
3 - 6 Spring Place
Spring Place Ltd

Planning Statement

DP9

September 2016



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PLANNING STATEMENT

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APPENDIX 1 – VIABILITY & SUITABILITY OF USE REPORT (CURRELL)

1.0 INTRODUCTION

- 1.1 This report has been prepared by DP9 Ltd (DP9) on behalf of Spring Place Limited (“the Applicant”) in support of a planning application for the proposed demolition of the existing single-storey, double-height servicing garage and redevelopment to provide a new office building of up to six storeys, with flexible A1/A3 floorspace and event space (“the proposed development”) at 3-6 Spring Place, Kentish Town, London Road, NW5 3BA (“the Site”).
- 1.2 This Planning Statement has been completed in order to explain the nature of the proposed development and assess it against relevant planning policy and demonstrate its acceptability.

The Scheme

- 1.3 The application seeks Planning Permission for the proposed development, which includes:
- Demolition of existing buildings and structures;
 - Erection of a new building of up to 6-storeys (plus basement) to provide 3,375 sq.m GIA of flexible office floorspace (Class B1) with an additional 126 sq.m GIA of ground floor café / restaurant (Class A1 / A3), 495 sq.m GIA of event space (Generis) and two external terraced areas at second floor level;
 - Introduction of a new Grafton Road entrance including an outdoor area (‘The Yard’) designed to accommodate an outdoor seating and furniture, a temporary food and beverage offer and/or other similar elements. This area will be publicly accessible during business hours;

- Works associated with the removal of existing vehicular access points from Spring Place and the provision of new pedestrian and cycle access from the public highway to the new Spring Place and Grafton Road entrances; and
 - Provision of soft landscaping along Spring Place, comprising trees and low level planting.
 - Plant area of circa 50 sq.m GIA on the 5th floor roof to the north west of the Site and 40 photovoltaic panels on parts of the roof.
- 1.4 The proposed development, through the provision of a new, modern office building with additional facilities including publicly-accessible and flexible café / restaurant / event space, represents a significant opportunity to deliver the following economic, social and environmental benefits:
- Help to deliver sustainable development in line with the NPPF and facilitate the maximised economic use of the existing brownfield site.
 - Provision of flexible and modern employment space, recognising the needs of the existing and emerging office market.
 - Deliver approximately 600 workspaces and additional jobs associated with management, food and beverage and the event space, with further jobs created during the demolition, construction and fit out period. A large number of the construction jobs will originate from the local community, within the site's immediate catchment.
 - Provision of café / restaurant offer to meet the needs of building tenants and local residents and workers, providing additional local choice.
 - Creation of modern event space to serve tenants of the proposed office building and members of the public, bringing additional activity and income into the area.
 - Provision of modern, sustainable and high quality design and associated improvements, representing an appropriate response to the character of the

area and recognising the historical context of the Site and helping shape the future of the area.

- Undertaking of considerable and necessary repair and restoration works to the existing railway viaduct arches to ensure their structural integrity and continued use as part of the proposals.
- Substantial investment in an area where future development and investment is being targeted.
- Building upon the accessible location with an existing good level of public transport and pedestrian and cycle accessibility and introducing design measures including site layout and design to encourage enhanced pedestrian and cyclist accessibility.
- Removal of over 300 daily vehicular trips relating to the existing use.
- Incorporation of sustainable and renewable technologies to achieve BREEAM “excellent” standards.
- Generate substantial Community Infrastructure Levy payments for local benefit, plus an uplift in business rates and tax receipts.

The Planning Application

- 1.5 The planning application has been submitted in full to London Borough of Camden (“LBC”) and seeks planning permission for the following development:

“Demolition of existing buildings and structures and erection of a new (up to) six storey building (plus basement) to provide flexible office floorspace (Use Class B1) with ground floor flexible café, restaurant (Use Class A1 / A3) and event space (Sui Generis) and other associated works.”

- 1.6 The Planning Application comprises of the following:

- Completed Application Forms and Ownership Certificates;

- Application Plans and Drawings (September 2016) prepared by Piercy & Company ('Piercy & Co.');
- Design & Access Statement (September 2016) prepared by Piercy & Co.;
- Planning Statement (September 2016) prepared by DP9;
- Daylight & Sunlight Report (September 2016) prepared by Lumina London ('Lumina');
- Noise & Vibration Assessment (September 2016) prepared by Scotch Partners;
- Draft Construction Management Plan (September 2016) prepared by Arcadis;
- Basement Impact Assessment (September 2016) prepared by Heyne Tillett Steele ('HTS');
- Surface Water Drainage Statement (September 2016) prepared by HTS;
- Preliminary Ecological Assessment (September 2016) prepared by Peak Ecology;
- Sustainability & Energy Statement (September 2016) prepared by MTT;
- Ventilation Strategy (September 2016) prepared by MTT;
- Transport Assessment (September 2016) prepared by Transport Planning Practice Ltd ('TPP');
- Workplace Travel Plan (September 2016) prepared by TPP; and
- Statement of Community Involvement (September 2016) by London Communications Agency ('LCA').

1.7 Against this background, this Statement provides an overview of all aspects of the proposed development and an assessment of its appropriateness against the Development Plan and other material considerations. The scope of this Statement is as follows:

- Section 2 describes the Site, the main features of the surrounding area and the Site's planning history.

- Section 3 describes the main components and features of the proposed development.
- Section 4 outlines the relevant planning policy context of the Site and the proposed development
- Section 5 sets out a planning assessment of the proposed development against policy requirements.
- Section 6 provides a summary and our conclusions on the proposed development.

2.0 THE SITE AND SURROUNDING AREA

- 2.1 The Site extends to 2,221 sq.m (0.2221ha) and comprises a single-storey (double height) brick warehouse building, located between Spring Place and Grafton Road in Kentish Town. The building fronts onto Spring Place with multiple vehicle and pedestrian accesses along this frontage. This is additional to a secondary, single access point of access off Grafton Road, although it is understood that this access is not actively used. The existing building provides approximately 1,858 sq.m GIA of accommodation.
- 2.2 The Site is dissected by a railway viaduct relating to the route between Kentish Town West and Gospel Oak Mansfield Road on the London Overground line. As well as providing a commercial / commuter route, the route is heavily used by freight trains. The result of the viaduct is a series of six arches running through the Site. These are in a state of disrepair internally and require attention in terms of making water tight and to ensure their structural integrity going forward.
- 2.3 The Site is currently used by Addison Lee as a servicing garage for the company's fleet of taxis and other vehicles. The Class B2 use involves the servicing and repair of vehicles and typically operates daily between 6am and 2am (i.e. 20 hours per day). The use currently generates frequent vehicular activity throughout the day (approximately 300 trips). Addison Lee are due to vacate the Site in January 2017, relocating to a larger and fit-for-purpose facility elsewhere in Hayes, near Heathrow.
- 2.4 The wider area is characterised by a mix of uses and is transitional in nature being located between industrial / warehousing uses and buildings, established residential properties and other commercial uses, including offices and studio space. Of note is that a number of residential uses (and larger buildings) have more recently been granted planning permission. In addition, planning permission

has been granted for the redevelopment of the Magnet site on Holmes Road to provide an up to 7-storey student housing scheme.

