

Planning Statement

13 Leeke Street, London WC1X 9HY –
Change of use

Incorporating Sustainability Statement

June 2019

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Client

Paul Hamlyn Foundation

Our reference

GUYL3001

June 2019

1. Introduction

1.1 This Planning Statement has been prepared on behalf of the Paul Hamlyn Foundation (PHF) to support an application for planning permission for the following description of development at no. 13 Leeke Street, London WC1X 9HY

“Change of use of 13 Leeke Street from C3 residential use to B1a office use”

1.2 The applicant, PHF, is one of the largest independent grant-making foundations in the UK. The charity has a particular interest in supporting young people and a strong belief in the importance of the arts. The Foundation also provides a range of working facilities for other charities at the site, thereby making a substantial contribution to the success of LBC’s voluntary and community sector (VCS).

1.3 PHF’s headquarters has been on Leeke Street since 2012 and PHF has historic links to Camden. PHF was established by the successful publisher Paul Hamlyn, who started selling books in Camden from 1949. PHF’s current premises are inadequate in size and constrain the full potential of the organisation and its ability to support other charities, including many in the local area.

1.4 The site is a narrow two storey brick building constructed around 2011 that is vacant but was last in residential use. It adjoins the office premises and headquarters of the applicant at Nos.5-11 Leeke Street; the subject premises are also owned by the applicant. The site lies within the Kings Cross St Pancras conservation area but Leeke Street contains no listed buildings.

1.5 Leeke Street is a quiet cobbled side street within the heavily trafficked King’s Cross gyratory road system. The street links King’s Cross Road to Wicklow Street and traverses railway tracks linking King’s Cross-St Pancras station to Farringdon station.

1.6 No. 13 Leeke Street was previously B1 office until its change of use in 2010 and the proposal seeks to restore the former land use. The premises have lain vacant since August 2016 and were sporadically occupied prior to this. The residential unit is substandard due to failing to meet minimum space standards, a single aspect north-facing orientation, lack of external amenity space, absence of space for refuse and recycling, and lack of cycle parking.

1.7 The objective of the applicant is to expand and extend its current constrained office workspace by adding the floorspace of no.13 to its available facilities. The space will be used by the charity as offices and meeting space in furtherance of its objectives and in support of the local VCS. It is considered that the loss of one sub-standard and vacant residential unit is justified on the basis of the planning balance given the overall benefits of the scheme.

1.8 In 2018, the applicant successfully appealed (Appeal Ref: APP/X5210/W/18/3205121, dated 1 November 2018) against a decision of LBC to refuse planning permission for a change of use from C3 to B1a use at the site, demolition of the existing building and construction of a new larger building on the plot (Ref 2017/4707/P, dated 18 August 2017). The change of use is therefore already approved by the Planning Inspectorate

and this appeal ruling forms an important material consideration in the assessment of this application.

- 1.9 The applicant is progressing pre-application discussions with LBC with regards to a wider scheme to enhance office provision at the subject site and its neighbouring Headquarters building. It is envisaged, subject to progress with those discussions, which the office use hereby applied for will be for a temporary period.
- 1.10 This Planning Statement has been prepared to assess the proposed development against the Development Plan and all other material planning considerations. This Statement should be read in conjunction with the documents outlined below:
- Planning Application Form, prepared by Turley
 - Certificates and Notices, prepared by Turley
 - Cover Letter, prepared by Turley
 - Location Plan and Block Plan, prepared by Guy Stansfeld Architects
 - Existing Plans, Sections and Elevations, prepared by Guy Stansfeld Architects
 - Proposed Plans, Sections and Elevations, prepared by Guy Stansfeld Architects
- 1.11 The structure of this Planning Statement is as follows:
- Chapter 2 – Site and surroundings
 - Chapter 3 – Planning history
 - Chapter 4 – Proposed development
 - Chapter 5 – Planning policy context
 - Chapter 6 – Planning assessment
 - Chapter 7 – Sustainability statement
 - Chapter 8 – Summary and conclusions

2. Site and surroundings

The site and surroundings

- 2.1 Leeke Street is located within the King's Cross ward of LBC in central London. It is a narrow thoroughfare formed of two distinct parts linked together by a Network Rail bridge over railway tracks beneath. The site is located on the longer section of the street, which terminates on King's Cross Road (A201), the borough boundary between the London Boroughs of Camden and Islington.
- 2.2 The site at No.13 Leeke Street is a narrow two-storey brick building with a sloping roof and large Crittall-style windows. The building has had a residential use since 2010 but has been sporadically occupied and now lies vacant. The front building façade was constructed around 2011 in yellow stock brick and is of limited architectural merit.
- 2.3 Prior to its change of use, the building was in B1 use (see planning approval reference 2010/0057/P). It was associated with the existing neighbouring building at Nos. 5-13 Leeke Street and is identified within LBC's records as ancillary space for the larger building. The plans from prior to the change of use show an interconnecting doorway between Nos. 5-11 Leeke Street and No. 13 Leeke Street.

