



PLANNING STATEMENT

In respect of

145- 147 York Way, Camden, London N7 9LG

On behalf of

Shurgard UK Ltd.

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*Authorised
by:* **Alun Evans**

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Figure 2.1	Aerial image of site location
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1. INTRODUCTION

- 1.1 This Planning Statement ('PS') has been prepared on behalf of Shurgard UK Ltd ('the applicant'), in support of a full planning application for the erection of an extension of the existing building for self-storage (B8 Use Class) purposes at 145-147 York Way, Camden, London N7 9LG ('the Site').
- 1.2 The applicant seeks planning permission for the following development works ('the proposals'):
- 'Erection of a 5-storey infill extension to the existing building to provide an additional self-storage floorspace (B8 Use Class), along with the provision of new car parking and cycle parking spaces and associated works'*
- 1.3 The planning application is advanced further to positive pre-application discussions with Camden Council ('the Council'). The scope of the application has been agreed in advance and key planning issues have been identified, which are comprehensively addressed in this submission.
- 1.4 This report has been prepared to assess the application proposals against the relevant provisions of the statutory Development Plan and other material considerations, particularly the National Planning Policy Framework (NPPF, February 2019) and accompanying Planning Practice Guidance (PPG, as amended), and Camden's Planning Guidance. As identified below, the Council's Development Plan supports the principle of B8 use at the site.
- 1.5 This PS demonstrates that planning permission should be granted without delay having applied the NPPF presumption in favour of sustainable development. It will demonstrate full development plan support for the principle and also assess all relevant development management considerations, with appropriate mitigation proposed where relevant.

Planning Benefits

- 1.6 There is a recognised undersupply of industrial land within Camden, and growing London-wide demands for self-storage space, as outlined in the Mayor's Land for Industry and Transport Supplementary Planning Guidance. Shurgard is, as a result, under increasing pressure to improve the capacity of the existing operation at York Way. The planning application is advanced on this basis.

1.7 We consider that these development proposals will bring with them several key planning benefits, including:

- Provision of high-quality employment floorspace – Providing much needed employment floorspace to help alleviate Camden’s current undersupply of industrial floorspace;
- Intensification of the existing site – The proposed development will ensure the optimisation of development on the existing site for industrial purposes;
- Economic benefits – The development will support the creation of employment opportunities during the demolition, construction and the operational phases as well as serving commercial customers which represents approximately 15-20% of units rented;
- Improved Highway Safety — The proposed development provides an improved egress solution through the utilisation of a currently disused exit onto York Way, thereby allowing cars to access and egress the site in a forward gear and improving highway safety; and
- Sustainability benefits — The development seeks to secure a zero-carbon scheme that enhances the resilience of the application site in face of climate change.

Scope of Planning Application

1.8 The report is structured as follows: Section 2.0 of this statement sets out the application site context and relevant planning history. Section 3.0 outlines pre-application discussions. The development proposal is outlined in Section 4.0. Section 5.0 and 6.0 analyse the relevant planning policy context and assesses the proposed scheme against relevant development plan policy and other material considerations. Finally, Section 7.0 concludes the statement and summarises how the development scheme complies with relevant development plan policy.

1.9 This PS should be read alongside the following supporting reports which accompany the planning application.

- Daylight & Sunlight Report, prepared by Right of Light Consulting;
- Design & Access Statement, prepared by Threesixty Architecture;
- Energy Statement (including Sustainability Statement), prepared by Butler Consulting Engineers;

- Geo-Environmental Desk Study, prepared by Woolgar Hunter Engineers;
- Transport Statement, prepared by Ardent Consulting Engineers;
- Heritage Statement, prepared by Bidwells; and
- BREEAM Pre-Assessment, prepared by Atelier Ten.

2. THE APPLICATION SITE, CONTEXT & PLANNING HISTORY

- 2.1 The Site is largely occupied by a 6-storey red-brick building currently in self-storage and warehouse use (Use Class B8), of which the applicant purchased in November 2018.

