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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|-------------------------------------------------------------------|----------|
| Address: | Northgate House 67-69 Lincoln's Inn Fields London WC2A 3JB | | 2 |
| Application Number(s): | 2022/2269/P | Officer: Elaine Quigley | |
| Ward: | Holborn and Covent Garden | | |
| Date Received: | 25/05/2022 | | |
| Proposal: Change of use of basement, part of the ground floor and first to fourth floors of the building from educational use (Class F1 (Learning and non-residential institutions)) to flexible use as educational use (Class F1 (Learning and non-residential institutions)) or office use (Class E(g)(i)). | | | |
| Background Papers, Supporting Documents and Drawing Numbers: Existing and Proposed: Site location plan; 7551-LAT-S1-B1-DP-A-2000; 7551-LAT-S1-00-DP-A-2001; 7551-LAT-S1-01-DP-A-2002; 7551-LAT-S1-02-DP-A-2003; 7551-LAT-S1-03-DP-A-2004; 7551-LAT-S1-04-DP-A-2005. Supporting Documents: Planning Statement prepared by Cushman Wakefield dated May 2022 | | | |
| RECOMMENDATION SUMMARY: Grant conditional planning permission subject to a Section 106 Legal Agreement | | | |
| Applicant: | | Agent: | |
| Habro | | Cushman and Wakefield 1 Colmore Square Birmingham B4 6AJ | |

ANALYSIS INFORMATION

| Land Use Details: | | | |
|-------------------|--------------------------------------|-----------------|------------------------------------------------|
| | Use Class | Use Description | Floorspace – Gross External Area (GEA) (Sq. m) |
| Existing | Education (Class F1) | | 2,770 sq. m |
| | Total | | 2,770 sq. m |
| Proposed | Office use (Class E(g)(i)) OR | | 2,700 sq. m |
| | Education (Class F1) | | 2,770 sq. m |
| | Total (flexible Class E(g)(i) or F1) | | 2,770 sq. m |

| Parking Details: | | |
|------------------|--------------------------|---------------------------|
| | Parking Spaces (General) | Parking Spaces (Disabled) |
| Existing | 0 | 0 |
| Proposed | 0 | 0 |

OFFICERS' REPORT

Reason for Referral to Committee: Non-residential development involving change of use of more than 1,000 sq. m of non-residential floor space [Clause 3(ii)].

EXECUTIVE SUMMARY

- i. The application follows on from previous planning permissions; which secured planning permission for change of use of the basement and part of the ground floor to educational use (2006/2260/P); and an application which granted planning permission for the change of use of first, second, third and fourth floors of existing office (Class B1 now Class E(g)(i)), to allow educational use (Class D1 now Class F1) or a dual office (Class B1 now Class E(g)(i)) or educational use (Class D1 now Class F1) (2011/5373/P). The 2012 permission which affords flexibility of use for the upper floors for 10 years has now reached the end of its flexible time period and the building continues to be occupied by Queen Mary University of London (QMUL) Centre for Commercial Law Studies which commenced their occupation in 2012. The authorised use of the basement, part ground floor and the 1st to 4th floors is therefore considered to comprise a mix of education and ancillary offices. The remaining part of the ground floor is occupied by a retail unit (Greggs) that fronts onto Kingsway and falls within Class E(a) use. Although included within the red line it falls outside of the scope of the application.
- ii. The current application proposes a flexible use of the basement, part ground floor and 1st to 4th floors of the building (2,770 sq. m (GEA)) from the existing educational use to a flexible use of education or office floorspace within these floors.
- iii. No physical changes are proposed to the building under this application and the proposal seeks to continue the existing use on the relevant floors whilst at the same time retaining the option to convert the building to professional service use should the existing educational occupier vacate the premises. As such there are considered to be minimal impacts from the proposal in terms of amenity, transport and sustainability.
- iv. It is considered that the proposed flexible use for commercial or educational use would not affect the economic viability or viability of the area given that both proposals would retain potential employment opportunities. Camden's Local Plan gives both office uses and educational uses a level of protection. In respect to education, Local Plan policies E1 and C2 recognise the contribution that educational uses make in helping sustain a balanced economy and providing employment opportunities. In respect of employment use 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.

- v. The applicant has agreed to an employment and training package to be secured in the event of a subsequent change of use of 1000 sq. m or more of the floorspace back to office use (Class E(g)(i)) being implemented under this permission which would be in line with the development plan. The applicant has also agreed to a workplace travel plan in the event of such change of use.
- vi. Officers recommend planning permission is granted subject to a Section 106 legal agreement securing a travel plan with monitoring and measures contribution of £5,196, and an Employment and Training package including a financial contribution of £67,829 in the event that 1000 sq. m or more of the floor space is reoccupied by commercial user(s) within the lifetime of the flexible permission sought.

OFFICERS' REPORT

Reason for Referral to Committee: Clause 3(i) development involving the conversion of more than 1000 sq. m of non-residential floorspace.

1 SITE

- 1.1 The application site is known as Northgate House and is located on the north west corner of Lincoln's Inn Fields at the junction of Lincoln's Inn Fields, Gate Street and Remnant Street. The application building comprises a six-storey building plus basement. The building has frontage onto Kingsway (60 Kingsway) although the ground floor of this part is occupied as a retail unit and outside of the scope of this application. The fifth floor of the building is also outside the scope of the application being occupied separately for office use.
- 1.2 The basement, part ground and first to fourth floors of Northgate House are occupied by Queen Mary University of London (QMUL) Centre for Commercial Law Studies which comprises the University's Postgraduate Law School. It is home to the Centre for Commercial Law Studies and forms a base for Master of Law (LLM) teaching and post graduate research. It includes a lecture theatre, teaching spaces, seminar rooms and library/ study areas as well as individual lecturers offices and open plan administrative offices.
- 1.3 The site is not statutorily listed or locally listed but falls within the Bloomsbury Conservation Area and lies directly opposite Kingsway Conservation Area. There are a number of listed buildings within close proximity to the site. St Anselm & St Cecilia Roman Catholic Church lies to the northwest which is a Grade II listed building. To the south lies Powis House, 60 Lincoln's Inn Fields which is Grade II* listed building and to the east lies 1 and 2 Lincoln's Inn Fields which are Grade II listed buildings. The site is opposite Lincoln's Inn Fields which is registered as a Grade II park of Special Historic Interest and a site of Nature Conservation Importance.
- 1.4 The site has benefitted from several planning permissions to use the majority of the building for educational use. In 2006 planning permission was granted for use of the basement and part of the ground floor of the building as educational use for the law school of Queen Mary University London (the applicant). Planning permission was granted in 2012 for a flexible permission of the first to fourth floors (2,085 sq. m GIA) of the building for either educational use or a dual use of office and educational uses. The 2012 flexible permission concluded in February 2022 with Queen Mary University London having occupied the basement, part ground floor and 1st to 4th floors since 2012. The lawful use of the building is therefore considered to be education use (Class F1).
- 1.5 The site sits within an area characterised by a mixture of uses, including commercial and retail premises to the north and west, university institutions to the south and legal uses within Lincoln's Inn Fields. The site is located within the Central London Area and the Local Plan Knowledge Quarter. The western frontage of the site lies within the New Oxford Street Central London frontage.