- 2.5 The Site is not within any planning policy designated areas being outside of the identified Kentish Town Industrial Area.
- 2.6 The Site is not in a Conservation Area, although the Inkerman Conservation Area is located to the south of the Site. There are no listed properties in the immediate area. The Design & Access Statement lists the listed properties in the wider area.
- 2.7 To the immediate south of the Site, at the corner of Spring Place and Holmes Road, is a 2-storey building operating as the Autograph recording studios.
- 2.8 To the north of the Site is a part 7/8 storey residential property (7 Spring Place) and the 3 storey Wall to Wall studios (8-9 Spring Place). To the north of this is Spring House, a part 3/5 storey building occupied by Spring Studios offering studio space. North of this, where Spring Place becomes Gillies Street, is a terrace of 3 storey residential properties.
- 2.9 To the west of the Site and immediately to the north of the Site's access of Grafton Road is Star House (104-108 Grafton Road). This is a part 3/4/5 storey office building (although some of the property is now believed to have been changed to provide residential accommodation). To the north of Star House is the Annroy Gallery (110-114 Grafton Road), a 4 storey property.
- 2.10 To the east of the Site is the Camden waste vehicle depot and offices, comprising 1 and 2 storey buildings and offices and yard space. This site is identified as a redevelopment opportunity in the Kentish Town Neighbourhood Place and the emerging Camden Local Plan.
- 2.11 Further detail of the Site, these adjacent properties and the wider area is included in the Design & Access Statement and in the supporting plans and drawings submitted as part of this planning application.

- 2.12 The Site is easily accessible by public transport with the nearest bus stops located on Malden Road (to the west) and Kentish Town Road (to the east). These stops primarily support local services and connections into Central London (The City and Westminster) and north to Hampstead, Finchley and Clapton. The Site is also well served by train (Overground (including Thameslink) and Underground) with Kentish Town and Kentish Town West stations within 0.5km of the Site and Gospel Oak and Chalk Farm just beyond this. As a result, the Site has a Public Transport Accessibility Level (PTAL) of 5 (with 6b being the highest).

Site Planning History

- 2.13 The Site's planning history records are limited. A review of LBC's online planning applications register reveals just a single application relating to the Site. In February 1997 Planning Permission was granted for alterations to the front elevation of the building (including new fire emergency doors, new industrial doors in existing openings, new access door and metal fascia) (LBC Ref: PE9606133). Alongside this, Advertisement Consent was also granted for externally illuminated signs on doors and internally illuminated projected sign (LC Ref: AE9606134). The Site is referred to as 77 – 82 Spring Place (Arches) in this application.
- 2.14 The online planning applications register indicates that no further applications have been submitted in relation to the Site.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The component parts of the proposed development are set out in Section 1 of this Planning Statement, with additional information in the application plans and drawings and Design & Access Statement submitted as part of this planning application.
- 3.2 As established, the proposed development will deliver a number of distinct benefits, representing a significant investment in the area and will provide a substantial increase in employment opportunities and associated and direct spinoffs from this. The various elements of the proposed development must be considered as a complete package, with the overall viability and deliverability reliant on the whole scheme coming forward.
- 3.3 Planning Permission is sought for the demolition of the existing single-storey building and other structures and the redevelopment of the Site to provide a modern building of up to 6 storeys (plus basement). This will include Class B1 office space at ground to 5th floor, publicly-accessible flexible Class A1 / A3 food and beverage floorspace (in the form of a café / restaurant), *Sui Generis* event space, designed for use by office tenants and members of the public, at ground floor level and a basement providing cycle parking, plant and other back of house elements. An outdoors area, The Yard, will be created, providing an entrance to the building off Grafton Road and a flexible space for external seating and potentially temporary food and beverage carts, or similar. A breakdown of the proposed uses is set out below:

Use	Floorspace (GIA)
Office (Use Class B1)	3,375 sq.m
The Yard (Use Class A1 / B1)	23 sq.m
Café / restaurant (Use Class A1 / A3)	126 sq.m
Event space (Sui Generis)	495 sq.m
Basement cycle parking / plant / back of house	524 sq.m
Total Floor Space	4543 sq.m

- 3.4 The office floorspace will be arranged to meet modern flexible office requirements offering variety in rentable office space to fulfil the needs of different sized tenants. A potential use is for co-working space that will allow companies to take anything from individual desk space, to small ‘pod’ spaces to complete floors of the building (as required). The flexibility of the space is key, allowing individuals and businesses to grow and adapt within the building, resulting in a dynamic and evolving collaborative work environment, in line with an identified local need
- 3.5 A series of internal zones will allow tenants to engage with their work and engage with their neighbours in a number of different ways, from the relaxed to the formal; providing the user with the services and facilities that they require on any given day, with everything designed around flexibility and accessibility. Indicative floorplans are provided with the application, which demonstrate one way in which the co-working office space and format could be arranged.
- 3.6 A distinctive café/restaurant is proposed to serve both the office space (tenants and visitors) and the public, a distinct café / restaurant is proposed. This is located at the Spring Place entrance, creating an attractive and usable feature space within one of the railway viaduct arches. This space is designed to be flexible in nature and will sit complimentary to an adjacent event space area. A modest kitchen and preparation area is proposed and this will be located in the basement. The proposed ventilation / extraction system is shown on the scheme plans and drawings with further technical detail provided in the Ventilation Strategy prepared by MTT and submitted with this application. The proposed hours of operation of the café / restaurant / event space would be from 6am to 11pm each day.
- 3.7 The proposed Grafton Road entrance is designed to provide an attractive public access (during business hours) to the Site through the creation of an outdoor area for external seating as well as the potential for temporary food and beverage provision. Details of this space are included in the Design & Access Statement

- and the submitted plans and drawings. Two other external areas are proposed in the form of terraces at 2nd floor level, at the north and south west corners of the buildings. These are designed for private access to office tenants and will provide additional amenity space with the inclusion of some soft landscaping / planting.
- 3.8 67 cycle parking spaces (in the form of ‘spacepods’) are provided in the basement with access through the main building at ground floor off Spring Place and Grafton Road. Further details of the basement and cycle parking provision and layout are included in the Transport Assessment and in the scheme layout plans with information relating to access arrangements included in the Design & Statement. Visitor cycle parking is suggested to be on highways land under the arches on Grafton Road, rather than directly in front of the Site on Spring Place. Further explanation and justification is included in the Transport Assessment.
- 3.9 Alterations and adjustments to the existing accesses off Spring Place and Grafton Road are proposed to provide adequate cyclist, pedestrian and disability access to the Site. This also deals with the change in nature of the Site from being a servicing garage where frequent vehicular access in and out of the building occurs to a car-free development. A dedicated disabled parking bay is proposed on Spring Place, adjacent to the front of the proposed building within existing on-street parking bays.
- 3.10 Vehicular servicing access to the Site, along with refuse storage and collection, is proposed from Spring Place. A dedicated loading bay, to be secured through a Section 106 and Traffic Regulation Order (TRO), is proposed to the front of the proposed building, with easy access into the main reception area and servicing access on Spring Place. Please refer to the accompanying Transport Assessment for further details.
- 3.11 As well as plant areas in the basement, a small area for additional plant is proposed on the roof at 5th floor level. This area of approximately 50 sq.m has been carefully and efficiently designed to accommodate air handling units and

condensers, noting adjacent sensitivities in terms of design and amenity. The design and noise implications of this plant area have been considered and are referred to in the relevant documents with this application.

- 3.12 As set out in the Design & Access Statement, the proposed development introduces modern yet complimentary and contextual architecture and will utilise the highest quality materials to create a visually attractive scheme delivering positive and visually improving the entrances off Spring Place and Grafton Road.

Pre-Application Discussions

- 3.13 Prior to the submission of this application, pre-application discussions have been held with LBC planning and design officers, with additional engagement and correspondence with other officers including those from LBC's Business Growth Sustainability and Highways teams. We have had two formal pre-application meetings between June and July 2016 with these and other discussions secured through a Planning Performance Agreement between LBC and the Applicant.
- 3.14 Through these discussions it has been confirmed that the principle of office use in this location is acceptable, and that the proposed design of the scheme was considered acceptable.
- 3.15 In addition to these pre-application meetings a Public Exhibition has been undertaken and the scheme presented to LBC's Design Review Panel in July 2016. Furthermore, an extensive local engagement exercise has been completed, involving local residents and stakeholder groups. Full details of this engagement, including how the scheme has evolved to take on board comments made, is set out in the Statement of Community Involvement prepared by LCA and included within the application submission documents.

