



**Symes Mews, 15a-37 Camden High Street, London, NW1 7JE**

**Planning Statement**

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DP9 Ltd  
100 Pall Mall  
London  
SW1Y 5NQ

Tel: 020 7004 1700  
Fax: 020 7004 1790

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## **1. INTRODUCTION**

- 1.1 This Planning Statement has been prepared by DP9 Ltd on behalf of Fabx2.2 GP (The Applicant) in support of a full planning application for development at Symes Mews, 15a-37 Camden High Street, London, NW1 7EJ (the Site).

### ***The Planning Application***

- 1.2 Detailed planning permission is sought to use the existing building as offices (Class B1a)
- 1.3 The application seeks planning permission for the Proposed Development, comprising:

*“Conversion of existing building for office use (Class B1a)”*

- 1.4 This Statement assesses the planning considerations associated with the Proposed Development and considers the development in the context of relevant planning policy and guidance.

### ***Application Structure***

- 1.5 This Statement should be read in conjunction with the documents, plans and technical studies submitted to accompany the planning application, as set out below. The format of the planning application has been discussed and agreed with the Council as part of pre-application discussions.

### ***Planning Application Documents***

- 1.6 The following documents are submitted to accompany the planning application:
- Cover Letter
  - Application Form and Certificates
  - CIL Additional Information Form
  - Planning Statement
  - Existing and Proposed Drawings
  - Transport Statement
  - Energy Statement
  - Marketing Report

***Structure of this Statement***

1.7 This document provides an overview of the Application Site and the Proposed Development and sets out a justification for the development. The Planning Statement takes the following form:

- Section 2 provides a description of the Application Site and surrounding context;
- Section 3 sets out a summary of the Proposed Development;
- Section 4 assesses the Proposed Development against relevant planning policy; and
- Section 5 sets out the overall conclusions.

## **2. APPLICATION SITE AND SURROUNDINGS**

- 2.1 The Site comprises a vacant 3-storey building which was most recently used by the David Roberts Art Foundation. In addition, there are 2no non-self-contained residential flats on the first floor. It is situated within the administrative area of the London Borough of Camden.
- 2.2 The primary pedestrian access to the building is via Symes Mews, with secondary access from Camden High Street leading to a rear alleyway and yard that services the Site and 13 and 15 Camden High Street.
- 2.3 The Site is bordered by Symes Mews to the north and commercial uses to the east, west and south. The surrounding area comprises predominantly commercial uses, along Camden High Street to the east, and residential uses on the upper floors?.
- 2.4 In terms of public transport, the Site has a Public Transport Accessibility Level (PTAL) of 6B, which indicates excellent public transport accessibility. The Site is approximately 400 ft north of Mornington Crescent underground station (Northern line) and approximately 300m south of Camden Town underground station (Northern line). Euston station and Kings Cross/St Pancras station are located approximately 600m south and 900m south-east respectively. There are regular north-ward bound bus services along Camden High Street, with services to Highgate, North Finchley, Chalk Farm, Hampstead and Hackney, and south-ward bound bus services along Eversholt Street and Hampstead Road (to the south of Site) with services to Clapham, Trafalgar Square, Chiswick, Tottenham Court Road, Old Kent Road and Euston.
- 2.5 The Site is located within Camden Town Centre Conservation Area. The Site is not statutorily nor locally listed yet are noted as buildings making a positive contribution to the Conservation Area.
- 2.6 The Site is located within Flood Zone 1 and is therefore not at risk of flooding.
- 2.7 The Application Site is designated within Camden Town Centre and partly as Secondary Protected Frontage (at Camden High Street).

***Planning History***

- 2.8 A search of the Council's online planning search function indicates the following planning history:

<b>Reference</b>	<b>Description</b>	<b>Determination</b>
2005/5411/P	Change of use from ground floor tattoo parlour (Class A1) to offices (Class B1) with associated remodelling works to the Symes Mews elevation and the erection of a single-storey extension within the existing courtyard at the entrance of 15a Camden High Street and a visibility screen within the exiting internal central courtyard	Granted 27/02/2006
2007/1271/P	Change of use form tattoo parlour (Class A1) to offices (Class B1) at ground floor level including minor alterations to the existing façades and the demolition of existing wc block and glazed structure. Erection of 1 and 2-storey roof extension, to provide additional offices (Class B1) and three self-contained flats (Class C3)	Granted 11/06/2007
2008/0931/P	Alterations and extensions including the addition of a second-floor extension and full height side extension, in associated with the change of use from film studio, workshop (Class B1) and tattoo parlour (Class A1) to art gallery (Class D1) and 2x self-contained studio flats (Class C3)	Granted 15/08/2008
2011/3764/P	Renewal of planning permission granted on 15/07/08 (Ref: 2008/0931/P) for alterations and extensions including the addition of a second-floor extension and	Granted 30/03/2012

	full height side extension, in association with the change of use from film studio, workshop (Class B1) and tattoo parlour (Class A1) to art gallery (Class D1) and 2x self-contained studio flats (Class C3).	
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### **3. THE PROPOSED DEVELOPMENT**

