Estate Agent
64 Pratt St	917	9,867	Leasehold	Edward Charles & Partners

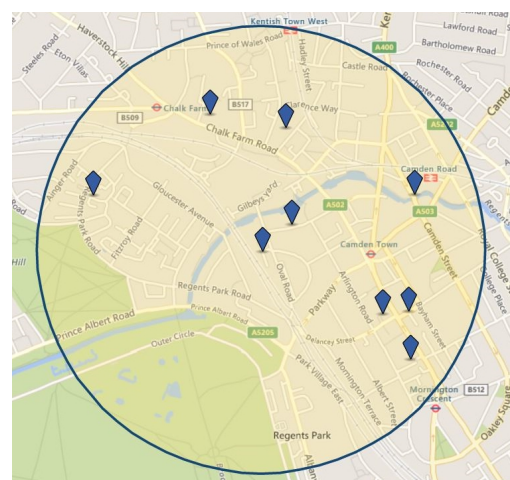
Source: Costar

Figure 4.2: NW1 postcode area – offices to let



Source: Costar

Figure 4.3: 0.5mile radius from the site – offices to let



Source: Costar

- 3.14 JLL research estimates there to be circa 24,497 sqm (263,689 sqft) of B1 floorspace in the pipeline in the Camden office market area (ie. under construction or not started). This includes the construction of 6,116 sqm (65,835 sqft) of office space at Jamestown Wharf, located c. 0.3km (0.2 miles) away from the site (see above). The extent of the pipeline floorspace in the borough and in the location around the site demonstrates very clearly that this will continue to be an important location for office activity in the future.

Take Up

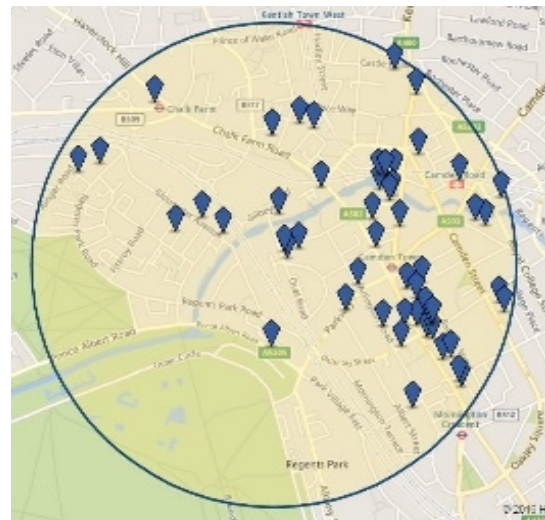
- 3.15 Take-up in the NW1 postcode between 2011 and 2016 totalled 1,688,330 sqft across 252 leases (Source: CoStar), showing a high level of market activity in this area. The single largest transaction was the occupation of the 176,109 sqft 132-140 Hampstead Road by University College London near Euston Station. Across all transactions the average floorspace occupied was 5,892 sqft (source: CoStar).
- 3.16 Analysis of the take-up in the local 0.5 mile radius area from the site between 2011 and 2016 totalled 311,219 sqft across 90 leases (Source: CoStar). There were many smaller deals along Camden High Street and in close proximity to the site. Almost all of these occupiers were for smaller units under 500 sqm (5,000 sqft) with these providing 76 small transactions. Across all transactions the average floorspace occupied was only 321 sqm (3,457 sqft) (source: CoStar).