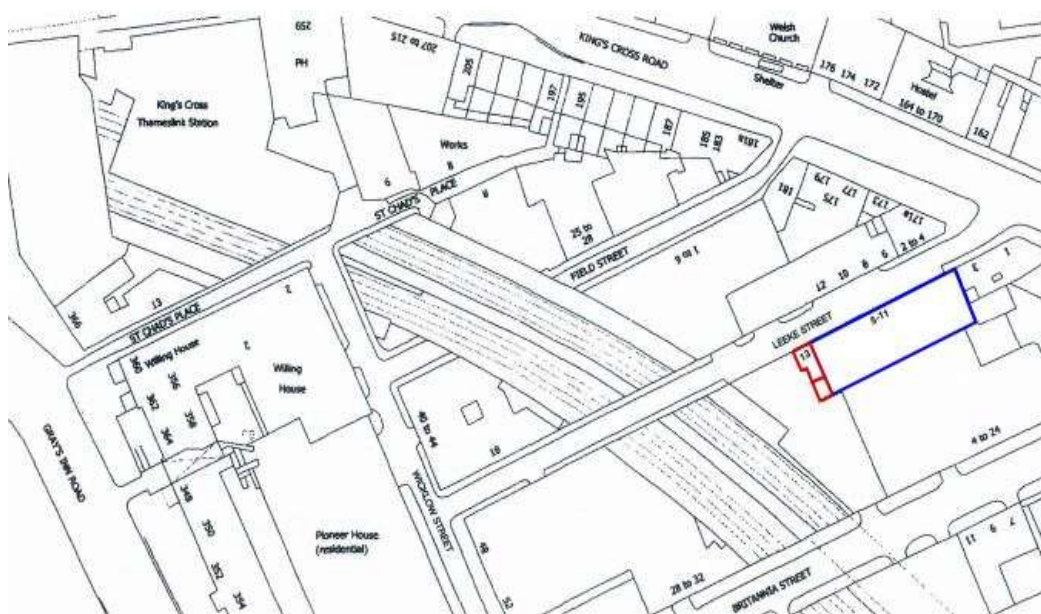


Figure 2.1: Block plan extract

- 2.4 To the east of the site is the headquarters of PHF at Nos. 5-11 Leeke Street, a major grant-giving charity working in the fields of migration, arts, education and learning, young people and India. PHF's headquarters has been on Leeke Street since 2012 and the Foundation has historic links to Camden. PHF was established by the successful publisher Paul Hamlyn, who started selling books in Camden from 1949. PHF's current premises are inadequate in size and constrain the full potential of the organisation and its ability to support other charities in the local area.

- 2.5 To the west of the site adjoining No. 13 Leeke Street is a brick warehouse building with a pair of large doors on to the highway.
- 2.6 Across Leeke Street from the site is a mix of two, three and four storey buildings constructed at different times with a variety of materials and in varying architectural styles.
- 2.7 King's Cross Road is a very busy route forming part of the Transport for London road network. It links with Euston Road as one part of the extensive King's Cross gyratory system. However, Leeke Street is a quiet cobbled road with very limited traffic as there is no access for motor vehicles over the bridge. The site benefits from exceptionally good transport connectivity with a very wide range of local, national and international destinations accessible by public transport from nearby. The PTAL is 6b – the highest possible level.
- 2.8 The surrounding area is a vibrant part of central London that is continuing to undergo a considerable amount of change and redevelopment, including at King's Cross station and the Argent site at the King's Cross railway lands to the north. The regeneration of the wider area has resulted in a growth of artistic and cultural industries relocating in the area, as identified in the Camden Local Plan.
- 2.9 Within a short walking distance of the site are a wide variety of commercial, community and residential uses that are expected within the CAZ. These include:
- private residential homes, student housing and hostels for homeless people;
 - a range of large, medium and small sized office developments;
 - a substantial variety of retail uses, pubs and restaurants along King's Cross Road, Pentonville Road and further afield;
 - cultural and creative uses including the Gagosian art gallery at the rear of the site, the Joint music studios located between Leeke Street and Field Street; and Heatherwick Studios at nearby Willing House, and
 - community uses such as the Ethiopian Christian Fellowship church on King's Cross Road, and the PHF building itself, which provides space free of charge to charitable organisations.
- 2.10 The existing building at No.13 Leeke Street is not listed but the site lies within the King's Cross St Pancras conservation area. The following listed buildings are located in the wider area:
- 173-179 King's Cross Road (Grade II)
 - Former Welsh Congregational Union Chapel, Pentonville Road (Grade II)
 - Willing House and attached hall with railings, 356-364 Gray's Inn Road (Grade II)
 - 75 Wicklow Street (Grade II)