- 1.6 The nearest residential properties are within the upper floors of properties along Gate Street to the north east and Lincoln's Inn Fields to the east.
- 1.7 The site has a Public Transport Accessibility Level (PTAL) rating of 6b (excellent). The site is located close to Holborn Underground Station and bus routes along High Holborn, Kingsway and the Strand. There is no on-site cycle parking provision within the building.
- 1.8 The site location plan (Fig 1) and an image of the building (Fig 2) are shown below:



Figure 1 Site location plan

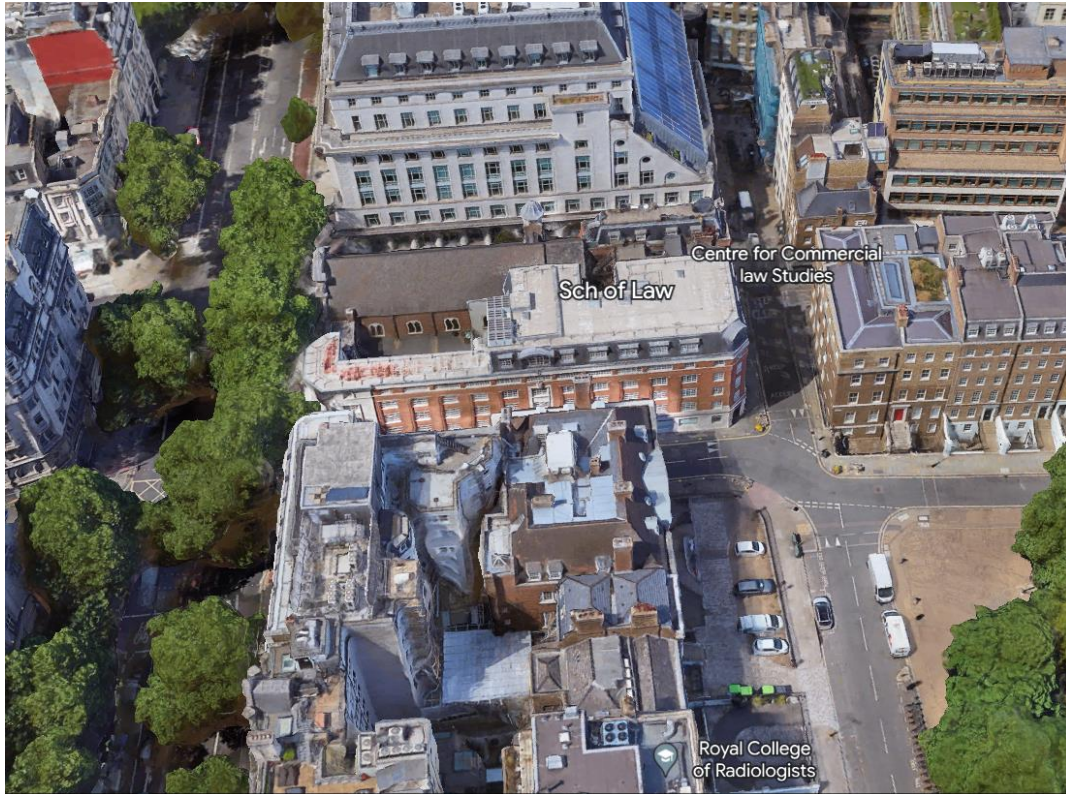


Figure 2 Aerial image of the building

2 THE PROPOSAL

- 2.1 This application seeks planning permission for use of the basement, part of the ground floor and 1st to 4th floors for a flexible use of offices (Class E(g)(i)) or educational use (Class F1 (non-residential institution)). This will renew the ability which ceased in 2022 under planning permission 2011/5373/P to provide more flexibility of uses across the building and allow the occupancy of a commercial tenant if necessary.
- 2.2 Queen Mary University of London (QMUL) currently occupy the basement, part of the ground floor and 1st to 4th floors of the building and will continue to use these floors of the building as its postgraduate law school for the foreseeable future. The proposal for change of use to flexible office / education uses would allow these floors of the building to be occupied by either an education use, as is currently the case, or a flexible use as an education and commercial use or as solely commercial floor space if the QMUL vacates the relevant floors of the building in the future. This would allow the applicant a greater degree of flexibility with regards to the future use/tenants of these floors to ensure floor space is not left vacant which in turn would benefit the surrounding economy. The flexibility of the change of use would allow for the letting of all the specified floors to adapt to the needs of any future tenants, such as small business or different businesses over multiple floors or a new office use occupying all specified floors. The applicant currently operates from the building and considers this location and its proximity to other educational establishments in the area to be well suited to continued educational use. However the applicant is seeking to secure greater flexibility in the market and support the wider function of Lincoln's Inn Fields.

- 2.3 Although the 2011 approved floor plans and the proposed floor plans show some changes to the layout of the ground floor to provide a lecture theatre, the second and third floors to provide seminar rooms, and the fourth floor to provide a staff common room/meeting area and offices, these changes were carried out by the university during its occupation of the building since 2012. It must be noted that internal works do not require planning permission in a non-listed building. A site visit confirms that these internal changes have already taken place. Therefore there are no internal or external alterations proposed as part of this application.

3 RELEVANT HISTORY

- 3.1 2005/3402/P - Change of use of existing offices (Class B1) to a restaurant and retail premises (Class A3) at the basement and ground floors, associated alterations to the interior/exterior including new entrances and windows at ground floor level along Remnant Street, Gate Street and the corner of the building, together with uplighting to statues at first floor level, and the installation of mechanical plant to the rear and on the roof – **Refused** on 10/11/2005. Decision went to appeal and was dismissed on 31/05/2006.
- 3.2 2005/3696/P – Change of use of part of the ground floor and first to fifth floors from office (Class B1) to educational (Class D1) use – **Granted** 14/10/2005. This permission expired and lapsed on 14/10/2008.
- 3.3 2006/2260/P - Change of use of basement and part of ground floor from office use (Class B1) to educational use (Class D1) – **Granted** 24/07/2006
- 3.4 2011/5373/P - Change of use of first, second, third and fourth floor levels of existing office (Class B1) to allow educational use (Class D1) or a dual office (Class B1) and educational use (Class D1) – **Granted** 27/02/2012

4 CONSULTATION SUMMARY

Statutory consultees

- 4.1 Bloomsbury Conservation Area Advisory Committee (CAAC) raised no objection to the proposal.

