



MAY 2025

# Planning Statement

NCP, Parker Mews, London, WC2B 5BT

Iceni Projects Limited on behalf of  
CP CO 13 Limited

May 2025

ICENI PROJECTS LIMITED  
ON BEHALF OF CP CO 13  
LIMITED

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Planning Statement



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## 1. INTRODUCTION

1.1 This Planning Statement has been prepared by Icen Projects on behalf of CP CO 13 (the “Application”) in support of a full planning application for the change of use of the basement carpark from Sui Generis to B8 (self-storage) at National Car Park (NCP), Parker Mews, Covent Garden WC2B 5NT (‘the Site’).

1.2 The application seeks planning permission for the following:

*“Change of use of the basement carpark from Sui Generis to B8 (self-storage).”*

1.3 This application is submitted to Camden Council (“the LPA”) as the determining planning authority under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).

1.4 This application is purely for the change of use of the existing basement car park to B8 (self-storage) for the future operation of a Here Self Storage facility. Here Self Storage is a self-storage company that offers secure storage units in a variety of sizes for personal and business use. The first Here Self Storage facility is in Loughborough, and the company plans to expand to other locations in the UK and Continental Europe.

1.5 No external works or alterations are proposed. This Planning Statement provides an overview of the proposed change of use including operational details and an analysis of the proposal against relevant planning policies.

1.6 In addition to this Planning Statement and Application Form prepared by Icen Projects as part of the planning application, the following documents and drawings have been prepared and submitted in support of this planning application:

Document title	Author
Planning Statement	Icen
Site Location Plan	Janus
Indicative Layout Plans	Janus
Fire Statement	Socotec
Transport Statement	Icen Projects

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Document title	Author
Acoustic Report	TBC
Community Infrastructure Levy (CIL) – Form 1	Iceni Projects

## 2. FACTUAL BACKGROUND

### Site and surrounding

- 2.1 The site is known as New London House and is a 14-storey mixed use building in the heart of Covent Garden. The building features retail, office and residential floorspace with a theatre (Gillian Lynne Theatre) and 5 storeys of basement car parking. The site is subject to two leasehold interests whereby the theatre and car parking form part of the same long-term leasehold to the Applicant.
- 2.2 The site fronts Drury Lane to the south, Macklin Street to the west and Parker Street to the east. The basement car park is accessed off Parker Mews and currently has 330 car parking spaces (10,998 sqm) which predominately provides parking for the Gillian Lynne Theatre above. The car park is over-provisioned for the demand of its customers given the site's well-connected location with a PTAL rating of 6b. As such, the Applicant is looking to reutilise the space for self-storage purposes.
- 2.3 The surrounding context is characterised by a mix of uses including residential apartment blocks, commercial buildings, ground floor retail and education (St Joseph's Catholic Primary School).
- 2.4 The site has no designations or allocations under the Camden Local Plan Policies Map. The Site does not contain any listed buildings but is located within the Seven Dials (Covent Garden) Conservation Area. It is located within Flood Zone 1, indicating a low probability of flooding.

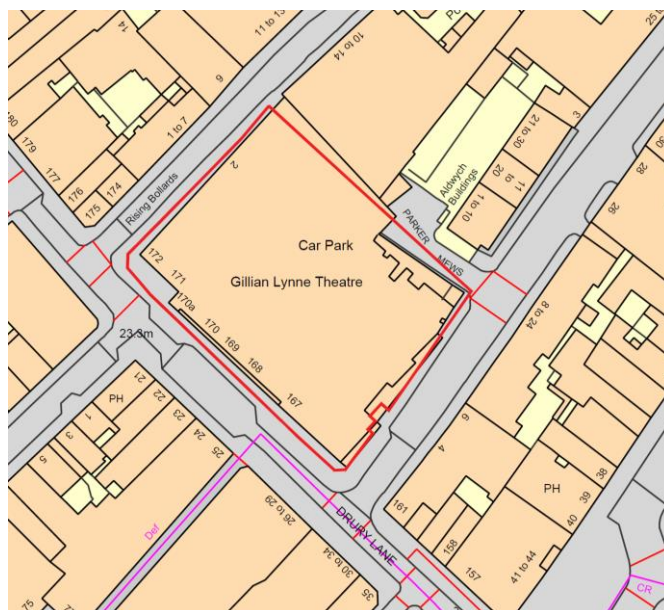


Figure 1 - Site Location Plan

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### 3. PROPOSED DEVELOPMENT –