- Cobden Buildings, 128 King's Cross Road (Grade II)
- 2.11 The closest listed buildings are at 173-179 Road but these are not visible from the site (or vice versa).
- 2.12 The site is located in the Kings Cross conservation area, which covers a wide and varied area stretching from Camden Town in the north to Bloomsbury in the south. The area south of Euston Road containing the site was added in 1991. As identified in the LBC statement, the conservation area is characterised by major infrastructure, areas of redevelopment, and great variety in character and appearance. Sub-area 4, which contains the site, comprises a mix of early 19th century terraces and larger scale institutional buildings.
- 2.13 Nos. 5-13 Leeke Street are identified as positive contributors to the conservation area in the statement. However, it is clear that this designation does not apply to No. 13 given it was only constructed around 2011 and therefore was not subject to the relevant conservation audit by LBC (this was the position taken by LBC when it allowed change of use in 2010 - see officer's report for application reference 2010/0057/P).

3. Planning history

3.1 Key planning decisions relating to the site are as follows:

- **2010/0057/P**: Change of Use of side extension/garage from B1 to C3. Granted 2010.
- **2017/4707/P**: Change of Use from C3 to B1 and redevelopment of site, to provide office space linked to 5-11 Leeke Street. Granted on appeal November 2018 (ref APP/X5210/W/18/3205121).

4. Proposed development

4.1 The proposed description of development is:

“Change of use of 13 Leeke Street from C3 residential use to B1a office use”

4.2 The intention of the applicant is to restore No.13 Leeke Street to its former use as B1 office space. The proposal is simply for a change of use from the existing C3 use to B1a office space.

4.3 The proposals do not involve any physical works to the exterior of the building and no increase or decrease in floorspace. The proposal does include the reinstatement of an interconnecting door between the subject site and the next door PHF headquarters at Nos.5-11 Leeke Street. This access point is important to allow proper functioning of the wider site but does not require planning consent given it is entirely within the existing building.

4.4 This proposal is in accordance with the 2018 appeal where this change of use was approved (Appeal Ref: APP/X5210/W/18/3205121, dated 1 November 2018).

4.5 The new office space will be used by the applicant for its charitable purposes, and in support of other voluntary and community sector organisations. As shown on the drawings, the building will be used for meeting space and workspace for employees and volunteers of PHF. Such space is in very high demand at PHF given growth in the Foundation’s activities and the consequent lack of space within the charity’s main building next door.

4.6 The proposed change of use involves the loss of one substandard and vacant residential unit, which was a poor quality conversion of the subject property, which was previously in office use. This dwelling has been recognised as substandard by the Planning Inspectorate in the aforementioned appeal ruling and has been vacant for some years.

5. Planning policy

5.1 Planning applications are to be determined in accordance with the Development Plan (unless material considerations indicate otherwise)¹.

Adopted Development Plan

5.2 The adopted Development Plan for the site comprises:

- London Plan (2016)
- Camden Local Plan (2017)

5.3 The following documents are material considerations in the determination of this application:

- National Planning Policy Framework (NPPF) (2018)
- Planning Policy Guidance (PPG)
- LBC Supplementary Planning Documents and policy guidance
- Mayor of London's Supplementary Planning Guidance

Emerging Development Plan

5.4 The NPPF states that the weight that can be given to policies increases as the plan becomes more advanced, and taking into account the extent of unresolved objections and the degree of consistency with the NPPF as a whole. More clarification is given in PPG, which states that a refusal on the grounds of prematurity will seldom be justified where the draft Local Plan has yet to be submitted for examination.

5.5 A new draft version of the London Plan was published in November 2017 and subsequently submitted for Examination in Public (EIP) in July 2018. The draft Plan places a strong emphasis on making the best use of land, including the prioritisation of the delivery of high-density places on brownfield land that is well-connected by existing or planned Tube and rail stations (Policy GG2).

5.6 The draft London Plan is anticipated to be adopted in Winter 2019/20. It is a material consideration for the purposes of this application and will gain planning weight as it proceeds through the examination and subsequent adoption process.

