



GERALDEVE

Karma Kitchen, Building C, Stables Market, Chalk Farm Road,
London, NW1 8AH

On behalf of: Triangle Upper Limited

12/12/2019

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1 Introduction

- 1.1 This application seeks planning permission for a new co-working commercial kitchen space (Use Class B1(c)) at sub-basement level within Building C, Stables Market ('the site'), which would be operated by Karma Kitchen.
- 1.2 The applicant is the owner of the site, the wider Stables market, as well as other important market destinations within Camden, which include Camden Lock Market, and Buck Street Market which is currently being re-developed. It has entered into an agreement with Karma Kitchen to try to bring the sub-basement back in to use.
- 1.3 The site is currently permitted as a commercial kitchen, but as ancillary Class A3 floorspace, to support the club, bar and restaurant Shakazulu, located on the two floors above. Shakazulu has not used, and does not require, the additional kitchen facilities.
- 1.4 The proposed use as co-working commercial kitchens, operated and managed by Karma Kitchen, would provide support for small catering businesses, amongst others, within Stables Market, Camden Lock Market and Buck Street Market. The proposed kitchens would also provide a platform for local start-up catering companies.
- 1.5 Karma Kitchen would also provide youth training schemes, work placement and apprenticeships for local people. These schemes have been very successful in the existing Karma Kitchen space, located at the Oval in Hackney.
- 1.6 Karma Kitchen and LabTech have given careful consideration to transport, servicing and deliveries, in addition to ventilation and extraction. Detailed supporting technical reports and an Operational Management Statement set out the mitigation measures that would be put in place to support the operation of the kitchen facility within this central Camden Town location.
- 1.7 On this basis, the proposed application is considered an exciting opportunity to provide a new workspace concept that seeks to support local start-up and small businesses and foster a new working community within the borough.
- 1.8 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 MBH Design
- c. Design and Access Statement, prepared by MBH Design;
- d. Existing and proposed plans, prepared by MBH Design;
- e. Transport Statement, including servicing, deliveries and pickup details, prepared by Arup;
- f. Noise Report, prepared by Scotch and Partners;
- g. Ventilation Report, including odour management details, prepared by Scotch and Partners;
- h. Operational Management Statement, prepared by Karma Kitchen; and
- i. Employment and Training Strategy, prepared by Karma Kitchen.

2 Site and Surrounding Area

- 2.1 This section describes the site's location and context in greater details. The full extent of the site is shown within the red line boundary of the Site Plan, submitted as part of this application.

Surrounding Area

- 2.2 Building C is located within Stables market, which fronts Chalk Farm Road and is bounded by Camden Lock Place to the east and Regents Canal to the south.
- 2.3 The site is immediately surrounded by a number of eclectic stalls, including a large number of food and beverage stalls, cafes and restaurants which deliver an exceptional food offering that draws a high number of local and international visitors to the Market.
- 2.4 Surrounding the Market are a number of independent shops, bars, restaurants and nightclubs, which characterise this part of Camden Town.

The Site

- 2.5 Building C is a triangular site located between Camden Stables market and Camden Lock Market. Building C adjoins Building D to the rear and to the south sits a number of covered ad-hoc retail and food stalls/ units. It is a glass building that was constructed in the early 2000s.
- 2.6 Building C comprises three basement levels, a ground floor and three upper levels. A mixture of Class A1, A3, B1 and D2 uses are permitted at the site. Part of the market is located at ground floor with a number of shops and food outlets. Shakazulu, a restaurant, bar and nightclub occupies the basement level.
- 2.7 At the front of the building is an entrance, where an escalator provides access to the first basement level. Access directly to the basement levels is from Camden Lock Place. The land is higher to the west of the site where from Gilbeys Yard access is directly on to the first-floor level.

Planning Designations

The site is subject to the following planning designations, as defined by Camden Local Plan (2017).

a. Regents Canal Conservation Area

The building is not listed, but a number of buildings within the Market in proximity are listed, which include Grade II listed Provender Store, and the Stables fronting Chalk Farm Road.

3 Planning History

3.1 A detailed review of Camden's online planning records has been carried out. The below provides a summary of the records, which are considered to be of most relevance to this application

3.2 On 26th April 2001, planning permission (ref. PE9800576R2) was granted for the redevelopment of Building C including the erection of a 4 storey plus basement building for Class A1, A3, B1 and D2 uses.

