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London Borough of Camden  
Planning Department  
2<sup>nd</sup> Floor, 5 Pancras Square  
c/o Town Hall  
Judd Street  
London  
WC1H 9JE

Dear Sir/Madam,

**189-191 CAMDEN HIGH STREET, LONDON, NW1 7BP**

**CHANGE OF USE OF FIRST AND SECOND FLOORS FROM FINANCIAL AND PROFESSIONAL SERVICES (Class A2) TO OFFICE USE (Class B1a)**

Please find enclosed an application for planning permission submitted on behalf of our client, Royal Bank of Scotland, for the change of use of the first and second floor from Use Class A2 (financial and professional services) to Use Class B1(a) (office) at 189-191 Camden High Street ('the Site').

Application is sought for:

*'Change of use of first and second floor level from financial and professional services (Use Class A2) to offices (Use Class B1a)'.*

The application has been submitted via the Planning Portal (reference: PP- 07756703). This letter sets out the planning background of the site, details of the existing planning permission and a description of the development proposals. An overview of the relevant planning policy is also included.

**Application Package**

The application comprises:

- This covering letter which sets out the background, justification and detail of the proposed change of use amendments;
- Site Location Plan (ref: L(47)0001)
- Existing First Floor Plan (ref: L(47)004)
- Proposed First Floor Plan (ref: AMM0443);
- Existing Second Floor Plan (ref: L(47)005)
- Proposed Second Floor Plan (ref: AMM0443); and
- Completed and signed application form.

The planning application fee to the amount of £462.00 and additional £20.00 administration fee linked to the Planning Portal reference PP-07756703, has been sent under separate cover to Camden Council.

## Site Context

The Site comprises a partially vacant three storey former bank building that occupies the prominent north western corner of Parkway and Camden High Street. The building was most recently used by the Royal Bank of Scotland as a Banking Hall on the ground floor with associated ancillary space on the upper floors.

The building is not listed, but is located within the Camden Town Centre Conservation Area. The building is not statutorily or locally listed yet is noted in the Camden Conservation Area Appraisal map as one that makes a positive contribution, with a presumption in favour of retaining.

The Site is bordered by a broad range of different uses, including retail uses at ground level (A1 & A2) and gym (D2) to the north along Camden High Street. The uses to the west along Parkway are A3 at ground level and office (B1a) at upper levels.

Historically, the building has been in use as a bank within Use Class A2 'Financial and Professional Services'. The ground floor contained the main Banking Hall and the space on the upper floors is ancillary to the main function of the premises as a bank both in nature (i.e. majority of the space is given over to storage, with some staff office and ancillary areas such as toilets etc.) and physically via an internal staircase from the Banking Hall to the upper floors.

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 diagonally opposite Camden Town Underground Station (Northern Line). Euston Station and Kings Cross/St Pancras Station are located approximately 0.9 miles and 1 miles south and 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.

The Site is located within Flood zone 1 and is therefore not at risk of flooding.

## The Proposals

The Proposed Development is for the use of the building for office (Class B1a) at first and second floor levels. 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.

The Royal Bank of Scotland has now vacated the ground floor and this space is currently vacant. The Royal Bank of Scotland is seeking to identify an occupier for the ground floor. With regard to the upper floors, the Royal Bank of Scotland intends to occupy these themselves as self-contained offices with primary pedestrian access via Parkway.

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.

Delivery and servicing will continue to take place on-street within existing loading bays on Camden High Street similar to the existing and surrounding building arrangements.

The majority of deliveries to offices are typically associated with post, online mail order and office supplies that usually take place via box vans. There are many vehicles making such deliveries in the area in any event as part of scheduled multiple drop-offs and therefore there will be little or no impact to the surrounding area.

## Planning Background

An online planning history search identified a number of historic planning applications relating to minor internal and external works on the property. These are listed below.

2018/2444/P - External alterations to the Parkway and Camden High Street elevations of existing bank (Class A2) in association with the removal of ATM's, signage and reinstatement of stone cil, stone panel and former window.

2016/0808/A - shop front alterations including erection of internally illuminated fascia and projecting signs.

2006/0279/A - Display of 2 x internally illuminated fascia signs and 2 x internally illuminated projecting signs with new internally illuminated panels to existing ATM's for the existing bank (Class A2).

### **Planning Policy Context**

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.

Section 38(6) of the Planning Compulsory Purchase Act 2004 (as amended) requires planning applications to be determined in accordance with policies of the adopted statutory Development Plan, unless material considerations indicate otherwise.

