

PLANNING STATEMENT

ARCHES 29–41, CASTLE
MEWS, NW1 8SU

THE ARCH COMPANY LIMITED

MARCH 2025



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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Montagu Evans LLP on behalf of The Arch Company Properties Limited (*"the Applicant"*) to support a full planning application (*"the Application"*) for development at Arches 29-41 Castle Mews, London, NW1 8SU (*"the Site"*). This Application is submitted to the London Borough of Camden (*"the Council"*).

PROPOSAL OVERVIEW

- 1.2 This Application seeks full planning permission for the following development (*"the Proposed Development"*):

"Partial demolition of existing warehouse, refurbishment / extension of existing warehouse, external alterations to existing railway arches and associated works related to the continued use of the Site as a builders' merchant (Sui Generis), and / or Class B8 (Storage and Distribution) and / or Class E(g)(iii) (Light Industrial/Sui) uses."

- 1.3 The Site is located within the London Borough of Camden and is accessed from Castle Mews, just off Castle Road. The Site comprises an existing employment site, last occupied by Buttle's Builders' Merchant (Sui Generis). The Site has been vacant since November 2023. The area surrounding the Site is mixed use in nature, including residential housing, two schools, public house and other commercial / industrial uses beneath the arches to the north.
- 1.4 The Site itself comprises land beneath and adjacent to the railway viaduct and includes 13 of the arches (numbered 29 to 41), as well as land to the west of the arches which accommodates a service yard and a warehouse with a pitched roof. The warehouse is in poor state of repair, with large cracks and structural deformities, as well as asbestos within the roof. In its current state, there is no prospect of reoccupation and work is required in order to make the unit safe for future occupiers and neighbours, as well as bring the accommodation in-line with modern standards.
- 1.5 The Proposed Development seeks to improve the vitality and safety of the Site through the refurbishment of the railway arches, including external alterations, together with the partial demolition and reconstruction / extension of the adjoining warehouse. Arches 29-35 are proposed to be enclosed within the new warehouse unit, whilst new front infills are proposed for Arches 36 and 37, which will provide ancillary office space. Galvanised palisade fencing / gates are proposed to the front and rear of Arches 39-40 to secure them for open storage, whilst Arch 41 will accommodate refuse stores, cycle parking and 2 no. EVC parking spaces, one of which will be allocated for blue badge users.
- 1.6 The Proposed Development makes effective use of the land by substantially improving the quality of employment floorspace, as well as improving the relationship of the Site with the adjacent school, and wider surrounding area. The Proposed Development will bring a vacant site back into active employment use, with the flexible range of uses proposed (continued builders' merchant (Sui Generis) and / or Class B8 (Storage and Distribution) and / or Class E(g)(iii) (Light Industrial)) intended to maximise market appeal and the prospect of reoccupation.
- 1.7 Full details of the Proposed Development can be found in Section 3.0 of this Statement, as well as in the supporting application documentation, which is summarised below:
- Schedule of Application Material, prepared by Montagu Evans;
 - Application Covering Letter, prepared by Montagu Evans;
 - Application Form, prepared by Montagu Evans;
 - Site Location Plan, prepared by RKG;
 - Schedule of Application Drawings, prepared by RKG;
 - Application Drawings, prepared by RKG;
 - Design and Access Statement, prepared by RKG;
 - Planning Statement, prepared by Montagu Evans;
 - Transport Statement, prepared by TPA;
 - Framework Travel Plan, prepared by TPA;
 - Arboricultural Impact Assessment and Method Statement, prepared by Phlorum;
 - Preliminary Ecological Appraisal, prepared by Phlorum;
 - Bat Emergence Activity Survey Report, prepared by Phlorum;
 - Biodiversity Net Gain Exemption Letter, prepared by Phlorum;

- Noise Assessment, prepared by AAC;
- Air Quality Assessment, prepared by AAC;
- Sustainability Statement, prepared by RED;
- Fire Strategy, prepared by Socotec;
- Existing and Proposed Drainage Plans, prepared by RKG;
- Community Infrastructure Levy Form, prepared by Montagu Evans on behalf of The Arch Company Properties Limited.

REPORT PURPOSE AND STRUCTURE

- 1.8 The purpose of this Planning Statement is to assess the Proposed Development against relevant policies in the adopted Development Plan documents, key national policies and other material considerations. This Statement seeks to demonstrate why the Application is considered appropriate for the Site and surrounding area, adheres to national and local planning policy and other material considerations and is, therefore, acceptable in planning terms.
- 1.9 This Planning Statement is structured as follows:
- **Section 2 - Site Location and Planning History** introduces the existing Site, its location and its surroundings, including the Site's planning history and relevant planning history from the wider area;
 - **Section 3 - Proposed Development** outlines the details of the Proposed Development and Application;
 - **Section 4 - Planning Policy Framework** provides an overview of relevant planning policy, including national and local polices, and material considerations, including supplementary planning guidance;
 - **Section 5 - Planning Assessment** considers the Proposed Development against relevant policy and provides a planning assessment detailing how the Proposed Development complies with relevant planning policy; and
 - **Section 6 - Summary and Conclusion** provides a summary and overview of this Statement and concludes that the Proposed Development complies with the relevant policies and should be granted permission.

2.0 FACTUAL BACKGROUND

- 2.1 This section describes the Site and its context, including an overview of relevant planning history of the Site and surrounding area.

APPLICATION SITE

- 2.2 The Site comprises Arches 29-41, Castle Mews, London, NW1 8SU. The Site is located in the administrative area of the London Borough of Camden. The Site is shown outlined in red on **Figure 2.1** below. A copy of the Site Location Plan can be found at **Appendix 1.0**.

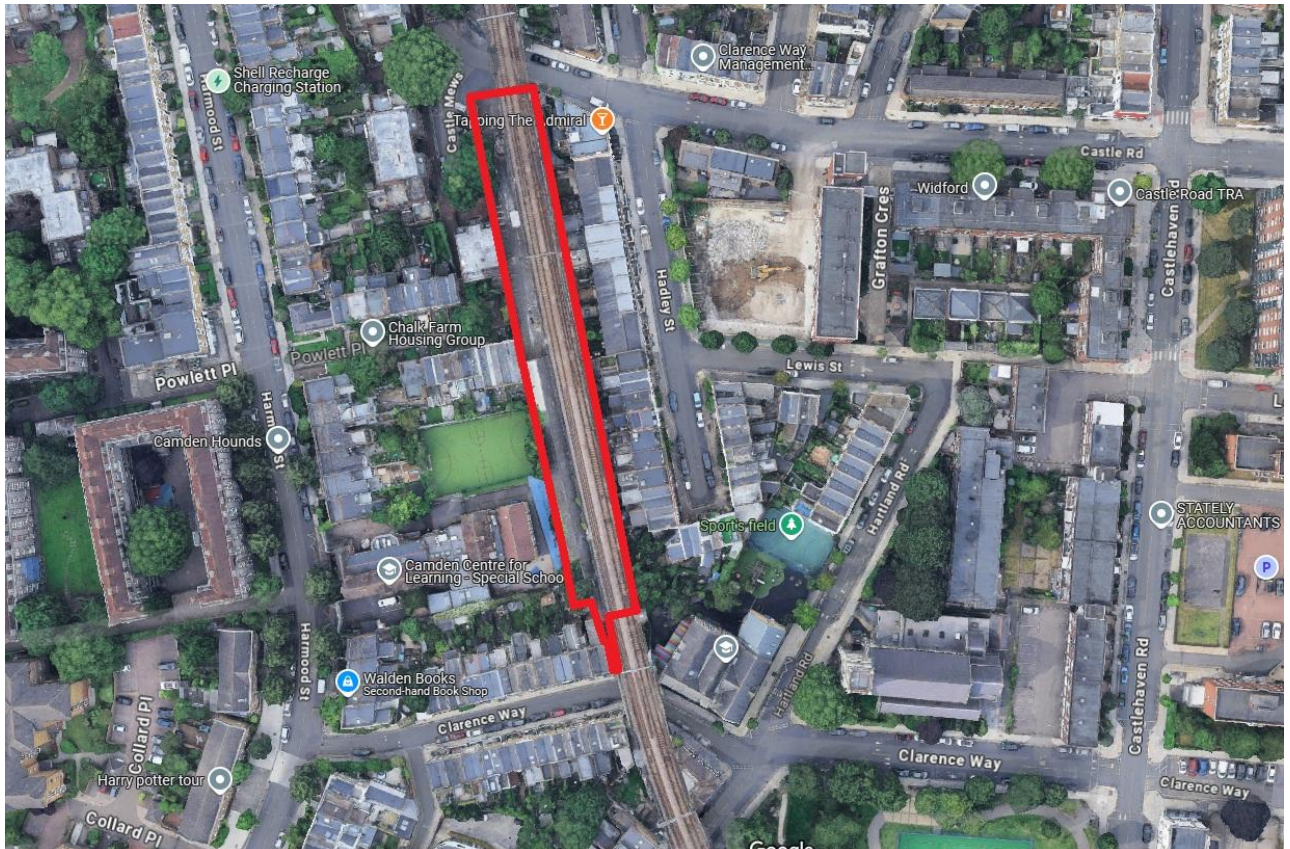


Figure 2.1: Aerial Image of Site with Indicative Red Line Application Boundary (Source: Google Maps).