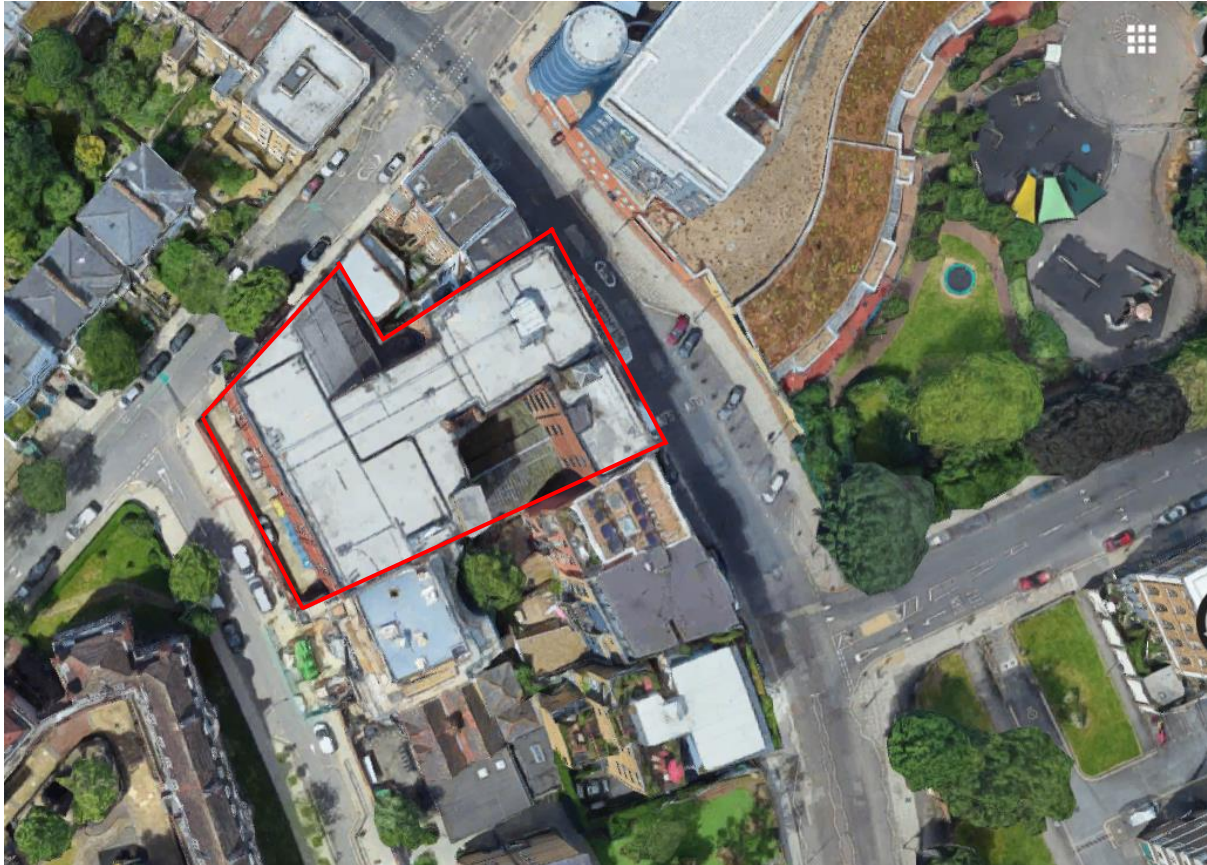


Figure 2.1 Aerial image of site location

- 2.2 The principle entrance of the Site is accessed off York Way, which leads into a small internal courtyard that is currently used for customer car parking and unloading/ loading purposes. The Site has a Public Transport Accessibility Level (PTAL) rating of 4, with 1 being the least accessible and 6b the most accessible, which indicates good access to London's excellent public transport network.
- 2.3 The nearest bus stop is located within 90m from the Site, serviced by two bus routes (routes 390 and 393) that provide connections within North London and Central London, operating 7 days a week and most hours of the day. Caledonian

Road Station, serving the Piccadilly Underground line is located 1km from the site, whilst the Camden Road, Caledonian Road & Barnsbury and Kentish Town Overground Stations are all within 1.5km of the Site. Camden Road A503 is also located within 180m from the site, providing direct vehicular connections into Central London.

