



GERALDEVE

Buck Street Market, 192-200 Camden High Street NW1 8QP

On behalf of: LabTech

July 2018

LJW/J10161

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Executive Summary

This application seeks planning permission for exciting proposals to provide a container market at the Buck Street Market site for a temporary period of five years.

The applicant, LabTech, is the owner of this site as well as other important landholdings further north on Camden High Street including Camden Lock Market, Stables Market and Hawley Wharf, which is currently being redeveloped. LabTech is committed to providing good stewardship of these markets with a focus on original and eclectic goods, particularly arts and crafts, music and high quality food.

LabTech has instructed Urban Space Management (USM) to help deliver the project. USM has nearly 50 years' experience of attractive and affordable retail initiatives including the creation of the first market at Camden Lock. More recently it has devised container markets, an innovative and environmentally sustainable system which uses recycled shipping containers to provide stylish and modern markets.

Transport for London is currently undertaking feasibility work with regard developing a new entrance to Camden Town Underground Station. It is planned that this would be located across from this site on the north side of Buck Street. As this would result in the creation of a new underground 'station box' below the market, this site is safeguarded by the Camden Local Plan (2017) and Camden Town Underground Station Site SPD (2007) so that wholesale redevelopment of this hardstanding site cannot take place in advance of the station works.

Accordingly, the applicant is bringing forwards a 'meanwhile use' for a temporary five year period. Following the success of similar markets, a ground plus two level container market is proposed. The ground floor would predominantly provide retail space, both within the containers and in the courtyard area, whilst the upper floors would mainly provide food and beverage uses.

As the containers would be designed off-site, on-site construction works would be limited to just four to six weeks (one week to clear the site, one week to install the containers, two weeks to complete the new courtyard ground floor surface and two weeks to complete the service connections) therefore disruption in the local area

would be kept to a minimum.

The majority of tenants at the market currently sell low quality merchandise, much of it counterfeit. The new market would provide a more diverse offering to include independent retailers and street food so that the 'look and feel' of the market would be closer to that at Camden Stables and Camden Lock markets. Existing retailers which sell original merchandise are being offered the opportunity to either stay at the new market or relocate to another stall within Camden. Once this tenant consultation period is completed there will be a focus on attracting new start-up businesses to trade from the market.

The proposals present an opportunity to significantly improve the offering of the existing market which would provide a significant boost to Camden Town in advance of more permanent works coming forwards subsequent to the new underground station entrance.

1 Introduction

- 1.1 LabTech is bringing forwards a planning application at Buck Street Market. This seeks to develop a container market which would be in place for a five year period.
- 1.2 Full planning permission is sought for the following:
- “Use of land for siting of a ground plus two level container market (*sui generis*) comprising retail, restaurant / café, hot food takeaway and ancillary management / storage uses with associated stalls, partial roof canopy, landscaping, lifts, seating and servicing areas for a temporary five year period”.**
- 1.3 The application site is bound by Camden High Street to the west, Buck Street to the north, the Trinity Church to the east and Dewsbury Terrace to the south. It is in a prominent and busy location given its close proximity to Camden Town underground station to the south.
- 1.4 This market is the first that visitors to the area see when exiting the underground station. However the quality of the merchandise sold and the general character of the market is below that of both Camden Stables and Camden Lock markets, further north on the high street. Accordingly there is considered to be an opportunity to improve the existing market and make it a more attractive retail and food and beverage destination for both local residents and visitors.
- 1.5 Transport for London is currently undertaking feasibility work and a public consultation exercise with regards to developing a new entrance to Camden Town Underground Station. It is planned that this would be located across from this market on the north side of Buck Street. As this would result in the creation of a new ‘station box’ underneath the market, this site is safeguarded by the Camden Local Plan (2017) and Camden Town Underground Station Site SPD (2007) so that wholesale redevelopment of this site cannot take place in advance of the station works. TFL’s programme shows that upgrade works should start in 2020 and that the station upgrade should complete in 2025, with the Over Station Development subsequently completing in 2028.

- 1.6 On this basis a container market is the solution proposed as the works can be undertaken quickly to improve the market offer with minimal disruption to the existing market traders, surrounding business and local community. It is currently the intention that the new market would be installed and be open for trading prior to Christmas 2018, subject to planning permission being achieved in a timely manner.
- 1.7 This proposal has been subject to significant public consultation which included a public exhibition held on 7 and 9 June 2018. The feedback from these sessions was mainly positive. Pre-application discussions have also taken place with existing market traders, a Secured by Design officer, Transport for London and the London Borough of Camden.
- 1.8 In summary, it is considered that the proposal would provide the following benefits:
- a. Upgrade the existing market to provide a much improved destination for both local residents and visitors to the area;
 - b. Provide an improved retail and food & beverage offer where no counterfeit products are sold;
 - c. Provision of high quality, bespoke container architecture which contributes to the character and appearance of Camden Town;
 - d. Provision of a 'meantime use' which enables the optimum use of the site in the short term without undertaking subterranean works and does not impact Transport for London in terms of works to the new underground station entrance or the wider redevelopment prospects at the site;
 - e. Re-branding of the market as Buck Street Market to avoid confusion with the existing and original Camden Lock and Camden Stables markets;
 - f. An opportunity for small, start-up businesses to operate in Camden Town;
 - g. The use of recycled storage containers which would be able to again be recycled and used at different sites in the future;
 - h. Provision of customer toilets and cycle parking which is not currently provided at the market.
- 1.9 This statement should be read in conjunction with the other documents submitted as part of this planning application, which comprise the following:
- a. Cover letter, planning application form and CIL form, prepared by Gerald Eve