Figure 4.4: NW1 postcode area – offices deals



Source: Costar

Figure 4.5: 0.5mile radius from the site – offices deals



Source: Costar

Feasibility of Centric Close as an office location

- 3.17 As stated above, the office market across the borough of Camden is diverse, with larger, newly developed offices focussed on the key regeneration areas of Euston / Kings Cross to the south of the site. The local office market surrounding the office itself includes smaller offices serving small and medium sized businesses. The very low vacancy rates are evidence of high demand for this type of space, with businesses attracted to the central London location, just outside of the Midtown and West End / Soho office markets.
- 3.18 Whilst an industrial use of the site is somewhat isolated from other similar uses, there is a thriving local office market. The surrounding occupants include offices interspersed within residential areas and mixed use office / residential developments, typically with offices occupying the ground floor. The close proximity to the dwellings is not a key concern for office occupiers, unlike industrial uses. The close proximity to local shops and services on the High Street and to public transport (Camden Tube and Camden Road Overground) also make this an attractive office location, evidenced by the well occupied offices currently located in around the site.
- 3.19 The size and scale of the site constrains any ability for the site to form a “destination” headquarter business location. Such occupiers tend to locate in the Euston / Kings Cross market areas. The site would, however, be well suited to mixed

use development including the provision of additional office space to suit the small and medium sized occupiers who are attracted to this location. The re-provision of employment floorspace as part of the redevelopment of the site would meet market demand and provide higher density employment in addition to being a more suitable neighbouring use for surrounding residential occupiers when compared with the existing industrial uses on site.

- 3.20 As set out in the marketing section, TMT companies are migrating out of the Tech City cluster and towards well connected areas such as Camden Town. Occupier demand in Camden is driven predominantly by this TMT sector – which makes up around 41% of total demand. Opportunities in this location for new supply suitable for the TMT sector is limited, presenting an opportunity for new provision on this site.

Camden Industrial Market

Industrial / Warehouse Supply

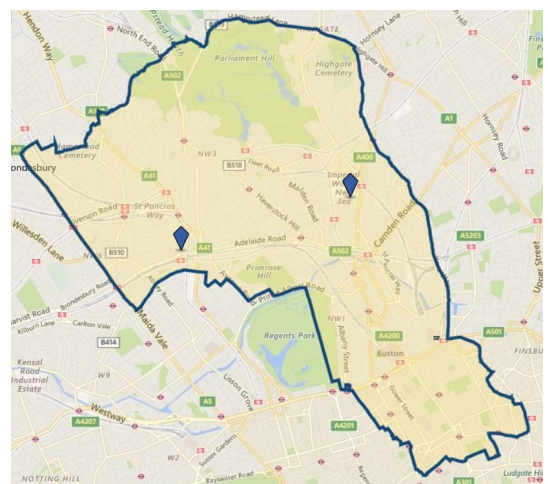
- 3.21 Table 4.3 lists the industrial availability in the borough of Camden as of mid-November 2016. There is 2,231 sqm (24,018 sqft) of industrial floorspace available in this area distributed over two units, dominated by the 2,148 sqm (23,117 sqft) available at Regis Rd in the Kentish Town Business Park. There is no industrial space currently being actively marketed within the 0.5 mile radius of the site, with the available space spread across the borough. As stated previously, this industrial site is isolated from other industrial uses, with the surrounding uses predominantly comprising residential and office use.

Table 4.3: Industrial supply within Camden Borough at mid-November 2016

Address	Type	Space available (sqm)	Space available (sqft)
Fairfax Rd	Light Industrial	84	901
Regis Rd	Industrial	2,148	23,117
Total	-	2,232	24,018

Source: Costar

Figure 4.6: Camden industrial space to let



Source: Costar

Industrial / Warehouse Demand

- 3.22 Over the period of 2010-2015 inclusive, industrial take-up within the borough of Camden totalled 13,673 sqm (147,177 sqft) and averaged 2,279 sqm (24,529 sqft) per annum, boosted by a number of large transactions, including 2,255 sqm (24,269 sqft) to Smith News Trading Ltd at Tottenham Lane (Source: CoStar). The number of deals done has reduced year on year over the past five years.
- 3.23 This decline in the number of transactions is considered to be linked to the lack of suitable available space in the borough, highlighted in their recent ELR. This tight market is causing higher rents and caused occupiers of industrial units to make compromises in terms of the suitability of the location. There is therefore an additional factor to consider in relation to the demand for sites in Camden, where the location within Camden itself is masking a potential lack of suitability for such uses. Notwithstanding this, on a site specific basis we note that three of the six units at the Centric Close site are currently vacant, two of which have been so for over six months.