4.0 PLANNING POLICY CONTEXT

4.1 Paragraph 11 of the National Planning Policy Framework (NPPF) requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the Site comprises the London Plan (Consolidated version, March 2016); the LBC Core Strategy (November 2010); LBC Development Policies DPD (November 2010); and LBC Site Allocations DPD (September 2014).

4.2 The Kentish Town Neighbourhood Plan ('KTNP') is due to be formally adopted on 19 September 2016, following a successful referendum in June 2016. Once approved by LBC Full Council it will become part of the Development Plan. For the purpose of this scheme and the Planning Statement, the KTNP is considered to be part of the Development Plan.

4.3 LBC are currently in the process of preparing a Local Plan. A draft was submitted to the Secretary of State in June 2016 with Examination Hearings due towards the end of October 2016. At this stage, as the Local Plan is not adopted it should therefore be given limited weight only in the determination of this application. In any event, the draft policies therein are largely consistent with adopted Development Plan policies of relevance to the proposed development.

4.4 This section sets out the planning policy framework relevant to the Site and proposed development.

National Planning Policy Framework

4.5 The NPPF was published in March 2012 and sets out the Government's objectives for achieving sustainable development. The NPPF establishes a presumption in favour of sustainable development. Paragraph 7 confirms there are three dimensions to sustainable development: economic, social and environmental.

- 4.6 When making planning decisions, paragraph 14 of the NPPF confirms that there should be a presumption in favour of sustainable development and that planning permission should be granted where development proposals accord with the development plan. This approach is applied in the assessment of the proposed development.
- 4.7 The NPPF then outlines a series of considerations against which development should be assessed. In terms of the proposed development the relevant considerations are:
- Chapter 1 – Building a strong, competitive economy;
 - Chapter 4 – Promoting sustainable transport;
 - Chapter 7 – Requiring good design;
 - Chapter 8 – Promoting healthy communities;
 - Chapter 10 – Meeting the challenge of climate change, flooding and coastal change;
 - Chapter 11 – Conserving and enhancing the natural environment; and
 - Chapter 12 – Conserving and enhancing the historic environment.
- 4.8 Within Chapter 1, specifically at Paragraph 19, of the NPPF it is established that *“planning should operate to encourage and not act as an impediment to sustainable growth... [and] ... therefore significant weight should be placed on the need to support economic growth through the planning system”*. To achieve this, *“local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century”* (paragraph 20).
- 4.9 To accord with this principle, NPPF Paragraph 22 states that *“planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose”*. Critically, it should be practiced that *“where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or*

buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities” (ibid.). Although the Site is currently occupied by Addison Lee, it will become vacant in 2017. The proposed development is being brought forward in advance of this Site becoming vacant and will therefore deliver the benefits whilst minimising the period of vacancy and inactivity. The justification for the proposed loss of the existing use against the Development Plan is included in Section 5 of this Statement as well as demonstration of the demand for the proposed uses.

- 4.10 The Site’s location in an Edge of Centre location in retail planning terms (approximately 250m from Queen’s Crescent neighbourhood centre and also 450m from Kentish Town town centre) is another consideration in the determination of this application, namely referring to the flexible café / restaurant space. Paragraphs 24 and 26 set out the sequential and retail impact tests for proposals outside of defined Centres, although in regard to the requirement for impact testing a threshold of 2,500 sq.m is established, unless there is a lower locally set floorspace threshold (which there is not). Paragraph 27 in turn sets out how applications should be determined against the sequential and impacts tests. The compliance with these tests is detailed in Section 5 of this Statement.
- 4.11 NPPF paragraph 34 requires that decisions *“should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”*. The accessibility of the Site is demonstrated throughout this Statement (as well as the Design and Access Statement and Transport Assessment) and the proposals are genuinely car-free encouraging sustainable transport modes.
- 4.12 Paragraph 35 encourages proposals to be located and designed to achieve a number of specific objectives, including: efficient delivery solutions; the prioritisation of pedestrian and cycle movements; providing safe and secure layouts reducing conflict between transport users; and meeting the needs of

people with disabilities. The proposed development will achieve these key practical targets.

- 4.13 The NPPF requires high quality design and good architecture. Paragraph 58 (3rd bullet) identifies that there should be an aim to *“optimise the potential of the site to accommodate development ... and sustain an appropriate mix of uses”*. Paragraph 60 seeks to promote or reinforce local distinctiveness through planning applications and also look for *“opportunities available for improving the character and quality of an area”* (paragraph 64).
- 4.14 Paragraph 65 of the NPPF states that *“local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design”*. The scheme has been carefully designed to incorporate high performance materials, reduce heat loss and to provide renewable energy through the installation of photovoltaic panels, where this is achieved from a design and maintenance point of view.
- 4.15 The NPPF supports the local design review process with decision-takers *having regard* to the recommendations from the design review panel (paragraph 62). It is also expected that applicants *“work closely with those directly affected by their proposals to evolve designs [and that where this can be demonstrated] ... new development should be looked on more favourably”* (paragraph 66). Extensive pre-application engagement has been undertaken to achieve a high quality scheme, which is sympathetic the various needs of key stakeholders.
- 4.16 Paragraph 69 of the NPPF states that decisions *“should aim to achieve places which promote ... active street frontages which bring together those who work, live and play in the vicinity”*. The proposed development achieves this.
- 4.17 New development should *“take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption”* (paragraph 96). The

proposed development incorporates sustainable and renewable technologies, inherent to the design to achieve this. Details are provided in this Statement and in further details in other core planning documents submitted with this application.

- 4.18 Paragraph 111 of the NPPF states that *“decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”*. An important benefit of the proposed development is the enhancement of this Site in design and sustainability terms but also through the realisation of its optimum and effective use.
- 4.19 New development should *“prevent unacceptable risks from pollution and land instability ... [with decisions ensuring that it is] ... appropriate for its location”* (paragraph 120). In a similar vein, it is important that planning decisions *“avoid noise from giving rise to significant adverse impacts”* (paragraph 123).
- 4.20 Regarding the Site’s location adjacent to the Inkerman Conservation Area, the NPPF requires heritage assets to be conserved *“in a manner appropriate to their significance”* (paragraph 126). In terms of decision-making, *“where a development proposal will lead to a less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”* (paragraph 134). NPPF paragraph 138 recognises that *“not all elements of a Conservation Area will necessarily contribute to its significance”*.
- 4.21 The NPPF encourages Local Planning Authorities to determine applications positively to foster the delivery of sustainable development (Paragraph 186). LPAs are advised to look for solutions rather than problems and decision-takers are asked to approve applications for sustainable development where possible (Paragraph 187).

Planning Policy Guidance

- 4.22 In March 2014 the Government launched the Planning Practice Guidance (PPG) as an online web-based resource. This is a material consideration in planning decisions. Relevant parts of the current PPG are referred to in the Section 5 (Planning Assessment) of the Planning Statement.

The Development Plan

The London Plan (March 2016)

- 4.23 The following London Plan policies are of relevance to the Site and proposed development:

- Policy 2.9 (Inner London) targets supporting and sustaining existing and new communities, including through “*ensuring the availability of appropriate workspaces for the area’s changing economy*”.
- Policy 4.1 (Developing London’s Economy) recognises the strategic aim to “*promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London*”, including the support and promotion of “*specialist clusters of economic activity*”, emphasising “*the need for greater recognition of the importance of enterprise and innovation*”.
- Policy 4.2 (Offices) encourages further office accommodation across London, including the renewal and modernization of office stock and to meet the distinct needs of the market.
- Policy 4.4 (Managing Industrial Land and Premises) stresses that Boroughs should adopt a strategic approach to ensure that there is a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses.
- Policy 5.2 (Minimising Carbon Dioxide Emissions) requires development proposals to accord with the energy hierarchy, namely to be lean, clean and

green. There is also an expectation to meet targets for carbon dioxide emissions reduction.