LLP;

- b. Site Location Plan, prepared by LabTech;
 - c. Existing drawings, prepared by KSM Management;
 - d. Proposed drawings, prepared by Urban Space;
 - e. Design and Access Statement, prepared by LabTech;
 - f. Heritage and Townscape Assessment, prepared by Heritage Collective;
 - g. Transport Statement, prepared by Arup;
 - h. Servicing Management Plan, prepared by Arup;
 - i. Interim Travel Plan, prepared by Arup;
 - j. Air Quality Assessment, prepared by Arup;
 - k. Statement of Community Involvement, prepared by LCA;
 - l. Energy and Sustainability Strategy, prepared by Hoare Lea;
 - m. Crime Impact Assessment, prepared by LabTech;
 - n. Ventilation Statement, prepared by Hoare Lea;
 - o. Draft Construction Management Plan, prepared by Urban Space;
 - p. Structural Statement, prepared by Urban Space;
 - q. Market Operational Plan, prepared by LabTech;
 - r. Daylight and Sunlight Assessment, prepared by Keeping Blue; and
 - s. Acoustic Strategy, prepared by Hoare Lea.
- 1.10 This Town Planning Statement provides a comprehensive review of national, regional and local planning policy and guidance relevant to the nature of the development proposal and assesses the degree to which the proposals would conform to the requirements of the statutory Development Plan and other material considerations, in accordance with the requirements of section 38(6) the Planning & Compulsory Purchase Act 2004.
- 1.11 For the reasons set out in this Town Planning Statement, we consider that the proposal is in accordance with the objectives of town planning policy and guidance and would deliver a much improved market within the heart of Camden Town.

2 Site and Surrounding Area

- 2.1 Buck Street Market is situated on a cleared site which is bound by Camden High Street, Buck Street, Trinity Church and Dewsbury Terrace.
- 2.2 The section of Camden High Street which this fronts is a key thoroughfare which provides pedestrian access for visitors between Camden Town underground station, which is 100 metres to the south of the site, and the main tourist attractions in Camden Town, including Regent's Canal, Camden Lock Market and Camden Stables Market.
- 2.3 The site is surrounded by a number of eclectic shops, bars, restaurants and nightclubs which characterise this part of Camden Town.
- 2.4 The site itself measures 1,020 sqm. It comprises an open market, with a number of closely packed ad-hoc retail stalls selling a selection of clothing, tourist and alternative goods, in addition to one hot food takeaway. The market is open during daytime hours. Rather than deconstructing the market each evening traders generally keep goods on site overnight and cover these with tarpaulin.
- 2.5 There is direct access to the market from Camden High Street and there is a more secondary access point from Buck Street, though none of these are clearly defined. Although there is green 'The Camden Market' signage on both the high street and Buck Street this is neither the original or primary market within Camden Town, these are located further up the high street at Camden Lock and Stables markets. There are also a number of ad hoc temporary awnings which extend out from a selection of stalls on Camden High Street and Buck Street.
- 2.6 In terms of nearby heritage assets, Arlington House is Grade II listed though is located somewhat to the northwest of the site. The Grade II* listed Church of St Michael and Grade II listed War Memorial in connection to the church lies to the east of the site, at the other side of Kentish Town Road.
- 2.7 The site is within the Camden Town Conservation Area. Appendix 2 of the accompanying conservation area audit states that 186-190 Camden High Street (directly to the south), 10 Dewsbury Terrace (to the south) and Trinity Church (to the

east) are 'positive buildings' which make a positive contribution to the local area. Trinity United Reformed Church, which is on the corner of Buck Street, is of an Edwardian neo-Gothic style though is the replacement of a building destroyed by fire in the early 20th century. Adjacent to the market on Buck Street is a building which provides access to an underground shelter which was used during World War II.

2.8 Page 4 of the audit explains that this market stands on the site of properties destroyed in World War II and that this created an irregularly shaped, uncharacteristic break in the otherwise continuous building line. It states that when it is open the market provides interest, but that the main market structures have a temporary and congested appearance due to the temporary nature of the boundary treatment and market signage. Appendix 3 goes on to state that the cleared market site is a 'negative space' which detracts from the character and appearance of the conservation area and could suitably be redeveloped.

2.9 Although the market is currently an open site, it was previously developed and buildings were originally constructed on the site in the mid-19th century. It was used as a sack depot in the early 20th century until damage caused by the war. After this the site was disused before a market emerged in the 1980s, following the success of Camden Lock Market.

2.10 The site is subject to the following designations as defined by Camden Local Plan:

- a. Camden Town Centre;
- b. Core Retail Frontage;
- c. Camden Town Conservation Area; and
- d. Archaeological Priority Zone.

2.11 The site also falls into the Camden Town Underground Station Site SPD, adopted October 2007.

2.12 The site is very well served by public transport services, and has a Public Transport Accessibility Level of 6b given its proximity to Camden Town underground station, which is located 100 metres from the site and Camden Road overground station, which is located 500 metres from the site. In addition, there are numerous bus routes which stop close to the site as well as bike docking stations. The

underground station, in particular, is very congested during the weekend.