3.1 This planning application seeks full planning permission for the following:

*Change of use of the basement carpark from Sui Generis to B8 (self-storage)."*

3.2 The development proposals include the change of use of the basement carpark from Sui Generis to B8 (self-storage) for the future operation of a Here Self Storage facility. This will result in no.822 drive up self-storage units across floors -4 Level B-C, -5 Level C-D and -6 Level D, equating to 2995.3m<sup>2</sup> GFA of B8 use. The rest of the car park will remain as a car park use.

3.3 Self-storage is an ever-growing sector in the United Kingdom and is in high demand from local residents and small businesses alike. The adaptive re-use of existing car parks in central London for the use of self-storage offers a sustainable solution to storage problems for households and local small businesses.

3.4 By comparing data from the Office for National Statistics (2023 vs. 2024), it was found that Camden had the biggest increase in small businesses (+ 1,360 new businesses or +4.01%) when compared against 22 central London boroughs.

#### **Operational Details**

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3.5 The operations details of the self-storage facility are proposed as follows:

- The facility will be operated by Here Self Storage; an established operator providing a range of storage facilities for local residents and surrounding businesses. (<https://www.hereselfstorage.co.uk/>).
- The facility will be accessible 24/7 by customers.
- The existing ticket office will form both a ticket office for the car park and a reception for the self-storage facility.
- Customer's first time accessing the self-storage facility will be during staff hours and by appointment only, where they will be greeted by staff and shown around the facility. After that, Customer's will be able to access the facility through a booking system.

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- The existing access arrangements will be utilised for the operation of the facility. Customers arriving by vehicle will be informed of the height restriction (2.1m) when booking either over the phone or via the website. Vehicles larger than a transit van will be denied access to the self-storage centre.
  - No parking or designated set down bays are to be provided within the car park with the exception of 1no. accessible space for use by staff, if required. For those visiting the Site to load/unload items for storage from a private vehicle or bikes and/or cargo bikes, sufficient width is available within the circulatory throughout the Site to enable vehicles to enter, navigate toward their respective storage unit and temporarily set down adjacent to the unit to load (whilst not blocking circulation of the facility for other vehicles), before egressing the Site via the vehicular access onto Parker Mews.
  - Customers are prohibited from leaving any items or rubbish on the premises. Refuse servicing will be undertaken in line with the existing arrangement at the site whereby any rubbish produced will be coordinated with the building operator.
  - The Indicative Layout Plans prepared by Janus that accompany this application are for information purposes only and are not intended to form part of the planning permission.
  - CCTV cameras are installed at entry ways and throughout the facility. These are live monitored continuously, while others (in corridors) are motion triggered.
  - Both the fire alarm and intruder alarm systems are monitored and integrated within the CCTV system.
  - For access control, Noke Systems is used throughout the facility which allows building access and activity to be tracked, revoke entry permissions instantly and manage access points remotely via an online portal, without needing to be on site.



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## 4. PLANNING POLICY

- 4.1 This section of the Planning Statement defines the Development Plan and sets out the relevant adopted and emerging planning policy and guidance at national, regional and local level.

### **The Development Plan**

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- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act and Paragraph 5 of the National Planning Policy Framework (NPPF) requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section identifies the principle planning policy considerations which have informed the development proposals, and which provide the context for the consideration of this planning application, as well as other material considerations.