Neighbourhood planning

5.7 There is no adopted or emerging Neighbourhood Plan covering the site.

¹ See s70(2) of the Town and Country Planning Act 1990 (as amended) and s38(6) of the Planning and Compulsory Purchase Act (2004) (as amended).

Planning designations

5.8 The following planning policy designations are in place at the site:

- Central Activities Zone (CAZ)
- King's Cross St Pancras Conservation Area
- Viewing corridor from Kenwood gazebo to St Paul's Cathedral

6. Planning assessment

- 6.1 This chapter assesses the proposed development in the context of the policies from the adopted Development Plan and other material considerations.
- 6.2 Two main grounds of assessment are discussed below in policy terms, namely the proposed office use at the site and the related loss of residential use. The recent appeal case is then considered as a fundamentally important material consideration for assessment of the application.
- 6.3 The chapter concludes with an assessment of cycle parking requirements.

Proposed office use

London Plan

- 6.4 The London Plan seeks to support and promote the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity (Policy 4.1 (Ad)). As part of this, a significant demand for office supply is identified of 2.3 million sqm (net) in the CAZ (Table 4.1). Boroughs are required through their LDFs to enhance the environment and offer of London's office locations in terms of physical attractiveness, amenities, ancillary and supporting activities (Policy 4.2 (Ba)). Development should also support sustainable transport objectives, for example, by reducing the need to travel by car (Policy 6.1). It is thus clear that there is strong support at strategic level for an expansion of office space in locations such as Leeke Street.
- 6.5 The London Plan also expects office development within the CAZ to be mixed use and include housing, assuming this is appropriate given other policy objectives (Policies 2.1 (Aa) and 4.3 (Aa)). In the case of No. 13 Leeke Street we consider that this policy does not apply given the small scale of the site and its consequent inability to include housing without compromising quality of office space or breaching Development Plan policies on design and heritage.
- 6.6 In summary, the proposed development would make a contribution to London's office space requirements within the CAZ, and the provision of new office space in this location is supported in the London Plan.

Draft London Plan

- 6.7 The Draft London Plan was published in December 2017 and public consultation on it has now finished. Although the new Plan currently has limited weight, this will increase as it progresses to examination in public, which is anticipated to be in November 2018.
- 6.8 Of particular relevance is Policy SD4 concerning the CAZ. This seeks to reinforce the role of the CAZ as a location for office floorspace of varying kinds. Part B states "The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values." It is thus clear that the proposed development is fully in line with the emerging direction of policy at strategic level given its contribution to this objective.

- 6.9 This is reinforced by the Draft Plan's recognition of the economic importance of agglomeration of offices supporting creative industries in the CAZ (para 2.4.6). This section specifically states *"A supportive policy approach to the wide variety of business space requirements, quality and range of rental values is essential to enable these sectors to flourish and for small and medium-sized enterprises to fulfil their economic potential"*.
- 6.10 In addition, Policy SD5 rebalances expectations for the balance between office and residential in the CAZ by comparison with the current London Plan. A greater emphasis is placed on encouraging office development. Part A states that *"New residential development should not compromise the strategic functions of the CAZ."* Part H states that *"Residential development proposals should not lead to a loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices and/or alternative provision is made for the provision of net additional office space near the development"*. Moreover, the 'strategic function' of the CAZ, set out in paragraph 2.4.4 of the draft London Plan, does not include residential.
- 6.11 Overall, the draft London Plan provides enhanced support for the proposal by recognising that office use needs to be protected and intensified within the CAZ, and that this is a priority above residential. The previous decision to allow change of use at the site and the loss of important office space suitable for a range of enterprises would not be compatible with the emerging approach for this central London location.

Local Plan

- 6.12 LBC's Local Plan provides strong policy support for delivery of new office space at suitable locations, and for the provision of enhanced community facilities within the Borough.
- 6.13 LBC's most recent Annual Monitoring Report (2016/17) states that *"the last 7 years have seen a loss in office (B1 use class) floorspace of approximately 10,197 sqm"*. This is a significant loss. The Council is now seeking to deliver 695,000sqm of office floorspace within the Borough by 2031 (Policy G1). The proposed change of use will make a small contribution to this target and support the operation of an existing office.
- 6.14 This loss of office has prompted LBC to issue a number of Article 4 Directions removing office-to-residential Permitted Development rights. The CAZ is currently exempt from these rights due to a national exemption; however, LBC has introduced an Article 4 Direction to protect offices in its part of the CAZ from change of use to residential when the national exemption expires. Indeed, given the concern that now exists in Camden about loss of office space to residential (as demonstrated by the policies of the Local Plan and the aforementioned Article 4 Directions), it is unlikely that the 2010 decision to allow change of use from B1 to C3 at No.13 Leeke Street would have been approved if it had taken place a few years later.
- 6.15 Policy G1 (a) also states that the council will support development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. Part (f) identifies that one of the most significant locations for growth will be at highly accessible locations in Central London, i.e. places such as the appeal site.