Adjoining Occupiers

- 4.2 Four site notices were displayed from the 03rd August 2022 to 27th August 2022. 1 outside Northgate House, 67-69 Lincoln's Inn Fields, 1 outside Remnant Street, 1 outside Catholic Church of St Anselm Twyford Place, and 1 outside 70 Lincoln's Inn Fields (Gate Street). The application was also advertised in the Camden New Journal newspaper on 4th August (expiring 28th August 2022).
- 4.3 No responses were received in response to the application.

5 POLICY AND GUIDANCE

5.1 National Planning Policy Framework 2021

5.2 The London Plan 2021

5.3 Mayor's Supplementary Planning Guidance

5.4 Camden Local Plan (2017)

- Policy G1 Delivery and location of growth
- Policy C2 Community facilities
- Policy C5 Safety and security
- Policy C6 Access for all
- Policy E1 Economic development
- Policy E2 Employment premises and sites
- Policy A1 Managing the impact of development
- Policy A4 Noise and vibration
- Policy D1 Design
- Policy D2 Heritage
- Policy CC1 Climate change mitigation
- Policy CC5 Waste
- Policy T1 Prioritising walking, cycling and car-free development
- Policy T2 Parking and car-free development
- Policy T3 Transport infrastructure
- Policy T4 Sustainable movement of goods and materials
- Policy DM1 Delivery and monitoring

5.5 Camden Planning Guidance

- CPG Amenity (2021)
- CPG Design (2021)
- CPG Energy efficiency and adaption (2021)
- CPG Transport (2021)
- CPG Developer Contributions (2019)
- CPG Employment sites and business premises (2021)

6 ASSESSMENT

- 6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

| | |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| 7 | Land use <ul style="list-style-type: none">• Provision of commercial floorspace• Proposed flexible uses |
| 8 | Design |
| 9 | Amenity |

| | |
|----|----------------------------------------------|
| 10 | Energy and sustainability |
| 11 | Safety and security |
| 12 | Access |
| 13 | Transport |
| 14 | Refuse and servicing |
| 15 | Employment and training opportunities |
| 16 | Community Infrastructure Levy |
| 17 | Conclusion |
| 18 | Recommendation |
| 19 | Conditions |
| 20 | Informatives |

7 LAND USE

- 7.1 The proposal seeks to extend the ability to change the use of the building between either Class E(g)(i) office use or Class F1(a) education use for a period of 10 years by way of a flexible use permission. The basement and part of the ground floor has an authorised use as educational use under planning permission (2006/2260/P) and has been used by the law school for seminar rooms, library, lecture theatre and the main reception. An education or dual use of education and office uses was previously approved for the upper floors under planning ref 2011/5373/P in respect of the former use classes D1 and B1 (now Class F1 and Class E(g)(i)).
- 7.2 A flexible permission allows the applicant the right to change between the uses granted for a 10 year period from the date of permission after which the lawful use would revert to whichever use is taking place at the time. This is based on the legislation set out in the General Permitted Development Order (GPDO), Schedule 2, Part 3, Class V.
- 7.3 The first and second floors of the building function in a similar way to offices with 1,498.4 sq. m Gross Internal Area (GIA) used by the lecturers as their individual offices and associated open plan administration offices. Of the 2,344 sq. m (GIA) of floorspace within the building, 845.6 sq. m (GIA) is currently used for seminar rooms, a lecturer theatre and common rooms for the students. The lecturers' offices and administration offices are part of the functions of the law school with lecturers using their offices to plan their lectures and hold 1-2-1's with the post graduate students. The breakdown of the floors are detailed below in Figure 3.

The table excludes communal facilities such as toilets, kitchens, break out areas and quiet rooms.

| Floor level | Floorspace (sq. m) (GIA) | Uses |
|---------------------|-------------------------------------|---------------------------------------------------------------------------------|
| Basement floor | 326.3 sq. m | Seminar rooms and library/ study area |
| Ground floor | 248.3 sq. m | Lecture theatre, reception and common room |
| First floor | 40 sq. m 393.7 sq. m | Seminar room Lecturers offices |
| Second floor | 88 sq. m 410.7 sq. m | Seminar rooms and lecturers and administration offices |
| Third floor | 143 sq. m 292.7 sq. m | Seminar rooms Meeting rooms and admin area |
| Fourth floor | 401.3 sq. m | Ancillary employment law office, staff meeting room and human resources offices |
| TOTAL FLOORS | 2,344 sq. m | |

Provision of professional services floorspace

- 7.4 The proposal seeks flexibility to change to Class E(g)(i) as offices. In terms of the office floorspace being created, this is strongly encouraged by the Council's employment policies E1 and E2. Moreover, new office development is promoted in this highly accessible location in the Central London area. The reoccupation of the specified floors of the building to provide office floorspace is therefore acceptable and in line with policy E1.
- 7.5 The building could be used either on a floor by floor basis or occupied by a single tenant. The premises presently offers modern accommodation arranged over flexible floorplates with generous floor to ceiling heights making it suited to a range of commercial occupiers as well as the current Class F1 use. Policy E2 seeks to ensure that the Borough retains a strong economy. It seeks to do this by safeguarding existing employment sites that meet the needs of modern industry and employers. Given the proposed flexible use between both commercial and education uses would facilitate the potential continuation of commercial use should the current educational occupier vacate the specified floors of the building, the proposal is considered to comply with policy E2. It must also be noted that the flexibility being sought between either educational or office uses was accepted by the Council in 2012. Although this permission was assessed under different policies their aspirations remain broadly similar.
- 7.6 It should also be noted that under the change to the Use Classes order in 2020 the new Class E also encompasses other uses that were previously in a different use class to offices. These include retail, restaurants, health and beauty

treatment clinics and gymnasiums. Due to the nature of the premises the practical use suited to the site is considered to be offices, but the mixed commercial nature of this location generally would mean that other uses within Class E could be accommodated without undesirable impacts on the area subject to other controls such as licencing which fall outside of the planning regime.