- 2.3 The Site extends to approximately 0.2 ha in total and comprises 13 railway arches (numbered 29-41), located beneath the railway viaduct, together with an existing warehouse unit (409 sqm) that adjoins Arches 29-35, which is in a poor state of repair. To the west of the Arches the Site also includes a service yard, which is accessed from Castle Mews.
- 2.4 The Site is surrounded by a mix of uses, predominantly comprising two to three storey terraced housing, as well as two schools, a public house and other commercial and industrial uses beneath the arches to the north. To the east, the rear gardens of properties on Hadley Street back onto the infilled facades of the Arches. A number of these infills are in were in very poor condition and in urgent need of repair for health and safety reasons.
- 2.5 The demolition of these infills have formed part of the enabling phase of works and an application for prior notification for demolition under Class B, Part 11, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) was submitted on 16th July 2024 (Ref: 2024/2921/P) and approved on 13th August 2024. These works have now successfully been undertaken.
- 2.6 To the west of the Site are a number of residential properties, with two residential buildings located close to the western boundary of the Site. These buildings have no windows on the eastern facades facing into the Site. To the southwest of the Site is Harwood School, part of Camden Centre for Learning, which is a school that caters for special educational needs. The Applicant has engaged with the school from the early stages of the development design process and the school is fully supportive of the Proposed Development.

- 2.7 The Site has a long history of occupation for employment purposes, having been in use as builders merchant for over 30 years. The Site was last used as a builders' merchant (Sui Generis) by Buttle's, who occupied the Site until November 2023. The Site has remained vacant since then.
- 2.8 Part of Arch 35 and Arches 36-39 are located to the north of the existing warehouse, with externally facing front facades that have been infilled to varying degrees to provide semi-enclosed spaces within the Arches. The front infills are of poor quality with structural defects which mean that they are not fit for long term future occupation.
- 2.9 Arches 29-34 and part of Arch 35 are connected directly with the existing warehouse, which adjoins them to the west. Together, the Arches and warehouse provide 380 sqm of employment floorspace. The warehouse is of brick construction and is in a poor condition, with large cracks and structural deformities. In addition, asbestos is present in the roof. The warehouse does not meet the typical standards required of tenants in the modern-day market and is unlikely to be safe without completion of the proposed works.
- 2.10 There is little vegetation or landscaping within the Site itself. A number of self-seeded trees are located on the south-western boundary of the Site (outside of the application boundary), with foliage growing on the western flank wall / roof of the warehouse. A Preliminary Ecological Assessment has been carried out in support of this Application which confirms that the main features at the Site are buildings, hardstanding and ruderal vegetation, none of which are considered priority habitats. Given the limited vegetation and landscaping a BNG exemption letter, prepared by Phlorum, is enclosed with this application which confirms that the Site falls below the de minimis threshold.
- 2.11 An Arboricultural Impact Assessment and Method Statement are also submitted as part of this Application, which identifies a total of 12 individual trees and 2 tree groups, within the vicinity of the site but outside of the redline boundary and applicant ownership. 1 tree is identified as category A, 4 as category B, 6 as category C and 1 as category U, both of the tree groups are identified as category C.
- 2.12 The Arboricultural Impact Assessment includes a Tree Constraints Plan, which shows the root protection areas for each tree. Whilst a number of trees and tree groups along the west boundary of the Site show root protection areas that encroach on the existing building, the assessment clarifies that the works proposed by this Application do not require any trees to be removed, subject to various mitigation measures.

ACCESSIBILITY

- 2.13 Pedestrian and vehicle access to the Site is via Castle Mews to the north. A secondary access, which provides emergency means of escape, is via an alleyway to the south of the warehouse, which connects onto Clarence Way.
- 2.14 The Site is highly accessible by all modes of transport. This is demonstrated through the high PTAL rating of 6a.
- 2.15 The closest bus stop to the Site is located on Prince of Wales Road approximately 150m north of the Site. The bus stops are served by two main bus routes providing access towards Paddington, Chalk Farm and Clapton.
- 2.16 The closest railway provision is Kentish Town West, which is approximately a 2-minute walk from the Site, 150m to the north, and is served by London Overground services.
- 2.17 The nearest underground station is Chalk Farm located approximately 600m from the Site and also accessible by bus. This station is served by the Northern Line providing access towards central London and further south as well as north towards High Barnet and Edgware. Camden Road station is also a similar distance to the southwest, providing overground network access.

OTHER DESIGNATIONS

- 2.18 The Environment Agency's Flood Map for Planning shows that the Site falls with Flood Zone 1, the area defined as having the lowest flood risk, and is not in a critical drainage area.
- 2.19 The Site has no ecological designations, and a Preliminary Ecological Assessment has been undertaken, which identifies that the Site has limited ecological and biodiversity value.

- 2.20 The Site is partially located within the Harmood Street Conservation Area, with the railway line providing a clearly defined boundary to the Conservation Area. An extract from the Policy Map is shown below (**Figure 2.2**), which shows the Harmood Street Conservation Area outlined and shaded in blue, with the Site outlined in red.