- 6.16 Furthermore, the Local Plan points out that *“Camden also attracts mid- and small-scale creative organisations. These often cluster together in tailored buildings, for example Cockpit Arts and Kingsgate Workshops, or in certain parts of the borough, such as the wider King’s Cross area, which contains over 300 small cultural and creative industries”* (para 5.2). The proposal is for office development in the King’s Cross area that will support an organisation that is focused on using arts and creativity to support the local community, which falls within scope of this aspect of the Local Plan.
- 6.17 Support for the proposed office development is also provided through Policy E1, which aims to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. This policy gives particular support to small and medium sized enterprises (such as PHF) in part (a) and seeks to 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 (d).
- 6.18 Although the Borough anticipates growth in office space overall in coming years, this is due to the delivery of large floorplates at the King’s Cross regeneration area, which are not generally suitable for SMEs and charities. CPG ‘Employment sites and business premises’ acknowledges that *“a substantial proportion of the projected supply is likely to consist of larger floorplate, corporate office space in the Kings Cross and Euston areas which are generally out of reach of micro, small and medium-sized enterprises (SMEs)”* (para 13). The guidance goes on to state that *“We will support the retention and/or re-provision of employment space in other parts of the borough, particularly where this consists of space that is suitable and affordable for micro and small businesses and particularly where this space is suitable for our growth and other important sectors and business clusters.”*
- 6.19 Another relevant aspect of Policy E1 is that new office development is directed to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031 (f). Indeed, while large office development is expected in the King’s Cross regeneration area and Euston, *“smaller scale office development will also occur at other sites across Central London”* (para 5.26). In summary, the Local Plan specifically directs small scale office development of the kind proposed to locations such as Leeke Street in the CAZ.
- 6.20 Furthermore, Policy E1 (gii) states that LBC will support proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2. This also provides support for the proposed change of use as an existing employment site will be intensified and enhanced in order to support employment and bring other benefits.
- 6.21 As also pointed out in the Local Plan para 5.9, *“Small businesses often seek premises that have flexible terms like shorter leases, layouts that can adapt as the business grows or changes and networking space to interact with other small business or to meet with clients. Therefore, as well as safeguarding existing employment sites, we will seek the provision of innovative new employment floorspace in developments that will provide a range of facilities including: flexible occupancy terms; flexible layouts; studios; workshops; and networking, socialising and meeting space that will meet the needs of a*

range of business types and sizes". The proposed scheme delivers exactly the sort of enhanced provision at Nos. 5-13 Leeke Street that is desired through this policy.

- 6.22 Further guidance on the Council's approach to employment premises is provided in Policy E2, which protects existing employment premises and supports their expansion. In particular, there is policy support for smaller businesses. The policy states that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that: (c) the level of employment floorspace is increased or at least maintained; (d) the redevelopment retains existing businesses on the site as far as possible. Both these conditions are fulfilled by allowing the expansion of the existing PHF office into No. 13 Leeke Street.
- 6.23 The proposed change of use will provide a small contribution of new office floorspace to help compensate in a modest way for the large losses of recent years in Camden. This will be space for small and medium sized enterprises in a highly sustainable location, as encouraged in Camden Planning Guidance. In addition, the space will support creative organisations, in line with the sectoral priorities of the Local Plan.

Loss of residential use

- 6.24 It is acknowledged that self-contained housing is the priority land use of the Local Plan (Policy H1), and that Policy H3 states that the council will resist development that would involve a net loss of residential floorspace. However, Policy H3 does not specifically state that all applications involving the net loss of residential floorspace will be refused planning permission; 'resisting development' is not the same thing as refusing development and clearly the policy as worded, quite properly allows for exceptional circumstances and a site specific assessment of the planning merits of a case. In this instance, taking a site specific approach to policy H3, the Development Plan and material considerations, the loss of one residential unit and the accompanying change of use at the site from C3 residential to B1 office space can be justified on an exceptional basis.
- 6.25 LBC's Camden Planning Guidance 2: Housing (updated in 2018) contains a section 'Development involving net loss of homes'. This document highlights a 'key message' for this section: *"We will assess proposals taking into account all relevant material considerations and particularly the history of the site including previous developments and valid planning consents involving the loss of homes"* (p47).
- 6.26 Based on this guidance, the decision-maker should take into consideration the specific circumstances of the site, including :
- the former B1 use of the premises;
 - the overall merit of providing office space in this location, as described in the first part of this chapter;
 - the substandard nature of the existing residential unit;
 - the very strong performance of LBC in exceeding its housing supply targets;