3 Planning History

- 3.1 A detailed review of Camden’s online planning records has been carried out. The site has a long and complex planning history. The below provides a summary of the records which are considered to be of most relevance to this application.
- 3.2 On 28 November 1979, planning permission (ref. 11/5/A) was granted for the erection of a four storey building which would provide a mix of retail, light industrial and office uses. This permission was not implemented.
- 3.3 On 1 March 1990 outline permission (ref. 8903546) was refused for “[t]he redevelopment of the site by the erection of a basement and four storey building to provide parking and servicing in the rear basement area retail uses in the front basement and ground floors with workshop units in the rear ground floor area with three floors of offices above.” The reasons for refusal were the scale of the proposed building and that the increase in office space would harm the character of the area.
- 3.4 There are also three historic refusals at the site (refs. CTPJ/J11/5/A/15995, CTP/J11/5/A/3292 and TP/2764/98688), all of which sought redevelopment of to provide permanent mixed-use buildings.
- 3.5 The first planning record regarding this market use is from 1985 where permission was granted on a temporary basis to allow this use on Thursdays to Sundays. This temporary permission was subsequently extended in 1990 and 1994.
- 3.6 In 1999 an application (ref. PE9900581) was refused for the operation of a market on weekdays. This was originally refused by the Council on congestion grounds and on the basis that it would prejudice permanent development of the site. This decision was however overturned by the Planning Inspectorate at appeal on 14 September 2000 (ref. APP/X5210/A/00/1045218).
- 3.7 Also in 1999, permission was granted for the redevelopment of the market site to provide retail and café use over two levels. Again this was originally refused, with the decision overturned by the Planning Inspectorate. On 15 March 2004 (ref.

2004/0020/P) this permission was extended.

- 3.8 On 20 October 2006 (ref. 2006/3460/P) permission was granted for the use of the site as a market (*sui generis*) for a three year period. Similar permissions were granted in 2010, 2012, 2015 and 2017. The operative permission is therefore ref. 2017/3343/P which allows the continued use of the site as a market until September 2022. Permission was granted for five years, this is a longer period than usual given that this site is safeguarded from major redevelopment due to the proposed underground station entrance works. Permanent use of the site as an open market has been repeatedly resisted by Camden as it prevents more wholesale redevelopment of the site.
- 3.9 In terms of more significant developments at the site, a ground / mezzanine market was permitted (ref. 2007/5973/P) on 9 December 2010. Conditions 6, 7 and 9 of the permission were discharged on 4 November 2013 as part of application ref. 2013/5671/P. Implementation of the permission (ref. 2014/5134/P) was confirmed by a certificate application granted on 24 February 2015 and although this has not been constructed it is considered that this permission remains extant.

4 Development Proposals

4.1 Planning permission is sought for the following:

“Use of land for siting of a ground plus two level container market (*sui generis*) comprising retail, restaurant / café, hot food takeaway and ancillary management / storage uses with associated stalls, partial roof canopy, landscaping, lifts, seating and servicing areas for a temporary five year period”.

4.2 This application proposes a ground plus part two level container market for a five year period. All the current ad hoc structures would be removed to make way for the containers, which would be designed off-site so that they can be installed on-site quickly and causing the minimum level of disturbance. At this stage it is intended that the market will be open for trading in advance of Christmas 2018.

4.3 At the ground floor level, improved access would be provided. The main entrances in to the market would be from Camden High Street and this frontage, at the southern side, would be chamfered to allow wider access in to the market. There would also be two access points from Buck Street.

4.4 The main land use provided at ground floor level, within both containers and at the stalls, would be retail (Class A1). There would also be cafes (Class A3) and hot food takeaways (Class A5) at this level with associated seating provided. There would be two double height containers at the northwest part of the site which would provide higher quality space and also act as a design feature. It is anticipated that the majority of traders would be independent retailers though the larger units facing the high street may be occupied by multiples.

4.5 There would be a secure waste and recycling area at the ground floor as well as cycle racks which would provide space for 22 bikes. There would also be two lifts and two staircases which would provide access to the two upper levels. Waste would be collected from Buck Street where possible.

4.6 At the first floor there would be some retail (Class A1) but a greater element of café (Class A3) and hot food takeaway (Class A5) uses, along with associated seating.

The market manager's office would also be located at this level. At the second level there would be three food and beverage units, customer toilers and two storage units. There would be less container coverage at this level which would enable a large terrace and associated outdoor seating to be provided.

4.7 The tables below set out the proposals in land use terms:

Table 1 – Areas sqm GEA

	Existing	Proposed	Difference
Retail (Class A1)	0	431	+431
Restaurant (Class A3)	0	179	+179
Hot Food Takeaways (Class A5)	12	340	+328
Ancillary	0	76	+76
Total	12*	1,026	+1,014

*the site is currently an open market on an area of hardstanding which measures 1,020sqm

Table 2 – Areas sqm GIA

	Existing	Proposed	Difference
Retail (Class A1)	0	378	+378
Restaurant (Class A3)	0	165	+165
Hot Food	11	290	+279

Takeaways (Class A5)			
Ancillary	0	67	+67
Total	11*	900	+889

- 4.8 The market would be constructed from recycled and modified storage containers so would provide an industrial feel. A number of the containers would include glass to provide an improved internal environment and a more varied external appearance. There would be a feature clock on the Camden High Street frontage along with text and imagery printed on the outside of the containers. There would be a partial canopy over the second floor terrace to protect customers from the weather.
- 4.9 Due to the underground tunnels and air raid shelter as well as the 'station box' proposed with regard the underground station improvement works, it is essential that only minimal subterranean works take place. Accordingly the only excavation required will be in relation to the lift pits. The containers would be placed on the hardstanding and not disturb the ground surface.
- 4.10 It is proposed that the retail element of the market would be open between 10am and 8pm and that the food and beverage uses could be open between 8am and 11:30pm.
- 4.11 In advance of this submission a meeting was held with a Secured by Design officer to ensure that measures to deter crime were designed in to the proposal. There will be gates at all three entrance points and these will be locked shut by the market manager when the market closes. CCTV cameras would be provided in eight locations and three security staff would patrol the market during opening hours. The CCTV would be connected to the wider Camden Market Estate and be monitored on a 24 hour basis.