- 7.7 The existing lawful use of the basement, part ground floor and first to fourth floors in this case is education so the flexible use would introduce a potential gain in employment floorspace of 2,770 sq. m (GEA). CPG Employment Sites and Business Premises requires proposals that bring about a net increase of 1,000 sq. m or more of employment space to support initiatives which create and promote employment and training opportunities in the Borough. This is normally to be achieved through apprenticeships and a financial contribution based on the number of full time jobs to be created. Employment space is defined for this purpose as including office, hotel and leisure developments.
- 7.8 The application involves more than 1,000 sq. m of floorspace where affordable workspace also becomes a consideration. However, as the employment floorspace pre-existed, and this application is only to allow flexible use rights to continue. An affordable workspace requirement is not considered appropriate or necessary.
- 7.9 Although the proposal does not create any additional floorspace with build costs exceeding £3 million, it could offer local employment opportunities on account of its floorspace of over 1000 sq. m (GIA). The applicant has agreed to enter into an obligation to provide a package of benefits and financial contribution that will be triggered in the event that over 1000 sq. m (GIA) of floorspace is converted to offices (Class E(g)(i)) under the flexible permission, should it be granted. The contribution is calculated in line with the CPG formula based on the number of full time jobs to be created that would be held by Camden residents and multiplies the cost to provide training per employee. The contribution is calculated using a different formula than for developments involving a loss of employment space giving a lower amount based on the fact the not all Camden residents will actually require training and to reflect the fact that these developments are providing new employment opportunities. Further details of the package and contribution are provided in section 15 of this report.

Proposed flexible uses

- 7.10 Camden's Local Plan gives both commercial uses and educational uses a level of protection. As London's economy is becoming increasingly service based, the London Plan seeks to ensure that there is enough office space of the right kind in the right location. However, there is also an acknowledgement that whilst office employment may grow by 303,000 between 2011 and 2031 requiring an additional 3.9 million sq. m (net), local plans and strategies should support the conversion of surplus offices to other uses and promote mixed use development, given the significant impact on business COVID-19 global pandemic.

- 7.11 The Local Plan supports the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. Therefore, whilst now lawful in any event, the option of continuing the education use embodied in the flexible permission sought, does not undermine the objectives of the plan policies and would allow continued support for commercial and educational uses.

Loss of educational use

- 7.12 The application is for a flexible education or commercial use. If the specified floors are converted to Class E(g)(i) office use in the future it would result in the loss of educational floorspace. Policy C2 seeks to preserve community uses (such as childcare, education, adult learning and training, healthcare and libraries) unless either 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.
- 7.13 The basement, part ground floor and 1st to 4th floors of the building are occupied by QMUL. The building is not vacant and there has been no marketing or search for alternative educational occupiers or community uses. There is no prospective commercial occupier / end user due to the flexible nature of the proposal. In the event that QMUL were to leave the building it is likely that they would leave the Borough to an alternative location within their main site in East London rather than relocate to an alternative site in Camden.
- 7.14 Notwithstanding this, the loss of educational use would be accepted in this instance as the office uses proposed as part of Class E(g)(i) are very similar to educational uses in terms of the employment offer and would deliver similar benefits.
- 7.15 The applicant is seeking to widen the options available for the specified floors of the building to be used as education or commercial uses in the future. It would allow the flexibility to implement either use and would continue to allow the potential for an educational user to occupy the basement, part ground floor and 1st to 4th floors of the building in the future. The proposal would continue to create employment-generating uses at the site and would continue to support the economy and social needs of the community. The flexible use would continue to facilitate an educational user within the relevant floors of the building which would ensure that a community use remains at the site. An informative would be attached to the permission to advise that the alternative use permission hereby granted gives flexibility of use for 10 years from the date of this permission. After 10 years the lawful use would revert to whichever of the uses is taking place at the time.

8 DESIGN

- 8.1 Policy D1 seeks to secure high quality design in all development by requiring development to respond to local character and context, be highly sustainable in

design and construction, integrate well to the surrounding streets and townscape, comprise high quality architecture, and be accessible for all. Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. Camden's Local Plan is supported by CPG (Design).

Alterations

- 8.2 The proposal would not include any alterations to the external elevations of the building. It is considered that the proposed change of use would not have an adverse impact on the character or appearance of the Kingsway Conservation Area and would be considered acceptable.

Layout

- 8.3 The internal area is also not affected by the proposal which is currently laid out to suit its existing education occupier; however this could be altered without the need for planning permission to adapt to any future occupier whether or not this remains under the existing lawful Class F1 use or a Class E(g)(i) office use under the flexible consent applied for.

9 AMENITY

- 9.1 Camden Local Plan policies A1 and A4 and the Amenity CPG are relevant with regards to the impact on the amenity of residential properties in the area. These policies seek to protect the amenity of Camden's residents by ensuring the impact of development is fully considered and does not harm the amenity of neighbouring residents. This includes daylight/sunlight, privacy, outlook and noise disturbance.
- 9.2 The application is not proposing any external works or extensions to the current building so there will be no impact in terms of light, privacy, outlook, or overshadowing.
- 9.3 This permission seeks added flexibility across the basement, part ground floor and 1st to 4th floors of the building for offices in the future. The provisions of the Class E use class includes a number of uses such as offices, light industry, shops, restaurants, indoor sports facilities, medical or health services and day nurseries. The specified floors of the building could change to other Class E uses without controls as there is no material change of use. There are certain uses within this use class that have different impacts in relation to activities associated with each use including noise and disturbance from the number of visitors coming and going, traffic generation and parking issues. The applicant has confirmed that the basement, part ground floor and 1st to 4th floors would be used as offices which is Class E(g)(i). Uses within the Class E use class such as solicitors offices, health clinics and research and development uses are similar in nature to an office use and would not be considered to significantly increase noise and disturbance by visitors coming and going or to generate additional harmful levels of traffic movement.

- 9.4 Due to the similar nature of the uses, a change of use to offices would be unlikely to significantly increase the number of people entering and leaving the site compared to the existing education use. As the site is within busy Central London surroundings, any future commercial occupier(s) within Class E(g)(i) office use would be unlikely to result in any significant change in levels of noise resulting from this activity. The proposal would be considered acceptable in line with policies A1 and A4.
- 9.5 With regards to hours of opening, the previous permission for a dual use of either office or education use was not controlled by condition. In this instance, for the reasons identified above, the proposed uses are not considered to unduly impact neighbouring amenity by way of excessive noise or disturbance, and as such, it would not be considered necessary to control the hours of use. However, in recognition of the fact that other Class F1 uses could potentially cause disturbance to residents, such as art galleries and places of worship a condition would be attached to any permission to restrict the proposed F1 use to education use only in order to protect the amenity of adjoining occupiers and the transport network (**Condition 2**).

10 ENERGY AND SUSTAINABILITY

- 10.1 Non-residential changes of use of more than 500sqm of floorspace are expected to provide an energy statement setting out how a development has been designed to follow the steps in the energy hierarchy set out in the London Plan. Policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies wherever feasible. Applicants are also expected to submit a sustainability statement, the details of which are to be commensurate with the scale of the development, showing how the development will implement the sustainable design principles.
- 10.2 The proposal would not include any external or internal changes to the building and the existing overall functions within the building would not significantly change. As no alterations would be proposed that would affect the sustainability of the building a BREEAM assessment was not required to support this application.
- 10.3 No physical changes are proposed to the building and the sustainability measures previously detailed in the BREEAM Pre-Assessment securing BREEAM Excellent, which accompanied the 2011 permission, continue to be in place. A BREEAM assessment would not be required if the specified floors of the building should be converted in the future.