- the lack of contribution to housing supply from the vacant unit;
 - the limited amount of residential floorspace affected (one unit of substandard size) and the consequent lack of material impact on strategic housing supply, and
 - the charitable operations of the applicant.
- 6.27 Weight should be given to draft London Plan policy SD5, which rebalances expectations for the balance between office and residential in the CAZ, as discussed above.
- 6.28 Furthermore and as discussed, the appeal decision is a significant material consideration in this instance; change of use from C3 to B1 has been permitted and this planning permission remains extant.
- 6.29 On balance, given the planning benefits associated with the office floorspace, and taking the provisions of the Development Plan as a whole, together with relevant material considerations including the charitable operations of the applicant and the recent appeal decision, we consider that the loss of residential can be supported in this instance.

Substandard nature of existing dwelling house

- 6.30 The Local Plan states that the council will “*not sacrifice housing quality in order to maximise overall housing supply*” (para 3.2). Regrettably, this is what has occurred at No. 13 Leeke Street due to the previous decision to allow change of use from B1 office to C3 residential at the site. The dwelling house is substandard according to a range of key criteria of acceptable residential standards and design quality:
- (a) **Space standards.** According to the LBC officer’s report at the time of change of use from B1 office to a two person C3 residential unit, the existing dwelling is only 38 sqm split over 2 storeys. Significant space is taken by the internal stair. By contrast, the minimum requirement for a 2 person 1 bed new dwelling with 2 storeys is 58 sqm (see London Plan Table 3.3). This is a nationally described space standard and the London Plan, associated Housing SPG, and LBC’s Interim Housing CPG, require compliance with it. The unit represents only 65.5% of the minimum required size, which is clearly a considerable deficiency.
- (b) **Aspect.** The residential unit is single aspect and north facing. This provides poor outlook and is not compatible with current design standards as set out in the Mayor of London’s Housing SPG and LBC’s Interim Housing CPG. Furthermore, while no daylight and sunlight assessment has been undertaken for this application, and indeed, none were required by LBC in allowing the change of use, it is noted that the north facing windows, narrowness of the street, and height of buildings opposite present very unfavourable conditions.
- (c) **Amenity space.** Contrary to present policy expectations, the residential unit benefits from no external space. The door from the main living area opens straight on to the street. The lack of external space is contrary to London Housing SPG standard 26, Local Plan Policy D1 and LBC’s Interim Housing CPG.

- (d) **Cycle storage.** The residential unit benefits from no cycle storage space. A suitable number of secure covered cycle spaces or storage space for them must be provided on new development as stated in London Plan Policy 6.9 and Table 6.3, London Housing SPG Standards 20 and 21; and Local Plan Policy T1.
- (e) **Refuse and recycling.** Standard 22 and 23 of the Mayor’s Housing SPG require appropriate and space for recycling and refuse facilities to be provided. This expectation is not met at No. 13 Leeke Street.
- (f) **Occupancy.** Evidence has been provided that demonstrates that there have previously been problems with letting No. 13 Leeke Street to private rented tenants given local community safety concerns. The previous owner supplied a letter, submitted with the successful appeal case, explaining his experience of this. The unit has only ever been sporadically occupied, thus demonstrating its lack of suitability. The current land use is not contributing to occupied housing supply in Camden.

6.31 Overall, the combination of lack of internal space, inadequate layout, poor aspect, lack of external space, and poor occupancy at No. 13 Leeke Street demonstrate that this unit is poor quality housing.

