

DWD

**STATEMENT OF COMMON GROUND
ALPHA HOUSE, 24-27 REGIS ROAD,
KENTISH TOWN, NW5 3EW**

**BY .BIG YELLOW SELF STORAGE
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Revision	Description	Originated	Checked	Reviewed	Authorised	Date
01	Draft Statement of Common Ground	AW	AD	AD	AD	19.01.2024
02	Draft Statement of Common Ground	AW	AD	AD	AD	18.03.2024
03	Statement of Common Ground	AW	AD	AD	AD	19.03.2024
04	Statement of Common Ground	AW	AD	AD	AD	20.03.2024

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1.0 INTRODUCTION

Background

- 1.1 This Statement of Common Ground is signed by DWD, on behalf of .Big Yellow Self Storage Company Limited (**'the Appellant'**), and Camden Council (**'Camden'**) to set out agreed and disagreed matters in relation to an appeal against the refusal by Camden of a full planning application for the following development in relation to and at Alpha House, 24-27 Regis Road (**'the Appeal Site'**):

'Demolition of the existing building and the construction of a self-storage facility (Use Class B8) and office space (Use Class E(g)(i)), together with vehicle and cycle parking and landscaping'

- 1.2 The application was submitted to Camden on 7th January 2023 and confirmed as valid on 7th February 2023.

2.0 FACTUAL BACKGROUND

Appeal Site and Surrounding Area

- 2.1 A description of the Appeal Site and surrounding area is provided in Section 4 of the Planning Statement and within the Design and Access Statement submitted with the planning application.
- 2.2 The Appeal Site is located within the administrative area of Camden Council approximately 350m to the west of Kentish Town centre and Kentish Town London Underground and National Rail station. The Appeal Site extends to an area of approximately 0.36 ha.
- 2.3 The Appeal Site currently accommodates a two-storey warehouse building built in 1987 with elevations formed mainly from cavity masonry construction comprising a brickwork outer skin generally up to 4m and a blockwork inner skin; windows generally finished in polyester powder coated aluminium and built-up metal cladding completing the external walls up to around 6m. It is presently vacant, but it was previously let as a combination of warehouse/office space. An electrical substation sits within the existing building on the southwestern corner.
- 2.4 Vehicular access is provided in the south-eastern corner of the Appeal Site in the form of a vehicle crossover off Regis Road. A 6m wide electronic vehicular gate is set back approximately 7m from the northern edge of Regis Road controlling vehicular access to the Appeal Site.
- 2.5 This access leads directly to a hardstand service yard and informal parking area adjacent to the eastern elevation of the existing building. There are no demarcated car parking spaces, however, the area can accommodate up to 15 vehicles. A hardstand area wraps around the northern extent of the existing building and Appeal Site, where a loading area exists. Vegetation in the form of trees and shrubs lines much of the perimeter of the Site, although not all of this is located within the curtilage of Big Yellow's ownership.
- 2.6 The immediate environment surrounding the Appeal Site is characterised predominantly by low rise industrial/commercial sites forming part of the Regis Road Industrial Estate. Regis Road borders the Appeal Site to the south, while the Regis Road Recycling Centre is located directly adjacent to the west. A large industrial building adjoins the Appeal Site to the east, which is occupied by several businesses including a Vapiano Delivery Kitchen and Howdens Joinery Co. North of the Appeal Site is a large-scale warehouse occupied by UPS. The Thameslink railway line lies just north of the UPS warehouse. A six-storey student apartment block at Mary Brancker House (54-74 Holmes Road) and a six-storey residential block (52a Holmes Road) are located opposite the Appeal Site on the southern side of Regis Road.

The Proposed Development

- 2.7 A full description of the development is set out in Section 7 of the Planning Statement and within the Design and Access Statement.
- 2.8 The Appeal Scheme comprises the redevelopment of a brownfield site, and the introduction of two land uses that are sought within the Kentish Town/Regis Road Growth Area.
- 2.9 The Appeal Scheme provides an uplift in B8 (self-storage) employment floorspace.