11 SAFETY AND SECURITY

- 11.1 The applicant has not submitted any information on the safety and security measures to demonstrate how the proposal would meet the requirements of Policy C5 (Safety and security) and the CPG Design. However, there will be a security strategy controlling access to the building near the ground floor entrance as existing to ensure controlled access at the ground floor entrance with electronic passes which are linked to the identities of individual users. The

approach is in accordance with the development plan and is considered acceptable.

12 ACCESS

- 12.1 There are no proposed changes to the methods of access into the building. Existing access arrangements would be retained with level access into the main building from the corner of Gate Street and Remnant Street and use of the existing stairs and lifts that provide access to all floors within the building.
- 12.2 The site is currently wheelchair accessible; with access to upper floors gained by the lifts near the main stairs.
- 12.3 Given the above, it is therefore considered the development would be in accordance with Policy C5 of the Local Plan.

13 TRANSPORT

Car parking

- 13.1 Policy T2 of the Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The existing building does not benefit from any car parking spaces and this application does not seek to provide any new car parking spaces.

Cycle parking

- 13.2 Local Plan Policy T1 (Prioritising walking, cycling and public transport) seeks to promote sustainable transport modes in the borough. In particular, in relation to cycling the policy seeks to ensure that development provides for accessible, secure cycle parking facilities. As a minimum the Council will expect developments to provide the number of spaces set out in the London Plan.
- 13.3 Whilst Policy T1 of the adopted Camden Plan requires the provision of cycle parking in line with the standards set out in the London Plan, no on-site parking is currently provided on site and none would be proposed. This was previously considered acceptable as part of the 2011 permission given the constraints of the existing building, particularly in terms of the ground floor and basement floor space limitations. Although the 2011 proposal was assessed under different policies the requirements relating to cycle parking remain broadly similar and no cycle parking would be required as part of this proposal.

Travel plan

- 13.4 The site has a Public Transport Accessibility Level of 6b (Excellent) with numerous bus stops available nearby on Kingsway, High Holborn and Aldwych. Holborn underground station is approximately 200m away. The subject site falls under the London Borough of Camden's Controlled Parking Zone (CPZ) and has limited pay and display parking spaces available. The site already benefits from a travel plan that was secured as one of the heads of terms of the legal

agreement for planning permission 2011/5373/P. There would be no change to the number of staff or students at the premises who would continue to travel to the site sustainably.

- 13.5 Given the flexible nature of the application and the potential for a commercial user to occupy the 2,770 sq. m (GEA) of floorspace within the building, any future commercial occupiers are not currently subject to a travel plan. In order to promote more sustainable modes of transport, it is recommended that a local level Travel Plan and associated measures and monitoring fee of £ 5,196 would be secured by section 106 legal agreement should 1000 sq. m or more of the specified floors be converted to office use.

Construction management plan (CMP)

- 13.6 There would be no construction impact given that the refurbishment works have already been undertaken without the need for planning permission. As a result, it is not considered necessary in this case and in such an easily accessible location to require a Construction Management Plan as a legal obligation.

14 REFUSE AND RECYCLING

- 14.1 Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 14.2 Servicing and waste arrangements including deliveries and waste/recycling collections will be as per the existing situation with the education building where vehicles load and unload goods from Gate Street. The change of use of the building to a flexible use of either education or commercial use would not involve any extension to the building and therefore would not increase the number of deliveries or servicing arrangements. As such, it is considered that a Servicing Management Plan would not be required.

15 EMPLOYMENT AND TRAINING OPPORTUNITIES

- 15.1 The Local Plan policies E1 and E2 and the CPG states that in the case of such developments, the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services. The nature of the proposed commercial use as part of this flexible use is welcomed as it will help ensure the building continues to contribute to the local economy either for commercial use or continuing in its current education purpose. The proposed flexible uses are likely to foster networks and promotion of SME's stemming from the students and those in the local area, or from renewed business activity on the site.
- 15.2 Notwithstanding this, in line with planning guidance, a range of training and employment benefits are also to be secured in order to provide opportunities from the end-use phase for local residents and businesses. A package of recruitment,

apprenticeships and a training contribution would be secured by s106 legal agreement in the event of a change of use of 1000 sq. m or more to office use within Class E(g)(i) and would comprise the following:

- Rolling programme of an end use apprenticeship. The apprenticeship could be within a range of roles, examples include business administration, finance, customer service, IT.
- Advertise vacancies in partnership with Good Work Camden and its relevant local employment support providers to create pathways into good quality employment
- Employment and training contribution based on 2,770 sq. m employment floorspace (calculated as follows):

(Employment floorspace (sq. m) / space requirement per full time business employee 12 sq. m) 2,770 / 12 = 231 full time jobs created

Full time jobs created x 21% [% of Camden residents who work in Camden] x 35% [% of employees requiring training] £3,995 [cost to provide training per employee] = **employment and training contribution**
 231 x 21% x 35% x £3,995 = **£67,829**.

15.3 The proposal would be in accordance with the guidance set out in the Council's Employment Sites and Business Premises CPG and policies E1 and E2 of the Camden Local Plan.

16 PLANNING OBLIGATIONS

16.1 The following contributions are required, in the event that 1000 sq. m or more of the relevant floors of the building are converted to commercial use, to mitigate the impact of the development on the local area, including the impact on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

| Contribution | Amount (£) |
|------------------------------------------------------------------|----------------|
| Training and employment package and contribution | £67,829 |
| Travel plan and travel plan monitoring and measures contribution | £5,196 |
| TOTAL | £73,025 |

17 COMMUNITY INFRASTRUCTURE LEVY

17.1 The proposal would not be liable for the Mayor of London's CIL2 (MCIL2) or Camden's CIL as there would be no uplift in floorspace.

18 CONCLUSION

18.1 The proposed development would help to ensure the continued use of the existing education use and help facilitate a smooth transition to an alternative appropriate commercial use or mix of these uses should the current educational function cease to operate. The impacts and policy requirements of a successive change to commercial use are considered to have been addressed by condition and planning obligations securing a travel plan, and an education and employment package including appropriate financial contributions. The proposed flexible use as provided for the legislation set out in the GPDO would have a limited period of 10 years from the date of the permission after which another change of use application would be required. An informative to this effect would be attached to any permission granted. The proposed flexible use at this location would be considered suitable and would comply with the objectives of the development plan.

19 RECOMMENDATIONS

19.1 It is recommended to **grant conditional planning permission subject to a Section 106 legal agreement** covering the following heads of Terms:

- Training and employment opportunities including contribution in the event that 1000 sq. m or more of floorspace is converted to office / commercial use;
- Travel plan and travel plan monitoring and measures contribution in the event that 1000 sq. m or more of floorspace is converted to office / commercial use.