5 Planning Policy and Planning Considerations

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise.
- 5.2 The statutory development plan for this site comprises the London Plan (March 2016) (consolidated with alteration since 2011) and the Camden Local Plan (July 2017).
- 5.3 The National Planning Policy Framework (July 2018), which sets out the Government's economic, environmental and social planning policies for England, is also a material consideration when determining all planning applications in England. This was recently updated following consultation which took place between March and May 2018.
- 5.4 Consultation also took place regarding the Draft New London Plan between 1 December 2017 and 2 March 2018. Adoption of the plan is targeted for late 2019 / early 2020. At this stage the draft document carries some, albeit limited, weight in terms of determining planning applications. The Mayor's 'Understanding London's Markets' (November 2017) is also a material consideration in terms of this application.
- 5.5 Camden Local Plan was adopted by London Borough of Camden on 3 July 2017. This replaced the Council's Core Strategy and Development Policies Document.
- 5.6 The following Camden Planning Guidance documents are considered to be of relevance in terms of this application:
- a. CPG 1 Design (July 2015, updated March 2018);
 - b. CPG Amenity (March 2018); and
 - c. CPG Town Centres and Retail (March 2018).
- 5.7 Camden Town Underground Station Site SPD (2007) is also of relevance to this application.

- 5.8 The principal considerations affecting this container market proposal are considered to be as follows:
- a. Land use;
 - b. Design and Heritage;
 - c. Transport, Servicing and Waste and;
 - d. Amenity (including Noise, Air Quality, Ventilation, Construction Management, Daylight / Sunlight).
- 5.9 Each of these principal considerations are considered in turn in the following chapters.

6 Land Use

Policy Context – Market Use

- 6.1 Both the current and emerging London Plan provide very strong policy support for markets across London.
- 6.2 London Plan Policy 4.8(e) sets out that planning decisions should promote the range of London's markets and specifically enhance the offer of markets and their contribution to the vitality of town centres.
- 6.3 The Draft London Plan explains that markets, such as those in Camden, have a wider than sub-regional offer and are significant attractions for Londoners and visitors alike. Within this document the Camden markets are considered to be of strategic importance.
- 6.4 In the GLA's 'Understanding London's Markets' document (November 2017), the Mayor sets out that he wants markets to continue to grow and thrive so that they remain a vital part of London life. He states that markets such as those in Camden are iconic destinations in their own right which draw customers to shops, restaurants and businesses in the locality.
- 6.5 Camden Local Plan Policy TC6(b) states that the Council will promote and protect markets in Camden and take into account the character of the existing market when assessing proposals for the refurbishment and redevelopment of markets.
- 6.6 The policy goes on to state that when assessing planning applications for new markets, the Council will consider their effect on: local residents and environmental conditions (see chapter 9), transport and pedestrian movement (see chapter 8), local centres and shopping provision, the storage and disposal of litter and refuse (see chapter 8), community safety (see chapter 7) and noise and toilet provision.
- 6.7 Paragraph 9.56 of this policy's supporting text sets out that the character of a market depends on many factors including the type, range and quality of goods sold, the size of stalls and pitches and its environmental quality. The Council will also take into account the importance of the existing market to the character, vitality and

viability of the centre of area in which it is located and proposals are expected to reflect this character.

- 6.8 Policy E1 of the Local Plan, Economic Development, states that to secure a successful and inclusive economy in Camden the importance of all employment generating uses, including markets, will be recognised.
- 6.9 Policy TC2(d), Camden's centres and other shopping areas, of the Local Plan sets out that the Council will support Camden's markets.

Assessment – Redevelopment of Existing Market

- 6.10 There is strong development plan support for markets to continue to grow and thrive, primarily at Policy 4.8 of the London Plan and Policy TC6 of the Local Plan.
- 6.11 As set out within the London Plan, Camden is known at an international level for its markets and Buck Street Market is the one that the majority of visitors see first given that it is closest to the underground station. However, counterfeit, duplicate and low quality goods are generally sold at this market. In addition the conservation area audit considers that the market detracts from the character and appearance of the wider area.
- 6.12 The market concept is being led by Urban Space Management and LabTech. Urban Space Management have almost 50 years' experience in the delivery of similar successful schemes and was involved in the creation and delivery of Camden Lock Market in 1973 so knows the character of the local markets extremely well. In turn, LabTech has experience of operating major destination markets given its ownership of Camden Stables and Camden Lock markets.
- 6.13 To align this market more with Camden Stables and Camden Lock markets it is proposed that the majority of traders would sell authentic products which are only available in Camden. Existing tenants who meet this criteria will have the opportunity to continue trading and start-up businesses will be sourced for the majority of the remaining stalls and containers. LabTech would seek to select a tenant mix which removes the current level of duplicity so that customers are encouraged to walk around the entire market, particularly at the ground floor. The

larger containers on the high street are likely to appeal to multiples, potentially with a Camden focussed concept.

