

JWP/HRW/DP5287

16 August 2019

FAO Gideon Whittingham

Regeneration and Planning
Development Management
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Dear Mr Whittingham,

JML HOUSE, REGIS ROAD, LONDON, NW5 3EG – APPLICATION FOR FULL PLANNING PERMISSION

On behalf of our client, Augustus Regis Ltd, we are pleased to enclose a full planning application for the above site. The planning application proposes:

‘Refurbishment of existing building and change of use from B1 on part of the site to flexible B1c, B2 and B8.’

Planning Application Submission

This minor planning application comprises the following documentation:

1. Full Planning Application Form and Ownership Certificate;
2. CIL Form
3. Site Location Plan
4. Existing and Proposed Floor Plans;
5. Transport Statement

A Community Infrastructure Levy Additional Information Form has also been submitted.

The planning application has been submitted via the Planning Portal (ref. PP-08061462). The planning application fee has been paid directly via planning portal. The application itself is categorised as a ‘minor’ given the proposal is not seeking to create any new floorspace.

This letter explains the background to the Site and its recent planning history, the proposed development and provides a proportionate assessment of the key planning considerations.

The Application Site

The Site extends to approximately 0.17ha and is located on the north side of Regis Road, in the Kentish Town area of the London Borough of Camden (LBC). The site was occupied by JML House, a two-storey unlisted building with associated car parking on a small forecourt. The building is of no architectural merit and is typical of a light industrial / office style, constructed using brick at lower levels and aluminium/steel at upper facade and roof level. JML House shares its eastern party wall with a very similar building in nature, scale, form and appearance which is occupied by Howden's.

The existing building formerly comprised a television production studios, offices and ancillary space, split over ground and first floor, plus a storage mezzanine level above. The building was last occupied by John Mills Limited ('JML') who have now vacated.

In terms of its development plan designations, the Site is situated within Kentish Town Regis Road Growth area. The adopted Camden Local Plan removed the previous Industrial Area designation. The Site is approx. 175m walking distance from the Kentish Town Centre boundary and is therefore an 'edge-of-centre' site based on the NPPF definition.

Surrounding Area & Accessibility

The surrounding area is typified by a mix of uses, including employment uses clustered within the existing Industry Area designation, as well as other commercial, leisure and retail uses concentrated around Kentish Town.

The area is very well connected given its location, within short walking distance of Kentish Town Rail/Underground Station and numerous bus routes which operate along Kentish Town Road. The site sits on the border between PTAL zones 4 and 6a, the latter being the area immediately to the east of the Site towards the Town Centre and Rail/Underground Station. Clearly, the Site is very well connected by public transport and therefore an appropriate location for higher density employment uses.

Planning History

The JML operation began following the grant of planning permission on 26th April 2004 (ref. PEX0300330/P), subject to Section 106 Agreement ("the JML permission"). The JML permission secured the building for JML's specific operation i.e. a personal permission as the legal agreement stated that upon vacation of JML, the building would revert to Class B8 Use.

Full Planning Permission (ref. 2015/7232/P) was granted on 29th February 2016 for:

'Change of use from warehouse (Class B8) to offices [Class B1(a)], increase of 93sqm of internal floorspace and insertion of windows to rear ground floor elevation.'

The February 2016 planning permission was sought specifically as JML were expected to vacate the building (and now have), and the owner wished for the long-established office use to continue.

A further application (ref 2017/3744/P) was then submitted in 2017 and granted in May 2018 for Refurbishment of existing building and single storey extension to provide additional office floorspace (Class B1(a) Use); Alterations and re-cladding to external facades; Associated hard and soft landscaping, cycle parking and ancillary works.

Proposed Development

The proposed development is a minor planning application by definition and is seeking permission for the continued B1a use on half of the building and refurbishment and change of use from B1 a to flexible B1c, B2 and B8 on the other (please refer to application drawings for further information). There are no external changes associated with the application. In terms of floorspace uplift, the proposal results in no overall net uplift.

Due to the ongoing vacancy of the building and in light of the Council's aspirations for the area, flexibility is critical here. Having the potential to use part of this site for either B1c, B2 or B8 would be more attractive to potential tenants and the space would more likely be bought back into use.

Planning Policy Framework and Assessment

LBC is currently preparing a planning framework for the Regis Road Area. This document will be designed as to guide the development of the area. It is intended that the Kentish Town Planning Framework will be adopted by the Council as a Supplementary Planning Document (SPD). This is currently in draft format and further consultation is anticipated to be held in late 2019. In the interim, the Council will rely on Local Plan policies in the Regis Road Area and in particular policies G1 Delivery and Location of Growth, E1 Economic Development & E2 Employment Premises and Sites.