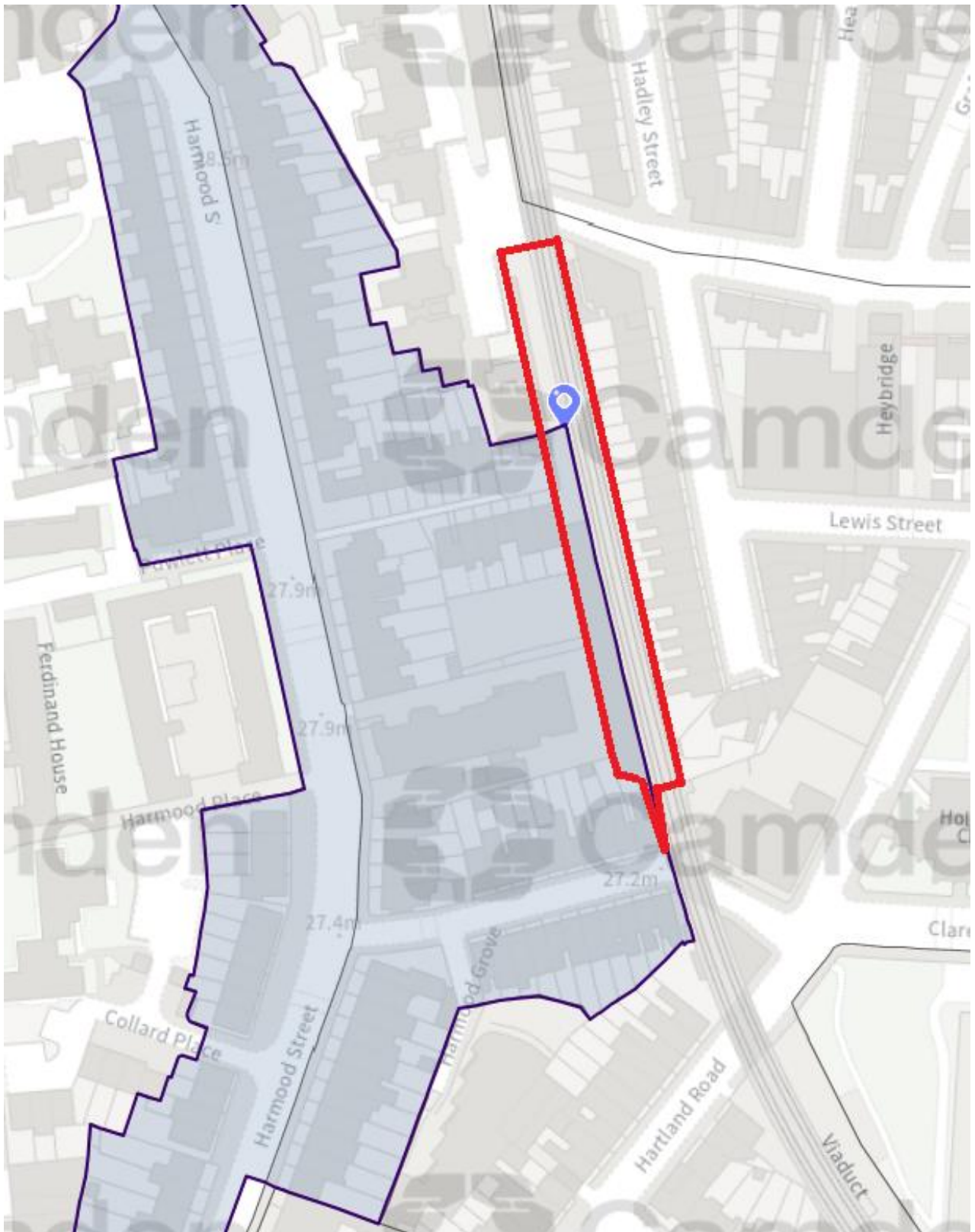


Figure 2.2: Policy Map Extract (Harmood Street Conservation Area) (Source: Camden Council).

- 2.21 There are no listed buildings on or adjacent to the Site.

PLANNING HISTORY

- 2.22 We have undertaken a review of the online planning records for the Site and surrounding area and set out below a summary of relevant applications.

THE SITE

- 2.23 The online planning history is relatively limited for the Site itself, save for a limited number of historic consents.
- 2.24 In September 2003, planning permission (Ref: PEX0200408) was granted for the change of use of the Site from Sui Generis (builders' / timber yard) to Class B1, together with the demolition of the existing extension and alterations and refurbishment to the rail arches. Whilst this permission was not implemented, it confirms the existing use of the Site as a builders' merchant / timber yard (Sui Generis).
- 2.25 The above consent was not subject to any hours of use restrictions. It included a single noise related condition, which limited noise levels from all plant and machinery at the nearby residential noise sensitive receptors.
- 2.26 Planning permission was granted in 2005 (Ref: 2005/0777/P) for the retention of a 6.3m timber store to the western edge of the Site.

THE SURROUNDING AREA

- 2.27 To the north of the Site are more railway arches numbered 43-49, which sit between Castle Mews and Prince of Wales Road.
- 2.28 In December 2022, planning permission was granted for the demolition of the existing lean-to warehouse and erection of a new single storey lean-to extension with access doors (Ref: 2022/4822/P) at Arches 43-46. The Arch Company Properties Limited were also the Applicant for this permission.
- 2.29 The principle of development approved by the December 2022 permission is similar to that proposed under this Application. It sought to remove an existing poor-quality structure linked to the arches, to be replaced with a new improved structure to facilitate the continued employment use within the arches and associated space. This permission sets a precedent for the type and quality of development that the Applicant is looking to achieve in this location.
- 2.30 Development pursuant to the December 2022 permission has recently been completed.

3.0 PROPOSED DEVELOPMENT

- 3.1 This section provides an overview of the Proposed Development. A more detailed explanation of the proposals can be found within the Design and Access Statement and accompanying application documents.

DESCRIPTION OF DEVELOPMENT

- 3.2 The Proposed Development comprises the refurbishment of the railway arches, including external alterations, together with the partial demolition and refurbishment / extension of the adjoining warehouse to support the continued use of the Site as a builders' merchant (Sui Generis) and / or for Class B8 (Storage and Distribution) and / or Class E(g)(iii) (Light Industrial)) purposes.
- 3.3 The proposed description of development is as follows:

"Partial demolition of existing warehouse, refurbishment / extension of existing warehouse, external alterations to existing railway arches and associated works related to the continued use of the Site as builders' merchant (Sui Generis), and / or Class B8 (Storage and Distribution) and / or Class E(g)(iii) (Light Industrial) uses"

- 3.4 The Proposed Development seeks to bring a vacant employment site back into active employment use. The proposals seek to refurbish the existing railway arches and adjoining warehouse, which are in a poor state of repair, and include a small extension to the warehouse on the northern elevation. Overall, the Proposed Development will improve the quality of the employment floorspace at the Site, and make the accommodation safe for re-occupation for employment generating uses.

USE, AMOUNT AND LAYOUT

- 3.5 In order to maximise flexibility to facilitate the re-occupation of a vacant employment site, this Application seeks to allow for the continued use of the Site as a builders' merchant (Sui Generis), together with the introduction of Class B8 (Storage and Distribution) and / or Class E(g)(iii) (Light Industrial) uses.
- 3.6 The Proposed Development seeks to refurbish and reuse the existing floorspace within the Arches and adjoining warehouse. A minor extension to the existing warehouse is proposed (from 380 sqm to 464 sqm), which results in the creation of an additional 84 sqm (GIA). In total, including the space within the Arches, the Proposed Development will result in a total floorspace of 1,161 sqm.
- 3.7 It is proposed that Arches 29 to 36 will form part of the warehouse, with their frontages opening directly into the new warehouse unit. Arches 37 and 38 are proposed to be enclosed, with new front infills, and will be internally connected to the warehouse unit. These Arches will provide ancillary office accommodation to the warehouse unit.
- 3.8 Arches 39 and 40 will remain semi-open, with the existing infills to be removed and replaced with a new galvanised palisade gate and fence to provide a securable open storage space within each of the Arches.
- 3.9 Arch 41 will remain open and will accommodate refuse storage, cycle parking and 2 no. EVC parking spaces, one of which will be demarcated for blue badge parking, as shown on the Proposed Plan (23-4758-PD-010 H).

EXTERNAL ALTERATIONS

DEMOLITION

- 3.10 Many of the existing structures at this Site are in a very poor condition. This includes the rear arch infills to Arches 29-31, as well as parts of the rear infills to Arches 37, 38, 40 and 41, and the existing front infills. It also includes the northern gable structure and southern part of the warehouse, together with the existing warehouse roof, which contains asbestos. The western flank wall of the warehouse has been deemed to be in a partially retainable condition.

- 3.11 In order to facilitate the Proposed Development, it is proposed that those parts of the Site that are no longer fit for purpose will be demolished. Full details of the elements to be demolished are shown on the Proposed Demolition Elevations and Sections Drawing (23-4758-PD-005 Rev A).
- 3.12 Whilst the majority of the demolition works will take place as part of the main programme of development works, due to the exceptionally poor condition of the rear infills to Arches 29-31, which are bowing from the line of the viaduct, are creating a health and safety concern. The demolition of these infills formed part of the enabling phase of works. An application for prior notification for demolition under Class B, Part 11, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) was approved on 13th August 2024 (Ref: 2024/2921/P). These works have now been undertaken successfully.

REAR INFILLS

- 3.13 The poor-quality rear infills of Arches 29 to 31 that face eastwards are to be removed and replaced with a new cavity wall, with fair face brickwork, in keeping with Arches 32 to 36 which are to remain largely unchanged save for the infill of any existing openings.
- 3.14 The metal sheeting on Arches 37 and 38 is proposed to be removed and replaced by new infill brickwork to match the existing construction of the retained arches.
- 3.15 Given the proximity of neighbouring properties to the rear infills, a Party Wall Surveyor has been appointed who is undertaking all necessary consultation with the adjoining landowners. Initial feedback from the consultation undertaken to date has been generally supportive of the proposed works with the proposals seeking to address potential health and safety issues.