- Policy 5.3 (Sustainable Design and Construction) states that *“development proposals should demonstrate that sustainable design standards are integral”*.
- Policy 5.7 (Renewable Energy) identifies that *“major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation, where feasible”*.
- Policy 5.9 (Overheating and Colling) requires proposals to *“demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs”*.
- Policy 5.10 (Urban Greening) supports the integration of green infrastructure, including elements such as tree planting and soft landscaping.
- Policy 6.9 (Cycling) supports increases in cycling across London through the provision of secure, integrated, convenient and accessible cycle parking facilities as well as associated changing and facilities and showers.
- Policy 6.10 (Walking) encourages new developments to *“ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space”*.
- Policy 7.1 (Lifetime Neighbourhoods) requires that *“the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood”*.
- Policy 7.4 (Local Character) states that *“development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings”*.
- Policy 7.6 (Architecture) sets out a number of criteria for the architectural quality of new development to ensure that it makes a positive contribution to public realm and streetscape.
- Policy 7.15 (Noise) is consistent with the NPPF (paragraph 123) in requiring new development to avoid *“significant adverse noise impacts on health and quality of life”*.

Camden Core Strategy (November 2010)

4.24 The following Core Strategy policies are of relevance to the Site and proposed development:

- Policy CS1 (Distribution of Growth) supports *“development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.”*
- Policy CS4 (Area of More Limited Change) states that in those area of more limited change, development will be required to *“respect the character of its surroundings, conserve[s] heritage and other important features and provide environmental improvements and other local benefits.”*
- Policy CS5 (Managing the Impact of Growth and Development) ensures that consideration is given to *“providing uses that meet the needs of Camden’s population and contribute to the borough’s London-wide role”*. This includes providing sustainable buildings and spaces of the highest quality and protecting the amenity of local communities.
- Policy CS7 (Promoting Camden’s Centres and Shops) applies the sequential approach to retail and other town centre uses outside of designated centres.
- Policy CS8 (Promoting a Successful and Inclusive Camden Economy) supports a strong economy through a number of strategies, including *“safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers; safeguarding the borough’s main Industry Area; [and] expect[ing] a mix of employment facilities and types, including the provision of facilities suitable for small and medium size enterprises, such as managed, affordable workspace”*. Supporting text sets out that LBC *“will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use”* (paragraph 8.13). Paragraph 8.15 goes on to suggest that it is in the Industrial Areas where the retention of industrial and warehousing uses is specifically important.

- Policy CS11 (Promoting Sustainable and Efficient Travel) encourages the promotion of walking, cycling and public transport use. This includes the minimisation of car park spaces and maximization of cycle parking and associated facilities.
- Policy CS13 (... Promoting Higher Environmental Standards) sets out that all development should “*take measures to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation*”.
- Policy CS14 (Promoting High Quality Places and Conserving Our Heritage) requires “*development of the highest standard of design that respects local context and character*”.
- Policy CS15 (... Encouraging Biodiversity) seeks to protect and improve sites of nature conservation and biodiversity including protecting trees and promoting the provision of new trees and vegetation.

Camden Development Policies DPD (November 2010)

4.25 The following Development Policies DPD policies are of relevance to the Site and proposed development:

- Policy DP1 (Mixed Use Development) requires “*a mix of uses in development where appropriate in all parts of the borough*”. Outside of the central London Area and town centres there is not a prescriptive requirement for specific uses.
- Policy DP12 (Supporting Strong Centres ...) looks to “*ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours*”.
- Policy DP13 (Employment Premises and Sites) sets the criteria for a change of use from a business use to a non-business use, namely that premises are no longer suitable for its existing uses and that there is evidence that its retention

has been explored. The policy does not strictly differentiate between different types of employment uses. Supporting paragraph 13.3 refers to sites' designation (or not) within an Industrial Area, as an important factor. In this instance, the Site is outside but adjacent to the Kentish Town Industrial Area. - *we add that the emerging Local Plan (June 2016) proposes the shrinking of the KTIA to exclude the land to the east of the Site*

- Policy DP16 (The Transport Implications of Development) seeks to “*ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links*”.
- Policy DP17 (Walking, Cycling and Public Transport) requires proposals to make suitable provision for these users, including providing high quality cycle parking, workplace showers and lockers.
- Policy DP18 (Parking Standards...) states that developments should provide the minimum necessary car parking provision, and be car-free in specific locations.
- Policy DP22 (Promoting Sustainable Design and Construction) requires development to “*incorporate sustainable design and construction measures ... including an expectation of achieving BREEAM ‘excellent’*”.
- Policy DP24 (Securing High Quality Design) requires “*all developments ... to be of the highest standard of design and will expect developments to consider character, setting, context and the form and scale of neighbouring buildings*”.
- Policy DP25 (Conserving Camden’s Heritage) states that development outside of a conservation area that causes harm to the character and appearance of that conservation area should not be allowed.
- Policy DP26 (Managing the Impact of Development on Occupiers and Neighbours) sets out that neighbour amenity will be protected in terms of overlooking, outlook and noise / vibrations.
- Policy DP27 (Basements and Lightwells) requires developers to demonstrate that proposed basements do not cause harm to the built and natural

environment and local amenity and do not result in flooding or ground instability.

- Policy DP28 (Noise and Vibration) ensures the control and management of noise and vibration. Amenity of neighbours will be safeguarded through conditions and obligations.
- Policy DP29 (Improving Access) requires new buildings and spaces to be designed to be as accessible as possible, including through the encouragement of public transport use and the provision of secure car parking.

Kentish Town Neighbourhood Plan (June 2016)

4.26 The following Kentish Town Neighbourhood Plan policies are of relevance to the Site and proposed development and to understanding the context of the immediate, changing area (note that the Neighbourhood Plan will only be formally adopted following Full Council approval on 19 September 2016):

- Policy D3 (Design Principles) sets out a series of design criteria against which proposals will be considered. These require schemes to be based on a comprehensive understanding of the site and its context; to be well integrated into their surroundings; to draw upon key aspects of character from the surrounding area; and to enhance accessibility.
- Policy SP2 refers to the Kentish Town Potential Development Area (KTPDA). This includes much of the Development Policies-defined Industrial Area (and therefore excludes the Site) and supports mixed use development “*whilst retaining, and where possible increasing, the level of industrial floorspace and employment opportunities including the growth of small and start-up businesses*”.
- Policy SP2a states that in the KTPDA, “*existing industrial floorspace is maintained or increased by better design and greater density of buildings*”.

Other Guidance and Evidence Base Documents

4.27 LBC have published a number of supplementary planning guidance documents, to assist in the planning application decision-making process. These documents are referred to as Camden Planning Guidance ('CPG'). CPG documents relating to Design (CPG1), Sustainability (CPG3), Amenity (CPG6) and Transport (CPG7) are referred to in other supporting planning documents, as relevant. CP5 relating to town centres, retail and employment is referred to below in more detail.

Camden Planning Guidance (CPG5) (September 2013)

4.28 This sets out that there is a very restricted supply of suitable sites and premises suitable for light industrial, storage and distribution uses in Camden (paragraph 7.8). To understand the value of existing industrial sites and premises, these are categorised from 1 (being the best) to 3 (the worst).

4.29 Paragraph 7.12 states that Category 1 sites are "*rare ... and will always be protected*" and that Category 2 sites are "*more common ... and will usually be protected unless there is very strong marketing evidence to show that they are no longer suitable*". Category 3 sites are concluded as being "*heavily compromised and may not be suitable for continued industrial use when they become empty or need significant investment*". The statement continues that "*they [category 3 sites] could be suitable for office B1(a) space*" (ibid.).

4.30 Paragraph 7.16 and 7.17 explicitly supports the protection of industrial uses in the designated Industrial Areas (the Site is not in an Industrial Area) and paragraph 7.18 sets out that marketing evidence is required where there is a loss of employment uses (the proposed development proposes an alternate employment use and therefore evidence of marketing is not required – this has been confirmed in pre-application discussions with LBC and correspondence from LBC's planning policy team).