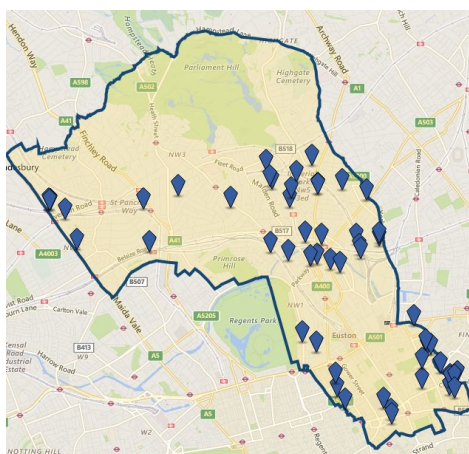
Table 4.4: Industrial take-up within Camden, 2010 – 2015

Year	sqm	Sqft	Deals
2015	660	7,109	5
2014	333	3,587	4
2013	3,343	35,980	2
2012	2,150	23,142	15
2011	2,339	25,174	14
2010	4,848	52,185	27
Total 2010 - 2015	13,673	147,177	
Annual Average 2010 - 2015	2,279	24,529	

Source: Costar

- 3.24 Take up of light industrial units, accounted for 5,017 sqm (54,000 sq ft) from 2010 to 2015, representing a 36% share of the Camden Industrial market. There were two light industrial transactions per year during 2014 and 2015. Two of the deals identified were in close proximity to the site – one a railway arch leased in 2011, c 0.6km (0.4 miles) from Centric Close and the other a large, historic building called the Courtyard on Gloucester Avenue leased in 2012, c. 0.5km (0.3 miles) from the site.

Figure 4.7: Light Industrial take-up within Camden 2010 – 2015



Source: Costar

Market Commentary Conclusion

- 3.25 Our analysis of the office market in Camden shows that there has been a high level of take up over the past five years and a low level of vacancy. The site is different in nature to the nearby Euston and Kings Cross office markets, however there is also a thriving local office market in the area surrounding the site, focussed along Jamestown Road and Camden High Street.
- 3.26 The analysis of the market for light industrial space shows that there is relatively little activity in the lettings market and a low level of supply across the Borough and also the areas around the site. The lack of a clear pipeline of supply in the market means that there will remain a prospect of continued use of the site for its existing or similar uses over a temporary period. However, these users would have to make significant compromises. The area surrounding Centric Close does not generally cater for light industrial uses, is not part of an industrial employment cluster and is generally unsuitable for such uses due to the dominance of established residential uses and the issues with access via narrow, residential streets.

- 3.27 The proposed redevelopment scheme by Fairview will include 1,219 (13,121 sq ft) of flexible commercial floorspace. In this location, we consider that there will be demand for office floorspace from occupiers attracted to the proximity to the High Street and excellent public transport connections. Although the current office supply is focussed around Jamestown Road, there is also ground floor office provision within more recent developments in close proximity to the site. We therefore support the provision of the proposed flexible B1 commercial floorspace and anticipate this to be attractive to the occupier market. The provision of space suitable for small and medium sized businesses is considered to appropriate for this area, which also has the potential to attract TMT occupiers – a growing presence in Camden and an important contributor to local employment.