FRONT INFILLS

- 3.16 Changes are proposed to the front infills of Arches 35-41 that face westwards onto the existing service yard in order to improve the layout and efficiency of the space within the Arches. These existing infills are of poor quality, with some structural defects, and it has been determined that it is not viable to retain and refurbish them as part of the Proposed Development.
- 3.17 The infills of Arches 39-41 are to be removed entirely to allow Arch 40 to accommodate refuse storage, cycle parking and 2 no. EVC parking spaces, one of which will be demarcated for blue badge parking. Arches 39 and 40 will be enclosed by a 2.4m high palisade fence and gates to provide secure storage space.
- 3.18 The partially open infills of Arches 37 and 38 are proposed to be replaced with new cavity wall infills comprising red brick, with glazing and entrance doors to provide ancillary office accommodation internally linked to the warehouse unit. A high-quality contemporary design is proposed for the new infills, which is in keeping with the Site's partial location within the Harmood Street Conservation Area.

WAREHOUSE

- 3.19 Whilst every effort has been made to re-use as much of the existing warehouse structure as possible, various elements have been deemed to be too structurally unsound to be viably salvaged. In addition, some of the existing structure includes asbestos, which requires removal.
- 3.20 The Proposed Development seeks to retain the western flank wall, whilst the height will be reduced to suit a new single pitched roof. The southern part of the warehouse will be rebuilt with a new cavity wall construction and red multi brick outer leaf. The extent of the building footprint in the southern part of the Site will remain as existing. A new 84 sqm extension is proposed to the north of the existing warehouse, which will similarly comprise a new cavity wall construction with red brick outer leaf. Dark grey / blue brick features will be added to the northern elevation to frame the doors and add visual interest.
- 3.21 An electrically operated roller shutter door is proposed on the northern elevation, along with a single personnel door. A new secondary means of escape is proposed on the southern elevation.

- 3.22 The roof of the new warehouse is proposed to have a single west facing pitch, resulting in a reduced overall height compared to the existing unit by approximately 2m. The reduced building height and altered roof form will significantly improve the relationship of the warehouse with adjoining neighbours on the western boundary and improve the ease of maintenance for both the warehouse roof structure and the viaduct.

ACCESS, PARKING AND SERVICING

- 3.23 The Proposed Development seeks to utilise the existing vehicular and pedestrian access via Castle Mews. The secondary means of escape via Clarence Way to the south is proposed to be retained.
- 3.24 The Site's general accessibility has been considered in detail within the Transport Statement, prepared by TPA. The Site has a very good PTAL rating of 6a, and the Proposed Development has been designed to be genuinely accessible. This is represented through the level of cycle parking proposed. In total, parking for 8 no. bicycles is proposed, comprising 2 no. short stay spaces, and 6 no. long stay spaces to be accommodated within the unit.
- 3.25 Arch 41 is conveniently located immediately adjacent to the access from Castle Mews and is proposed to accommodate two electric vehicle spaces, with one also proposed to be designated as a disabled parking space. Arch 41 is also proposed to accommodate the refuse storage area, as shown on the Proposed Plan ref. 23-4758-PD-10 rev H.

TREES

- 3.26 There are a number of existing trees / foliage along the south-western boundary of the Site, between the warehouse, Harmood School and residential properties fronting Clarence Way. These trees fall outside of the Application Site, on land owned by Camden Council. Whilst the Proposed Development does not include the removal of these trees, an Arboricultural Impact Assessment (AIA) and Method Statement are submitted as part of this Application, which consider the potential impacts of the Proposed Development on the adjacent trees.
- 3.27 The survey identifies a total of 12 trees and two tree groups adjacent to the Site. The 3 trees adjacent to the service yard are the highest value trees in the vicinity of the Site. These trees fall outside of the application boundary, and will not be impacted by the Proposed Development.
- 3.28 The 7 trees and two tree groups located adjacent to the west boundary wall are located outside of the application site on land outside of the Applicant's ownership. They are located between the existing warehouse and chainlink fence along the school playground boundary, and it has been confirmed that this land falls within the school's demise and is owned by Camden Council.
- 3.29 The AIA identifies the two tree groups and seven trees to be of poor quality, ranging from U – C categorisation. The AIA and Method Statement demonstrates that the Proposed Development does not require the removal of these trees, despite the encroachment of the root protection areas on the existing building. The report confirms that the works proposed relate to the replacement and improvement of the existing foundations in places, and do not propose works within virgin ground. Therefore, the trees will not be impacted by the Proposed Development in its final built form and no tree removal is required as part of the Proposed Development.
- 3.30 To assist in the retention of the trees the Method Statement sets out mitigation measures including, the programme for the order of works, use of temporary tree protection fencing and ground protection, supervision of specific activities by an arboriculturalist, the dismantling of various existing walls and associated footings by hand, and the pruning of root invasion by hand using secateurs. Overall ensuring the retention of adjacent trees.

4.0 PLANNING POLICY FRAMEWORK

- 4.1 This section provides a summary of the relevant planning policy context for the Site including the adopted Development Plan policies and other relevant material considerations. **Section 5** provides an assessment of the Application against the policies and guidance contained within these documents.

STATUTORY PROVISIONS

- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that *“if regard is to be had to the development plan for the purpose of any determination to be made under the planning acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*.
- 4.3 Section 70 of the Town and Country Planning Act 1990 states that when determining applications for planning permission, the local planning authority should *“have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations”*.

DEVELOPMENT PLAN

- 4.4 The Site is located in the authority area of the London Borough of Camden Council (*“the Council”*). The statutory Development Plan for the Council consists of:
- The London Plan – adopted 2021; and
 - Camden Local Plan – adopted 2017.
- 4.5 The Development Plan also includes the Camden Site Allocations Plan (2013), Fitzrovia Area Action Plan (2014), and various adopted Neighbourhood Plans. However, these are not directly relevant to the Site or the scope of this Application.

LONDON PLAN

- 4.6 Relevant policies from the London Plan include:
- Policy SD10: Strategic and Local Regeneration;
 - Policy D2: Infrastructure Requirements for Sustainable Densities;
 - Policy D3: Optimising Site Capacity Through the Design-Led Approach;
 - Policy D4: Delivering Good Design;
 - Policy D5: Inclusive Design;
 - Policy D11: Safety, Security and Resilience to Emergency;
 - Policy D12: Fire Safety;
 - Policy D14: Noise;
 - Policy E4: Land for Industry, Logistics and Services to Support London’s Economic Function;
 - Policy E7: Industrial Intensification, Co-Location and Substitution;
 - Policy E8: Sector Growth Opportunities and Clusters;
 - Policy E11: Skills and Opportunities for All;
 - Policy GG1: Building Strong and Inclusive Communities;
 - Policy GG2: Making the Best Use of Land;
 - Policy GG5: Growing a Good Economy;
 - Policy GG6: Increasing Efficiency and Resilience;
 - Policy G7: Trees and Woodlands;
 - Policy HC1: Heritage Conservation and Growth;
 - Policy SI1: Improving Air Quality;
 - Policy SI2: Minimising Greenhouse Gas Emissions;
 - Policy SI3: Energy Infrastructure;
 - Policy SI4: Managing Heat Risk;
 - Policy SI5: Water Infrastructure;
 - Policy SI6: Digital Connectivity Infrastructure;

- Policy SI7: Reducing Waste and Supporting the Circular Economy;
- Policy SI12: Flood Risk Management;
- Policy SI13: Sustainable Drainage;
- Policy T1: Strategic Approach to Transport;
- Policy T2: Healthy Streets;
- Policy T4: Assessing and Mitigating Transport Impacts;
- Policy T5: Cycling;
- Policy T6: Car Parking;
- Policy T6.2: Office Parking;
- Policy T6.5: Non-Residential Disabled Persons Parking;
- Policy T7: Deliveries, Servicing and Construction;
- Policy T9: Funding Transport Infrastructure Through Planning; and
- Policy DF1: Delivery of the Plan and Planning Obligations.

CAMDEN LOCAL PLAN 2017

4.7 Relevant Local Plan Policies include:

- 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 CC2: Adapting to climate change
- Policy CC4: Air quality
- Policy CC5: Waste
- 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.

