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Our Ref: 15528



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Dear Sir or Madam

PLANNING APPLICATION: ST JAMES HOUSE, 10 ROSEBERY AVENUE, CAMDEN, LONDON, EC1R 4TF

DWD are instructed by G.E. C.I.F. Trustees Ltd. (the 'Applicant') to submit an application for Full Planning Permission for the ongoing flexible use of St James House, 10 Rosebery Avenue, Camden, London, EC1R 4TF.

The 'Proposed Development', submitted to the London Borough of Camden (the "Council"), is:

"Retention of existing dual use of site for office (Class E(g)) and educational (Class F1(a)) uses."

This seeks to extend the ability to operate a dual use as approved under applications 2012/2472/P and 2011/1587/P.

Application Context

The Site

The application site comprises a 6-storey period property located on the east side of Rosebery Avenue, close to the junction with Laystall Street. The site is currently operating in F1(a) education use and is occupied by QA Learning Services, the University of Roehampton and Ulster University.

The main access to the building is from Rosebery Avenue at upper ground floor level but the lower ground floor can be accessed from Vine Hill which forms the northern boundary of the property.

There are 6 car parking spaces located on the eastern side of the property which are accessed from Vine Hill. There are also 18 cycle parking spaces located at the north and south of the property. The site is within PTAL 6b and therefore is highly accessible by public transport.

The site is located with the Central London Area, Central Activity Zone, the Hatton Garden Conservation Area and within a number of viewing corridors. The building is not Listed, however is identified as a building that makes a positive contribution to the Conservation Area.

The site is within Flood Zone 1 and therefore not at risk of flooding.

The Use

The lower ground to first floor of the site is currently operating lawfully under planning permission reference 2012/2472/P, granted 21 September 2012. This application permitted:

Partners

R J Greeves BSc (Hons) MRICS
G Bullock BA (Hons) BPL MRTPI
A Vickery BSc MRICS IRRV (Hons)
S Price BA (Hons) DipTP MRTPI

A R Holden BSc (Hons) FRICS
G Denning B.Eng (Hons) MSc MRICS
B Murphy BA (Hons) MRUP MRTPI
A Meech BSc MRICS

S Page BA MA (Cantab) MSc MRTPI
P Roberts FRICS CEnv
T Lodeiro BA (Hons) PGDip MSc MRICS
A Pilbrow BSc (Hons) MRICS IRRV(Hons)



“Change of use at lower ground, mezzanine, upper ground and first floor levels from an educational facility (Class D1) to dual office (Class B1a) and educational (Class D1) uses.”

Informative 1 on this permission confirmed that after 10 years from the date of the permission the lawful use will revert to whichever use is taking place at the time. This is based on the GPDO, Schedule 2, Part 3, Class V.

Similarly the second and third floors are operating lawfully under planning permission 2011/1587/P, granted 20 May 2011. This application permitted:

“Retrospective application for change of use from office use (Class B1a) on the 2nd and 3rd floors to an alternative use, of non residential institution/provision of educational use (Class D1) or office use (Class B1a) and the provision of 8 cycle stands.”

Informative 3 on this permission confirmed that after 10 years from the date of the permission the lawful use will revert to whichever use is taking place at the time. This is based on the GPDO, Schedule 2, Part 3, Class V.

On the basis the use remains in F1(a), the possibility of converting the property to Class E(g) would no longer be possible after the 21 September 2022 (lower ground to first floor) and 20 May 2021 (second and third floor). The Applicant is therefore seeking permission to extend this ability to change to Class E(g) for a further period of 10 years.

Planning Assessment

As the applicant is only seeking to extend the timeframe for the dual use, there is no material impact of this extension. Regardless, the following sub-sections identify key topics and provide a response to these.

Land use

Camden’s Local Plan gives office uses and educational uses a level of protection. In respect to education, Local Plan policies Policy E1 and C2 recognise the contribution that educational uses make in helping sustain a balanced economy and providing employment opportunities. In respect of education Local Plan policy E1 confirms the Council will maintain a stock of premises that are suitable for a variety of business activities. Similarly, Local Plan policy E2 confirms the Council will protect premises or sites that are suitable for continued business use.