4 Marketing Strategy for the Proposed Floorspace

The Floorspace

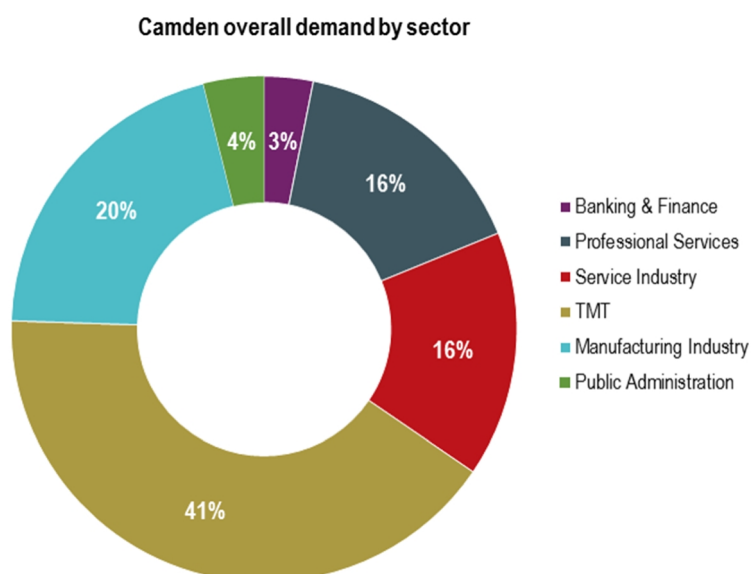
- 4.1 The floorspace would be best marketed as “flexible commercial floorspace” with passive provision in the design to have it as a single unit or multiple units.
- 4.2 The floorspace is ideally located to capture the interest of a growing occupier market, with proximity to Camden rail connections aiding the desirability and breadth of occupiers anticipated to be interested in the space.

The Target Market

- 4.3 The target market will be a combination of start-up businesses, co-working operators and TMT companies (Technology, Media & Telecommunications) re-locating from areas such as Tech City in East London. Drivers of this relatively fresh new market include both the increased rents of these more established markets, but also the shifting demographic of the tech and creative industries. The demographic is increasingly shifting towards a young, skilled, often international workforce, many of which want to live, work and socialise in the same areas. Where these boundaries between work and leisure are becoming blurred, the location of the office is key to attracting the most skilled and sought after staff.
- 4.4 These changing demographics, combined with the development of the commercial market within more established city fringe locations (such as Clerkenwell, Old Street and Shoreditch), have meant that Camden is becoming an increasingly established office location for many creative and tech companies.
- 4.5 Despite the huge success of the established cluster around “Tech City”, increasing rents are pushing many occupiers to establish new TMT and creative office locations. In areas like Clerkenwell and Old Street, demand significantly outweighs supply and prime rents now stand at £67.50 and £65.00 per sq ft. These are the two fundamental factors which have stimulated some of the migration north and east to areas such as Camden.
- 4.6 The business rates revaluation in 2017 is also expected to stimulate further growth in these more fringe locations. TMT companies will need to ask themselves how much they are willing to pay for offices in their preferred locations. Occupiers based in Shoreditch currently pay business rates in the region of £10-15.00 per sq ft with these likely to rise to around £30.00 per sq ft.

Occupier demand for Camden

- 4.7 Occupier demand in Camden is increasingly driven by the TMT sector which accounts for 41% of the total, as shown in the chart below.



- 4.8 Companies are looking at alternative locations to reduce their overall running costs, although cost-effectiveness is not the only factor for consideration. For the TMT sector the talent pool is still tight and the location and style of the office accommodation is significant in attracting the best staff. As the boundaries between work and leisure become blurred, many young professionals want to live, work and socialize in the same area.
- 4.9 In relation to the local pipeline, aside from the Jamestown Wharf scheme (see above) there is a limited pipeline supply. The proposals presented by this scheme therefore present a positive opportunity to improve this supply for the future.