EMERGING LOCAL PLAN

4.8 The Council consulted on a draft new Local Plan (Regulation 18) from 17 January to 13 March 2024, and are currently considering all the responses received. An updated version of the Local Plan is expected to be published for further consultation in spring 2025. Whilst the Regulation 18 Draft Local Plan provides draft policies, given the early stages of this new plan, the policies are afforded limited weight in the context of the Proposed Development.

SITE DESIGNATIONS

4.9 In accordance with the adopted Policies Map (2021), the Site falls within the urban area. The Site itself is not allocated for a specific land use. The Policies Map (see **Figure 4.1**) identifies the Site as falling partially within the Harmood Street Conservation Area.



Figure 4.1: Policy Map Extract (Source: Camden Council).

OTHER MATERIAL CONSIDERATIONS

- 4.10 In addition to the statutory Development Plan Documents, a number of further documents comprise material considerations in the determination of planning applications. These include the National Planning Policy Framework (NPPF) (2024), Planning Practice Guidance (PPG) and local Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPG).
- 4.11 In December 2024 a new NPPF was published which was updated by the Labour government in order to contribute to the planning reform agenda. The adoption follows a consultation period and includes key updates in relation to Housing Targets, Grey Belt Land, Housing Need and Design Standards. Whilst the recently updated NPPF does not impact the proposals submitted as part of this application, the NPPF as a whole remains an important material consideration.

5.0 PLANNING ASSESSMENT

- 5.1 In this section we assess the Proposed Development against the relevant Development Plan policies and other material considerations outlined in Section 4 of this Planning Statement.

PRINCIPLE OF DEVELOPMENT

- 5.2 The NPPF states the overarching purpose of the planning system is to contribute to the achievement of sustainable development. Chapter 11 of the NPPF confirms that development should utilise brownfield sites to meet development needs as much as possible. Moreover, the NPPF also states that planning policies and decisions should promote and support the use and development of under-utilised land and buildings where the development will meet identified need.
- 5.3 Chapter 6 of the NPPF sets out the Government's approach to building a strong, competitive economy. In accordance with Paragraph 85, "*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*". Accordingly, planning decision making should recognise and address the specific locational requirements of different sectors.
- 5.4 **Policy GG1** (Building Strong and Inclusive Communities) of the London Plan identifies the need to help deliver strong and inclusive communities within which a range of economic and other opportunities continue to be supported. **Policy GG2** (Making the Best Use of Land) goes on to emphasise the need to make the best use of land whilst also maximising the development potential of sites.
- 5.5 **Policy GG5** (Growing a Good Economy) of the London Plan seeks to conserve and enhance London's global economic competitiveness. It seeks to ensure that London's economy diversifies and requires sufficient employment and industrial space to be planned for in the right locations to support economic development and regeneration. **Policy GG5** goes on to identify the role of planning and development in supporting London's role as a 24-hour city.
- 5.6 **Policy E4** (Land for Industry, Logistics and Services to Support London's Economic Function) identifies the need for a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions to be provided and maintained. Such supply should make provision for the varied operational requirements of different industrial and related uses.
- 5.7 **Policy E4** splits London's industrial, logistics and service land into three categories – Strategic Industrial Locations (SIL) (**Policy E5**), Locally Significant Industrial Sites (LSIS) (**Policy E6**) and Non-Designated Industrial Sites – and states that the retention, enhancement and provision of additional capacity should be planned, monitored and managed. **Policy E7** (Industrial Intensification, Co-location and Substitution) states that development should be proactive and encourage the intensification of business uses (Classes E(g)(iii), B2 and B8) occupying all categories of industrial land.
- 5.8 **Policy E8** (Sector Growth Opportunities and Clusters) seeks to promote employment opportunities across a diverse range of sectors, including support for start-ups, SMEs and flexible workspace.
- 5.9 Local Plan **Policy E1** (Economic Development) reiterates the national and regional policy objectives in supporting a successful and inclusive economy and seeks to create conditions for economic growth. The employment policy protection is reinforced through **Policy E2** (Employment premises and sites), which protects against the development of business premises for alternative uses. The policy also sets out explicit support for premises or sites that are suitable for continued business use, in particular premises for small businesses and services that provide employment for Camden residents.
- 5.10 The policy protection is reiterated within the Draft Local Plan, and further enhanced by **Policy IE3** (Industry), which goes on to set out requirements for marketing evidence if industrial and warehousing uses are proposed to be lost.
- 5.11 Whilst the Site is not specifically allocated in the Local Plan, it has a long history of occupation for employment uses, most recently as a builders' merchant (Sui Generis). Its employment use is, therefore, afforded significant policy protection in line with **Policies E4** and **E7** of the London Plan, **Policy E2** of the adopted Local Plan and draft **Policy IE3** of the Draft Local Plan, particularly at the local level for businesses and services that provide employment for Camden residents and those that support the functioning of the local economy.

- 5.12 The Site has been vacant since November 2023 and is currently in a poor state of repair, with significant works required (including the removal of asbestos) to bring the employment floorspace up to standard to meet modern market needs. In its current state, there is no prospect of safe reoccupation. The Proposed Development would, therefore, bring the Site back into active economic use.
- 5.13 The Proposed Development seeks to retain the existing builders' merchant (Sui Generis) employment use, as well as introducing the flexibility for Class B8 (Storage and Distribution) and E(g)(iii) (Light Industrial) uses in order to widen the scope of employment related operators that could occupy the Site. Diversifying the range of employment generating uses would maximise the Site's potential, generating employment opportunities and re-activating an existing, but vacant, employment site.
- 5.14 The Site is located in a highly accessible, sustainable location (PTAL 6a). The Proposed Development seeks to make best use of a unique brownfield site, located beneath / adjacent to the railway viaduct, and would deliver significant improvements to provide a high-quality of employment floorspace, suitable for a range of occupiers, including small to medium sized enterprises and local businesses.
- 5.15 The Proposed Development has the potential to generate significant employment opportunities for the local area. Utilising the Homes & Communities Agency's Employment Density Guide 3rd Edition (November 2015), it is estimated that a total of between 17 and 25 jobs could be created for the range of uses proposed.
- 5.16 In summary, the principle of the Proposed Development wholly accords with the aims and objectives of the NPPF and relevant Development Plan policies.

DESIGN AND LAYOUT

- 5.17 Paragraph 131 of the NPPF highlights the important role that the planning and development process plays in facilitating the creation of high quality, beautiful and sustainable buildings and places. The emphasis on design places it at the heart of the social objectives of the planning system and is accompanied by the publication of a National Design Guide and National Model Design Code.
- 5.18 **Policy D3** (Optimising site capacity through the design-led approach) of the London Plan requires development to make best use of land by following a design-led approach that optimises the capacity of sites. **Policy D4** (Delivering good design) sets out the methods to be applied in order to deliver good design, including the use of masterplans and design codes and the scrutiny of proposals by the borough. **Policy D5** (Inclusive design) requires development to achieve the highest standards of accessible and inclusive design and **Policy D11** (Safety, security and resilience to emergency) states that development should include measures to design out crime.
- 5.19 At a local level **Policy D1** (Design) of the Local Plan seeks to secure high quality design in development, requiring that development, inter alia, respects local context and character, preserved or enhances the historic environment and is sustainable in design and construction.
- 5.20 The purpose of the Proposed Development is to provide modern industrial and warehousing accommodation within the Arches and adjoining warehouse to improve the quality of employment floorspace offering at the Site, responding to commercial market demands and meeting the operational requirements of potential occupiers.
- 5.21 The Proposed Development has been designed to not only meet occupational requirements, but also to have an attractive appearance architecturally, which is in keeping with the surrounding area, and with particular regard afforded to the Site's partial location within the Harwood Street Conservation Area. This is illustrated in the submitted Design and Access Statement, as well as the Proposed Elevations (ref. 23-4758-PD-020 rev B), which show the high-quality development design principles that have been incorporated into the Proposed Development.
- 5.22 The proposed elevational treatment ensures a cohesive design approach and includes the much-needed replacement of many of the front and rear infills, which are in a poor, unsafe condition. The majority of the proposed elevational treatment comprises red brick, in keeping with the existing railway viaduct and the surrounding built context. In addition to brick, contemporary glazing and aluminium framing is proposed, which contributes to the modern high-quality, yet in keeping, design of the proposals.