Similar policies are applied within the London Plan (2021). Policy S3 ‘Education and childcare facilities’ that *“Development proposals should ensure that there is no net loss of education or childcare facilities”*, whilst policy E1 ‘Offices’ states that *“Increases in the current stock of offices should be supported”* in the CAZ.

The premises presently offer modern accommodation arranged over flexible floor plates and with generous floor to ceiling heights making it suited to a range of office occupiers as well as the current F1 use.

On the basis of the above, it is considered that the proposed uses are supported by Local Plan policies E1, E2 and C2, as well as London Plan policies S3 and E1, and should therefore still be considered as acceptable by Camden.

Impact on neighbour amenity

As part of application 2012/2472/P it was noted by the Council in the Committee Report that there is a general presumption that office and educational uses are comparable in terms of the hours of operation, footfall and noise generated. It was therefore not considered that there was any need for conditions restricting the use of the premises, or hours of operation to be imposed.

As this application does not propose any external alterations or changes to the permitted uses, the proposal would not have any new impacts on the living conditions of the occupiers of neighbouring buildings in terms of a loss of daylight/sunlight, privacy or outlook.

As a result of the above, the proposal is not considered to conflict with the guidance on amenity set out in Local Plan policies A1 and A4, as well as London Plan policies D13 and D14, and should therefore be considered as acceptable.

Transport

None of the existing access arrangements would change as result of the proposed change and the servicing requirements of F1 and E uses are comparable. The proposal would therefore not have an adverse impact on the existing transport network.

There are a total of 18 cycle spaces on site for the educational use and application 2012/2472/P confirmed a need for further details for additional cycle storage would be required if the site was changed to an office. It is proposed that a similar condition should be implemented which requires details of cycle parking for an office use be submitted and in line with the relevant planning policy at that time.

There are 6 car parking spaces on site, this remains sufficient for the existing long-term users of the site and no changes are proposed as part of this application.

As a result of the above, the proposal is not considered to conflict with the guidance on transport set out in Local Plan policies T1 and T2, as well as London Plan policies T1, T4, T5 and T6, and should therefore be considered as acceptable.

Sustainability

The Applicant acknowledges the validation requirement to submit an Energy and Sustainability Assessment, in line with Local Plan Policy CC2. It is however noted that the submission proposes no material changes to the internal nor external of the building. Despite this, an 'Energy and Sustainability Technical Note', prepared by Envision, has been submitted as part of this application.

Flexible Use

The flexible change of use is permitted by Class V, Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). The wording within Class V states that development is permitted for:

“Development consisting of a change of use of a building or other land from a use permitted by planning permission granted on an application, to another use which that permission would have specifically authorised when it was granted.”

The flexibility in uses will allow changes between approved uses for a period of 10 years in order to avoid any lengthy periods of vacancy and adapt to market needs.

NPPF paragraph 81 states that *“Planning policies should... be flexible enough to... enable a rapid response to changes in economic circumstances.”*

As a result of the GPDO and NPPF the principle of a flexible use to support economic shifts is considered acceptable.

Submission Documents

In addition to this Cover Letter, the following documents are submitted to support this application:

- Energy and Sustainability Technical Note, prepared by Envision
- CIL Form
- Site Location Plan, prepared on ProMap
- Existing and Proposed Floor Plans (plans include Site Location Plan at 1:1250):
 - Lower Ground Floor Plan, Drawing No. 01
 - Mezzanine Floor Plan, Drawing No. 02
 - Upper Ground Floor Plan, Drawing No. 03
 - First Floor Plan, Drawing No. 04
 - Second Floor Plan, Drawing No. 05
 - Third Floor Plan, Drawing No. 06

Summary

This application seeks the London Borough of Camden’s approval for the retention of existing dual use of site for office (Class E(g)) and educational (Class F1(a)) uses.

The Proposed Development will enable the use to move from its current educational use to a use for offices without the need for further planning applications.

The proposed works are in line with national and local policy as they support the enhancement existing local educational use.

I trust that this provides all the information you require for the application. Should you have any queries regarding the submission, please contact me on the below details.

Yours faithfully,

A handwritten signature in black ink that reads 'J Smith'.

James Smith
Planner
DWD

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