- 6.14 It is considered that the proposal would improve the character of this market, make it more consistent with those at Camden Stables and Camden Lock and align it more with visitor expectations of the area.
- 6.15 In addition to retail, there would be café / restaurant and hot takeaway uses at the container market – these would be predominantly located at the upper levels where there is more space for associated seating. These food uses are likely to drive footfall within the market.
- 6.16 There is both tenant and customer demand for new, small, independent retailers which sell authentic products which are only available in Camden as well as pop-up food stalls / cafes. It is considered that as footfall would likely increase as a result of this new destination market that it would provide further support for the local centre and shop provision, rather than act as a competitor to existing shops, as visitors would also use nearby shops, restaurants, pubs and other businesses.
- 6.17 Toilets for market customers to use would be provided at the second floor. Level access to these would be provided by lifts. There are no toilets at the current market therefore this is considered to be a planning benefit.
- 6.18 An enlarged market would also be likely to provide increased employment opportunities, something which is strongly supported by Policy E1 of the Local Plan.
- 6.19 In summary, it is considered that the proposed temporary container market would align with the quality of the other markets in Camden Town, increase the vitality of Camden Town and improve it in terms of being an important visitor destination.

Policy Context – Mixed Use

- 6.20 Policy H2, Maximising the supply of self-contained housing from mixed-use schemes, requires schemes where additional floorspace of more than 200 sqm GIA is proposed in areas including Camden Town to provide 50% of all additional

floorspace to be self-contained accommodation.

Assessment - Mixed Use

- 6.21 Given the nature of this proposal, for a temporary container scheme, it is considered that the development would be unable to create an acceptable level of residential amenity and therefore that the mixed use policy should not be applied to this scheme.

7 Design and Heritage

Policy Context - Design

- 7.1 The government attaches great importance to the design of the built environment in the NPPF. Paragraph 56 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 7.2 Good design is central to all the objectives of the London Plan. Policy 7.4 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.
- 7.3 Camden Local Plan Policy D1 sets out that the Council seeks to secure high quality design in development. Relevant to this application the Council requires that development:
- a. Part (a) respects local context and character;
 - b. Part (b) preserves or enhances the historic environment and heritage assets;
 - c. Part (d) is of sustainable and durable construction and adaptable to different activities and land uses;
 - d. Part (e) comprises details and materials that are of high quality and complement the local character;
 - e. Part (i) is secure and designed to minimise crime and antisocial behaviour; and
 - f. Part (k) incorporates high quality landscape design and maximises opportunities for greening.
- 7.4 Supporting text at paragraph 7.2 sets out that development will be expected to consider the character, setting, context and the form and scale of neighbouring buildings; the suitability of the proposed design to its intended use; its contribution to public realm and its impact on views and vistas; and the wider historic environment and buildings of historic value.
- 7.5 Paragraph 7.11 goes on to state that building facades should be designed to provide active frontages and respond positively to the street, as views into buildings provide

interest to passer-by and views out of buildings provide safety through passive surveillance.

- 7.6 Camden Local Plan Policy C5 relates to safety and security and outlines the Council's aim to make Camden a safer place. Part E states that within Camden Town the Council will ensure that those organisations providing food, drink and entertainment uses take responsibility for reducing the opportunities for crime through effective management and design.

Policy Context - Heritage

- 7.7 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 7.8 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made on the basis of the significance of the asset, and the harm (substantial or less than substantial) that the proposal would cause to the significance of the heritage asset.
- 7.9 At a local level, Camden Local Plan Policy D2 parts e-h sets out the Council's policy on development within conservation areas. In line with statute, part e requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.
- 7.10 Camden Town Conservation Area Appraisal and Management Strategy (October 2007) describes Camden Town Centre as "powerfully urban in character with few openings between the continuous building lines and an absence of public open spaces and soft landscaping." The existing Market is described as "creating an irregularly shaped, uncharacteristic break in the otherwise continuous building lines with the main market structures having a temporary and congested appearance". Appendix 3 goes on to state that the cleared market site is a 'negative space' which detracts from the character and appearance of the conservation area and could

suitably be redeveloped.

Assessment – Design and Heritage

- 7.11 The Design and Access Statement, prepared by LabTech, explains the design approach for the proposed redevelopment of the Market. This has progressed throughout the pre-application process and the final scheme design is the result of detailed consultation with Camden Council officers and relevant stakeholders. A Heritage and Townscape Assessment, prepared by Heritage Collective, also accompanies this application.
- 7.12 The proposed market structure comprises recycled containers stacked on top of each other rising up to three storeys. The maximum height of the containers would be similar to the height of surrounding architecture and is considered to be in keeping with the height, bulk and mass of the Camden Town Conservation Area, as required by Local Plan policies D1 and D2.
- 7.13 The use of recycled containers is considered to be a visually interesting approach in terms of a temporary market design. This has proved successful at other locations across London.
- 7.14 The proposed container structure would be made from recycled and adapted containers. In addition, at the end of their use the containers could be moved to another site for a similar market use or recycled as scrap steel. This use of recycled materials is in line with Camden Local Plan Policy D1 part (d). In addition, the use of recycled containers would provide a more industrial appearance.
- 7.15 The proposed market has been designed so there are seating areas at the first and second levels as well as tables and chairs at the ground floor. Greening has been added to the scheme design in line with Camden Local Plan Policy D1.
- 7.16 The proposed market would incorporate active frontages on Camden High Street with open container shops and stalls facing the main road. The northwest unit would also include glazing and a feature clock. These features as well as the general container approach would significantly improve the visual interest of the site in

comparison to the existing market.