Housing supply in Camden

- 6.32 The Council has been successful in identifying sufficient sites to exceed its housing targets in line with expectations at national and London level. The Local Plan states, *“The housing trajectory indicates that there are sufficient identified sites in place to provide just over 17,100 additional homes from 2016/17 to 2030/31 and exceed our housing targets throughout the Plan period”* (para 3.10).
- 6.33 Furthermore, LBC’s most recent Annual Monitoring Report from 2016/17 records that *“a net total of 1,257 homes were completed in the Borough, exceeding the London Plan annual target of 889 and the new Local Plan target of 1,120. Camden’s five-year supply of deliverable sites for housing amounts to 6,189 homes (or circa 1,238 homes per year). This exceeds our target of 1,120 homes for the period in the adopted Camden Local Plan and the adjusted target of 1,176 homes for the period (with a 5% buffer) as set out in the National Planning Policy Framework”*.
- 6.34 LBC’s strong track record in identifying housing sites and delivering new homes means that Development Plan policy expectations for providing market housing are met and exceeded. The need to therefore preserve every single unit of housing, no matter its poor quality or the planning merits of an alternative proposal, is therefore lessened in comparison to an LPA where this is not the case. Indeed, No.13 Leeke Street is currently vacant and making no contribution to housing supply in Camden. There is no question that this case has a material bearing on strategic housing supply in the Borough.
- 6.35 It is established practice within planning decision-making to weigh an LPA’s supply of housing land and previous housing delivery in the balance when making determinations on applications. In light of LBC’s record on housing, it is considered that - in this particular case - Policy H1 should be balanced against Policies E1 and E2 in support of new office space. The benefits of the proposed change of use for the local

community outweigh the loss of one poor quality unit, which in terms of design standards, is contrary to Development Plan policy.

- 6.36 By way of comparison to the successful delivery of housing in Camden, the loss of offices in Camden under permitted development rights for change of use from office to residential has been considerable (despite an exemption being continually in place for the CAZ area since the relevant change to the GPDO). Following the change to development rights in 2013, 257,000 ft² of B1a office space was lost in less than 12 months. The recently adopted Camden Planning Guidance document 'Employment sites and business premises' states regarding the permitted development rights that *"there has been concerns about their impacts on Camden – in terms of the loss of small business space, jobs, loss of opportunity to secure affordable housing and the quality of new residential units and their impact on the amenity of surrounding communities"* (para 18).
- 6.37 It is also worth noting that the CAZ exemption from office-to-residential Permitted Development rights prevents loss of office to provide residential. It seems counter-intuitive to, at the same time, prevent the loss of residential to provide office, particularly given the unwanted loss off office in recent years and the recent history of commercial use at the appeal site.

London Plan

- 6.38 London Plan Policy 3.14 (B) states that loss of housing should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace. As described above, housing is being replaced in Camden and is increasing at rates that exceed London Plan requirements. It is therefore considered that London Plan Policy 3.14 presents no barrier to approval of the proposed development.
- 6.39 The London Plan also states that *"existing housing should be retained where possible and appropriate"* (para 3.81). In this instance, it is not appropriate taking into account all the specific facts of the case, the full range of policies within the Development Plan, and the planning balance.

Appeal reference APP/X5210/W/18/3205121, dated 1 November 2018

- 6.40 The arguments discussed above have already been put forward in a recent appeal at the site. The applicant appealed against LBC's decision to refuse planning permission for:
- 'Demolition of existing building and erection of new three storey building with brick façade and erection of a two storey roof and rear extension. Change of use from residential house (Use class C3) to office space (Class B1) in conjunction with the existing use at 5-11 Leeke Street'* (local authority reference: 2017/4707/P).
- 6.41 The appeal was allowed and planning permission was granted for the demolition of the existing building and erection of a new three storey building with brick facade and erection of a roof and rear extension; change of use from residential flat (Use class C3) to office space (Class B1) in conjunction with the existing use at nos. 5-11 Leeke Street at no. 13 Leeke Street, London WC1X 9HY in accordance with the terms of the

application, Ref 2017/4707/P, dated 18 August 2017, subject to conditions added by the Inspector.

- 6.42 The Planning Inspector made the following remarks concerning loss of residential at the site:

“The proposed development would clearly result in the loss of residential space. However, it is of limited size and is located amidst commercial buildings. Whilst I note the Council’s view that No 13’s two-storey scale would allow some variation in outlook and light penetration to its rooms, its single aspect, and the narrowness of the street which those windows face would serve to limit significantly the quality of light and outlook available to these broadly north facing windows. Moreover, due to its door opening directly from the street, and single aspect nature, No 13 lacks amenity, ancillary, and defensible space. These matters, taken together all limit the appeal property’s ability to meet the needs of existing and future households, and I am also mindful in this regard that the property has been vacant for some considerable time. For these reasons, whilst the proposed development would result in a reduction in residential floorspace it is not demonstrably of a quality to meet the existing or future needs of households. Consequently, this is a material consideration that justifies a departure from the restrictions of Policy H3 of the Local Plan in this instance.”

- 6.43 In upholding the appeal, the Inspector made the following concluding points:

“In this instance I have found that site and property specific matters related to No 13 constitute material considerations which justify a decision other than in accordance with Policy H3 of the Local Plan, insofar as it seeks to protect existing housing from changes of use. I find no other conflict with the development plan insofar as the other policies that have been drawn to my attention are concerned.”