- 5.23 The proposed alterations to the warehouse represent a significant and necessary improvement to the existing facility, with the introduction of a high-quality material palette, consistent with the proposed Arch infills. Brick detailing is proposed around the doors on the northern warehouse elevation to add visual interest. The proposals also include the removal of the existing roof structure, which is currently a poor-quality asbestos roof. A new contemporary roof is proposed in its place, with an alternative roof form proposed to the existing roof. A single pitch is proposed, which will reduce the overall height of the building by approximately 2m. The improved quality of structure, together with altered roof form and reduced height, significantly improves the relationship of the warehouse with its adjoining neighbours.
- 5.24 Further details of the proposed design, including detail of materials and sustainability features, can be found within the Design and Access Statement.
- 5.25 In summary, the Proposed Development is considered to directly accord with the relevant objectives of the statutory Development Plan and will provide a high-quality employment development that is in keeping with the surrounding context (including the Harmood Street Conservation Area) and meets the occupational needs of a wide range of operators.

HERITAGE

- 5.26 Chapter 16 of the NPPF sets out the Government's approach to conserving and enhancing the historic environment. Paragraphs 212-213 encourage Local Planning Authorities to look for opportunities for development within conservation areas that enhances or better reveals its significance and acknowledge that not all elements of a conservation area will necessarily contribute to its significance.
- 5.27 London Plan **Policy HC1** (Heritage conservation and growth) seeks to conserve and enhance the historic environment and heritage assets. The policy requires development proposals that affect heritage assets (including conservation areas) to be sympathetic to the assets significance and appreciation within their surroundings, in order to avoid harm to the asset.
- 5.28 Local Plan **Policy D1** (Design) makes reference to the requirement for development to preserve or enhance the historic environment and heritage assets in accordance with **Policy D2** (Heritage).
- 5.29 **Policy D2** (Heritage) sets out that the Council will preserve and enhance Camden's heritage assets, including conservation areas. The policy states that the Council will not permit the loss of or substantial harm to designated heritage assets, including conservation areas. In order to maintain the character of Camden's conservation areas, the policy states that the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.
- 5.30 **Policy D2** further stipulates that the Council will:
- require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;
 - resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;
 - resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and
 - preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.
- 5.31 The Site is partially located within the Harmood Street Conservation Area. The Harmood Street Conservation Area Statement (adopted in 2005) makes little to no reference to the railway arches or their relationship to the adjacent mid-19th century houses on Harmood Street and surrounding streets (the latter being central to the significance of the Conservation Area). The railway line appears to have been incorporated into the Conservation Area by virtue of it being a clearly definable boundary, with little consideration for the existing warehouse that forms part of the Conservation Area. The lack of reference to the Site or the railway viaduct within the Conservation Area Statement suggests that the significance of its contribution to the Conservation Area is minimal.
- 5.32 The Proposed Development will result in an improved quality of built form, with a lower, less visually intrusive building form and the refurbishment of the Arches, which together would deliver a modest improvement to the appearance of the Site

from its immediate environs without materially compromising its existing neutral contribution to the wider Conservation Area.

- 5.33 Therefore, the Proposed Development is considered to be acceptable in heritage terms and in accordance with the NPPF and regional and local historic environment policies.

TRANSPORT

- 5.34 Chapter 9 of the NPPF relates to transport matters and highlights the importance of considering transport issues from the earliest stage in the planning process (paragraph 109). Paragraph 116 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 5.35 At the regional level, **Policy T1** (Strategic Approach to Transport) of the London Plan requires development proposals to facilitate the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. In addition, **Policy T1** states that all development will be expected to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes. In accordance with **Policy T1**, any impacts on London's transport networks and supporting infrastructure must be mitigated.
- 5.36 London Plan **Policy T2** (Healthy Streets) states that development proposals should seek to reduce the dominance of vehicles on London's streets and be permeable by foot and cycle, as well as public transport. The national requirement for Transport Assessments/Statements is reflected under **Policy T4** (Assessing and Mitigating Transport Impacts), together with the requirement for Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans, where relevant. Where appropriate, **Policy T4** identifies that mitigation will be required to address adverse transport impacts that are identified.
- 5.37 This is also recognised at a local level in the Camden Local Plan, **Policy T1** (Prioritising walking, cycling and public transport) which seeks to promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 5.38 Local Plan **Policy T2** (Parking and Car free development) goes a step further stating that it will limit the availability of parking and require all new developments in the borough to be car free, with on-site parking limited to disabled parking needs, and essential operational and servicing requirements.
- 5.39 Draft Local Plan **Policy T1** (Safe, Healthy and Sustainable Transport) reiterates the same objectives of the adopted local plan in relation to transport, including promoting walking and cycling, and requiring development to reduce vehicle use.
- 5.40 A Transport Statement has been prepared by TPA and is submitted as part of this Application. The Transport Statement provides a detailed overview of the existing and proposed access to the Site, in addition to the wider connectivity of the Site into the surrounding areas, including an assessment of potential trip generation from the proposed uses.

ACCESS

- 5.41 The Site is accessed from Castle Mews, a cul-de-sac with a private access leading to the Site. It is connected to Castle Road to the east. Castle Road joins Prince of Wales Road to the north and A502 Chalk Farm Road to the south via Castlehaven Road to the east.
- 5.42 The Site is in a highly accessible location in terms of walking, cycling and public transport as denoted by its PTAL rating of 6a, therefore a sustainable location for intensification of employment uses which would promote sustainable modes of transport in accordance with local and regional policy.

TRAFFIC IMPACT

- 5.43 The Transport Statement includes an assessment of trip generation for the proposed uses, including Classes E(g)(iii) (Light Industrial) and B8 (Storage and Distribution). Given the builders' merchant (Sui Generis) use is existing, the Transport Statement does not re-assess this use.

- 5.44 The Transport Statement identifies that Class E(g)(iii) uses present the potential worst-case scenario in terms of trip generation, with the potential to attract a total of 14 deliveries across the day, resulting in 28 two-way movements. It is noted that a large part, if not all the vehicular movements associated with van deliveries would not be new to the network, as delivery slots would likely be shared across several deliveries and linked trips. In light of this, and given the very accessible location of the Site, the Transport Statement concludes that the trip generation impact of the Proposed Development is negligible, and therefore accords with the relevant national, regional and local planning policy objectives.

CAR PARKING

- 5.45 The Proposed Development does not include any on-site vehicular parking for staff. Two electric vehicle parking spaces are proposed for use by operational vehicles only. Provision is also proposed for one blue badge parking space, which is indicatively shown on the Proposed Plan (ref. 23-4758-PD-010 rev H) to double up with one of the EVC spaces.
- 5.46 The Proposed Development is, therefore, considered to be acceptable and in accordance with Local Plan **Policy T2**.

CYCLE PARKING

- 5.47 London Plan **Policy T5** (Cycling) sets out the cycle parking standards for development across all use classes, these standards are set as a minimum. Local Plan **Policy T1** clarifies that development should provide for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan. The standards are as follows:

USE CLASS		LONG STAY (FOR EMPLOYEES)	SHORT STAY (FOR CUSTOMERS)
B1	Light Industrial, Research and Development	1 space per 250 sqm	1 space per 1000 sqm
B8	Storage and Distribution	1 space per 500 sqm	1 space per 1000 sqm

- 5.48 The development proposes a total of 1,161 sqm, and in accordance with the above standards, provision is included for a total of six long stay cycle parking spaces and two short stay spaces within the yard for visitors, which is in excess of the required standards (5 long-stay and 2 short-stay).

TRAVEL PLAN

- 5.49 A Framework Travel Plan has been prepared and submitted as part of this Application. The Travel Plan sets out a long-term strategy that outlines the principles and measures to ensure that travel made by staff and visitors is carried out in the most sustainable manner, including reducing reliance on the private car.
- 5.50 The Framework Travel Plan includes a range of hard and soft measures that will be implemented by the occupiers to promote sustainable travel. Measures proposed include:
- The provision of welcome packs;
 - Encouraging walking;
 - Encouraging cycling;
 - Encouraging the use of public transport; and
 - Provision of advice regarding accessible public transport.
- 5.51 The Framework Travel Plan is part of a continuous process and will be monitored and reviewed regularly through the lifespan of the Plan.