- 7.17 The increase in active frontages, which would be at three levels, would increase natural surveillance and minimise opportunities for crime and anti-social behaviour in the area. Following a Secured by Design meeting with the Metropolitan Police the proposed design also incorporates a number of additional measures to prevent crime and anti-social behaviour. A CCTV system would be installed and would be monitored 24 hours a day, security staff would be on-site during opening hours and secure external gates would be locked when the market is closed.
- 7.18 It is proposed to clearly brand the market as Buck Street Market, its original name, to distinguish the site from Stables Market and Lock Market and give the market its own identity. 'Buck Street Market' would be marked at high level on containers on both the Camden High Street and Buck Street frontages.
- 7.19 The impact of the proposed design on the Camden Town Conservation Area, Regent's Canal Conservation Area and nearby listed and locally listed buildings has been considered in detail within the submitted Heritage and Townscape Assessment, prepared by Heritage Collective.
- 7.20 The submitted assessment concludes that the proposed design would be an improvement to the townscape in comparison to the existing market site, which has been identified as having a negative effect on the surrounding area within the Camden Town Conservation Area Appraisal. The assessment further concludes that the proposed design would preserve the significance of the Camden Town Conservation Area and would not detract from the setting of nearby listed and locally listed buildings in line with national and local planning policy.
- 7.21 In line with Local Plan Policy D1, nine views have been tested as part of the Heritage and Townscape Assessment. The impact on views from Camden High Street is considered to be negligible, whilst the proposal is considered to improve the views from Inverness Street by providing a more continuous streetscape.
- 7.22 In summary, it is considered that the proposed container market design is of a high quality, and the use of recycled shipping containers is in keeping with the varied character of the Camden Town Conservation Area. The proposed design

incorporates an increase in public space, active frontages onto Camden High Street and distinct branding for the market which would improve the appearance of the existing site, which is considered to be a 'negative space' by the conservation area audit. As such the proposed design is considered to meet policy requirements at all levels.

8 Transport, Servicing and Waste

Policy Context – Safeguarding

- 8.1 Policy T3 of the Local Plan states that Camden will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects. Item 44 of Camden’s Infrastructure Table, which is at Appendix 1 of the Local Plan, states that improvements to Camden Town Underground Station are one such infrastructure project.
- 8.2 Policy H4 encourages Boroughs to support meanwhile uses at sites where longer-term development is awaited.

Assessment – Safeguarding

- 8.3 TFL’s programme shows that upgrade works, which would constitute a new station entrance to the north of Buck Street with the ‘station box’ being developed underneath this market site, should start in 2020 and that the station upgrade should be completed in 2025, with the Over Station Development subsequently completing in 2028. As a result, at this stage a comprehensive redevelopment scheme at this market site would not be acceptable in principle. Accordingly, the applicant is bringing forwards an improved ‘meanwhile use’ for a temporary five year period.

Policy Context - Transport

- 8.4 Paragraph 29 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes.
- 8.5 Policy 6.9 of the London Plan states that “the Mayor will work with all relevant partners to bring about a significant increase in cycling in London.” With respect to cycling, development should provide secure, integrated and accessible cycling facilities in line with the minimum standards set out in Table 6.3.
- 8.6 Local Plan Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport in the boroughs.

Assessment – Transport

- 8.7 The site benefits from a Public Transport Accessibility Level (PTAL) of 6b (excellent) with Camden Town Underground Station providing access to the northern line, and Camden Overground station within walking distance. A number of bus routes can be accessed from Camden High Street, Camden Road and Kentish Town Road. There are also a number of cycle docking stations in the area.
- 8.8 A Transport Statement and Interim Transport Plan prepared by Arup, which assess in detail the proposals with regards to transport, have been submitted as part of the application.
- 8.9 In line with Camden Local Plan Policy T3, the Interim Travel Plan sets out measures that will be adopted to encourage use of sustainable transport options to and from the site. This includes raising awareness with visitors and retailers of local transport options, promotion of journey planning through the website and smartphone apps and promotion of local and national events such as Bike Week and Green Transport Week.
- 8.10 In line with regional and local plan policy the development will be car-free and due to limited parking in the surrounding area, the proposed development is not anticipated to result in an increase in vehicular trips.
- 8.11 In terms of public transport it is anticipated that a lot of visitors to the market would be visiting Camden's other destinations such as Regent's Canal, Stables Market and the Lock Market. Therefore, the additional strain on the public transport network would be relatively limited.
- 8.12 The number of cycle parking spaces proposed is 22. These racks would be designed to Camden standards and be located to the east of the site, close to an entrance from Buck Street. There are no on-site cycle spaces at the current market so this is considered to be a planning benefit.

Policy Context – Servicing and Waste

- 8.13 Policy A1 of the Local Plan, Managing the impact of development, sets out that

deliveries and services will need to be addressed as part of all planning applications.

