52 HOLMES ROAD, KENTISH TOWN

**DRAFT**

**COMPLIANCE WITH EMPLOYMENT POLICY**

**Introduction**

1. This note explains how the provision of employment (light industrial) floorspace (B1(c)) within the proposed development would satisfy the aims of the employment policies within Camden’s Development Plan policies.

**What is the aim of the Policy?**

1. Core Strategy policy CS8 aims to promote a *“successful and inclusive”* Camden Economy. The key driver behind the policy is to create and safeguard jobs.
2. In fact, the introduction to the policy says:

 *“Policy CS8 will be a key element in achieving the vision and objectives of the Community Strategy and this Core Strategy by providing for the jobs and training opportunities needed to support Camden’s growing population and by securing land and premises for the borough’s businesses”.[[1]](#footnote-1)*

1. The policy sets out the requirements in relation to industrial premises in the Borough. This states that, to provide these jobs, the policy safeguards “*existing employment sites and premises in the borough that meet the needs of modern industry and other employers”.*
2. Specifically related to industrial sites, the justification states that the Council,

*“will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use. This will help to provide premises for new and expanding businesses, support the Central London economy and secure job opportunities for local people who may find difficulties finding alternative work”.*

1. Thus, there is a key test within the Core Strategy that such floorspace has to be suitable and viable in order to create the jobs that are required.
2. This stance was echoed in the Inspector’s Report at the Core Strategy Examination that noted the rationale behind the Council’s protection of (sometimes “aging”) industrial sites was related to the provision and safeguarding of jobs: “*The primary reason for protecting industrial and warehousing sites and premises is to safeguard jobs for people who would otherwise be at high risk of being unemployed. This is an argument acknowledged in the [Employment Land] Review and, in my view, is a compelling one”.*
3. Policy DP13 of Camden’s Development Policies is also relevant. While this generally requires that the level of employment floorspace is maintained in mixed-use developments, there are other tests within the policy that are relevant. In particular, there are requirements that the development includes other *“priority uses”* such as housing.

**How does the proposed employment space comply?**

1. The rationale underpinning Camden’s policy protection of employment, and specifically industrial, floorspace is linked to the provision of jobs.
2. Any assessment of the proposal must therefore compare the existing and proposed situations on site, together with an assessment of their ability to deliver jobs.

Existing Situation

1. The existing premises are part of a converted car showroom. They are no purpose built light industrial floorspace. The site is being used by a fabric business and there is the potential to deliver a better designed, more productive premises, which would generate additional jobs.
2. The operator’s statement, enclosed at Appendix 1, confirms that the current layout is ineffective, with large areas of unproductive space including two toilet areas, two staircases, as well as a round showroom that is no longer suitable for a modern fashion business.
3. There therefore exists the opportunity to increase the quality and efficiency of the floorspace on offer, to enable more jobs to be delivered.

Proposed Situation

1. The proposed employment space has been designed to suit modern operator requirements.
2. Appendix 1 explains how the proposed space will be designed to meet modern requirements.
3. A reception and meeting room would be positioned at front of house, making for a more attractive and efficient. The ancillary storage area would be located in the basement, taking up less valuable floorspace. Designed to accommodate modern light industry, the occupiers envisage that the new premises will operate more efficiently and generate more employment.
4. The submitted Daylight and Sunlight Report (BVP – June 2016), confirms that the proposed light industrial accommodation at ground floor would benefit from greater levels of daylight than the existing accommodation. This would create a more pleasant and productive working environment than the current accommodation.
5. While there is a slight reduction in the employment floorspace overall, the proposed floorspace would have a more efficient layout thus allowing more employees to be accommodated.

**Why the proposed floorspace should be supported?**

1. The reason for the protection of industrial sites in Camden is strongly related to the provision of jobs. This is not only explained within the policy justification, but the Inspector noted the protection of jobs as the *“compelling”* reason to protect industrial floorspace.
2. Notwithstanding the loss of a minimal amount of floorspace, the proposal will deliver an improved quality and efficiency of floorspace which would have the potential to generate a greater amount of jobs than the current premises.
3. The proposal therefore satisfies the drivers behind Camden’s employment policies (i.e. to safeguard and create jobs), specifically those relating to the protection of light industrial floorspace and should therefore be supported.
1. Para 8.3, Camden Core Strategy [↑](#footnote-ref-1)