3.3 Following this, on 22nd October 2003, planning permission (ref. 2003/0726/P) was granted for:

“Amendment to previous planning permissions (Reg.no.PE9800576R2, and PEX0200404) for the redevelopment of the site including the erection of a 4 storey plus basement building on the triangle site (building C) for Class A1, A3, B1 and D2 uses, by the amendment of the elevational design of the Camden Lock Place elevation and the design of the glass drum at the main site entrance.”

3.4 On 26th November 2004, a subsequent planning permission (ref. 2004/3953/P) was granted for:

“Alterations during the course of construction for the erection of plant screening at third floor and roof levels to Building C for A1, A3, B1 and D2 uses as a variation to planning permission PE9800576R2, as amended by PEX0200404 and 2003/0726/P.”

3.5 On 31st March 2005, planning permission (ref. 2005/0224/P) was granted for:

“Extension during the course of construction to four storey building (approvals 2003/0726/P, PEX0200404 & PE9800576R2) to provide an additional basement level to accommodate preparation and storage areas attached to the approved restaurant use (Class A3) at first floor level, toilets to the leisure use (Class D2) at basement level and plant and safety requirements ancillary to the use of the entire building”.

- 3.6 Condition 2 attached to the permission (ref. 2005/0224/P) sets out that the sub-basement approved **“shall only be used for 621 sqm of plant and safety equipment, 135sqm of Class D2 (leisure) and 342 sqm of Class A3 (food and drink) and shall be ancillary only the approved uses of Building C”**.
- 3.7 Condition 3 states that **“no customers associated with the Class A3 floorspace across the Stables Market site shall have access to the sub-basement hereby approved.”** Condition 4 restricts use of the premise by staff and customers between the hours of 24:00 and 08:00 the following day.
- 3.8 On 18th July 2005, planning permission was granted for:
- “Installation of a canopy at first floor level to provide cover to a seating and viewing area.”**
- 3.9 On 17th July 2009, planning permission (ref. 2009/2418/P) was granted for:
- “Details of programme of ground investigation for the presence of soil and groundwater contamination and landfill gas pursuant to condition 8 of planning permission dated 31st March 2005 (for the extension during the course of construction to four storey building (approvals 2003/0726/P, PEX0200404 & PE9800576R2) to provide an additional basement level to accommodate preparation and storage areas attached to the approved restaurant use (Class A3) at first floor level, toilets to the leisure use (Class D2) at basement level and plant and safety requirements ancillary to the use of the entire building).”**

4 Development Proposals

4.1 Planning permission is sought for the following:

“Use of the sub-basement of Building C as Class B1(c) light industrial - commercial kitchen, installation of associated roof top plant and other associated works.”

4.2 This application proposes use of the sub-basement of Building C within the Stables Market by Karma Kitchen, a company that provides flexible commercial kitchen spaces for predominantly small, independent and start-up companies. Given the site context it is considered that the proposed operations of Karma Kitchen, as set out below, would fall within a Class B1(c) light industrial use class.

4.3 The existing lawful use of the space is as a commercial kitchen (Class A3) to support the existing restaurant and club, Shakazulu, which is located on the two upper levels. The proposed use, although falling within a different use class, is considered to be similar in terms of operations and requirements to the existing lawful use of this part of the building.

Karma Kitchen

4.4 Karma Kitchen was established in 2018 by Gini and Eccie Newton following their initial venture Karma Cans and their first-hand experience of the difficulties of starting up a catering business without access to a suitable and affordable commercial kitchen space.

4.5 Karma Kitchen opened its first commercial kitchen at the Oval in Hackney. The kitchen has proven a great success, being used by companies such as Island Poke, 26 grains and Pip&Nut, who are now fully established catering brands with retail units across London and products sold in a variety of stores across the UK. For this reason, Gini and Eccie are looking to open their second premise in Camden Market, albeit with the additional aim of supporting those catering companies already operating from within one of the Camden Markets.