Self-Storage Facility/Offices

- 2.10 The proposal includes the erection of a self-storage facility (Use Class B8) operated by Big Yellow Self Storage in the western portion of the Appeal Site. The facility has been designed to accommodate five storeys. Planning permission is sought for two 'permanent' floors at ground and second floor levels providing 3,521m² (GIA) of self-storage floorspace (Use Class B8).
- 2.11 The quantum of self-storage floorspace could increase through using permitted development rights to install demountable mezzanine floors at first, third and fourth floor levels. The introduction of the mezzanine floors could enable further floorspace of up to 5,476m² GIA to be provided. Therefore, the maximum quantum of self-storage floorspace (both permanent and mezzanine floors) possible in this facility is 8,997m² (GIA).

Office Space

- 2.12 The proposed building will also accommodate office space across the ground, first and second floors. The positioning of the office on the southern elevation is intended to activate the Regis Road frontage.

Vehicle and Pedestrian Access Arrangements

- 2.13 The Appeal Scheme will be accessed via the existing vehicle crossover from Regis Road, with no modifications to that access proposed. It has a width of 5.8m with visibility splays of 2.4m x 25m achievable to the east and west within the Appeal Site and/or existing extent of Regis Road. This access leads directly to the service yard and car parking area.
- 2.14 The access to the Appeal Site will be gated to prevent unauthorised access. This gate will be open during staff hours of 8am-6pm and closed outside of these core opening hours. Big Yellow offers limited access to specific customers outside of core opening hours, with access to the service yard proposed to be via key-code entry. During opening hours, the gates would be open with no requirement for vehicles to obtain entry.

- 2.15 Pedestrian access to the self-storage facility will be provided directly from the Regis Road frontage that will lead to the main reception entrance. Pedestrian access to the office units will be provided via a separate entrance that is also accessed directly from Regis Road.
- 2.16 The Appeal Scheme will provide a total of 11 car parking spaces, including one disabled and one parent and child parking space. Four of these spaces will be provided with electric vehicle charging points.
- 2.17 A list of the appeal drawings submitted in relation to the Appeal Scheme is set out at Appendix C to the Appellant's Statement of Case.

History of Discussion in relation to the Development

- 2.18 Discussions with Camden's Placeshaping (Regeneration) and Inclusive Economy teams, and the Greater London Authority ('GLA') took place between July 2021 and April 2022. It should be noted, however, that the Appeal Scheme was not discussed, and the Appeal Scheme is not the outcome of these discussions.
- 2.19 The Appellant attempted to arrange a pre-application meeting with the Council's planning officers in October 2021 and a significant package of information was submitted to inform that meeting. However, in response to that request and attached at Appendix A to the Statement of Case, the Council declined to meet with the Appellant stating:

'I've discussed this proposal internally and as this submission is for piecemeal development of the site without a wider approval of the masterplan for the whole area, this would be contrary to Council's policies and guidance. We would not be able to support such proposal and you are advised to engage with Wen Quek and Katrina Christoforou part of Placeshaping Team, and discuss further steps.

I've drafted a short letter for you which explains our position, please see attached. As it stands we do not see how a meeting with the planning department can provide you with any substantial support, as we would just reiterate the assessment as detailed in the letter.'

- 2.20 Following the submission of the planning application, the Appellant has actively engaged with the Case Officer and has worked with Camden to resolve any outstanding comments from Statutory Consultees.

Relevant Planning Policy

- 2.21 The development plan relevant to the Appeal Site comprises:

- The London Plan (March 2021)
- LB Camden: Local Plan (July 2017)
- LB Camden: Site Allocations (September 2013)
- Kentish Town Neighbourhood Plan (September 2016)
- Joint North London Waste Plan (July 2022)

2.22 Together these documents provide spatial policies, development management policies and site allocations to guide and manage development in Camden.

2.23 In January 2024, the Council published a draft new Camden Local Plan (Regulation 18), which incorporates Site Allocations, for consultation. As an emerging plan, the draft new Local Plan is now a material consideration in planning decisions.