- 6.44 The successful appeal and consequent grant of planning permission for change of use from C3 to B1 office at the site is an important material consideration. It is not considered that there are any new or material differences from the appeal scheme with regards to the proposed change of use, which could justify an alternative conclusion from that reached by the Inspector when assessing this case.

- 6.45 The change of use as proposed has been established at the site and can be implemented by the applicant at any time. This appeal decision is therefore a significant material consideration.

Cycle parking

- 6.46 The site is exceptionally well connected by public transport; no car parking is proposed as part of the application. However, the applicant proposes to provide two additional cycle parking spaces in the existing ground floor garage at Nos. 5-11 Leeke Street for use of employees, volunteers and visitors.

- 6.47 Table 6.3 of the London Plan sets standards for cycle parking in new B1 office development as follows:

- Long stay: inner/ central London: 1 space per 90 sqm

- Short stay: first 5,000 sqm: 1 space per 500 sqm

6.48 There are currently 8 cycle parking spaces at the site provided via 4 Sheffield loops.

6.49 Less than 50 sqm of new office space is proposed via the change of use in this application. It is not possible to provide an external short stay space due to site constraints. The applicant therefore proposes two additional spaces to be provided within the main PHF building in an accessible location as shown on the proposed ground floor plan. It is considered that this meets the expectations of the London Plan given the small scale of the proposed new B1 space and the site circumstances.

7. Sustainability statement

- 7.1 LBC requires that all schemes consider sustainable development principles from the start of the design process and include these in a Sustainability statement (Camden's Local Area Requirements for Planning Applications 2018).
- 7.2 The Camden Local Plan contains the following policies specifically related to sustainability:
- Policy CC1 'Climate change mitigation' promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following an energy hierarchy.
 - Policy CC2 'Adapting to climate change' expects application of the cooling hierarchy and for non-domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments.
 - Policy CC3 'Water and flooding' requires incorporation of water efficiency measures.
 - Policy CC4 'Air quality' aims to ensure that the impact of development on air quality is mitigated.
 - Policy CC5 'Waste' seeks to make Camden a low waste borough.
- 7.3 The proposal is solely for a change of use at the site from C3 residential to B1 office use and there are no changes to the building fabric contained in this planning application. The policies listed above that relate to sustainable design measures are therefore not applicable in this instance.
- 7.4 The retention of the existing vacant building (rather than demolition) and its repurposing for productive use for a Camden charity is in line with sustainability principles that emphasise the conservation of existing resources and embedded energy.
- 7.5 Sustainable transport is a key element of the Development Plan. No motor vehicle parking is included in the proposals and the site is exceptionally well located for access via public transport.
- 7.6 Taking all these factors into consideration, the proposal is considered to be sustainable development.

8. Summary and conclusions

- 8.1 The application for planning permission at the site is for a change of use from the existing C3 residential use to B1 office use. This will return the site to the use class that was in place prior to 2010. No external physical alterations are proposed and the only physical change to the building will be a new internal doorway reinstating a previous link to the office building next door.
- 8.2 The applicant, PHF, is an important local Camden charity that requires no. 13 Leeke Street for a meeting room and workspace in pursuit of its charitable endeavours. This will be of greater benefit than the existing vacant and substandard dwelling house.
- 8.3 A recent appeal case at the site that included a change of use from C3 residential use to B1 office use was upheld by the Planning Inspectorate. The change of use could lawfully be made at any time under this appeal decision and the appeal decision is an important material consideration that indicates that the proposal should be approved. This change of use is sought whilst on-going pre-application discussions are underway with LBC officers, with regards to a wider office improvement and extension scheme affecting the subject site and the adjoining Headquarters of the charity.
- 8.4 The proposed change of use has been considered against the relevant policies of the Development Plan and the emerging London Plan, which is a material consideration following the recent Examination in Public. There is strong policy backing for the provision of new office space at the site and the loss of residential is acceptable in planning terms given the specific circumstances of the site. LBC's updated Camden Planning Guidance 2 also includes supportive provisions pertaining to the appropriate loss of homes based on site-specific considerations.
- 8.5 The proposed development makes no external changes and retains the existing building at the site. Two additional cycle parking spaces will be provided in support of the council's sustainable transport objectives. The change of use therefore represents sustainable development as a centrally-located site and through the re-use of an existing building.
- 8.6 In summary, the proposed change of use is in accordance with the Development Plan and relevant material considerations including the recent decision by the Planning Inspectorate. Planning permission should be granted to allow No.13 Leeke Street to be returned to productive and beneficial use.

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