Camden Employment Land Study (ELS) prepared by URS (August 2014)

- 4.31 Section 5.6 sets out that “*prime industrial and warehousing land providing high quality units within LB Camden is limited in supply*” (our emphasis) (p.30). The ELS also identifies the threat to existing industrial and warehouse land from residential (including student housing) development (p.32).
- 4.32 Industrial sites which support the CAZ are noted as being important and the ELS identifies that “*these employment sites are typically characterised by good strategic access into central London, with good quality units providing both office and warehousing or industrial space, with adequate servicing and parking provision ... [and] ... they are all located away from residential and sensitive uses allowing potential for 24-hour access and operation*” (p.32). None of these criteria are met in the application Site.
- 4.33 The ELS forecasts a contraction in demand for additional industrial floorspace between up to 2031 of between 10,000 and 16,000 sq.m gross. This is against a forecast increase in demand for almost 700,000 sq.m net additional office floorspace by 2013 (Section 7.10, p.66).

Policy Conclusions

- 4.34 The Site is in an existing Class B2 industrial use and the proposed redevelopment of the Site to provide Class B1 office floorspace is supported in principle in the Development Plan by virtue of the continued (and substantially enhanced) employment use proposed and, importantly, that the Site is outside of the protected Kentish Town Industrial Area.
- 4.35 The policy basis and evidence base and planning guidance support for flexibility in the retention and provision of employment sites is a key consideration and the

proposed development helps secure the strategic aims of the Development Plan (both London-wide and Camden-specific) in responding to market demand.

- 4.36 The proposed development is considered to be consistent with the NPPF, and the Development Plan, in terms of the principle of development and also in terms of design and other technical matters including transportation, neighbour amenity and sustainability.
- 4.37 Section 5 sets out a comprehensive assessment of the Site and proposed development's compliance with the Development Plan and other material considerations including the NPPF.

5.0 PLANNING ASSESSMENT

5.1 This section outlines our assessment of the proposed development against the planning policy context identified in Section 4. Reference is made to the Design & Access Statement, plans / drawings and other consultants' documents submitted in support of the Planning Application to avoid unnecessary repetition.

Decision-Making Approach

5.2 The NPPF forms a primary consideration for the planning application alongside the Development Plan. The approach to assessing the proposed development should be based on the land uses proposed and whether the scheme constitutes sustainable development and will thus benefit from the NPPF paragraph 14 presumption in favour.

5.3 The proposed development should be defined as sustainable development for the following reasons:

- **Economic Role:** the proposed development will contribute towards reinforcing a strong, responsive and competitive 'local' economy within the Kentish Town area through the delivery of new flexible office floorspace, representing the right type of use in the right place at the right time "*to support growth*" (NPPF paragraph 7). The proposed development will also lead to a substantial increase in both direct and indirect job creation (estimated to be over ten times above the existing). The proposed office use and associated increase in footfall and activity will help support local businesses in the vicinity, including in the nearby Neighbourhood and Town Centres, with the proposed public café / restaurant use complimenting existing uses and serving the needs of the local community. As such the proposals are considered consistent with the NPPF and specific parts of the Development Plan including London Plan Policies 2.9 and 4.1, Core Strategy

Policies CS1, CS5 and CS8 and Development Policies DPD Policies DP12 and DP13.

- **Social Role:** the proposed development will make a series of contributions helping maintain a strong, vibrant and healthy community. The proposed development, through the design approach adopted, creates a high quality built environment, elevating the quality of the streetscene and acting as catalyst to future quality investment in the area. Furthermore, the design of the building ensures that it is inclusive and accessible to all. The scheme also provides opportunities for local small business and start-up firms to locate in Kentish Town and, through the café / restaurant / event space, the proposals provide services responding to the identified needs of the local area. In addition, there is public access to the building and ‘The Yard’ during business hours. This accords with relevant parts of the NPPF and the Development Plan, London Plan Policy 7.1 and Core Strategy Policies CS4 and CS8 in particular.
- **Environmental Role:** the proposed development will contribute towards the protection of the natural environment through the introduction of sustainable design and materials and the transition away from high levels of vehicular activity to providing a substantial local employment provider in an accessible and sustainable location. Renewable energy is provided, where possible, in the form of photovoltaic panels and there is an ecological benefit provided in the form of the introduction of bat boxes and increased areas of soft landscaping and planting. The historic and built environment will be protected and also enhanced due to the high level of design applied to the proposed building and the impact that this will have on the streetscene and the nearby Conservation Area. As such the proposed development is consistent with Chapters 8 and 11 of the NPPF and a number of development management policies, discussed later, in the adopted Development Plan. The

proposals are also consistent with design policies set out in the Development Plan and the NPPF.

5.4 On the basis that the proposals represent sustainable development, this assessment now turns to specific development management matters, with the key issues to be tested as part of this assessment being:

- Design approach;
- Loss of existing use;
- Appropriateness of proposed uses;
- Transport and accessibility;
- Impact on neighbour amenity; and
- Sustainability.

Design Approach

5.5 An important planning consideration is whether the proposed development is considered to be acceptable in terms of design, paying particular regard to the immediate surroundings, the local context and the nearby Inkerman Conservation Area.

5.6 The design and layout approach of the proposed development is outlined in full in the submitted plans and drawings and Design & Access Statement (prepared by Piercy & Co.) which present the layout, scale and appearance of the proposed development. Detailed elevational drawings and computer generated images (CGIs) have also been prepared and show the proposed fenestration and materiality of the building.

5.7 Recognising national and local policy requirements and guidance, the scheme has been carefully designed to; respond to the specific constraints, and opportunities, of the Site; respect the local character and context of the its surroundings, notably Kentish Town's history and the Inkerman Conservation Area; and meet the needs

- of the Applicant in providing a viable and deliverable scheme capable of delivering the benefits associated with the proposals.
- 5.8 The design of the proposed development focuses on replacing the existing building and structures, considered to be poor quality and disruptive to the streetscene (both on Spring Place and Grafton Road), with a high quality building. The proposed development incorporates a number of design *highlights*, including the visual exposure of the to-be-restored railway arches from Spring Place – a central feature of the scheme; the creation of external courtyard space as part of the proposed public café / restaurant; the provision of a central mews running along the railway arches between distinct office areas; and the opening up of access to the Site from Grafton Road through the proposed ‘The Yard’ space.
- 5.9 The proposed development, when read as a whole, references the articulated roofscapes that once lined the railway, as well as the textured, enduring materials of the best local buildings, which represents a positive architectural introduction to the streetscene.
- 5.10 The proposed development has accordingly been designed to achieve the objectives of Sections 7 and 12 of the NPPF. In particular, the proposals are considered to optimise the potential of the site (paragraph 58), through the re-use of previously development land (paragraphs 69 and 111) and improve the character and quality of the area (paragraph 64). Given the location of the site, near to the Inkerman Conservation Area, the design has been developed to ensure there is no harm to the setting of the Conservation Area and will, in fact, respond positively to the setting of this heritage asset. Through the introduction of outward looking and publicly accessible ground floor spaces, off both Spring Place and Grafton Road, the proposed development helps achieve bringing together of those who work, live and play in the vicinity, as targeted in paragraph 69 of the NPPF.
- 5.11 London Plan Policy 7.1 is satisfied through the proposed development’s contribution to the creation of a ‘lifetime neighbourhood’, achieved through the

introduction of a well-designed new building which provides legibility and permeability to the area and interaction of new uses with the existing and new members of the 'neighbourhood'. In designing the scheme, the architects have undertaken a forensic approach to understanding and reflecting local character, both in terms of surrounding buildings' size, scale and design through to materials being uses historically and more recently. As such, the proposed development is consistent with London Plan Policy 7.4 and, due to the architectural quality of the proposed building, London Plan Policy 7.6 also.