Marketing Strategy

- 4.10 As the scheme approaches completion (within 6 months), we recommend that marketing boards should be erected on the building and high quality electronic marketing material should be prepared and distributed. This should be in the form of an interactive website, pdf brochures and online advertising.
- 4.11 The marketing material should note the possible options available (i.e. the accommodation could be let or sold and is available in its entirety or potentially split into smaller units – this split should be noted).
- 4.12 Alongside a strong online marketing presence, marketing details should be distributed to all 500 central London agents so they can be listed on databases, and accessed by agents with clients seeking this type of premises.
- 4.13 In addition, we would recommend also using the property portal Rightmove. There are other commercial search engines which we could use but Rightmove has the most significant market share.
- 4.14 The marketing will be most effective when the unit/s have been finished, or are very close to completion. We would also encourage early engagement with workspace providers in Camden and the Camden Economic Development Team regarding the proposals.

5 Conclusions

- 5.1 This report provides an assessment of the site as an existing employment location, and considers the potential for accommodating employment uses as part of a redevelopment scheme.
- 5.2 Camden local policy aims to protect suitable sites for employment uses and to allow for redevelopment for other priority uses, such as housing, where sites are unsuitable. This reflects the guidance at national level set out in the NPPF.
- 5.3 The current policy emphasis (Policy DP13) is on allowing redevelopment where sites are shown to be unsuitable and where a lack of demand is shown.
- 5.4 The existing buildings are in a reasonable state of repair. However, we are firmly of the opinion that the site is not an appropriate location for a light industrial or storage and distribution use.
- 5.5 As shown in Appendix 2, the locational aspects of the site, which are given due priority in the Council's own guidance on assessment of site suitability (Camden Planning Guidance 5), have significant limitations for light industrial users. The proximity to residential uses is clear, with little distance or separation between the site and surrounding dwellings, including those flats directly overlooking the site. The access routes to and from the site are challenging, via narrow residential roads with on street parking. The site is reliant on the road network with no access to other servicing means (ie. rail or water). The site is a small employment site and is not located in close proximity to other industrial uses. It is not therefore supporting a wider industrial employment cluster. From our assessment of the criteria set out Camden Planning Guidance 5 we are firmly of the opinion that the subject site complies with the Category 2 and Category 3 criteria. It is not therefore a Category 1 site (i.e. not prime stock).
- 5.6 The secondary thrust of Camden's employment policy is on evidencing a lack of demand. However, given the demonstrable unsuitability of this site for continued industrial use, we question the relevance of such an exercise. The retention of this site for light industrial use would not meet the overarching national and local policy aims, which are to ensure the provision of suitable employment space. The transfer of this site to more suitable uses – i.e. mixed use office and residential development would satisfy this policy aim, meet demand for these alternative uses which are a strategic priority and continue to support local economic activity. The provision of residential uses as part of this redevelopment would not be possible if light industrial use was retained, as these uses do not sit well alongside one another.
- 5.7 JLL has undertaken detailed investigations of the local employment market in Camden. This has shown that there is a diverse and highly active market in the surrounding area for local office provision. This is differentiated from the larger office spaces located in the Kings Cross and Euston area, and is characterised by smaller office spaces offering flexible space suitable for smaller and medium sized businesses. The site is assessed to be attractive for small and medium sized office development, particularly likely to attract occupiers from the TMT sector, which is of growing importance in the borough.
- 5.8 The site should be released from its existing use and redeveloped as mixed use residential and office accommodation. The provision of 1,219sqm and (13,121sqft) (GIA) flexible B1 employment floorspace as part of the redevelopment of the site will result in an estimated additional 43 full time jobs being supported by the site, due to the higher density employment of these uses. It would also not constrain or undermine neighbouring residential uses in any respect. We calculate the proposed floorspace to provide capacity for 88 employees in accordance with the HCA Employment Densities Guide (2015). This contrasts with the existing 45 jobs potential of the existing layout in Class B8 use.
- 5.9 We conclude that the site is not currently in its most suitable use and that the potential employment benefits of the site could be optimised from redevelopment to higher density office uses. This would meet established demand in the area for this type of employment space provision. The redevelopment of this site would also include new residential units, which are a priority use and a strategic priority at the local, regional and national level.