- 4.3 In this instance, the relevant development plan for the Site consists of:

- Camden Local Plan (Adopted 2017)
- Site Allocations Plan (2013)
- Camden Local Plan Policies Map (Adopted 2017)
- The London Plan (2021)

### **National Planning Policy**

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- 4.4 The National Planning Policy Framework (NPPF) provides the planning policies for England and how these should be applied. This section provides an overview of the Government's national planning policy and guidance that is relevant to the proposed development.

- 4.5 The updated National Planning Policy Framework (NPPF) was published in December 2024 and sets out the Government's economic, environmental, and social planning policies.

### **Sustainable Development**

- 4.6 The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system. Section 11 of the NPPF encourages the use of previously developed (brownfield) land for new developments. Paragraph 125 promotes a number of objectives under which planning policies and decisions should be made, including –

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*“c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*

*d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).”*

### **Camden Local Plan (2017)**

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- 4.7 Camden Council is in the process of updating the Local Plan which is to replace the current Camden Local Plan (2017) and Site Allocations Plan (2013). The Council consulted on the draft new Local Plan (Regulation 18) from 17 January to 13 March 2024 and is currently considering all the responses received and will publish an updated version of the Local Plan for further consultation in Spring 2025. At the time of this application, the updated version of the Local Plan (Regulation 19) is not available.
- 4.8 The site has no designations or allocations under the Camden Local Plan Policies Map. The Site does not contain any listed buildings but is located within the Seven Dials (Covent Garden) Conservation Area.
- 4.9 In addition, the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) places a duty on decision makers to have special regard to the desirability of preserving heritage assets, including conservation areas as a whole.
- 4.10 The policies in Table 4.2 are relevant to the proposal.

**Table 4.1 Relevant Local Plan Policies**

<b>Policy Number</b>	<b>Policy Synopsis</b>
Policy E1	‘Economic Development’ identifies that Council will support businesses of all sizes, in particular start-ups, small and medium sized enterprises.
Policy E2 (Employment premises and sites)	‘Employment premises and sites’ identifies that Council will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy. identifies the site as being within the Southampton Road ‘Principal Employment Area.’

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Policy Number	Policy Synopsis
Policy T1	'Prioritising walking, cycling and public transport' requires the Council to promote sustainable transport by prioritizing public transport throughout the Borough. This includes ensuring that accessible and secure cycle parking facilities are provided in line with the London Plan requirements for cycle parking and design standards.
Policy T2	'Parking free development' states that the Council will limit the availability of car parking across the borough and, most importantly, support the redevelopment of existing car parks for alternative uses.
Policy A1	'Managing the impact of development' seeks to ensure that the amenity of communities and neighbours is protected.

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## 5. PLANNING ANALYSIS

- 5.1 This section reviews the key planning considerations arising from the proposed development. It provides a reasoned justification for the proposed development in the context of relevant policy and the specifics of the site and its surroundings.

### Principle of Development

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- 5.2 Paragraph 8 of the NPPF defines the parameters for considering new development, for which sustainability is the driving force. The key considerations in relation to addressing these parameters include the following objectives:

- **An economic objective** – the proposal is an employment generating land use within a designated Central Activity Zone. The proposal will deliver ongoing jobs to operate the self-storage facility.
- **A social objective** – the development provides a range of self-storage facilities to cater to local residents and small businesses. The change of use will not result in any physical works which may temporarily impact the amenity of neighbours during construction.
- **An environmental objective** – The proposal seeks to utilise an existing car park and does not involve any physical works that may harm the natural and built environment. The proposed change of use will result in a reduction of 86 daily vehicles which contributes towards reducing carbon emissions and improving air quality in central London.

- 5.3 The assessment above shows that the proposed development would meet the objectives of sustainable development as set out in the NPPF. The benefits of the proposed development set out above should be taken on board and considered in the planning balance alongside the policy justification set out in each section below.

- 5.4 Paragraph 125 (c) of the NPPF (2024) gives weight to the value of using suitable brownfield land whereby *“proposals should be approved unless substantial harm would be caused.”* Therefore, to meet the test for a refusal of planning permission it would need to be demonstrated by the decision maker that the development has a substantial harm, when balanced against the benefits of the development when considered against the NPPF in its entirety.