NOISE

- 5.52 Paragraph 187 of the NPPF seeks to prevent development from contributing to, being put at unacceptable risk from, or being adversely affected by a range of pollution sources, including noise. Accordingly, Paragraph 198 states that potential adverse impacts resulting from noise from new development should be mitigated and reduced to a minimum. Noise giving rise to significant adverse impacts on health and the quality of life should be avoided.
- 5.53 **Policy D14** (Noise) of the London Plan sets out the ways in which development should reduce, manage and mitigate noise to improve health and quality of life, including by:

- avoiding significant adverse noise impacts on health and quality of life;
- mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses; and
- where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles.

- 5.54 Local Plan **Policy A4** (Noise and Vibration) further reiterates the national and regional objectives in relation to controlling and managing noise. The policy goes on to set local thresholds for industrial and commercial noise sources. Confirming that within the scope of the document it is expected that British Standard 4142:2014 'Methods for rating and assessing industrial and commercial sound' (BS 4142) will be used. For such cases a 'Rating Level' of 10 dB below background (15dB if tonal components are present) should be considered as the design criterion).
- 5.55 **Policy A4** confirms that planning permission will not be granted for development likely to generate unacceptable noise and vibration impacts. **Draft Policy A4** (Noise and Vibration) reiterates the principles of the adopted policy and includes the same noise thresholds for industrial and commercial development.
- 5.56 In order to demonstrate that the proposals are acceptable in terms of noise, a Noise Assessment, prepared by Air and Acoustic Consultants, is submitted as part of this Application. Vibration is not considered to be relevant to this Application.
- 5.57 The Noise Assessment considers the noise implications of the Proposed Development at the nearest noise sensitive receptors during both daytime and at night. The Assessment identifies six noise sensitive receptors, four of which comprise residential dwellings within Castle Mews, one a dwelling on Castle Road, and another an eight-storey residential building between Castle Road and Lewis Road to the east of the Site. The assessment concludes that the predicted noise rating levels at all receptors are less than the national assessment criterion level during the day, apart from one receptor, with predicted exceedances at 5 receptor locations during the night-time period. However, when taking into account the wider context of the Site (particularly noting the proximity to the railway), the Noise Assessment concludes that the impacts can be classified as less than the Lowest Observed Adverse Effect Level (LOAEL) with no mitigation required.
- 5.58 The Noise Assessment demonstrates, therefore, that the Proposed Development is acceptable in terms of noise and accords with the requirement of regional and local policy.

AIR QUALITY

- 5.59 Paragraph 187 of the NPPF also relates to air quality, seeking to prevent development from contributing to, being put at unacceptable risk from, or being adversely affected by a range of pollution sources, including air quality. Accordingly, Paragraph 199 states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones.
- 5.60 **Policy SI1** (Improving Air Quality) of the London Plan and **Policy CC4** (Air Quality) of the Local Plan relate specifically to air quality. They outline the expectation for development to not result in pollution hazard which prejudice the health and safety of communities and their environments and requires developments to be air quality neutral.
- 5.61 The Site is also located within an Air Quality Management Area (AQMA) and is in close proximity to the 'Camden High Street from Mornington Crescent to Chalk Farm and Camden Road' Air Quality Framework Area (AQFA).
- 5.62 As part of this Application, an Air Quality Assessment ("AQA") has been undertaken by Air and Acoustic Consultants to assess the effects of the Proposed Development on air quality, both during construction and operational phases. The AQA has reviewed the existing air quality and the likely changes to it arising from the Proposed Development, taking into account climate change.
- 5.63 The AQA concludes that the impact on air quality is considered to be negligible as a result of the Proposed Development. In relation to the operational impacts, the assessment concludes that operational traffic is anticipated to be 'insignificant'. In relation to the construction implications, the assessment identifies some risk of low impact from dust, albeit the highest level of risk is identified as 'medium'. Nevertheless, the assessment identifies a range of mitigation measures, such as water assisted sweeping, water suppression, and to avoid the use of explosive blasting. Provided the mitigation measures

are implemented, the assessment concludes that the effects of dust and emissions from demolition and construction activities upon the local area and sensitive receptors, will be temporary and 'not significant'.

- 5.64 The AQA demonstrates, therefore, that the Proposed Development complies with the relevant regional and local policy in relation to air quality for both construction and operational phases of development.

ENERGY AND SUSTAINABILITY

- 5.65 Paragraph 161 of the NPPF identifies the role of the planning system in supporting the transition to a low carbon future in a changing climate. Paragraph 165 sets out ways in which planning should help to increase the use and supply of renewable and low carbon energy and heat. Paragraph 166 requires development proposals to comply with Development Plan policies on local requirements for decentralised energy supply, unless it can be demonstrated that it is not viable or feasible. Development proposals should also take account of landform, layout, building orientation, massing and landscaping in order to minimise energy consumption.
- 5.66 **Policy SI2** (Minimising greenhouse gas emissions) of the London Plan identifies the target for all major development to be net-zero carbon. In order to minimise adverse impacts on the urban heat island, **Policy SI4** (Managing heat risk) emphasises the importance of design, layout, orientation, materials and the incorporation of green infrastructure.
- 5.67 Local Plan **Policy CC1** (Climate change mitigation) requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy states that the Council will:
- require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
 - ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
 - support and encourage sensitive energy efficiency improvements to existing buildings;
 - require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
 - expect all developments to optimise resource efficiency.
- 5.68 Local Plan **Policy CC2** (Adapting to climate change) seeks to ensure that development is resilient to climate change. The Council will promote and measure sustainable design and construction by, inter alia, ensuring development demonstrates how sustainable development principles have been incorporated into the design and proposed implementation of development. **Policy CC2** sets out the expectation for non-domestic developments of 500sqm or more (including conversions, extensions and changes of use) to achieve BREEAM 'Excellent' and zero carbon in new development from 2019 and requires development relating to more than 500 sqm of additional floorspace to provide a Sustainability Statement.
- 5.69 A Sustainability Statement, prepared by RED, is submitted as part of this Application. The Sustainability Statement notes the unique characteristics of the Site, comprising a highly constrained site beneath the railway viaduct, and outlines the ways in which sustainability has been maximised through the design of the Proposed Development, with the adoption of the 'Energy Hierarchy'. This includes:
- Retention and refurbishment of as much existing fabric as possible;
 - Minimisation of operational energy consumption through building fabric and building services efficiency measures;
 - High efficacy LED luminaries;
 - EPC Rating requirement of B;
 - Inclusion of low / zero carbon technologies, including Air Source Heat Pumps;
 - Inclusion of two EV charging spaces for operational vehicles only;
 - Inclusion of cycle parking in excess of the policy standards;
 - Exploration of enhanced biodiversity measures on adjacent school land;
 - Implementation of a Travel Plan.

- 5.70 The Sustainability Statement recognises the requirement of **Policy CC2** for development to target BREEAM 'Excellent' and provides an assessment of the Proposed Development against the BREEAM Refurbishment and Fit-out 2014 methodology. It determines that an assessment would be unlikely to achieve a meaningful score in a sustainable manner, again highlighting the inherent physical constraints of the site, and confirms that sustainability measures have been maximised and that opportunities to further enhance the sustainability credentials of the Proposed Development will be explored as the development progresses.