4.6 The new Karma Kitchen facility is therefore anticipated to support:

- a. Existing vendors of Camden Market;
- b. Start-up catering companies seeking to test their business;

- c. Small catering companies seeking more space to cater one-time large events; and
 - d. A small percentage of companies cooking for home deliveries.
- 4.7 The proposed Karma Kitchen would offer the following economic benefits to the local Camden community:
- a. Provision of commercial kitchen space at affordable prices and flexible lease terms to attract new start-up and small catering companies to Camden;
 - b. Provision of additional commercial kitchen space to support those catering companies within Stables Market, Camden Lock Market and the forthcoming Buck Street Market;
 - c. Provision of 10 full time job to oversee the management of the new space; and
 - d. Provision of local apprenticeship, work placement and youth training opportunities, which support the development of local people and provide permanent employment opportunities at the end of the schemes.
- 4.8 Karma Kitchen would offer the following benefits to small and start-up catering companies within Camden:
- a. Provision of professional commercial kitchen space within a central location;
 - b. Flexible lease arrangements including availability of shared kitchen space for an eight-hour period starting from £42 per shift;
 - c. Provision of general maintenance and upkeep of the kitchen spaces;
 - d. Provision of washing up and cleaning assistance including laundry; and
 - e. Designated servicing, deliveries and waste arrangements.

Proposals

- 4.9 Access to the co-working kitchen spaces would be through the existing main entrance on Camden Lock Place. Access down to the basement area would be via the goods/passenger lift and staircore, which runs from the existing lobby area.
- 4.10 No customers or visitors would be permitted access into the kitchens.

- 4.11 No external changes are proposed as part of the application, with the exception of replacement plant equipment which is still to be selected. Internally, proposed works would provide a high-quality commercial kitchen fit out, including the following:
- a. 7 shared kitchens between 20-30 sq. m, which include ovens, hobs, storage, washing facilities, kitchen equipment and kitchen work services; and
 - b. 2 private kitchens between 50-70 sq. m, which includes ovens, hobs, storage, washing facilities, kitchen equipment and kitchen work services.
- 4.12 The total floorspace provided is 469 sq. m (GIA).
- 4.13 The proposed kitchen would operate three shifts per day: 7:00-15:00, 16:00-23:00 and 24:00-6:00. There would be one hour between each shift for cleaning, where cleaning staff only are permitted in the kitchen spaces.
- 4.14 The proposed kitchen would be 24 hours. However, it is anticipated that the 12:00 – 6:00 shift would only be at 20% capacity with no deliveries and there would be no deliveries between the hours of 24:00 and 06:00.

Transport, Servicing and Deliveries

- 4.15 A Transport Statement prepared by Arup has been submitted as part of this application. The Statement assess the potential effects of servicing and indicative numbers of deliveries and pickups on the surrounding area, the existing transport network and amenity considerations, as required by national and local planning policy.

The Statement sets out a number of measures, which would be implemented to mitigate potential effects of the proposed development. These include:

- a. A car free development;
- b. A dedicated waste and recycling management system in line with the existing waste arrangements for Stables Market;
- c. Use of separate servicing bays for pickups and deliveries, which are located on Chalk Farm Road and Camden Lock Place;
- d. No deliveries between the hours of 20:00 and 6:00;
- e. No deliveries on a Sunday;
- f. No pickups between the hours of 24:00 and 12:00;
- g. Preparation of a Management Strategy for all servicing, deliveries and pickups;

- h. Preparation of a Code of Conduct, which will be issued to all users of Karma Kitchen;
 - i. Encouragement of the use of e-bikes, cargo bikes and cycles for deliveries and pick-ups; and
 - j. A dedicated team of kitchen porters to manage all deliveries, pick and waste arrangements.
- 4.16 On the basis of the above implemented measures, the Transport Statement concludes that the transport activity associated with the proposed development can be managed to ensure that it does not adversely affect local transport conditions.

Amenity

- 4.17 A Noise Assessment and a separate Ventilation Statement, both prepared by Scotch and Partners have been submitted as part of the application.
- 4.18 The details of the proposed plant equipment have not yet been finalised. The Noise Assessment therefore sets out the background noise levels and identifies through a feasibility study the maximum noise level of the new plant equipment that would ensure that the noise levels at the nearest sensitive receptor meet LB Camden's noise criteria. It is concluded that the required noise levels to meet Camden's Planning Policy requirements would be achievable.
- 4.19 The Ventilation Statement, including details of Odour Management sets out that the proposed development would use the highest quality ventilation equipment, which would in parts re-use parts the existing extraction system ducts already installed into Building C. The proposed extract system would efficiently and effectively control possible odours from the kitchens, whilst remaining sensitive to the amenity and appearance of the surrounding area.

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).

National Guidance – National Planning Policy Framework (‘NPPF’) (2018)

- 5.3 The Framework (February 2019) sets out the Government’s economic, environmental and social planning policies for England. It is a material consideration when determining all planning applications in England.
- 5.4 The NPPF establishes the presumption in favour of sustainable development at paragraph 11. Paragraph 80 states planning policies and decisions should **“help create the conditions in which businesses can invest, expand and adapt”**.
- 5.5 In March 2014, the Department for Communities and Local Government (DCLG) launched its web-based Planning Practice Guidance (‘PPG’) resource. This aims to provide guidance which is useable in an up-to-date and accessible manner. The PPG was updated in July 2019 in line with the publication of the revised NPPF.
- 5.6 Consultation also took place regarding the Draft New London Plan between 1 December 2017 and 2 March 2018. The Examination in Public (EiP) of the New London Plan occurred between January 2019 and May 2019. In July 2019, the Mayor published a revised draft Plan, proposing some changes in response to the discussion at EIP. The officers report was published on 8th October 2019. At this stage the draft document carries some weight in terms of determining planning applications.
- 5.7 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.
- 5.8 The following Camden Planning Guidance documents are considered to be of relevance in terms of this application:

- a. Employment sites and business premises CPG (March 2019)

- b. Transport CPG (March 2019)
- c. CPG Amenity (March 2018); and
- d. CPG Town Centres and Retail (March 2018).

5.9 The principal considerations affecting this proposal are considered to be as follows:

- a. Land use;
- b. Transport, servicing and waste;
- c. Amenity (including noise and ventilation).

5.10 Each of these principal considerations are considered in turn in the following chapters.

6 Land Use

Policy Context – Proposed Co-Working Kitchen Use

- 6.1 The current and emerging London Plan shows a strong support for
- 6.2 Policy 4.1 sets out that the Mayor will promote and enable the continued development of a strong and sustainable and increasingly diverse economy across London ensuring the **“availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and environments”**. Part (f) further states that the Mayor will **“emphasise the need for greater recognition of the importance of enterprise and innovation”**.
- 6.3 Supporting text paragraph 4.4 goes on to emphasise that planning needs to facilitate the change that is required to ensure that London continues to allow enterprises to flourish.
- 6.4 Paragraph 4.8 recognises that the availability for suitable and affordable workspaces within central London for small and medium sized enterprises (‘SMEs’) is constrained and an effort needs to be made to ensure that these businesses have appropriate spaces to grow.
- 6.5 London Plan Policy 4.8(e) further 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.
- 6.6 Emerging London Plan Policy E2 sets out that boroughs should support the provision of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents **“to meet the needs of micro, small and medium sized enterprises and to support firms wishing to start-up or expand”**.
- 6.7 Policy TC2(d), Camden’s centres and other shopping areas, of the Local Plan sets out that the Council will support Camden’s markets.
- 6.8 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.

- 6.9 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. Part (a) states that the Council “**will support businesses of all sizes and in particular start-ups, small and medium-sized enterprises**”.
- 6.10 Part (b) of Local Plan Policy E1 goes on to state that the Council will maintain a stock of premises suitable for a variety of business activities, firms of different sizes, available on a range of terms and conditions for firms with differing resources. This is to support the large proportion of small businesses that locate within Camden with 85% employing less than nine people (para. 5.6).
- 6.11 Paragraph 5.9 of the Local Plan further states that the Council will “**seek the provision of innovative new employment floorspace that will provide a range of facilities including: flexible occupancy terms, flexible layouts, studios, workshops and networking, socialising and meeting space**”.

Policy Assessment

- 6.12 In line with adopted London Plan Policy 4.1, emerging London Plan Policy E2 and Local Plan Policy E1, the proposed Karma Kitchen co-working kitchens will provide a range of kitchen sizes that are fully equipped and able to be rented on longer or shorter term leases. The size of the space and flexibility of use and cost, provides an ideal environment for small businesses, specifically start-up companies to grow.
- 6.13 The success of Karma Kitchen in supporting start-up businesses has already been proven by its first model at the Oval in Hackney. The space has since supported a number of businesses in their developing stage, including Island Poke, 26 Grains, Pip & Nut. These companies have since become very successful, now operating units within central London and with products sold in a variety of stores.
- 6.14 As recognised by Camden Local Plan paragraph 5.6, this part of Camden is defined by the high proportion of small and independent businesses that operate in the area. Support of this section of Camden’s economy is vital to retaining the unique character of this area and it is considered that the proposed Karma Kitchen use would support this and encourage a further diversification of employment spaces within Camden.
- 6.15 Karma Kitchen’s ethos would further be well suited to the character of Camden’s town centre, as not only would it offer functional and affordable commercial kitchen space, including cold/ frozen storage, dry storage/ pallet storage and specialist equipment. The space also fosters

a sustainable working environment in terms of support of recycling, composting and reducing plaster to building a working community, which encourage a sharing of knowledge and experiences between like-minded businesses.

- 6.16 A sustainable working environment is also demonstrated by Karma Kitchen's provision of youth training programmes, work placements and recruitment opportunities for local people to gain commercial kitchen experience. Karma Kitchen have already secured employment for people via charities and local councils such as the Prince's Trust and upskill within their Hackney space.
- 6.17 The location of the proposed co-working Karma Kitchens within Stables Market, and in proximity to the forthcoming Buck Street Market, is intended as the new Karma Kitchen space seeks to provide support to the many independent food and beverage units that operate within these markets. Many of the stalls and units within the Markets have limited back-of-house and operational spaces. The proposed Karma Kitchens would provide a much-needed opportunity for companies to expand their food offer by the use of the additional space, as required.
- 6.18 Further, the use of the Karma Kitchen kitchens by the independent businesses already operating within the Market is intended to reduce the need for these businesses to prepare for off-site and arrange delivery of pre-prepared food into the site. The proposed development would therefore support the existing Market by enabling a more sustainable operation and opening up opportunities for growth for existing tenants. This is in line with London Plan Policy 4.8 part (e) and Local Plan Policies TC2 part (d) and TC6 part (b).
- 6.19 In summary, the proposed development is considered to provide a new flexible employment space to LB Camden, which would benefit the surrounding Markets, support start-up catering companies, and provide a variety of employment opportunities for local people. The proposed use is therefore considered to accord with national and local planning policies.

7 Transport, Servicing and Deliveries

Policy Context

- 7.1 Paragraph 29 of the NPPF states that the transport system needs to be balanced in favour of sustainable transport modes.
- 7.2 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.
- 7.3 Local Plan Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport in the boroughs.
- 7.4 Policy A1 part (d) of the Local Plan, sets out that the Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network. This is with the overall aim to protect the quality of life of occupiers and neighbours. This includes consideration of delivery and servicing details.
- 7.5 Supporting text paragraph 6.8 – 6.11 goes onto to state that the Council expects proposals to provide information on the likely impacts of the development and step taken to mitigate those impacts. Further, safety of vulnerable road users is a key consideration.
- 7.6 Camden’s waste requirements are set out in CPG 1: Design.

Assessment

- 7.7 A Transport Assessment prepared by Arup has been submitted as part of the application. The Transport Assessment sets out the transport implications of the site relating to trip generation, deliveries and servicing, and waste. The Transport Statement concludes that **“the transport activity associated with the proposed development can be managed to ensure that it does not adversely affect local transport conditions”**.

Trip Generation

- 7.8 The site benefits from a Public Transport Accessibility Level (PTAL) of 6b (excellent). And in line with London Plan Policy T1, it is expected that all members of staff will use sustainable transport methods.
- 7.9 Given that the total number of people anticipated on site at any one time is not anticipated to exceed 20 people (excluding porters), the impact of person trips is considered to be negligible.

Car and Cycle Parking

- 7.10 No car parking will be provided for the development.
- 7.11 As no visitors or customers are permitted on site, no short stay cycle parking is required. There is cycle parking available on Camden High Street opposite Camden Lock Place. There is also a Santander bike docking station on Castlehaven Road.

Waste

- 7.12 The waste strategy has been produced to work within the existing waste management strategy for the wider Stables Market.
- 7.13 A dedicated team of kitchen porters will be responsible for collecting waste and transferring all waste into the correct bins separated for general waste and recycling.
- 7.14 All food waste would be converted into compost with waste oil used to generate energy.

Deliveries and Servicing

- 7.15 The anticipated number of deliveries and servicing have been estimated using the existing Hackney premises as a precedent and the proposed number, and size of, kitchen space.
- 7.16 No food pickups are proposed between the hours of 24:00 and 12:00 and no deliveries are proposed between the hours of 20:00 and 6:00. No deliveries would be scheduled on a Sunday. Indicative numbers set out in the submitted Transport Statement show

that deliveries and pickups would be evenly spread between the hours of 6:00-24:00 Monday-Saturday with pickups only on the Sunday.

- 7.17 Indicative numbers of pickups are estimated to be between 46-56 per day Monday – Sunday and indicative numbers of deliveries are estimated to be between 28-33 per day Monday – Saturday. Please refer to the submitted Transport Statement for the full schedule of indicative numbers of pickup and deliveries.
- 7.18 As set out in Section 4 of this Statement, the new Karma Kitchen is different from the existing Hackney space in that it seeks to provide additional kitchen space for the vendors at Camden Market. The numbers are therefore considered to account for the maximum number of deliveries and pick ups to and from the site.
- 7.19 Further, the use of Karma Kitchen by existing vendors at Camden Market seeks to reduce the number of deliveries by those who are required to prepare their food off-site due to a lack of commercial kitchen space within the Market. This reduction in trips is anticipated to offset the number of delivery and servicing trips from the new Karma Kitchen space.
- 7.20 In accordance with Policy A1 part (d) of the Local Plan, careful consideration has been given to the amenity of surrounding residents and the following measures are proposed to minimise potential effects of the increased number of trips to and from the market:
- a. The deliveries and pick ups would take place from two separate bays located on Chalk Farm Road and Camden Lock Place;
 - b. The Chalk Farm Road delivery bay would not be used after 22:00;
 - c. No deliveries and pickups would take place between the hours of 24:00 and 06:00;
 - d. A dedicated team of porters would be employed to manage deliveries, and pickups including transferring all deliveries from the loading bay to Karma Kitchen;
 - e. A Code of Conduct would be published and issued to all those using the site with respect to the correct procedure for deliveries and pickups;
 - f. Strict security personnel to refuse any deliveries and pickups at the incorrect place or outside of permitted times Suspension of membership should the Code of Conduct not be followed; and

- g. The main food delivery operators have committed to the introduction of electric bikes from 2020 in London.

7.21 It is considered that the above measures sufficiently mitigate the potential effects of the proposed development on the existing transport network, and the amenity of visitors and local residents. As such, the proposed development is considered to accord with national and local planning policy.

8 Amenity

- 8.1 This section addresses the following amenity considerations:
- a. Noise; and
 - b. Odour.

Policy Context - Noise

- 8.2 The London Plan aims to reduce noise and enhance soundscapes under Policy 7.15.
- 8.3 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.
- 8.4 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.
- 8.5 Appendix 3 sets out the noise thresholds for industrial and commercial uses during the daytime, evening and night.

Assessment

- 8.6 A Noise Report prepared by Scotch and Partners has been submitted as part of this application.
- 8.7 The report sets out the result of the environmental noise survey, which have been carried out at the site. The external background noise survey measured the following background noise levels 56 dB during the daytime, 53 dB during the evening, and 50dB at night-time.
- 8.8 The noise sensitive receivers in proximity have been identified within in Figure 4.1 and 4.2 of the submitted report. The nearest noise sensitive receptor has been identified as the Interchange Building located on Oval Road.
- 8.9 The design and specifications of the new plant equipment are yet to be finalised. However, the report identifies through a feasibility study that achieving a target of 10dB below the

background sound level at the nearest noise sensitive receptor would be achievable through a combination of attenuation owing to distance and screening.

- 8.10 The proposed noise levels, as demonstrated by the submitted Acoustic Report, would be 10dB below the measured background noise levels and would not contain any tonal sounds. The proposed noise levels have been considered as acceptable, as they accord with a condition attached to a recently approved similar scheme within Camden, which is referenced in paragraph 2.1 of the Noise Statement.
- 8.11 On this basis, the Noise Statement concludes that “the expectations of the Local Authority, in terms of noise control, are expected to be able to be readily satisfied”. The proposed noise levels are expected to be conditioned and it is considered on this basis that the proposed development would be in accordance with Camden Local Plan Policies TC4 and A4 would be satisfied.

Policy Context - Odour Control

- 8.12 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.
- 8.13 Local Plan Policy D1 ‘Design’ part (o) requires that development carefully integrates building services equipment. Supporting paragraph 7.34 states that ventilation and extraction systems should be contained within the envelope of the building or be located within a visually inconspicuous position.

Assessment

- 8.14 In line with local planning policy requirements, an Extraction Statement, including odour management, prepared by Scotch and Partners has been submitted as part of this application. The plan sets out the proposed ventilation and extraction for the proposed commercial kitchen, on the basis of the 2 shared kitchens and 7 private kitchens that would be provided.
- 8.15 The Plan proposes an odour abatement system that provides a high level of grease and odour control, using the following:

- a. Grease filters within the canopies
- b. In-line single pass electrostatic precipitator (ESP) in combines ducts; and
- c. UV ozone system in combined ducts.

8.16 The proposed extraction system is to be combined into two central extract systems, which as far as possible are reusing parts of the existing extraction system that is already in place. In line with policy A1 part (k) and Policy D1 part (o), re-using the existing extraction system minimises any visual effect from the system on the surrounding area.

8.17 The extraction systems would remove possible odour from the kitchen units through the following stages:

- a. Cooking pollutants/ emissions captured by kitchen canopy baffle type grease filters;
- b. Gaseous contaminants removed via UV system in combined extract ducts;
- c. Particulate containments removed using inline ESP in combined extract ducts;
- d. Centrifugal fans provide pressure rise to match system resistance; and
- e. Discharge attenuators to attenuate noise to meet LB Camden's noise requirements.

8.18 It is considered that the proposed extract system, which has been tailored to the proposed Karma Kitchen use would efficiently and effectively control possible odours from the kitchens, whilst remaining sensitive to the amenity and appearance of the surrounding area to meet local planning policy requirements.

9 Summary

- 9.1 In summary, the proposed development seeks a change of use of 469 sq. m (GIA) at sub-basement level of Building C, Stables Market from ancillary cooking space (Class A3) to shared commercial kitchen space (Class B1c).
- 9.2 Although the proposed use is considered to fall within a different use class from the existing use, the two uses are considered to be very similar with regards to operational and management of the space.
- 9.3 The proposed development would be operated by Karma Kitchen to provide high-quality, professional standard shared and private kitchens.
- 9.4 The kitchen space seeks to support the existing vendors at Camden Market, start-up local catering companies and small catering companies. The kitchen space would be leased on the basis of 6, 7 and 8 hour shifts, at affordable prices.
- 9.5 It is anticipated that these catering companies would use the space for a variety of purposes including additional food preparation space to support their market stall; testing of new products and business plans; catering of large one-time events; a small proportion of home deliveries.
- 9.6 Karma Kitchen would also provide a number of structured work placement, youth training schemes and apprenticeships to support local people who would like to enter the commercial catering sector.
- 9.7 The submitted Transport Statement sets out the possible effects of the proposed development on the surrounding area and amenity of local residents. It is anticipated that the main use of the new kitchen space would be to support existing vendors at Camden Stables, Camden Lock and Buck Street market, which would reduce the overall number of deliveries to the Market.
- 9.8 Notwithstanding the above, the Transport Statement sets out a set of carefully selected measures would be implemented to ensure that all transport activity from the proposed development is adequately managed. These include the use of separate bays to facilitate deliveries and pick ups and there would be no deliveries or pickups between the hours of 24:00 and 06:00.

- 9.9 Careful consideration has also been given to noise and ventilation. The supporting Statements demonstrate that the proposed development would meet the required noise criteria and that the highest level of extraction system would be installed. As such, it is considered that there would be no impact on the character or amenity of the area from noise and odour.
- 9.10 In summary, the proposed use of the sub-basement level of Building C by Karma Kitchen, would bring the currently unoccupied space back into an active use that fulfils the employment objectives of the London Borough of Camden to deliver new types of business space to support small local businesses and new employment opportunities for local people.
- 9.11 Accordingly, we consider that these proposals should be granted planning permission.