Appendix 1 – Photo Schedule



Appendix 2 – Policy Assessment

The table below provides a systematic point by point assessment of how the subject site performs when considered against the criteria set out in Development Policies - Policy DP13 (at paragraph 13.3) and Camden Policy Guidance 5 (from paragraph 7.8 onwards).

POLICY DP13		
Criteria	Assessment	Conclusion
Is located in or adjacent to the Industry Area, or other locations suitable for large scale general industry and warehousing;	The subject site is not located in or adjacent to an industrial location	Not Applicable
Is in a location suitable for a mix of uses including light industry and local distribution warehousing;	The surrounding area is a residential location with some provision of small-medium office space.	Not Applicable
Is easily accessible to the Transport for London Road Network and/or London Distributor Roads;	Access to either A501 (Euston Road) or A41 is tortuous and the subject site is located within a network of narrow residential streets with on-street parking.	Not Applicable
Is, or will be, accessible by means other than the car and has the potential to be serviced by rail or water;	The site is in good proximity to the underground but offers little prospect of servicing by rail or water.	Minimal Compliance
Has adequate on-site vehicle space for servicing;	There is space for vehicle parking and turning.	Applicable
Is well related to nearby land uses;	The site is within a residential neighbourhood and is not adjacent to other industrial uses.	Not Applicable
Is in a reasonable condition to allow the use to continue;	The site is in good condition – though the location is relatively unsuitable.	Applicable
Is near to other industry and warehousing, noise/vibration generating uses, pollution and hazards;	The site is in a residential neighbourhood and is not adjacent to other industrial uses. Other employment uses are predominantly offices.	Not Applicable
Provides a range of unit sizes, particularly those suitable for small businesses (under 100sqm).	All six units are of a similar size and none are under 100 sqm.	Not Applicable
CAMDEN POLICY GUIDANCE 5		
Criteria	Assessment	Conclusion
Category 1		
Purpose built accommodation;	Yes.	Applicable

Predominantly single storey premises;	All units are two storeys	Not applicable
Clear, high ceiling heights;	Yes (>5m ²)	Applicable
Access for large delivery and servicing vehicles both into and around the site;	Poor access for large vehicles along a narrow residential road with on street parking.	Minimal Compliance
24 hour operation with unrestricted loading access	No specific conditions on hours of operation but some limiting conditions due to residential uses in surrounding area.	Minimal Compliance
Minimal risk that the 24-hour operation will adversely harm the amenity of neighbouring properties.	Residential uses in surrounding area	Not Applicable
Category 2		
Good access for servicing and delivery;	Poor access for large vehicles along a narrow residential road with on street parking.	Not Applicable
Slightly more restricted hours of operation than Category 1 sites;	No specific conditions on hours of operation but some limiting conditions due to residential uses in surrounding area.	Minimal Compliance
Roller shutter doors;	Yes.	Applicable
Clear, high floor to ceiling heights (3-5m);	Yes.	Applicable
Lots of natural light;	Industrial sheds – no large windows	Not Applicable
Level access – normally ground floor;	Yes	Applicable
Flexible neighbouring uses;	Residential uses in surrounding area	Not Applicable
Limited number of upper floors with goods lift access;	Limited upper floors. Goods lift not required.	Minimal Compliance
Some off street parking.	Some parking on site	Applicable
Category 3		
Small, isolated premises;	The site is not surrounded by any other employment uses	Applicable

² Costar property details

Poor access - narrow streets, small doors, steps;	The access is relatively poor and via a narrow residential street.	Applicable
No goods lifts;	No goods lift, though few upper floors (mezzanine).	Minimal Compliance
Little or no space for servicing;	Vehicular access is restricted/poor, though there is space for vehicle parking and turning.	Minimal Compliance
Incompatible neighbouring uses (most often residential);	Residential neighbourhood	Applicable
Lower ground or basement level	No	Not Applicable



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