The current building is vacant, and the Applicant is seeking to bring this building back into use as soon as possible. Officers within the committee report for (App ref 2017/3744/P) granted in 2018 outlined that redevelopment will *"only be considered where this is employment-led and part of a comprehensive scheme. The Council expects comprehensive redevelopment to be a transformative, coordinated, strategically planned redevelopment proposal for the whole growth area. We are seeking to work with local landowners and stakeholders to achieve this."* The report goes on to state that where *"permissions have previously been granted within the Kentish Town Regis Road at the frameworks infancy, its progression and impending consultation means proposals for individual sites, piecemeal proposals and those that consider individual land parcels or areas in isolation no longer constitute a comprehensive approach and will be resisted. No uses outside of B1(b), B1(c), B2 and B8 and sui generis uses of a similar nature will be permitted in the area unless they form part of a comprehensive-employment led scheme."*

The Applicant is aware of the Council's intention for the area and is proposing uses that are identified as being suitable within the proposed framework. The benefit of the proposal is that it will bring the site

back into use and be compliant with the uses identified in the Local Plan and the 'Approach to interim development in the Regis Road Growth Area' Statement.

Planning Assessment

The proposed development should be considered against relevant policies contained within the development plan, namely the London Plan and the Camden Local Plan.

A significant proportion of Camden's growth up to 2031 is expected to be delivered through growth areas, including the Kentish Town Regis Road Growth Area

As outlined, ahead of the planning framework being adopted, the Council will rely on the Local Plan policies for the Regis Road area.

Policy G1 states that Camden will promote the most efficient use of land and buildings in Camden by supporting 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. In addition, the policy outlines that LBC will support a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

The proposal complies with Policy G1 (Delivery and location of growth) given it makes efficient use of an existing building through an improved employment offer contributing towards identified needs. The mix of uses proposed is in accordance with the strategic and coordinated development approach across the area and will continue to contribute towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan. We note that this specific proposal is not an appropriate proposition for mixed-use contributions given it comprises a refurbishment and change of use and is a minor application.

Policy E1 of the Local Plan seeks 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.

Policy E2 provides further guidance on the Council's approach to maintaining and securing a range of premises for businesses to support Camden's economy and provide employment opportunities for the borough's residents. The policy notes that the Council 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 proposal complies with Policy E1 (Economic development) which we note specifically directs office development to the Growth Areas, inc Regis Road, and supports the intensification of employment sites where these provide additional employment.

A statement for developers and landowners as referenced above has been provided by Camden Council specifically to assist landowners, developers and other interested parties by providing an understanding of the Council's intentions for the Regis Road area. Within the Statement, the Council set out that applications for development will be determined on the merits of the proposal, but the Council will also take into account certain considerations when assessing applications. These considerations have been identified and assessed below.

a) The scale and nature of the proposal and whether this is commensurate to interim development.

There are no external changes associated with this application. The application is seeking to change the use of part of the building to flexible B1c, B2 and B8 uses which are supported in this location.

b) Whether the proposals are linked to an existing or identified commercial occupier, whether the site has been marketed for occupation in its current condition and whether the property is being offered with short-term/flexible lease arrangements.

The building has been vacant for some time and changing part of the building to flexible uses will help to bring this site back into use. At this stage, it is envisaged any potential users of this space will be offered leases on short – medium term flexible lease arrangements.

c) Whether the proposals could prejudice the physical delivery of a comprehensive scheme on the site. For example, by blocking potential access, providing inactive or unsuitable street frontages, being of a nature that could be incompatible in a mixed-use environment.

There are no associated external changes proposed and the uses are compliant with Camden's planning policy for the area.

d) Whether the proposals could prejudice the viability of a comprehensive scheme. For example, by making significant investment into buildings that are likely to be redeveloped.

The proposals will not prejudice the viability of a comprehensive scheme. The proposals are only seeking to refurbish the inside of the building.

e) Whether proposals would undermine the coordinated partnership working towards delivery of a comprehensive scheme.

Refer to responses b and d above.

f) Any application will also be subject to the statutory consultation procedures

The application will be subject to the statutory consultation procedures.

Conclusion

This statement has assessed the proposed development against the provisions of the Development Plan, relevant guidance and national planning policy. It is considered that overall, the proposal accords with the relevant policies.

The proposed uses are commensurate for its surroundings and will not prejudice the overall function, viability or ongoing operation of the designated Growth Area. The use of the building is considered wholly appropriate and acceptable in this location.

Due to the ongoing vacancy of the building, flexibility is critical here. Having the potential to use part of this site for either B1c, B2 or B8 would be more attractive to potential tenants and the space would more likely be bought back into use.

We trust that you have sufficient information to validate, register and determine this planning application within the statutory timescales. We would be happy to provide paper copies of the submitted documents upon request. Should you have any queries or require any further information, please contact Jim Pool or Hannah Willcock at this office.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'DP9 Ltd', written in a cursive, stylized font.

DP9 Ltd.