20 LEGAL COMMENTS

20.1 Members are referred to the note from the Legal Division at the start of the Agenda.

21 CONDITIONS

22 Planning Conditions

| | |
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| 1. | <p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans: Site location plan; 7551-LAT-S1-B1-DP-A-2000; 7551-LAT-S1-B1-DP-A-2001; 7551-LAT-S1-01-DP-A-2002; 7551-LAT-S1-02-DP-A-2003; 7551-LAT-S1-03-DP-A-2004; 7551-LAT-S1-04-DP-A-2005; Planning Statement prepared by Cushman & Wakefield dated May 2022.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p> |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| | |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | <p>Use for F1 education purposes only</p> <p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 2020 or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the flexible F1 use shall only be used for educational purposes and for no other purposes whatsoever.</p> <p>Reason: To safeguard the amenity of the adjoining premises and the highway network, in accordance with policies A1, A4 and T3 of the Camden Local Plan 2017.</p> |
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23 INFORMATIVES

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| 1. | You are advised that the alternative use permission hereby granted gives flexibility of use for 10 years from the date of this permission. After 10 years the lawful use will revert to whichever of the uses is taking place at the time. |
| 2. | Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941). |
| 3. | This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council. |
| 4. | <p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319 or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444).</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and</p> |

| | |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours. |
| 5. | Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ. |