Site Constraints (Heritage and Environmental Considerations)

- 2.4 The Site is not within a Conservation Area (CA), though it is within the setting of the Camden Square CA located north and west of the Site and the Hillmartin CA (LB Islington) to the east. It is considered that the proposed development will not have a material impact upon the setting or character of the CA, as confirmed by the Heritage Statement submitted in support of this application.
- 2.5 There are no nationally Listed Buildings on or near the Site. According to the Council's Local List (adopted January 2015), the existing building on site is locally listed (REF472), with the following description:

'Late 19th century depository. Massive red brick structure, maintains building line and form of adjacent smaller residential buildings on York Way surprisingly successfully (although its elevations onto Cliff Villas and Cliff road are significantly less neighbourly due to scale). On York Way elevation the use of pilasters and blind arches, glazed and engineering brickwork and original fenestration add interest and relief to the formidable bulk of the building'.

- 2.6 The two terraced houses at 151-153 York Way (REF473) and the pair of Italianate villas at 5 & 6 Cliff Villas (REF471), adjoining the north and south boundaries of the Site respectively, are also locally listed. The impact of the proposed scheme on these historically significant buildings also forms a key part of the policy evaluation outlined in Section 6.
- 2.7 There are no Tree Preservation Orders on or near the Site. The Site is within Flood Zone 1, which means it is a low risk of flooding. It is also at a low risk of flooding from surface water, and so there are no notable environmental constraints on site.

Site Designations

- 2.8 According to the Council's Policies Map (March 2019 version), the Site is not covered by any specific planning designations.

Surrounding Area

- 2.9 The area surrounding the Site is dominated by 3 to 4 storey buildings that are mixed in land use. The townhouses immediately north of the Site, along York Way, are mainly in commercial use on the ground floor, and in residential/storage use on the upper floors.
- 2.10 Educational uses, including The Bridge London Teaching School, The Bridge Primary School and Hungerford Primary School are immediately east of the Site, and Brecknock Primary School immediately south. A number of community/medical buildings, including Goodinge Community Centre and Goodinge Group Practice are located further east from the Site.
- 2.11 Residential properties, largely three-storey townhouses and taller mansion blocks are dotted across the surrounding area.

Planning History

- 2.12 The following planning history is relevant to the application site:
- LPA ref. 20196 – Planning permission was granted on 3 June 1975 for *‘Alterations to existing archway fronting York Way, widening gateway fronting Cliff Road, and replacing existing wall along Cliff Villas by a ware fence.’*;
 - LPA ref. P9600764R1 – Planning permission was refused on 13 August 1996 for the *‘Erection of an additional floor at roof level to provide ancillary office and residential accommodation for existing storage use, as shown on drawing nos. YRK 210.A, 211.A and 212.’*.
- 2.13 Relevant applications on the adjacent site at 141-143 York Way include:
- LPA ref. 2007/1392/P – Planning permission was granted on 21 July 2007 for the *‘Erection of a mixed use six storey building with ground floor office accommodation (Use Class B1), 9 residential units above comprising 8 x 2 bedroom and 1 x 3 bed units (Use Class C3).’*; and
 - LPA ref. 2009/1574/P – A Lawful Development Certificate was granted on 21 July 2009 for *‘Minor internal and external alterations, as a variation to planning permission dated 21st July 2007 (ref. 2007/1392/P) for the erection of a mixed use six storey building with ground floor office accommodation (Use Class B1), 9 residential units above comprising 8 x 2 bedroom and 1 x 3 bed units (Use Class C3).’*.