8.14 Camden's waste requirements are set out in CPG 1: Design.

Assessment – Servicing and Waste

8.15 A Servicing Management Plan, prepared by Arup, forms part of this application.

8.16 As it is quieter, where possible, deliveries would take place on Buck Street, though there is a servicing bay to the front of the market on Camden High Street. It is anticipated that once construction works begin on the entrance to Camden Town Underground Station loading and unloading via Buck Street will not be possible. During this period servicing will take place from the servicing bay on Camden High Street.

8.17 The servicing strategy has been the result of engagement with TfL and would not interfere with the construction works proposed at the entrance of Camden Road Underground Station.

8.18 A number of vehicle reduction measures, such as consolidating deliveries across various traders, would seek to avoid unnecessary vehicle movements in accordance with Camden Local Plan Policy C4.

8.19 Waste storage areas would be provided at the ground floor level. This would allow waste to be stored on site during the day and the facilities management team would then ensure that the bins are left on the highway (Camden High Street) immediately ahead of collection times and brought back in to the site promptly.

8.20 The size of the waste storage areas has been calculated using the forecast waste generation based on two days of waste generation. The store could accommodate three large (1,100 litre) Eurobins for residual waste, 2 large (1,100 litre) Eurobins for dry mixed recyclables, 1,360L wheelie bin for glass and 4,240L wheelie bins for food waste. Waste would be separated on-site into recyclable material and non-recyclable material and food waste would be composted.

9 Amenity

9.1 This section addresses the following amenity considerations:

- a. Noise;
- b. Air Quality;
- c. Ventilation;
- d. Construction Management; and
- e. Daylight / Sunlight.

Policy Context - Noise

- 9.2 The London Plan aims to reduce noise and enhance soundscapes under Policy 7.15.
- 9.3 Camden Local Plan Policy TC4 part (i) sets out that the Council will consider the noise and vibration levels generated either inside or outside the site and the impact of these levels on the character, function, vitality and viability of a centre and amenity of nearby residential uses.
- 9.4 Camden Local Plan Policy A4 states that development should have regard to Camden's Noise and Vibration Thresholds, which are set out in Appendix 3 of the Local Plan. Further it is stated that the Council will seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.
- 9.5 Appendix 3 sets out the noise thresholds for entertainment uses during the daytime, evening and night.
- 9.6 Supporting text paragraphs 6.102-6.103 states that where food, drink, entertainment and leisure noises may alter the noise environment planning conditions will be used to restrict opening hours.
- 9.7 Camden Local Plan Policy TC6 Markets states that the Council will support new markets that will not cause individual or cumulative harm to the local area.

Assessment - Noise

- 9.8 An Acoustic Strategy has been prepared by Hoare Lea and accompanies this application.
- 9.9 The Assessment sets out the results of the environmental noise surveys which have been carried out at the site. The Acoustic Strategy assesses the potential operational impact of the proposed Buck Street Market on the local area and the nearest noise sensitive properties.
- 9.10 The nearest noise sensitive premises are identified as the Hawley Infant and Nursery School (albeit this has now relocated to Hawley Road) and the residential building located at 3 Buck Street.
- 9.11 The predominant noise source would continue to be from traffic. In comparison to the existing market use, the sound levels would not increase and would constitute 'No Observed Effect Level (NOEL)', as defined by Camden Local Plan Appendix 3.
- 9.12 A noise survey has been undertaken to account for the proposed terraces. During the daytime the predicted noise levels would be in the region of 50-55 dB(A), which would constitute NOEL and be compliant with Camden Local Plan Policy. During the evening the sound level from the terraces would be 'Low Observed Adverse Effect Level', which is considered appropriate as set out in Camden Local Plan Appendix 3.
- 9.13 Plant noise would be 5dB lower than the lowest background sound levels, which have been applied 1m from the nearest noise sensitive facades of 3 Buck Street to the northwest and Hawley Infant and Nursery School to the northeast.
- 9.14 The Acoustic Strategy concludes that there would be no change to the noise environment within the site as a result of the market upgrade, and the shipping containers would introduce localised screening to minimise the noise level from the market.
- 9.15 In summary, the new market would meet Camden's noise thresholds for entertainment uses, as required in Camden Local Plan Policy A3 and would not

cause harm to the amenity of surrounding residential properties in line with Camden Local Plan Policy TC6.

Policy Context - Air Quality

- 9.16 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution.
- 9.17 The London Plan, at Policy 7.14, also seeks to reduce pollutant emissions and minimise public exposure to pollution.
- 9.18 Camden Local Plan Policy TC4 part (j) considers the impact of fumes generated from the development of entertainment uses and part (f) considers the health impacts of development on the character, function, vitality and viability of a centre.
- 9.19 Camden Local Plan Policy CC4 sets out that the Council will take into account air quality when assessing development proposals to ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced. An Air Quality Assessment (AQA) is required where developments are likely to expose residents to high levels of air pollution.

Assessment - Air Quality

- 9.20 In line with the requirements of Camden Local Plan Policy CC4, an Air Quality Assessment (AQA), prepared by Arup, has been submitted as part of this application. The AQA outlines the predicted pollutant concentrations as a result of the proposed market, and the planned mitigation techniques.
- 9.21 The use of recycled shipping container units is significantly beneficial in terms of air quality, as there is no requirement for demolition, excavation or piling and limited construction. The material taken off-site will also be minimal. As such the impact of dust generating activities on the nearby sensitive uses would be negligible.
- 9.22 The proposed development is considered to be air quality neutral in relation to

transport emissions.