In this case, the statutory Development Plan comprises:

- The London Plan (Consolidated with Alterations since 2011)
- Camden Local Plan (2017)
- Camden Local Plan Policies Map (2017)

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 is currently being Examined in Public. It is anticipated that the Plan will be adopted in winter 2019/2020.

The Proposals Map which accompanies the local plan shows the site to be located within the Camden Town Centre, Camden Town Conservation Area and a Primary Located Frontage Area.

The Proposed Development has been assessed against relevant development plan policies, grouped into the below topic areas. The main principle planning considerations for the proposed development comprise:

- Provision of B1a Office Use;
- Loss of A2 Use;
- Design and appearance;
- Amenity Considerations; and
- Transport and Parking.

Each of the above principle planning considerations relevant to the change of use are discussed below.

#### Principle of B1(a) Use

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

Paragraph 80 of the NPPF outlines that policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wide opportunities for development.

Paragraph 81 of the NPPF adds that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

Adopted London Plan policy 4.3 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.

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.

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 sqm office floorspace between 2014 and 2031.

The Site is located within Camden Town Centre and has an excellent PTAL rating of 6b, a suitable location for new office development in accordance with regional and local policy.

The development of 281sqm of new office space will contribute to meeting Camden's forecast demand as set within the Local Plan.

The proposed conversion to office use would ensure the continued beneficial use of a prominent building within a prime Camden Town Centre location, improving the viability and vitality of the centre and improving Camden's competitiveness.

#### Loss of Financial and Professional Floorspace

Policy TC2 (Camden's Centres and other shopping areas) states that the Council will seek to protect and enhance the role and unique character of each of Camden's centres by providing for and maintaining a range of retail uses.

The Council has designated the site as a Primary Frontage as a location for shops (A1) together with a broader range of other town centre uses to create centres with a range of shops, services and food, drink and entertainment uses which support the viability and vitality of the centre.

This application only proposes the change of use at first and second floor level only from A2 (professional services) and the lawful use of the ground floor level will be retained as existing.

Policy TC4 which seeks to ensure that the development of town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or amenity of neighbours. This new proposal is consistent with this Policy as it proposes an uplift of 281sqm office area (B1a) to the town centre by converting underutilised floors into office use. Moreover, the new proposed office

floorspace from this proposal will not cause any harm to the Town Centre/Camden High Street as occupiers will use the existing entrance from Parkway.

### Design and Appearance

Section 12 of the NPPF details the importance of the design of the built environment. It states that good design is a key aspect of sustainable development and should contribute positively to making places better for people. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. The Local Plan policy D1 (Design) requires development to be of the highest architectural and urban design quality which improves the function, appearance and character of the area. Policy D2 (Heritage) states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas. Camden's Local Plan document is supported by CPG1 (Design).

This application deals with the change of use only and there are no external alterations proposed as part of this application. The proposed office space will be accessed via the existing main entrance on Parkway.

### Amenity Considerations

The NPPF sets out in Policy 7.15 that planning decisions should avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, mitigate and reduce other adverse impacts from noise to a minimum, and recognise that development will often create some noise.

Policy A1 of the Local Plan seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of neighbouring residents. This includes privacy, outlook, noise and impact on daylight and sunlight. Camden's Local Plan document is supported by CPG6 (Amenity).

The impact associated with the proposed office use is not considered to be materially different to the current financial and professional services use falling within the Use Class A2. Therefore it is not considered that the proposal would have a materially harmful impact in terms of amenity on neighbouring properties.

### Transport and Parking

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.

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 pay and display bays free of charge with no time limit.

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 only a handful of deliveries per day and will therefore have no material impact on the local highway.

This letter 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.

## **Conclusion**

This cover letter has been prepared by Avison Young to accompany an application for planning permission submitted on behalf of the Royal Bank of Scotland for the proposed development at 189-191 Camden High Street, NW1 7BP.

Detailed planning permission is sought for the change of use of the existing first and second floors to create new office space (Use Class B1a). 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 ensure the on-going use of the building and enhance the vitality and viability of the centre, improving Camden's competitiveness.

Overall, the Proposed Development complies with relevant planning policy at national, regional and local level, and represents sustainable development. On this basis, the planning application should be strongly supported.

We trust that the enclosed package is sufficient to enable you to validate and determine the application. Please do not hesitate to contact Andrew Dowell on 02079112782 or Matthew Harvey 020 7911 2740.

Yours sincerely,

*Avison Young*

**For and on behalf of  
GVA Grimley Limited t/a Avison Young**