- 5.12 Considering LBC policies, the proposed development complies with Core Strategy Policy CS4 through the design of the scheme and respectful relationship with its surroundings (including the Inkerman Conservation Area) and Policy CS14 through the delivery of a high quality scheme. It also satisfies Development Policies DP22 (achieving sustainable design), DP24 (high quality design in its context) and DP25 (respecting the setting of the adjacent conservation Area). Finally, the proposed development satisfies the specific design criteria set out in KTNP Policy D3, namely that it understands the site and its surroundings and that it integrates well within the immediate surroundings.
- 5.13 The evolution of the scheme, in design terms, has been borne out through close engagement with local stakeholders and with LBC's Design Review Panel. Paragraph 66 of the NPPF states that this should result in the presented scheme being "*looked on more favourably*".

Loss of Existing Use

- 5.14 The existing building is occupied by Addison Lee and operated as a vehicle servicing and repair garage / depot (Use Class B2). This is their main servicing operation in London. Addison Lee have planned the relocation of the existing operation in London. Addison Lee have planned the relocation of the existing operation on the Site to a purpose built facility in Hayes, near Heathrow, in January 2017, resulting in the Site becoming vacant at this time. The Hayes location is better suited to the geographical and operational requirements of Addison Lee, who have expressed to the Applicant that they have outgrown the

current building meaning some of the service operations have become fragmented (i.e. based off site) and they want to consolidate all service operations under one roof, reducing resultant inefficiencies. Whilst the role that Addison Lee perform from the Site is recognised, the proposed relocation will help improve the operation and performance of the company and facilitate its existing strength of presence as an important service provider in Greater London and the London CAZ in particular.

- 5.15 In land use terms, planning permission is not strictly required for the straight change of use of existing floorspace from Class B2 to Class B1 as this is Permitted Development, by virtue of the General Permitted Development Order (2015 – Class I). The proposed loss of the Addison Lee servicing garage (Class B2) should therefore be considered in light of this position that planning permission is not required for the change from the existing Class B2 use. It is however recognised that the proposed development relates to the demolition of the existing building and structures and redevelopment of the Site to provide a new office building and so relevant planning policy considerations are now addressed.
- 5.16 The proposed development results in a loss of the existing Class B2 use and whilst being aware of the Permitted Development position it has been agreed during pre-application discussions that it should be assessed against Core Strategy Policy CS8 and, in particular, Development Policies Policy DP13. Relevant parts of the NPPF and London Plan are also considered as part of this planning assessment.
- 5.17 As introduced in Section 4 of this Statement, Policy CS8 seeks to safeguard existing employment premises “*that meet the needs of modern industry and other employers*” with special protection afforded to those sites in Industry Areas. Policy DP13 sets out criteria that must be met in order for the loss of existing business use to be considered acceptable. As a new business use is being proposed

in this instance, criteria (f) of Policy DP13, is the only relevant consideration. This states that *“where premises or sites are suitable for continued business use ... redevelopment proposals for mixed use schemes will be considered provided that floorspace suitable for either light industrial, industry or warehousing uses is re-provided”*.

- 5.18 The acceptability of the proposed loss of the existing Class B2 use therefore requires either the demonstration that the premises is no longer suitable for the continuation of the existing business use, or that the proposed premises retains (or in this case provides) physical features that will enable the flexible use of the premises for a range of business purposes, including light industrial, industry or warehousing.
- 5.19 Turning first to the suitability of the site for the existing business use, paragraph 13.3 (supporting Policy DP13) outlines key criteria to be considered to determine whether there is potential for that use to continue. The performance of the Site against these criteria is assessed in the supporting note prepared by local agent Currell, included at Appendix 1 to this Statement. This note concludes that the existing site and premises fails to meet the majority of criteria, in particular that it is not well located in terms of its position and relationship with nearby industrial uses, that it is near to a number of noise-sensitive uses, that it does not offer good servicing access (for industrial vehicles) and that it fails to provide a range of unit sizes, particularly for smaller businesses.
- 5.20 In connection with paragraph 13.3, Camden Planning Guidance 5 (‘CPG5’) sets out criteria against which industrial sites are categorised, from 1 (the best) to 3 (the worst). Applying this methodology, Currell conclude that the site performs poorly against key criteria and as such it should fall within the Category 3 definition, being a site that does not warrant protection, against its loss as an industrial site, and one which *“could be suitable for [a change of use to] office B1(a) space”* (paragraph 7.18).

- 5.21 Secondly, considering the proposed development's achievement of enabling the flexible use of the premises, regard has been given to the list of 'design features' set out in paragraph 13.4 (supporting Policy DP13). These are identified as features to be retained, although in this instance they are features that will be provided as part of the proposed redevelopment. Again, the note prepared by Currell provides commentary on these features, relating them to the marketability of the scheme and the flexibility that this is offered by the proposals in terms of being suitable for a range of 'employment use' end users.
- 5.22 It is not possible to provide dedicated general industrial or warehousing space as part of the scheme due to the nature of the offer, the Applicant's business model and management strategy, and the impact that such uses would have on the design of the scheme and relationship with the street frontage. However, the proposed development is designed for flexibility across Use Class B1, including Class B1(c) light industrial tenants within appropriate areas of the scheme, should there be interest in the premises. The building layout is designed so as to allow distinct varieties of space, from shared co-working areas, to more standard 'office' floors, to rentable business pods. In this regard, the proposed development is considered to be consistent with the policy requirement to retain (and in this case provide) *"physical features that will enable flexible use for a range of business purposes"*.
- 5.23 During pre-application discussions, LBC development management and planning policy officers have confirmed that on the basis that the proposed redevelopment does not propose the replacement of the existing business use with a non-business use, other parts of Policy DP13 and supporting text are not engaged and that there is therefore no requirement to provide marketing evidence to justify the change of use.
- 5.24 Overall, the loss of the existing employment use complies with the requirements of Core Strategy Policy CS8 and Development Policies Policy DP13, and the principle is therefore considered to be acceptable. The Site is not in a protected Industrial Area and, critically, another employment / business use is proposed.

The Site is not considered to represent a high quality industrial site and, along with it being outside of the protected Industrial Area, there are no special grounds on which the Site should be protected. The proposed development is designed to provide flexible Class B1 floorspace and as a result, prospective tenants could lawfully operate under a Class B1(c) light industrial use. Furthermore, and notwithstanding the above policy assessment, the existing industrial floorspace could, by virtue of Permitted Development rights, be changed to Class B1 office without requiring Planning Permission (albeit this would not provide the uplift in employment-generating office floorspace or the ability to achieve high quality and flexible office space).

- 5.25 The proposed development is also consistent with national policy, specifically paragraph 20 of the NPPF, which identifies the role of planning to meet the current development needs of businesses and also paragraph 22 which governs against the long term protection of employment sites “*where there is no reasonable prospect of a site being used for that purpose*”. As stated previously, the proposed development seeks to replace an existing Class B2 employment use (soon to vacate the Site) with a new Class B1 employment use. The supporting Currell note appended to this Statement clarifies that the Site is not worthy of protection (as a Category 3 site) without the investment or redevelopment that this scheme shall provide.
- 5.26 In a similar vein, London Plan Policies 2.9 and 4.1 emphasise the need to provide “*appropriate workspaces*” for the changing and diversifying market and economy. The proposed development, through the provision of modern and flexible employment space is consistent with these requirements.
- 5.27 Against this background, the proposed development complies with the requirements of the NPPF and the Development Plan.

Appropriateness of Proposed Uses

Proposed Office Space

- 5.28 The Site is in an existing employment use and the principle of the proposed Class B1 use, as a replacement of the existing use, is therefore considered to be acceptable in this location, both in terms of planning policy support for the like-for-like replacement of employment space and Permitted Development rights associated with the transition from a Class B2 use to Class B1 use without the requirement to obtain Planning Permission.
- 5.29 The proposed development provides a considerable uplift in job opportunities, from circa 30-40 at present to over 600, making the most of the Site and its sustainable and accessible location in Kentish Town. This is consistent with strategic aims in Camden's Core Strategy (Policy CS1) and the London Plan (Policy 2.9), recognising the importance of maximising employment opportunities and workspace.
- 5.30 The proposals are consistent with the London Plan (Policies 4.1 and 4.2) and Core Strategy (Policy CS8) in seeking to provide modern and flexible office accommodation tailored to meet the diverse nature of office demand. The emerging Camden Local Plan continues these aims with a focus on providing space for modern office needs, including small and medium sized enterprise (SMEs) and local firms, with an aspiration for space to be flexible and affordable. The proposed office space shall meet these specific adopted and emerging policy objectives. Furthermore, the flexibility in the proposed floorspace (floorplate size, specification, etc.), diversity of end users is inherent to the proposed development. This would therefore lend support to a range of Class B1 uses.
- 5.31 Within the proposed development, an area of circa 496 sq.m GIA of event space is proposed at ground floor level, extending to a small first floor area also. This is genuinely ancillary to the main office function of the premises, designed to

support the proposed office tenants as well as providing a publicly rentable space. The area is clearly defined in the supporting plans and drawings, with further description provided in the Design & Access Statement. This space is acceptable, in terms of planning, by virtue of it further improving the proposed employment offer and increasing the flexibility and quality of the proposed office floorspace.

Proposed Café / Restaurant Space

- 5.32 Considering the proposed café / restaurant space, the Site is located in an Edge of Centre location in retail policy terms and the NPPF requires a sequential assessment of alternative sites (paragraph 24). This element of the proposed development, albeit small, is an integral part of the wider development and an important component as part of the flexible proposed workspace offer. It will principally support the office workers in the building as well as those in the immediate vicinity. As the floorspace will only come forward as part of the wider development, we do not consider it necessary to consider the potential to accommodate this floorspace as a separate entity in nearby centres, namely Kentish Town or Queen's Crescent. As such, the proposals are considered to satisfy the requirements of paragraph 24 of the NPPF.
- 5.33 The NPPF impact test (paragraph 26) requires proposed café / restaurant floorspace to be assessed with regard to the impact on existing, committed and planned public and private investment and the impact of the proposal on Town Centre vitality and viability. PPG adds that "*The impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible*" (Paragraph: 015, Reference ID: 2b-015-20140306). As established in this Planning Statement, the proposed café / restaurant element is limited to 126 sq.m GIA and therefore below the identified 2,500 sq.m threshold requiring an impact assessment. As a result, it is considered that a full quantitative retail impact assessment is not required and, furthermore, it is added that a proportionate approach should be taken, appropriate to the location, the retail context, and the restricted the proposed retail element.

5.34 The floorspace proposed is designed to primarily serve the workers from the office floorspace proposed on the Site, with additional visitors comprising those in the local area and those coming to the Site for meetings with office tenants. The proposed space is designed to sit alongside and be complementary to the existing offer in nearby centres and as a result, and considering also the health and offer of the centres, the likelihood is that any impact of the proposed development on Kentish Town or Queen's Crescent will be imperceptible. The proposed development is therefore in compliance with the NPPF, Core Strategy Policy CS7, Development Policies Policy DP12

Summary

5.35 Against this background, the proposed development complies with the requirements of the NPPF and the Development Plan in terms of delivering an appropriate and employment-generating use in a sustainable location and satisfying the 'retail'. Moreover, and in general terms, the proposed development is considered to be acceptable on the basis that it proposes an appropriate mix of uses (Development Policies Policy DP1) and introduces genuinely active street frontages to Spring Place and Grafton Road (both of which are currently inactive and/or inaccessible). In so doing it helps to deliver an important aim of the NPPF to bring together those who work, live and play in the area (paragraph 69).

Transport and Accessibility

5.36 A Transport Assessment prepared by TPP accompanies this application and demonstrates the acceptability of the proposed development in respect of servicing and delivery arrangements, the level of cycle parking provision and the impact of the proposals on the local highway network. A Workplace Travel Plan has also been prepared by TPP, setting out the anticipated practical travel activity relating to the scheme once operational.

- 5.37 The Site is accessible by non-car modes, including very good levels of access to public transport (the Site has a PTAL rating of 5) as well as walking and cycling links in the vicinity of the site. There are footways connecting the Site from Spring Place and Grafton Way and these offer convenient access to the local area, local amenities as well as public transport opportunities.
- 5.38 The scheme is particularly focused towards those traveling by non-car modes, through there being no car parking spaces proposed (other than the introduction of a dedicated disabled car parking bay on Spring Place), and the provision of 67 cycle parking spaces at basement level (above minimum cycle parking requirements for the scheme). This is consistent with London Plan Policies 6.9 and 6.10, Core Strategy Policy CS11 and Development Policies DPD Policies DP17 and DP18. More generally, the emphasis on the connections with the wider area complies with Development Policies DPD Policies DP16 and DP29 and KTNP Policy D3
- 5.39 The proposed development will remove over 330 vehicular trips per day from the local highway network (i.e. those associated with the existing operation of the Site). The proposed uses on the Site will generate less than 30 vehicular trips per day (broadly the same as the existing number of servicing trips alone), relating to some drop-off / pick-up trips and also servicing trips, associated with the office and café / restaurant uses. This overall reduction will dramatically change the nature of Spring Place, both in terms of vehicle movement (a significant reduction in the amount, speed and frequency of vehicles) and on-street parking (the removal of vehicles parked on Spring Place as an overflow from the garage use).
- 5.40 The Transport Assessment prepared by TPP and submitted with this application demonstrates the benefits to the local highways network and proposes an on-street servicing solution off Spring Place. It is felt that on-street servicing is the most effective means by which to service the premises as this facilitates the provision of an activity and activation along the Spring Place and Grafton Road frontages

and a well-designed scheme recognising the detrimental impact that a vehicle entrance / on-site bay would have on the key Spring Place elevation.

- 5.41 On the basis of the assessment undertaken as part of the Transport Assessment, the scheme is considered to comply with the terms of NPPF, paragraphs 29 and 37 in particular, where sustainable transport solutions are promoted and also Section 8 (Promoting Healthy Communities). The proposals are also consistent with key Development Plan policies in the London Plan and Camden's Core Strategy and Development Policies DPD.

Impact on Neighbour Amenity

- 5.42 There are not considered to be any amenity concerns on neighbouring properties arising from the proposals. Due to the design and orientation of the building, there will be no detrimental outlook impacts, loss of light on adjacent properties, or any unacceptable noise affects arising from the proposed development.
- 5.43 In terms of the impact on rights of light of the built form of the proposed development, this is considered acceptable. Lumina have undertaken Daylight / Sunlight and Rights of Light analysis and their report submitted in support of this application records that the closest residential accommodation is located to the north west of the Site at 110-114 Grafton Road and at 7 Spring Place to the north of the Site. The Report concludes that *"none of the existing neighbouring residential buildings will experience a material or noticeable loss of daylight or sunlight and there will be no material impact on daylight and sunlight amenity"* (paragraph 5.1). It goes on to say that the proposed development satisfies BRE guidelines and satisfies policy objectives.
- 5.44 In terms of any impact on neighbour amenity, the proposed development is considered to be acceptable in principle, by virtue of its location on a mixed commercial and residential street, adjacent to the railway line, and the distance

from any neighbouring residential (or other noise sensitive) uses on this street. It represents a positive change to the area, with the removal of the existing servicing garage which is active from 6am to 2am, daily (with some activity outside of these hours also) and which generates a substantial number of car-borne trips during this period. It is recognised, by neighbours and members of the local community, that the existing use operates long hours outside the usual working hours in this area, and the proposed development will replace this with more appropriate uses in this location.

- 5.45 In terms of servicing and deliveries these are proposed to be from the front of the proposed building, off Spring Place, using the dedicated car parking area. The Applicant, as owners and managers of the Site, will ensure that these are managed to reduce the frequency and duration of deliveries. Delivery hours are designed to be consistent with the proposed building opening hours. Full details are set out in the accompanying Transport Assessment.
- 5.46 The majority of plant equipment required is to be located at basement level, with a proposed plant area on the roof at the 5th floor level of the building which will accommodate specifically designed plant and air conditioning equipment and the necessary attenuation and mitigation measures are taken to ensure compliance with national and local requirements in terms of emissions and noise. Full details of the noise impact of the proposed plant and operational use of the proposed development are set out in the Noise & Vibration Impact Assessment (prepared by Scotch Partners) and plans submitted in support of this planning application.
- 5.47 The proposed development complies with national and local requirements, making the scheme acceptable against the requirements in Sections 7 and 11 (paragraphs 120 and 123 in particular) of the NPPF, London Plan Policy 7.15, Core Strategy Policy CS1 and Development Management Policies DPD Policies DP26 and DP28.

Sustainability

5.48 The Applicant's intention is to create an energy efficient and sustainable scheme that is attractive to prospective tenants and users and which is fit for purpose for the lifetime of the building. As such, a number of features are introduced to provide a high performance building in terms of sustainability and energy consumption. Further detail is set out in the Sustainability & Energy Statement prepared by MTT. In summary these include:

- High quality building fabric and materials, including high performance solar glazing, to minimise energy consumption and loss;
- Use of high efficiency boilers, control systems and energy-display thermostats;
- Use of LED lighting and lighting control systems;
- Enhanced daylight usage to minimise energy use.
- Smart controls for high energy use appliances;
- Use of natural ventilation where possible; and
- Photovoltaic panels (PVs) for the generation of on-site electricity.

5.49 As required by the London Plan (particularly Policy 5.2), the proposed development will follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies to secure a reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013.

5.50 In addition, and in line with Camden Development Policies DPD Policy DP22 the proposed development will, through the identified sustainability 'features', achieve BREEAM 'Excellent' standard and CO2 emissions will be reduced through the installation of Photovoltaic Panels (PVs) on part of the proposed roof.

5.51 Core Strategy Policy CS13 requires developments to achieve a 20% reduction in CO2 emissions through renewable technologies wherever feasible. A reduction is

achieved through the installation of 40 PV panels on the roof. Space and design constraints, as well as maintenance difficulties on the Site adjacent to the railway line, mean that a further reduction is not achievable. As a result, it is acknowledged that there is a requirement to make a carbon offset contribution. The rationale and justification for the level of reduction achieved is set out in full in the Sustainability & Energy Statement as well as the Design & Access Statement. These documents identify that PVs are the only feasible renewable technology that can be used on the Site and that due to the design and orientation of the roof, only certain parts are suitable for the installation of PVs. The Applicant has sought to maximise the level of CO2 reduction (and therefore number of PVs) as it is in their interests as future owners and managers of the premises to be sustainable and to reduce energy costs where possible.

- 5.52 In addition to the scheme design and energy efficiency and performance of the proposals, the proposed development is inherently sustainable by virtue of the significant removal of vehicular trips and activity from the Site and the promotion of trips on foot and by bike.
- 5.53 In summary, the proposed development is considered to comply with the NPPF (chapter 11 in particular), London Plan Policies 5.2, 5.3, 5.7 and 5.9, Core Strategy Policy CS13 and Development Policies DPD Policy DP22.

Other Planning Matters

Ecology

- 5.54 The railway viaduct running through the Site is identified as a Habitat Corridor. Core Strategy Policy CS15 seeks to protect and improve sites of nature conservation and biodiversity including protecting trees and promoting the provision of new trees and vegetation. A Preliminary Ecological Appraisal and Daytime Bat Survey has been prepared by Peak Ecology and is submitted with this application. The report concludes that it is *“highly unlikely that species other than common birds or bats are likely to utilise the site due to the lack of suitable*

habitat able to support other species” and that “the areas of vegetation were considered to be of low ecological value”.

- 5.55 In light of the Appraisal work submitted, there are no ecological concerns with the proposed development on the basis that should evidence of protected species be found during demolition and construction, works must pause to allow for monitoring and inspection. In addition, it is recommended that a sensitive lighting scheme be designed for the site (this is the case by virtue of the Site’s location adjacent to the railway line) and that bat boxes are installed (these are proposed and can be seen on the proposed plans). As such, the proposed development complies with national and local policy requirements.

Basement Structure

- 5.56 Camden Development Policies DPD Policy DP27 requires the demonstration that proposed basements are acceptable and that they will not lead to harm to the built and natural environment. As required by Camden’s applications validation requirements checklist, a Basement Impact Assessment has been prepared by HTS and is submitted in support of this application. A draft Construction Method Statement is also required and this has also been prepared by Arcadis with input from Volker Fitzpatrick, a leading UK based engineering and construction company. The construction of the proposed development, including the basement, will be the subject of close scrutiny as part of LBC’s standard application process.

Ground Contamination

- 5.57 Recognising that the existing use is a vehicle garage and servicing depot, a Contamination Risk Assessment has been undertaken by GEA and this is appended to the Basement Impact Assessment. This states that *“the site has had a contaminative history having been occupied by a garage for the majority of its known developed history ... [and that there may] be a requirement for some*

limited ground investigation to address this risk and to assess the requirements for disposal of any spoil arising from excavations. This would also allow potential perceived risks to be addressed and to give comfort to potential interested third parties”.

6.0 SUMMARY & CONCLUSIONS

6.1 The proposed development represents a substantial and positive investment in Kentish Town through the provision of a new, modern flexible office building with additional facilities including publicly-accessible and flexible café / restaurant / event space. Moreover, it delivers a modern, sustainable and high quality design approach and associated improvements, representing an appropriate response to the character of the Site and immediate area. The scheme has been brought forward with the support of LBC Officers, representing sustainable development and comprising uses that are expressly supported in national, regional and local policy.

6.2 The proposed development represents a significant opportunity to deliver the following economic, social and environmental benefits:

- Help to deliver sustainable development in line with the NPPF and facilitate the maximised economic use of the existing brownfield site.
- Provision of flexible and modern employment space, recognising the needs of the existing and emerging office market.
- Deliver approximately 600 workspaces and additional jobs associated with management, food and beverage and the event space, with further jobs created during the demolition, construction and fit out period. A large number of the construction jobs will originate from the local community, within the site's immediate catchment.
- Provision of café / restaurant offer to meet the needs of building tenants and local residents and workers, providing additional local choice.
- Creation of modern event space to serve tenants of the proposed office building and members of the public, bringing additional activity and income into the area.
- Provision of modern, sustainable and high quality design and associated improvements, representing an appropriate response to the character of the

area and recognising the historical context of the Site and helping shape the future of the area.

- Undertaking of considerable and necessary repair and restoration works to the existing railway viaduct arches to ensure their structural integrity and continued use as part of the proposals.
 - Substantial investment in an area where future development and investment is being targeted.
 - Building upon the accessible location with an existing good level of public transport and pedestrian and cycle accessibility and introducing design measures including site layout and design to encourage enhanced pedestrian and cyclist accessibility.
 - Removal of over 300 daily vehicular trips relating to the existing use.
 - Incorporation of sustainable and renewable technologies to achieve BREEAM “excellent” standards.
 - Generate substantial Community Infrastructure Levy payments for local benefit, plus an uplift in business rates and tax receipts.
- 6.3 On the basis that the supporting documents, including this Planning Statement, submitted as part of the planning application have demonstrated compliance with the requirements of the NPPF and the adopted (and emerging) Development Plan and in the absence of overriding harm, it is therefore entirely appropriate to grant Planning Permission for the proposed development.