- 5.5 The Camden Local Plan identifies the terms ‘business’ and ‘employment’ to refer to uses such as storage and distribution (Use Class B8). Policy E1 (Economic Development) and Policy E2 (Employment premises and sites) of the Local Plan identifies that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business provided that

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the level of employment floor space is increased or maintained and support businesses of all sizes, in particular small and medium sized enterprises.

- 5.6 The principle of the proposed change of use of an existing car park (Sui Generis) to a self-storage facility (B8) is in line with local policy as it will result in an increase in 11,514sqm of employment floor space within an existing car park, therefore intensifying the provision of employment floor space in central London. Here Self Storage is considered a medium sized enterprise and therefore the change of use to facilitate the operation of the facility is directly inline with Policy E2.
- 5.7 The site is located in the Central Activities Zone where ‘rich mix of strategic functions and local uses, should be promoted and enhanced’. Part M of Policy SD4 of the London Plan (The Central Activities Zone (CAZ)) identifies that “sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions.... to support the needs of business and activities within these areas.” The proposed Class B8 Use will support this policy and thus accord with the wider strategic policies for London.

### **Transport and Parking**

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- 5.8 Policy T2 (Parking and car free development) of the Local Plan states that the Council will limit the availability of car parking across the borough and, most importantly, support the redevelopment of existing car parks for alternative uses.
- 5.9 Policy T6 (Car Parking) of the London Plan identifies that car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity.
- 5.10 Policy T1 requires the Council to promote sustainable transport by prioritizing public transport throughout the Borough. This includes ensuring that accessible and secure cycle parking facilities are provided in line with the London Plan requirements for cycle parking and design standards.
- 5.11 Policy A1 states that the Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers and neighbours and the existing transport network.
- 5.12 Marked parking bays are not demarcated on the proposed layout of the self storage facility as vehicles will access the site on an ad-hoc basis and will park adjacent to the self-storage units to undertake loading/unloading. For those visiting the Site to load/unload items for storage from a private vehicle or bikes and/or cargo bikes, sufficient width is available within the circulatory throughout the Site to enable vehicles to enter, navigate toward their respective storage unit and temporarily set down adjacent to the unit to load (whilst not blocking circulation of the facility for other vehicles), before egressing the Site via the vehicular access onto Parker Mews.

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- 5.13 The provision of an alternative use (B8) within the existing car park directly supported Policy T2. The site has a PTAL rating of 6b which signifies the site has excellent public transport accessibility with the site conveniently located centrally between both Holborn (Picadilly Line) and Covent Garden (Picadilly Line / Central Line) underground stations. The existing use of the site as a car park is therefore no longer consistent with the objectives of the London Plan and the Local Plan (Policy T6) due to the high accessibility of the site.
- 5.14 The Transport Statement that accompanies this application identifies that the site benefits from an existing Spokesafe cycle parking facility, which is to be retained on site. The Spokesafe facility provides personal storage lockers, a bike repair station and pump, e-bike charging facilities and accommodates no.32 cycle parking spaces across a mix of a two-tiered rack system and several Sheffield stands, inclusive of spaces dedicated for larger cargo styled bikes and Ebikes. The provision of cycle parking is in line with the London Plan requirements and Local Policy T1.
- 5.15 The existing car park facility currently comprises 327 existing car parking spaces across five separate lower levels. A total of no. 176 car parking spaces are to be removed from the Site to provide 822 no. self storage units. This will reduce the existing car parking facility to no. 151 car parking spaces.
- 5.16 A net trip generation assessment has been undertaken in line with Local Policy A1, which identifies that the daily trip generation of 104 trips associated with the current car park would remain consistent even with a reduction in capacity from 327 to 151 spaces. Under this assumption, the addition of 18 daily trips generated by the proposed storage use would result in a total of 122 trips per day— still within the normal range of daily fluctuations observed at the site and lower than levels recorded on the busiest days.
- 5.17 Core Policy 57 states that a high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and by making efficient use of land.
- 5.18 The drive-up units are for the purpose of self-storage with a maximum height of 2.9 metres and therefore are considered small in scale and will not risk protruding above any surrounding buildings. The materials and colours used are consistent with the Here Self Storage branding and will be high quality and durable. Given the site's context within a wider employment area, the proposed development is considered entirely appropriate and fit within the wider character of the locality.