- 3.1 The Proposed Development is for the use of the building for office (Class B1a).
- 3.2 The proposed change of use will involve internal alterations only, namely the refurbishment of the existing accommodation. No external alterations are proposed as part of this application.
- 3.3 Access to Site will remain as existing, with primary pedestrian access to Symes Mews and secondary access to Camden High Street.
- 3.4 As existing there is no car parking associated with the Site and the proposals seek to retain the Site as car-free. Disabled parking demand will be met on-street at Camden High Street at designated, resident and pay and display parking bays.
- 3.5 A total of 14no. secure and covered cycle parking will be provided on-site.
- 3.6 Delivery and servicing will take place from Camden High Street similar to existing and surrounding building arrangements.
- 3.7 Bins will be stored within the Site boundary and waste collection will take place from Camden High Street, similar to existing and surrounding building arrangements.



#### **4. PLANNING ASSESSMENT**

- 4.1 The Government published the revised National Planning Policy Framework (NPPF) in July 2018. The National Planning Policy Guidance (NPPG) was also updated in July 2018 in line with the updated NPPF.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan unless material considerations indicate otherwise.
- 4.3 The statutory development plan for the Application Site comprises:
- The London Plan (Consolidated with Alterations since 2011)
  - Camden Local Plan (2017)
- 4.4 In terms of emerging Policy, the draft London Plan was published in December 2017 and seeks to update the adopted London Plan 2016. Following the conclusion of the consultation period in March 2018, Minor Suggested Changes were published in July 2018 and the Plan will be Examined in Public in January 2019. It is anticipated the Plan will be adopted in winter 2019/2020.
- 4.5 The Proposed Development has been assessed against relevant development plan policies, grouped into key topic areas as set out below. Each specialist report accompanying the planning application also comprises an account of relevant planning policy together with a proportionate assessment.

#### ***Land Use and Principle of Development***

##### *National Planning Policy*

- 4.6 The NPPF is underpinned by 12 core principles as outlined in paragraph 17. These include encouraging the effective use of land by reusing land that has been previously developed (provided it is not of high environmental value) and to proactively drive and support sustainable economic development to deliver the business and industrial units the country needs, including to objectively

identify and then meet business and other development needs of an area and respond positively to wider opportunities for growth.

- 4.7 At a national level, Chapter 1 states that the Government is committed to securing economic growth in order to create jobs and prosperity. Planning should operate to encourage and not act as an impediment to sustainable growth. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century.

#### *The Development Plan*

##### *Loss of Cultural/Leisure/Community Use (D1)*

- 4.8 It is understood that the previous art gallery use was operated mainly for storage of art for the David Roberts Art Foundation rather than a typical art gallery open to the public, nevertheless we have considered the Council's relevant policies of the loss of such uses.
- 4.9 Policy C2 of the Camden Local Plan seeks to ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following test are met:
- A replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users; or
  - The existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of community use, then our preferred alternative will be the maximum viable amount of affordable housing.
- 4.10 The officer report for application 2008/0931/P stated that the permission was restricted to an art gallery D1 use only, as other D1 uses are considered more intensive. As such, alternative culture, leisure or community uses are unsupported at this Site and would require full planning permission for a change of use.

- 4.11 A Marketing Report, provided by Robert Irving Burns, is submitted in support of the application. The D1 use was marketed informally between December 2016 and February 2017 where only one party, a charitable organisation, came forward to offer. Once vacant, a more formal open marketing process by RIB and ADS began on 9<sup>th</sup> April 2018 where specific targeted purchasers and agents were contacted and on 12<sup>th</sup> April 2018 a marketing document was distributed to an excess of 1,200 agents and uploaded to both RIB's and ADS's websites, LinkedIn, Perfect Information Property and West End Agents marketing platforms.
- 4.12 In total 47 inspections took place by investors, developers and owner occupiers. All the interest was from prospective office occupiers.
- 4.13 Bids were requested to be received by 16<sup>th</sup> May 2018 and in total 10 bids were received. A second round of bids resulted in 3 parties remaining; a B1 owner occupier and 2no. investor/developers. Both investor/developer parties withdrew due to constraints and no deal was agreed with the B1 owner occupier. Further interest was received from 2no. investor/developer parties, both looking at the properties for B1 opportunity.
- 4.14 There was no interest from prospective D1 occupiers.
- 4.15 In addition, research into other local art galleries found that a total of 10no. art galleries were located within a 1-mile radius of the Site. These include Camden Image Gallery, Peltz Gallery and Kings Place Gallery; as such, there is clearly a sufficient number of community facilities within the area.

*Loss of Residential Use (C3)*

- 4.16 Policy 3.14 of the adopted London Plan and Policy H10 of the draft new London Plan seeks to resist the loss of housing unless the housing is replaced at existing or higher densities with at least equivalent floorspace.
- 4.17 Policy H3 of the Camden Local Plan seeks to resist development that would involve a net loss of residential floorspace.