ECOLOGY AND TREES

- 5.71 Chapter 15 of the NPPF outlines the Government's approach to conserving and enhancing the natural environment. In accordance with Paragraph 187, planning should contribute to and enhance the natural and local environment.
- 5.72 London Plan **Policy G5** (Urban greening) requires major development proposal to contribute to urban greening and stipulates that predominantly commercial developments should seek to achieve a target score of 0.3. However, this is noted to exclude Class B2 and B8 uses.
- 5.73 London Plan **Policy G6** (Biodiversity and nature conservation) requires development proposals to manage impacts on biodiversity and aim to achieve biodiversity net gain. However, given the lack of priority habitat on site the proposals fall below the de minimis threshold for delivering biodiversity net gain. London Plan **Policy G7** (Trees and woodland) seeks to protect trees and woodland, it requires proposals to ensure that wherever possible, existing trees of value are retained.
- 5.74 At a local level, **Policy A3** (Biodiversity) sets out that the Council will seek to protect and enhance biodiversity, including by refusing planning permission for development that would result in the loss or harm to priority habitats and species, and by requiring the demolition and construction of development to be planned to avoid disturbance to habitats and species.
- 5.75 **Policy A3** also relates to trees, and states that the Council will:
- resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;
 - expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development; and
 - expect developments to incorporate additional trees and vegetation wherever possible.
- 5.76 The Site does not currently have any formal landscaping, with the only landscaping comprising vegetation along the southern part of the western boundary. A Preliminary Ecological Appraisal, Biodiversity Net Gain Exemption Letter, Arboricultural Impact Assessment and Method Statement, prepared by Phlora, are submitted as part of this Application.

ECOLOGY

- 5.77 The Preliminary Ecological Appraisal (PEA) identifies that the Site is not subject to any statutory or non-statutory ecological designations. The nearest statutory designated site is circa 1km to the southwest of the Site. It recognises the Site's composition as a developed site, including buildings, hardstanding and ruderal / ephemeral vegetation.
- 5.78 In terms of species, the PEA identifies the potential for the Site to support breeding birds and bats. Targeted bat surveys were recommended, which have been undertaken and a Bat Emergence Activity Survey Report is submitted as part of this Application. This Report confirms that no bat activity was detected at the Site.
- 5.79 The PEA recommends a precautionary approach to site clearance in respect to bats, mammals and breeding birds to minimise any adverse impacts on these species' groups and confirms that through the inclusion of mitigation measures, the Proposed Development will not have any adverse impact on protected species.

TREES

- 3.31 The Arboricultural Impact Assessment identifies a total of 12 trees and two tree groups adjacent to the Site. The 3 trees adjacent to the service yard are the highest value trees in the vicinity of the site, fall outside of the application boundary, and will not be impacted by the Proposed Development.

- 3.32 The 7 trees and two tree groups located adjacent to the west boundary wall are located outside of the application site boundary, and they fall outside of the land owned by the Applicant. They are located between the warehouse and chainlink fence along the school playground boundary, and it has been confirmed that this land falls within the school's demise and is owned by Camden Council.
- 3.33 The AIA identifies the two tree groups and seven trees to be of poor quality, ranging from U – C categorisation. The AIA and Method Statement demonstrates that the Proposed Development does not require the removal of these trees, despite the encroachment of the root protection areas on the existing building. The report confirms that the works proposed relate to the replacement and improvement of the existing foundations in places, and do not propose works within virgin ground.
- 3.34 The Method Statement sets out the specific mitigation measures required to be adhered to throughout construction, including tree protection fencing and barriers. The Statement also provides detailed methodology requirements for the ground works required from G1 – T8 and at T9 (as identified in the AIA), these include measures such as dismantling the of walls and footings by Hand and confirmation that the replacement walls and footings will not extend into virgin ground.
- 5.80 In accordance with the above, the Proposed Development is considered to be acceptable and in line with the relevant policies of the statutory Development Plan.

BIODIVERSITY NET GAIN

- 5.81 There are very limited areas of biodiversity value on the Site, therefore a Biodiversity Net Gain Exemption Letter, prepared by Phlorum, is submitted with this Application. This confirms that the development does not impact a priority habitat, nor does it impact more than 25 square metres of non-priority onsite habitat, nor 5m for non-priority onsite linear habitats. Therefore, the Exemption Letter confirms that the Application meets the de minimis threshold for the provision of a 10% biodiversity net gain.
- 5.82 The Proposed Development is therefore considered acceptable with regard to biodiversity net gain in the context of National Legislation and the relevant policies of the statutory Development Plan.

DRAINAGE

- 5.83 The NPPF requires that planning applications do not increase flood risk elsewhere (paragraph 170). Where appropriate, applications should be supported by a site-specific flood-risk assessment.
- 5.84 **Policy D11** (Safety, Security and Resilience to Emergency) of the London Plan requires development proposals to maximise building resilience and minimise physical risk. **Policy SI 12** (Flood Risk Management) requires current and expected flood risk from all sources (as defined in paragraph 9.12.2) across London to be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers. The policy requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 5.85 **London Plan Policy SI13** (Sustainable Drainage) states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 5.86 Local Plan **Policy C3** (Water and Flooding) accords with national and regional policy, requiring development not to increase flood risk elsewhere. The policy sets out requirements for development in areas at risk of flooding. However, the Site is not in an area of identified flood risk, as shown on the Environment Agency flood map for planning as being in Flood Zone 1.
- 5.87 Given that the Site is less than 1ha in size and that it does not fall within an area at risk of flooding, a site-specific Flood Risk Assessment is not required as part of this Application.
- 5.88 Existing and Proposed Drainage Plans (23-4758-PD) are submitted as part of this Application, which show the existing and proposed surface and foul water drainage for the Site. Further detail of the proposed drainage systems is contained within the Design and Access Statement.

- 5.89 The drainage proposals utilise the majority of the existing drainage framework and include some minor repairs and adjustments to elements such as the track drainage using new black pipework. The modifications will also allow for improved future maintenance of the existing drainage system within the application site and, overall, will ensure a more efficient drainage strategy that will not increase the risk of flooding elsewhere.

FIRE STRATEGY

- 5.90 London Plan **Policy D12** (Fire Safety) requires development to be designed to achieve the highest standards of fire safety, including providing suitable and convenient means of escape for all building users. Part B of **Policy D12** sets out the requirement for all major development proposals to be submitted with a Fire Statement, undertaken by a third party, suitably qualified assessor.
- 5.91 Accordingly Fire Strategy, prepared by Socotec, is submitted as part of this Application, the statement demonstrates that the design of this development is developed to meet the fire safety expectations within Policies D5 and D12 of the London Plan. The Fire statement assesses the fire risk of the proposed development whilst also setting out the mitigation measures to be incorporated, demonstrating that the proposed development is acceptable in respect of fire related matters and in compliance with the relevant policy and legislation.

6.0 SUMMARY AND CONCLUSION

- 6.1 This Planning Statement has been prepared by Montagu Evans LLP on behalf of The Arch Company Properties Limited to support a full planning application for development at Arches 29-41 Castle Mews, London, NW1 8SU. This Application is submitted to the London Borough of Camden.
- 6.2 The Application seeks full planning permission for:
- “Partial demolition of existing warehouse, refurbishment / extension of existing warehouse, external alterations to existing railway arches and associated works related to the continued use of the Site as builders’ merchant (Sui Generis), and / or Class B8 (Storage and Distribution) and / or Class E(g)(iii) (Light Industrial) uses”*
- 6.3 The Site comprises an existing employment site, which has been vacant since November 2023 and is in a poor condition. In its current state, the Site presents a health and safety concern, with structural instabilities and the presence of asbestos, and there is no prospect of re-occupation.
- 6.4 The Proposed Development will result in a significant improvement to the quality of employment floorspace. It seeks to maximise flexibility of use and facilitate the re-occupation of the Site for employment purposes. This will contribute to the vitality of the surrounding area, generate employment opportunities and re-activate a vacant employment site.
- 6.5 The principle of the Proposed Development is considered to be wholly in accordance with the aims and objectives of the NPPF and the statutory Development Plan, in particular **Policies E4** and **E7** of the London Plan, **Policy E2** of the adopted Local Plan and draft **Policy IE3** of the Draft Local Plan.
- 6.6 The proposals have been formulated in accordance with the relevant policies of the National Planning Policy Framework, the statutory Development Plan and other material considerations. A range of planning considerations, including highways, noise, air quality, trees and ecology, design, heritage and fire, have been assessed against which the Proposed Development has been found to be acceptable.
- 6.7 In conclusion, this Statement demonstrates that the Proposed Development is in accordance with the relevant policies of the statutory Development Plan and that planning permission should, therefore, be granted.

MONTAGU EVANS
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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL