

UPS response to Draft Camden Local Plan

March 2024

Introduction

UPS welcomes the opportunity to respond to the draft Camden Local Plan. As per previous responses and discussions on these proposals, we share and support LB Camden's vision to create significant regeneration and growth benefits for the area with a focus on environment, inclusion, health and well-being. We also understand the challenges underpinning the need to find new housing in the area. However, we would like to reiterate some of our concerns, specifically as they relate to the Regis Rd area, where UPS is based.

UPS is one of the world's largest logistics companies, playing a vital role in the collection, warehousing and delivery of goods. Our UK operation includes 77 operating facilities, approximately 10,000 employees and a fleet of more than 2,900 vehicles. The Regis Road depot is our largest in the UK with over 100,000sq ft and a capacity for 180+ delivery vehicles, serving businesses and consumers in North and Central London. We are a significant local employer employing more than 600 people at the site. Given the importance of the site to our network, we recently purchased the long leasehold interest of over 100 years.

The Kentish Town depot currently operates a fleet of 66 electric vehicles (EVs) and we recently installed SmartGrid charging and storage technology which will allow us to further expand this fleet this year. The location of the site is important given its proximity to central London to allow us to run EVs as well as exploring other final mile delivery solutions such as e-cargo bikes which also operate from the site. If we were forced to move further out of London, as there are no other comparable sized and located sites available, this would potentially mean longer journeys for our vehicles, more vehicles on the road and reduced ability to use electric vehicles and other sustainable delivery methods.

C2 (KT2) Regis Road and Holmes Road Depot

- ensure that non-employment uses do not compromise the operation of existing or future employment uses;
- c. provide high density employment uses, including a mix of light industrial, industrial and storage / warehouse / logistics uses and a significant element of affordable workspace, to increase the range of business premises and sectors on site, and provide significant additional jobs;



- d. seek to contribute to the continued success of existing business clusters, including light industry and the creative and knowledge sectors, and maintain, and where possible expand, the area's role in providing for businesses supporting London's Central Activities Zone;
- e. seek to retain existing businesses that wish to stay on the site, where possible, and in particular uses that support the functioning of the CAZ or local economy. The developer should therefore work with existing businesses to understand their requirements, ambitions and the potential for reprovision or relocation.
- f. A business retention / relocation strategy must be provided as part of the planning application for the site.

We welcome the above statements and are pleased to see the continued emphasis on retaining current businesses on the site. With approximately 600 people employed at the site, we are a significant employer in the area and the facility is essential to how we serve customers in central London. Over the last few years, we have had numerous discussions with the Council in regard to how the site could be developed into a mixed-use site. In our discussion, UPS highlighted several challenges with the redevelopment of the site. First is the need for business continuity at the site. It would not be possible for us to move our operation to another location while redevelopment of the site takes place both because there is no comparable piece of land in London as well as the significant cost and disruption this would have to our business.

The second challenge is that it is very difficult to have a mixed-use development alongside (or above) a logistics site. While there has been a lot of discussion around co-location, mixed use, intensification and stacking, there are few examples of where residential and logistics needs have been met in a successful development. Our operation runs nearly 24 hours a day, 6 days a week with peak operations very early in the morning and later in the evening which would not be attractive to residential properties. We are concerned that this could cause an increase in noise complaints which could become a management issue for both UPS and the council.

We would like to highlight the "Agent of Change" principle that is included in the Mayor's London Plan which addresses residential developments that are built near to industrial sites and covers the issues of noise. This places the responsibility for mitigating noise on the new development and we would like to reiterate this principle in relation to any residential development built near to our Regis Road site.

Access

• improve the link between Regis Road and Kentish Town Road, physically and visually, to better integrate the site with Kentish Town.



• seek to create additional access points, e.g. through the railway arches.

We welcome the above statement regarding providing additional access to the Regis Rd area. We would like to highlight that congestion at peak times is a major issue for our business and to reiterate previous suggestions of the introduction of an access road at the Regis Road estate that would relieve pressure on Kentish Town Road. Finding solutions to relieve congestion could have a truly transformative impact on the local area for both residents and businesses. As the area is developed and more residential brought to the mix, additional access will be required to reduce congestion.

Summary

In general, UPS supports the Council's plans for growth and development in the area. Given the role we play in providing employment, business critical services and sustainable delivery solutions, we would like to continue our discussions with the Council on our contribution to the area in order to ensure we can contribute to, rather than be disadvantaged by, any redevelopment plans.

For more information, please contact:

Sarah Bell UPS Public Affairs Manager sarahbell@ups.com