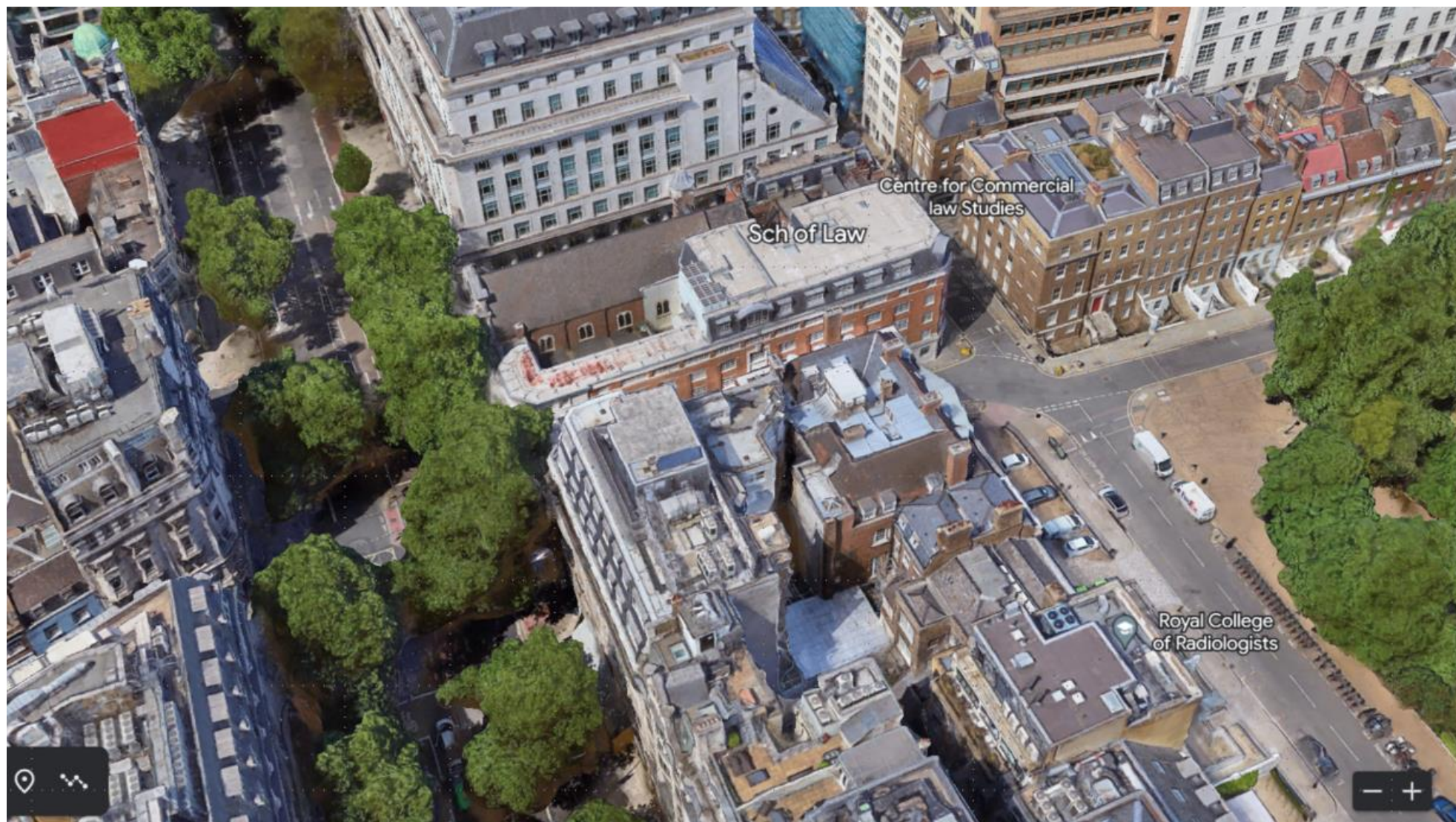
Planning Committee

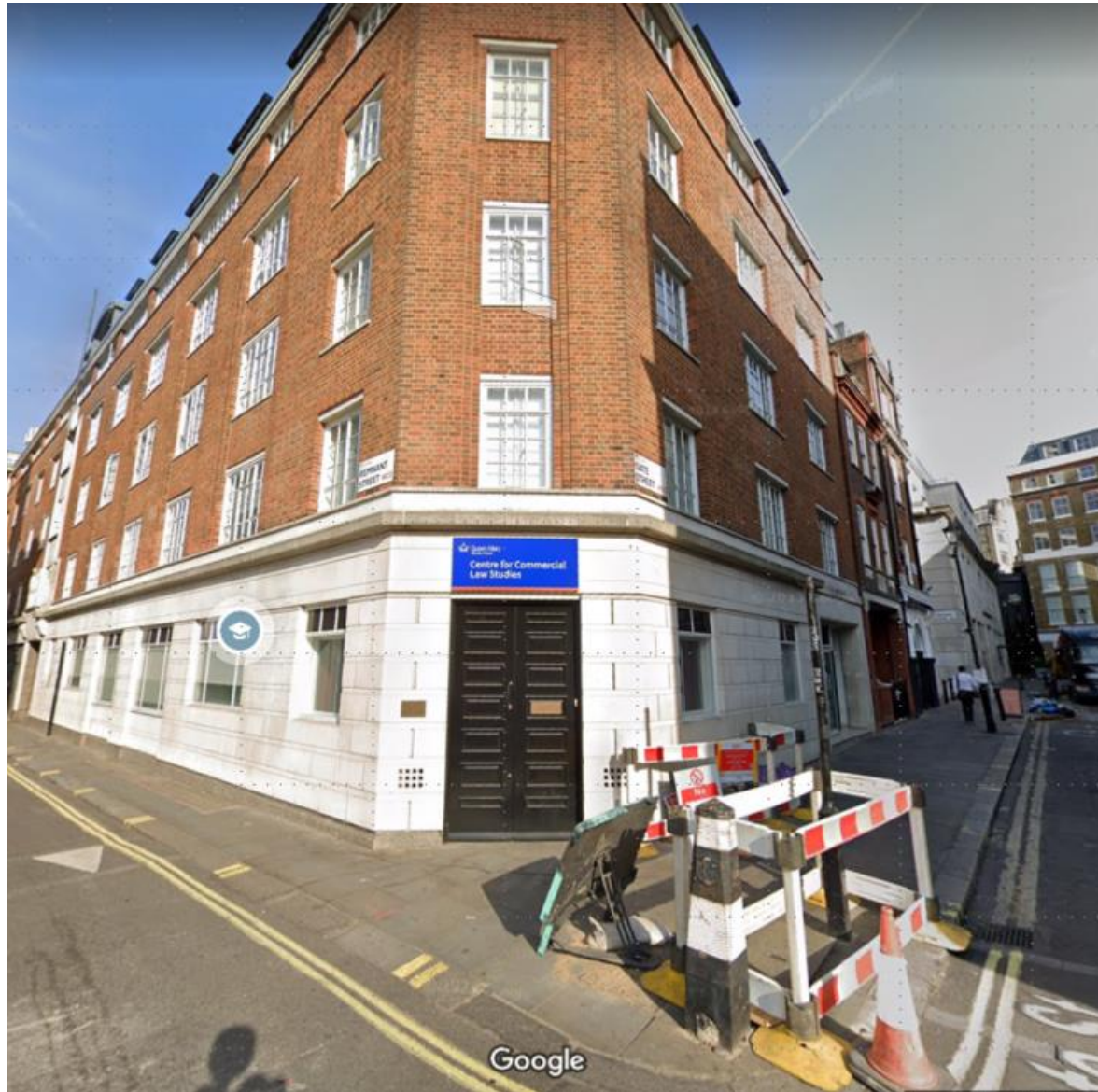
03rd August 2023

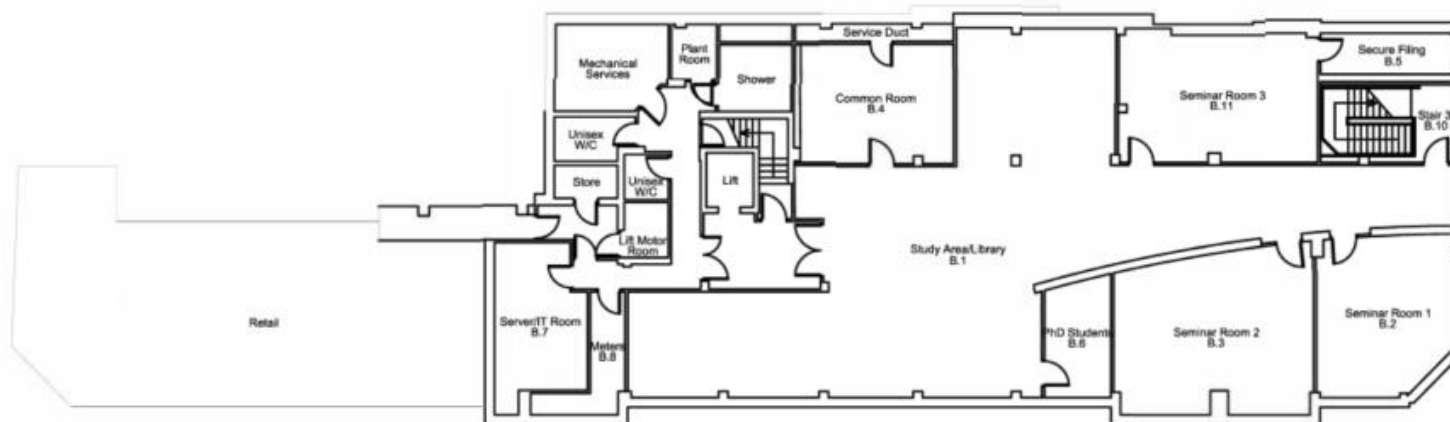
2022/2269/P

Northgate House, 67-69
Lincoln's Inn Fields,
London, WC2A 3JB

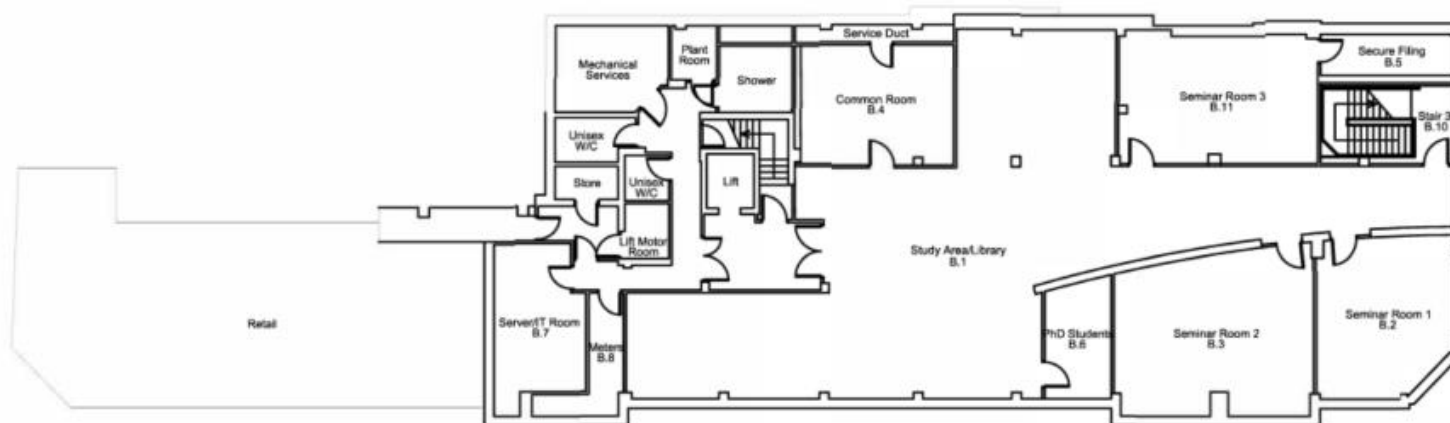








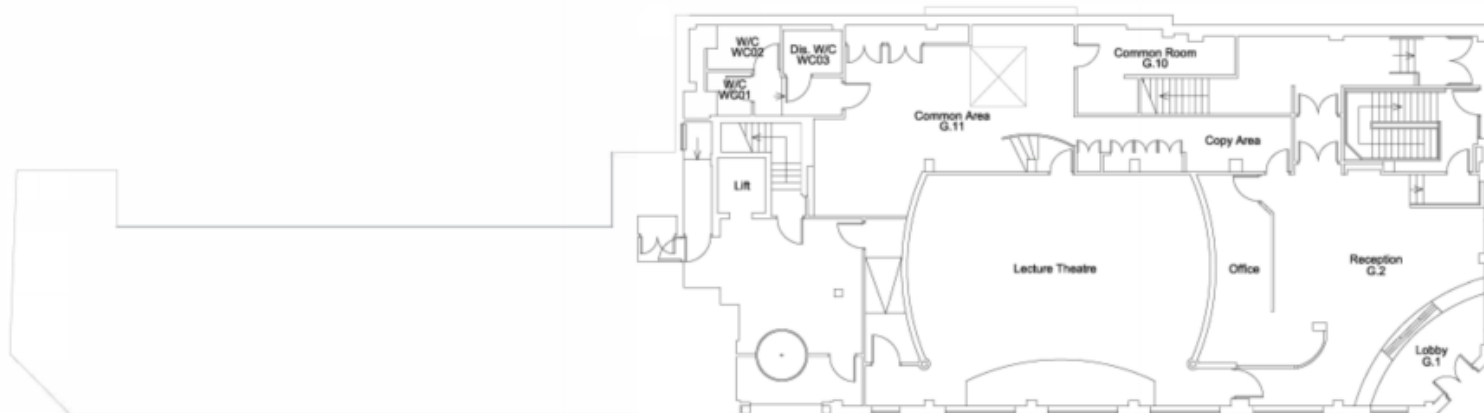
Alternative Use (office) - Basement Plan



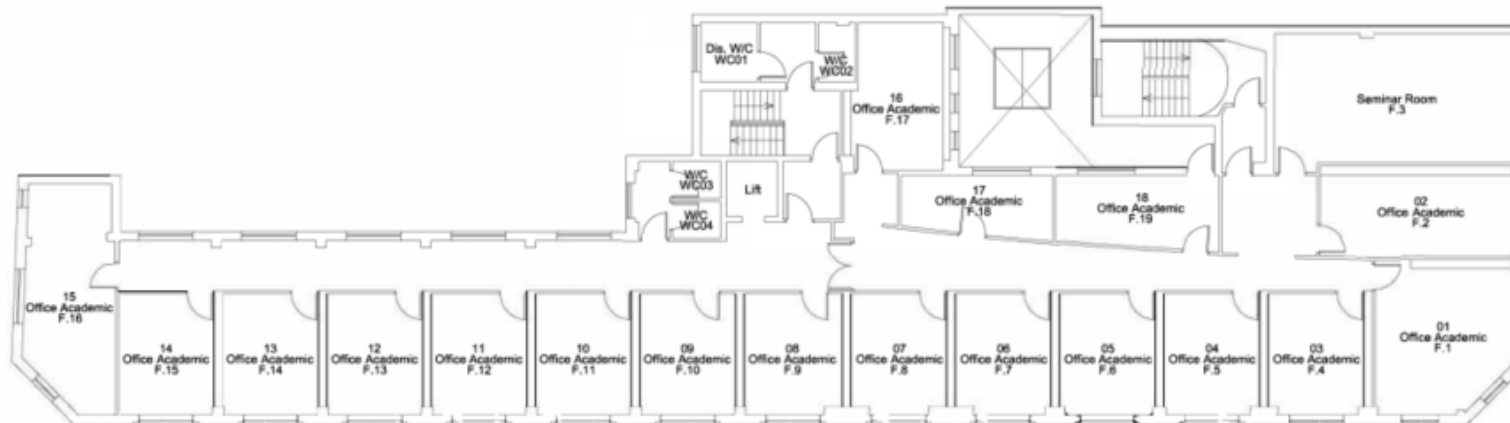
Existing Use (education) - Basement Plan



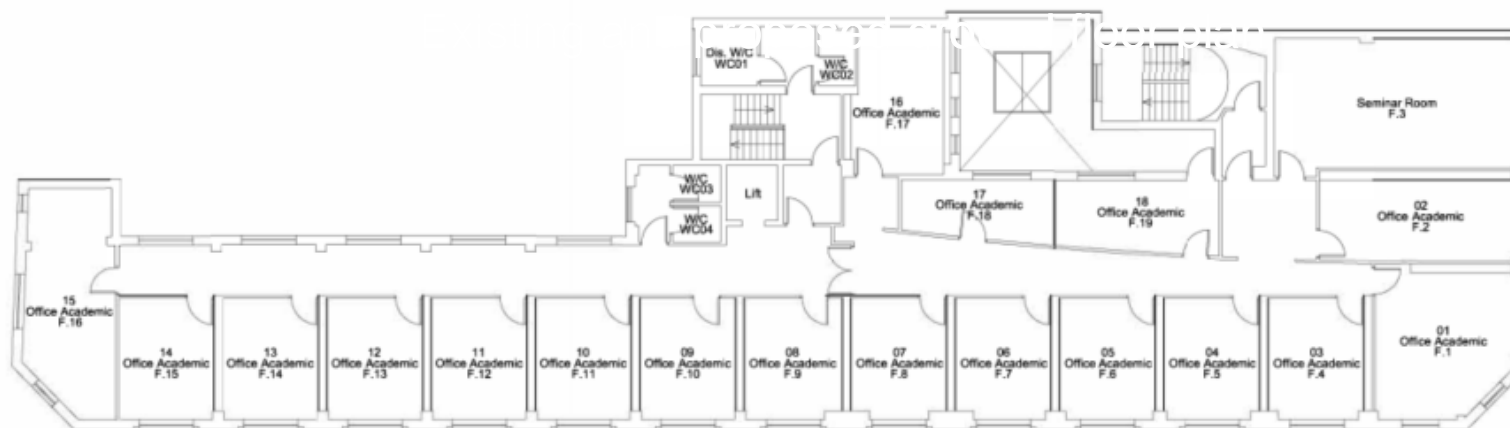
Alternative Use (office) - Ground Floor Plan



Existing Use (education) - Ground Floor Plan



Alternative Use (office) - First Floor Plan



Existing Use (education) - First Floor Plan



Alternative Use (office) - Second Floor Plan



Existing Use (education) - Second Floor Plan



Alternative Use (office) - Third Floor Plan



Existing Use (education) - Third Floor Plan



Alternative Use (office) - Fourth Floor Plan



Existing Use (education) - Fourth Floor Plan