### **Heritage Conservation**

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- 5.19 Whilst the site is located within the Seven Dials (Covent Garden) Conservation Area, the proposed change of use will not result in any physical impacts which may impact the nature of the Conservation Area.

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## **Amenity Impacts**

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- 5.20 Policy A1 of the Local Plan seeks to ensure the amenity of communities, occupiers and neighbours is protected including noise and vibration.
- 5.21 KP Acoustics have undertaken an environmental noise survey of the site to assess the likely impacts of the proposed change of use. The Assessment identifies that the noise emissions from the self-storage facility that are external (including vehicles entering the exiting the car park) are not expected to have an adverse impact on the nearest residential receptors. The proposal will also reduce the existing vehicle parking capacity and therefore vehicle movement associated with the car park are expected to decrease. No mitigation measures are deemed necessary. The proposal is therefore in line with the objectives of Local Plan Policy A1.
- 5.22 Policy C5 of the Local Plan requires appropriate security and community safety measures in buildings to ensure community safety and limit antisocial behaviour. Customer's first time accessing the self-storage facility will be during staff hours and by appointment only, where they will be greeted by staff and shown around the facility. After that, Customer's will be able to access the facility through a booking system. CCTV cameras are installed at entry ways and throughout the facility. These are live monitored continuously, while others (in corridors) are motion triggered. The proposed operation of the self-storage facility is therefore in line with Local Plan Policy C5.

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## 6. CONCLUSION

- 6.1 This Planning Statement has been prepared on behalf of CP CO 13 (the “Application”) in support of a full planning application for the change of use of the basement carpark from Sui Generis to B8 (self-storage) at National Car Park (NCP), Parker Mews, Covent Garden WC2B 5NT (‘the Site’).
- 6.2 Paragraph 85 of the NPPF identifies that “*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.*” The proposals will directly align with the Government’s ambition for economic growth through providing an employment generating land use on otherwise underutilised land. It has been justified that the proposed change of use of an existing car park, will not cause substantial harm in the context of heritage, amenity and traffic impacts. There is therefore no reason for the proposals to not be approved by the LPA in accordance with Paragraph 125 (c) of the NPPF. The Proposed Development will provide significant positive economic, social and environmental.

Economic	<ul style="list-style-type: none"><li>• The B8 self-storage use will provide self-storage facilities to small businesses in Camden.</li><li>• The proposal will facilitate the operation of an employment generating land use within a Central Activity Zone.</li><li>• The proposal will deliver job opportunities during the ongoing operation of the self-storage facility.</li></ul>
Social	<ul style="list-style-type: none"><li>• The development facilitates the future operation of the Here Self Storage Facility which provides a range of self-storage facilities to cater to local residents and businesses.</li><li>• The proposed change of use will not result in any substantial amenity impacts to neighbouring sites and the local community.</li></ul>
Environmental	<ul style="list-style-type: none"><li>• The proposed change of use will result in a reduction of 101-106 vehicles which contributes towards reducing carbon emissions and improving air quality in central London.</li><li>• The proposed modular units will provide a low impact self-storage product that does not require any permanent foundation fixtures.</li><li>• The proposal seeks to utilise an existing car park and does not involve any construction or clearing of land.</li></ul>



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- 6.3 The scheme accords with both local and national policy, whilst providing numerous economic, social and environmental benefits that weigh in support of the scheme being granted planning permission. Therefore, the proposals should be approved without delay in accordance with Paragraph 11(c) of the NPPF.