2.24 The relevant development plan policies applicable to the scheme as a whole, are as follows:

[The London Plan \(2021\)](#)

- Policy GG2 – Making the best use of land
- Policy D1 – London’s form, character and capacity for growth
- Policy D3 – Optimising site capacity through the design-led approach
- Policy D4 – Delivering good design
- Policy D5 – Inclusive design
- Policy H1 – Increasing housing supply
- Policy S1 – Developing London’s social infrastructure
- Policy E4 – Land for Industry, logistics and services to support London’s economic function
- Policy E7 – Industrial intensification, co-location and substitution
- Policy G1 – Green Infrastructure
- Policy G6 – Biodiversity and Access to Nature
- Policy SI2 – Minimising greenhouse gas emissions
- Policy SI7 – Reducing waste and supporting the circular economy

LB Camden: Local Plan (July 2017)

- Policy G1 – Delivery and Location of Growth
- Policy A1 – Managing the Impact of Development
- Policy A3 – Biodiversity
- Policy A4 – Noise and Vibration
- Policy D1 – Design
- Policy D8 – Public realm
- Policy C6 – Access for all
- Policy E1 – Economic Development
- Policy E2 – Employment Premises and Sites
- Policy H1 – Maximising Housing Supply
- Policy H2 – Maximising the supply of housing from mixed use schemes
- Policy T1 – Prioritising walking, cycling and public transport
- Policy T2 – Parking and car-free development
- Policy T3 – Transport Infrastructure
- Policy T4 – Sustainable Movement of goods and materials
- Policy CC1 – Climate Change Mitigation
- Policy CC2 – Adapting to Climate Change
- Policy CC3 – Water and Flooding
- Policy CC4 – Air Quality
- Policy DM1 – Delivery and Monitoring

Kentish Town Neighbourhood Plan (September 2016)

- Policy D3 – Design Principles
- Policy SP2 – Kentish Town Potential Development Area
- Policy SP2A – General Development Criteria

3.0 AGREED MATTERS

3.1 In addition to the matters set out in the earlier sections, the following matters are agreed as confirmed in the Delegated Officer's report:

- The proposal would provide self-storage and office floorspace, which accord with the land uses identified for the area in the Kentish Town Planning Framework (para 4.1).
- Recent decisions from the Planning Inspectorate have deemed a value of 20% VSC or more to be "reasonably good" for an urban context. It is also noted that Mary Brancker House is in transient residential use as it is student accommodation. There is only one incidence where VSC levels fall below 20% at 52 Regis Road (and the loss is greater than 20% of its former value) which relates to a bedroom window at first floor level. Given the room is a bedroom window and there are no other deviations in the same unit, the impact is considered acceptable (para 6.2).
- There are no sunlight impacts for existing residential occupiers associated with the proposed development (para 6.4)
- In terms of privacy and outlook, there would a 17.5-18m distance between those properties located on the south side of Regis Road which is a typical relationship between two buildings on opposite sides of a street and is an acceptable situation (para 6.5).
- The Whole Life-Cycle Carbon Assessment submitted alongside this application concludes that a review of the upfront embodied carbon emissions (A1-A5) is predicted to be 278kgCO₂/m² GIA, which is significantly lower than the LETI 2030 best practice target of 350kg CO₂/m² for non-domestic buildings. This is likely to be a result of the type of building, a warehouse / storage use with low heating demands. This is an acceptable carbon impact (para 7.3).
- The analysis, which focuses on the peak periods, indicates that the Appeal Scheme, provided it remains in use as a self-storage facility, is forecast to generate up to 15 trips during peak periods, with up to eight trips by vehicle. This is less than the existing use and there will be a net reduction in trip generation (para 12.2).
- Plan Numbers
- It is now agreed that the proposed development demonstrates that the proposed substantial demolition is justified in accordance with policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017 and policies SI2 (Minimising greenhouse gas

emissions) and SI7 (Reducing waste and supporting the circular economy) of the London Plan 2021.