- 4.18 It is understood from the officer report of application 2008/0931/P that the Site is not considered to be a primarily residential site due to proximity to existing uses and confined layout.
- 4.19 The existing 2no. residential flats are located at 1<sup>st</sup> floor and have no independent access, requiring tenants to access the flats through the primary ground floor entrance along with the other users of the building. A lack of independent access is considered less safe and secure and the constrained Site does not provide opportunity to create an independent access.
- 4.20 The existing flats are of low residential quality and would require significant refurbishment and reconfiguration to meet acceptable standards and this would impact the commercial viability of the remaining building.

*Principle of Office Use (B1a)*

- 4.21 Adopted London Plan Policy 4.2 requires development to extend the strengths of the diverse office markets outside central London, promoting their competitive advantages and focussing new development on viable locations with good public transport.
- 4.22 Draft London Plan Policy E1 similarly seeks to improve the competitiveness and quality of office space of different sizes through, but not solely, the provision of new office stock. The office markets in outer and inner London should be extended where viable, focussing new development in areas including town centres.
- 4.23 Policy E1 of the Camden Local Plan seeks a successful and inclusive economy in Camden by creating conditions for economic growth. In doing so, the Council will:
- Support businesses of all sizes;
  - Maintain a stock of premises that are suitable for a variety of business activities and firms of different sizes; and

- Direct new office development to the growth areas, Central London and the town centres in order to meet the forecast demand of 695,000 sq m office floorspace between 2014 and 2031.
- 4.24 The Site is located within Camden Town Centre and has an excellent PTAL of 6b, a suitable location for new office development in accordance with regional and local policy.
- 4.25 The development of 1,149 sq m of new office space will contribute to meeting Camden's forecast demand as set within the Local Plan.
- 4.26 The proposed conversion to office use would bring back into use a vacant building within a prime Camden Town Centre location, improving the viability and vitality of the centre and improving Camden's competitiveness.

#### ***Transport, Delivery and Servicing***

- 4.27 A Transport Statement has been prepared by TTP Consulting to accompany the planning application.
- 4.28 A car-free development is in accordance with the draft London Plan and the Local Plan and is considered appropriate due to the PTAL rating of 6b and proximity to public transport and walking and cycling routes.
- 4.29 Disabled parking demand will be met on-street, where there are parking bays on Camden High Street for a maximum of 3 hours and blue badge holders can park within resident and pay and display bays free of charge with no time limit.
- 4.30 The 14 proposed cycle parking spaces are in accordance with London Plan standards and will be covered and secured.
- 4.31 Delivery and servicing will take place on-street within existing bays on Camden High Street which permit loading for a maximum of 20 minutes. It is assumed that office development of this size will generate approx. 3 deliveries per day and will therefore have no material impact on the local highway.

- 4.32 Bins will be stored within the site boundary and private refuse collection will be arranged by the office tenants, where waste collection will take place from the street similar to existing and neighbouring properties.
- 4.33 The Statement concludes that the proposed change of use will not create any material transport related impacts and is therefore acceptable in relation to transport and traffic terms.

### ***Energy & Sustainability***

- 4.34 A high-level Energy Statement has been prepared by Hurley Palmer Flatt and submitted in support of the application.
- 4.35 The Statement explains that the refurbishment of the building will make best use of available low energy technologies, including:
- Replace existing lighting with low energy LED lighting
  - Provide adaptive lighting controls
  - Replace existing heating with modern efficient gas boiler systems
  - Limit the use of mechanical cooling to areas where required
  - Mechanical cooling to be as energy efficient as feasibly possible and controlled to minimise fuel demand
  - Where building fabric is replaced or augmented, consideration given to optimising this to align with installed HVAC systems
  - Energy metering to be installed
- 4.36 As such, the low energy technologies proposed to be incorporated into the development will be in accordance with regional and local policy.

## **5. CONCLUSION**

- 5.1 This Planning Statement has been prepared by DP9 Ltd to accompany an application for planning permission submitted on behalf of Fabx2.2 GP for the proposed development at Symes Mews, 37 Camden High Street, London, NW1 7EJ.
- 5.2 Detailed planning permission is sought for the change of use of the existing building to create new offices (Use Class B1a).
- 5.3 It is understood that the existing D1 use was used for storage of art for the David Roberts Art Foundation, rather than a conventional art gallery that is open to the public.
- 5.4 The current D1 use is restricted to art gallery use only and as such alternative D1 uses are not supported at this location. The existing D1 use is vacant and a marketing exercise undertaken by RIBs resulted in no interest from art gallery or alternative D1 operators.
- 5.5 The existing 2no. residential flats are considered of poor quality and lack independent access, resulting in insecure accommodation with no opportunity to provide independent access.
- 5.6 The proposed office use is supported in this town centre location in addition to its excellent PTAL of 6b. The proposed change of use to office will bring back the building into active use and enhance the vitality and viability of the centre, improving Camden's competitiveness.
- 5.7 The Proposed Development complies with relevant national, regional and local policy in respect of land use, transport, energy and sustainability.
- 5.8 Overall, the Proposed Development complies with relevant planning policy at national, regional and local level, and represents sustainable development. On that basis, the planning application should be strongly supported.