Policy Context - Ventilation

- 9.23 Camden Local Plan Policy TC4, Town Centre Uses, seeks to ensure that the development of entertainment uses does not cause harm to the character, function, vitality and viability of a town centre. Part (j) specifies that the Council will consider the fumes likely to be generated and the potential for effective and unobtrusive ventilation.
- 9.24 Local Plan Policy A1 part (k) states that the Council will consider impact from odours, fumes and dust to manage the impact of new development. Paragraph 6.22 requires all developments likely to generate nuisance odours to install appropriate extraction equipment and other mitigation measures, which should be incorporated within the building or sited sensitively.

Assessment - Ventilation

- 9.25 In line with local planning policy requirements, a Ventilation Statement, prepared by Hoare Lea, has been submitted as part of this application. This sets out the proposed ventilation for the food and beverage units, which includes installation of direct extracts above cooking appliances and termination of kitchen ductwork at roof level wherever possible to avoid smells from the food related uses at street level.
- 9.26 Additional mechanical ventilation will be provided at the male and female toilets and the rest of the site would rely on natural ventilation.
- 9.27 In summary, dispersal of cooking odours above roof level would mitigate the potential effects of cooking smells on the surrounding area in line with Camden Local Plan Policies TC4 and A1.

Policy Context - Construction Management

- 9.28 Camden Local Plan Policy A1 part (i) seeks to manage the impact of the construction phase on amenity levels.

- 9.29 Supporting text paragraph 6.12 outlines that measures to reduce the impact of demolition, excavation and construction works must be outlined in a Construction Management Plan. Potential impact of the construction phase must also be identified and mitigation measures outlined in the submitted plan.

Assessment - Construction Management

- 9.30 A Construction Management Plan Pro-forma, prepared by Urban Space Management, has been submitted as part of this application. The Pro-forma confirms that the hours for construction are in line with Camden's standard working hours for construction sites.
- 9.31 The use of pre-fabricated container units greatly reduces the amenity impact of construction, as the total construction period would be approximately four to six weeks and would not include any excavation and only limited demolition. This timeframe for construction includes one week to clear the site, one week to install the containers, two weeks to complete the new ground surface and two weeks to complete the service connections.
- 9.32 The delivery of the pre-fabricated modules would be on standard articulated lorries and it is estimated that circa 100 deliveries would be required. A delivery booking system would be used to co-ordinate deliveries, in addition to an appointed person to manage the deliveries.
- 9.33 Given that the safeguarding of the site requires a 'meanwhile use' for a temporary period, the short construction period is a key benefit of the proposed market design. This would also enable minimal disruption when the containers are removed at the expiry of the permission in accordance with Camden Local Plan Policy A4.

Policy Context - Daylight / Sunlight

- 9.34 Policy A1 of Camden Local Plan seeks to manage the impact of development and part (a) sets out that the Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected. The Council will also consider sunlight, daylight and overshadowing (part f).

9.35 The Amenity CPG gives further guidance on daylight and sunlight and states that where appropriate a daylight and sunlight assessment should be submitted, informed by BRE Guidance (paragraph 3.5).

Assessment - Daylight / Sunlight

9.36 In line with Local Plan policy a Daylight and Sunlight Assessment, prepared by Keeping Blue, has been submitted as part of this application. The assessment has been prepared using Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH), in line with BRE guidance.

9.37 The assessment considers the impact of the development to the daylight and sunlight levels for the habitable rooms for the surrounding properties. The surrounding properties assessed are 190 Camden High Street, 221-235 Camden High Street, The Bucks Head Public House and 3 Buck Street.

9.38 The results of the assessment show that the VSC exceeds 27% and is not less than 0.8 times its former level for all properties tested. The impact on daylight of the proposed development on the neighbouring properties is therefore negligible for all properties in line with BRE guidance.

9.39 Sunlight analysis for the habitable rooms is not required, as defined by BRE Guidance.

10 Summary

- 10.1 This application seeks planning permission for exciting proposals to provide a ground plus two level container market (*sui generis*) at the Buck Street Market site for a temporary period of five years. This application follows pre-application discussions with the London Borough of Camden, TfL, the Metropolitan Police and the local community.
- 10.2 TfL is currently undertaking feasibility and consultation work with regard developing a new entrance to Camden Town Underground Station. It is planned that this would be located across from this site on the north side of Buck Street. As this would result in the creation of a new underground 'station box' below the market, this site is safeguarded by the Camden Local Plan (2017) and Camden Town Underground Station Site SPD (2007) so that wholesale redevelopment of this hardstanding site cannot take place in advance of the station works. These are currently programmed to start in 2020.
- 10.3 Accordingly, the applicant is bringing forwards a 'meanwhile use' for a temporary five year period. Following the success of similar markets, a ground plus two level container market is proposed. The ground floor would predominantly provide retail space, both within the containers and in the courtyard area, whilst the upper floors would mainly provide food and beverage uses. Traders which sell a range of original merchandise would be sought so that the quality of the market aligns with the other markets in Camden.
- 10.4 As the containers would be designed off-site, on-site construction works would be limited to just four to six weeks therefore disruption in the local area in terms of dust, transport and noise would be kept to a minimum.
- 10.5 The proposals present an opportunity to significantly improve the offering of the existing market which would provide a significant boost to Camden Town in advance of more permanent works coming forwards subsequent to the new underground station entrance.
- 10.6 Following a thorough review of the proposal against planning policy we consider that this application should be granted planning permission. If permission is granted in a

timely manner it is currently the applicant's intention that the market would open in advance of Christmas 2018.