

Date: 13th January 2023
Our Ref: 15564

Camden Council
2nd Floor, 5 Pancras Square
Kings Cross
London

Dear Sir or Madam

CAMDEN COUNCIL: LOCAL PLAN REVIEW

INITIAL ENGAGEMENT

REPRESENTATIONS ON BEHALF OF BIG YELLOW SELF STORAGE COMPANY LIMITED

We write on behalf of our client, Big Yellow Self Storage Limited ('Big Yellow') to make formal representations to the initial engagement on Camden Council's draft Local Plan Review.

Alongside the updated Local Plan, it is our understanding that Camden Council intend to take forward an updated Site Allocations Plan, with consultation on the next iteration of both documents scheduled to take place later this year.

Big Yellow owns the freehold interest of Alpha House, Regis Road, Kentish Town, NW5 3EW ('Alpha House') shown in Appendix A, which forms a small part of the Kentish Town Regis Road Growth Area, as well as the area comprising draft Site Allocation KT2 (Regis Road Growth Area). This site was purchased by Big Yellow in 2021 and remains Big Yellow's sole landownership interest in Camden.

Big Yellow

Big Yellow is one of the leading self-storage operators in the UK. It is a publicly listed company which develops, owns and operates modern self-storage centres for personal, business and leisure storage. It now has 102 trading stores open across the UK, including 25 branded Armadillo Self Storage, and has 43 Big Yellow stores in London.

Big Yellow has been a pioneer in the self-storage industry, being the first operator to build purpose-built warehouses, as well as providing high quality, sensitive conversions of existing premises. Big Yellow employs over 450 full and part time staff.

Big Yellow's stores provide a secure, do-it-yourself facility for business customers and private individuals. Each store provides a variety of different room sizes from 10 sq. ft to 400 sq. ft, dependent on the requirements of the customer. The storage space provided is high quality, comprising modern, secure rooms each accessed from wide, well-lit corridors designed for easy manoeuvrability. The individual rooms can be rented for as short a period as 7 days or for as long a period as the customer requires. Each individual room has its own door, is alarmed and is locked by each customer's own padlock.

Customers of Big Yellow use self-storage for either domestic or business purposes. On average around 84% of customers of a store will be domestic, with the remaining 16% being business customers. This proportion relates to the numbers of customers, but business customers usually take a greater area of floorspace and thus the floor area they occupy is much greater. In 2018, 28% of self-storage floorspace nationally was occupied by businesses, but this has increased to 37% in 2022.



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In addition to self-storage, Big Yellow also has 18 stores which incorporate areas of flexible office space (Use Class E(g)(i)), aimed specifically at Small and Medium Enterprises (SMEs).

Aspirations for Alpha House

It is Big Yellow's aspiration to redevelop Alpha House to construct a new self-storage facility (Class B8) with flexible office space (Class E(g)(i)) and a full application has just been submitted to Camden Council. These aspirations have been outlined in detail to both the Council's Planning and Regeneration teams previously over the past 18 months.

Adopted Development Plan Policy Position

Alpha House is designated within the Kentish Town Regis Road Growth Area ('the Growth Area') and the Kentish Town Potential Development Area (in the Kentish Town Neighbourhood Plan).

The adopted Local Plan identifies the 'Kentish Town Regis Road Growth Area' to be one location where significant growth is expected to be delivered in the Borough over the Local Plan period (2016-2031). The expectation being that growth in this area will make a significant contribution to delivering some of the strategic objectives of the Local Plan, notably the provision of homes, jobs and services that will meet the needs of communities.

To achieve such growth, the Growth Area designation and Local Plan Policy G1 seeks to encourage regeneration and intensification and expects the wider Growth Area to be redeveloped to deliver a mix of uses that is employment-led. It expects the delivery of higher density industrial provision, alongside the delivery of a substantial increase in homes and jobs. However, the supporting text to Policy G1 makes it clear that redevelopment will only be considered where it is part of a comprehensive scheme.