3.2 The following reasons for refusal are overcome, subject to agreeing a Section 106 agreement and providing that they are considered to meet the statutory tests set out in regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended):

- Whether the proposed development, in the absence of a legal agreement to secure the details set out on the sustainability and energy plans and a BREEAM pre-assessment would be likely to contribute to climate change, contrary to policies CC1 (Climate change mitigation), CC2 (Adapting to climate change), CC3 (Water and flooding), CC4 (Air quality) and DM1 (Delivery and monitoring) of the London Borough of the London Borough of Camden Local Plan 2017 and policy SP2a of the Kentish Town Neighbourhood Plan 2016.
- Whether the proposed development, in the absence of a legal agreement to secure a car-free development, would be likely to contribute unacceptably to parking stress, environmental impacts and congestion in the surrounding area, contrary to policies T1 (Prioritising walking, cycling and public transport), T2 (Parking and car-free development), CC1 (Climate change mitigation) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017 and policy SP2a (KTPDA – General Development Criteria) of the Kentish Town Neighbourhood Plan 2016.
- Whether the proposed development, in the absence of a legal agreement to secure a Construction Management Plan, construction impact bond and a financial contribution for construction management plan monitoring, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), T4 (Sustainable movement of goods and materials), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.
- Whether the proposed development, in the absence of a legal agreement securing a carbon off-set contribution, would fail to meet the requirement for zero carbon, contrary to policies CC1 (Climate change mitigation), CC2 (Adapting to climate change) and DM1 (Delivery and monitoring) of the London Borough of the London Borough of Camden Local Plan 2017.

- Whether the proposed development, in the absence of a legal agreement for a Local Level Travel Plan and financial contributions for the associated monitoring, would be likely to give rise to conflicts with other road users and be detrimental to the amenities of the area generally, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), T3 (Transport Infrastructure), DM1 (Delivery and monitoring), A4 (Noise and Vibration) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.
- Whether the proposed development, in the absence of a legal agreement securing a local employment and training package including an appropriate financial contribution, would fail to support employment opportunities for local residents and contribute to the regeneration of the area, contrary to policies G1 (Delivery and location of growth), E1 (Economic development) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.
- Whether the proposed development, in the absence of a legal agreement securing affordable workspace for SMEs, would fail to provide a range of premises for businesses to support Camden's economy, contrary to policies G1 (Delivery and location of growth), E1 (Economic development), E2 (Employment premises and sites) and DM1 (Delivery and monitoring) of the London Borough of Camden Local Plan 2017.

4.0 AREAS OF DISAGREEMENT

4.1 The areas of disagreement relate to the following topics:

- Whether the proposal, by representing piecemeal development, prejudices the comprehensive redevelopment of the area and fails to promote the most efficient use of land, including the provision of a mix of land uses and supporting infrastructure, contrary to policies G1 (Delivery and location of growth), E1 (Economic development), and H1 (Maximising housing supply) of the Camden Local Plan 2017 and policies SP2 (Kentish Town Potential Development Area) and SP2a (KTPDA – General Development Criteria) of the Kentish Town Neighbourhood Plan 2016.
- Whether the proposed development, by reason of its height, mass, footprint and detailed design, would fail to make the best use of its site or respect the design aspirations for the Regis Road Growth Area, contrary to policies G1 (Delivery and location of growth) and D1 (Design) of the London Borough of Camden Local Plan 2017 and policies D3 (Design principles) and SP2a (KTPDA – General Development Criteria) of the Kentish Town Neighbourhood Plan 2016.
- Whether the existing site comprises a single or two planning units, and what the existing lawful uses comprise and their relative floor areas.
- Whether the net changes in proposed floor area by use class are as shown in Table 1 below:

Table 1: Proposed Land Uses

Use Class	Existing GIA (m ²)	Proposed GIA (m ²)	Difference (m ²)
B8 (Self-Storage) (exc demountable mezzanines)	2,030	3,521	+1,491
B8 (Self-Storage) (inc demountable mezzanines)	2,030	8,997	+6,967
E(g)(i) (Office)	1,290	566	-724
Total (exc demountable mezzanines)	3,320	4,087	+767
Total (inc demountable mezzanines)	3,320	9,563	+6,243

- Whether the proposed offices provide flexible accommodation to support local residents and businesses with storage needs, particularly including start-ups and SMEs.

5.0 DECLARATION

5.1 We certify that the wording within this Statement is agreed for the benefit of the Inquiry.

Andrew Deller

20.03.24

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Signed

Date

Andrew Deller BA (Hons) MRTPI
On behalf of the Appellant

Kristina Smith

20.03.24

.....

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Signed

Date

Kristina Smith
On behalf of Camden Council