Other adopted policy priorities for redevelopment in the wider Growth Area include the provision of appropriate employment space for identified growth sectors and small-to-medium enterprises and start-ups; and a significant number of new homes including affordable homes and a mix of types, sizes and tenures.

Neither the Growth Area nor Alpha House are presently allocated for development in the adopted Site Allocations document. However, the Consultation Document includes two draft policies (Policy KT1 (Kentish Town Area) and Policy KT2 (Regis Road Growth Area) that seek to provide greater clarity on what development is sought in the Growth Area and Alpha House. Alongside these representations, Big Yellow have provided further representations to Camden Council regarding the deliverability of draft Policy KT2 (Regis Road Growth Area).

The proposal for which a full application has just been submitted will deliver significant intensification in floorspace of the priority use (industrial) sought within the Kentish Town Regis Road Growth Area ('Growth Area'), whilst generating a significant net increase of jobs primarily associated with start-up businesses and SMEs and securing the most efficient use of a small site located in one of six areas expected to deliver significant growth and meet Camden's strategic needs/objectives.

In essence, this proposal achieves and will deliver everything sought by adopted Local Plan Policy G1 and the emerging Site Allocation (Ref: KT1 and KT2) associated with the Growth Area designation, except that the extent of Alpha House does not form part of a 'comprehensive' scheme comprising the entirety of the Growth Area. This point is outside of Big Yellow's control, given the multiple number

of landowners across the Growth Area, and it is Big Yellow's deep concern that it will take many, many years before collaboration of all ownerships becomes possible, if at all.

There is no comprehensive planning permission that has been granted or comprehensive planning application that has been submitted for development of the Growth Area. Furthermore, there is no comprehensive masterplan for the Growth Area. The Council have acknowledged that a comprehensive scheme for the entirety of the Growth Area will not be possible, given another (in addition to Big Yellow) significant landowner (owning approx 35% of the Growth Area) within the Growth Area have already stated their intention unequivocally not to collaborate in the evolution of a comprehensive masterplan based on their commercial interests. Therefore, any masterplan that is developed within the Growth Area would not be 'comprehensive' and, in any event, would instead represent 'piecemeal' development in policy terms.

To avoid likely extremely lengthy delays to the delivery on their investment, and to generate significant economic value and jobs to the locale, Big Yellow have decided to proceed with the submission of an application seeking full planning permission for piecemeal development that would not prejudice the possibility for the balance of the Growth Area to come forward for redevelopment in the future whether it be industrial or residential-led in nature.

Big Yellow acknowledges that the Council has a clear preference for the redevelopment of the Growth Area to be comprehensively masterplanned. However, this is a very inflexible approach to delivering large-scale regeneration of an area from a policy perspective – especially considering the recent Supreme Court judgment *Hillside Parks Ltd v Snowdonia National Park Authority* [2022] UKSC30 – given a comprehensive masterplan for the entire area cannot be formulated due to multiple landowner constraints.

It is highly likely that a comprehensive masterplan of the entire Growth Area will not be delivered, and the Council should be concerned that regeneration of the area and the contribution the Growth Area is intended to make towards meeting the Local Plan's strategic objectives will not be delivered during the plan period (by 2031) if piecemeal development proposals are resisted as a principle.

For the reasons provided above, it is Big Yellow's opinion that piecemeal redevelopment proposals should be considered an acceptable approach in-principle within the Growth Area and clearly stated as such within draft policy for the Growth Area in the updated Local Plan. By not doing so, it is Big Yellow's opinion that the regeneration of Alpha House and the wider Growth Area will likely be undelivered for many years.

I would be grateful if you could please confirm receipt of these representations and keep me informed of any further consultations moving forward. If you require any further information, please do not hesitate to me via the undersigned.

Yours faithfully



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Partner

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APPENDIX A – SITE LOCATION PLAN