2.14 Relevant applications at 5 and 6 Cliff Villas, adjacent to the application site, include:

- LPA ref. 2013/7259/P – Planning permission was granted at appeal on 24 April 2014 for the '*Demolition of existing 4 storey building comprising 8 flats and erection of 6 storey building comprising 12 flats (C3).*'. This development has recently been built out.

3. PRE-APPLICATION CONSULTATION

- 3.1 The NPPF provides the Government's most up-to-date policies relating to pre-application engagement. It advises that early engagement has the significant potential to improve the 'efficiency and effectiveness of the planning application system for all parties' stating:

'Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.' (Para. 39)

- 3.2 Consistent with paragraphs 39-46 of the NPPF, the applicant has actively engaged with Officers from Camden Council in a period of pre-application consultation. The first pre-application meeting took place 28 August 2019, and a second meeting on 4 September 2019. A summary of the consultation process is provided below.

- 3.3 The pre-application proposed a 5-storey over ground floor infill extension to the existing self-storage building (use class B8), including the provision of 4no. additional customer car parking spaces (including 1no. disabled parking space) at ground floor level to provide a total of seven parking spaces on site. The extension would be provided through the infilling of the existing internal courtyard currently used for customer car-parking and loading/ unloading purposes, offering a total of 890sq.m (GIA) storage space spread over five floors from first to fifth floors.

- 3.4 In its pre-application response dated 27 September 2019, the Council supported the proposed increase in storage floorspace, concluding that:

'The increase in storage use floorspace (Class B8) would optimise the contribution this site makes to Camden's economy. Therefore, the principle of an increase in self-storage floorspace is considered acceptable. The extension would sit within the plan form of the current building and only limited changes are proposed. Due to its location, there would be limited public views of the infill extension. Given this, the proposed extension would not harm the locally listed building and may be considered acceptable.'

- 3.5 The Council considered the proposed parking provision to be excessive and requested that it be reduced to only two additional car parking spaces. It was

also highlighted that cycle parking should be provided on site in line with the draft London Plan standards.

- 3.6 The feedback received from the Council during the pre-application process, especially with regards to car and cycle parking provision, has been addressed within the application submission and the proposals are therefore robust in this respect. Details of the proposed scheme showing changes made to the pre-application are set out in the following section, as well as in Section 6 'Planning Considerations' of this Planning Statement.

4. PROPOSED DEVELOPMENT

- 4.1 Following pre-application consultation, full planning permission is sought on behalf of Shurgard UK Ltd for the:
- ‘Erection of a 5-storey infill extension to the existing building to provide an additional self-storage floorspace (B8 Use Class), along with the provision of new car parking and cycle parking spaces and associated works’*
- 4.2 Shurgard is keen to improve the capacity of the existing building to address both customer demand in the area and the growing London-wide demands for self-storage space, as outlined in the Mayor’s Land for Industry and Transport Supplementary Planning Guidance. According to Camden’s Local Plan, there is currently an undersupply of industrial land within the Borough. Therefore, the proposed extension scheme will contribute to Camden’s economy, while addressing Shurgard’s desire to develop and grow their business in the Camden area.
- 4.3 A total of 890sq.m GIA of new storage space will be provided across 5 floors, which equates to 178sq.m GIA per floor. Considering the constraints of the Site and the historic fabric of the existing elevations, the extension will be undertaken through the infilling of the existing internal courtyard on-site, from the first to fifth floors. The ground floor of the courtyard will remain in use for car parking and ancillary services for the existing storage function.
- 4.4 A new fire-fighting stair and lobby are also provided in the north-west corner of the building. Internal corridors have been re-planned to aid fire evacuation and fire-fighting capabilities to ensure that the proposed extension does not negatively impact the fire safety and efficiency of the storage building. A new fire escape door will be provided at ground floor level on the west elevation.
- 4.5 A re-opened through route for vehicles is also provided on the ground floor, by way of utilising the second entrance/exit that currently fronts onto York Way but has been historically left unused. This will negate the need for cars to reverse out onto the public highway, providing a safe point of egress to and from the Site.
- 4.6 In response to the concerns raised by Officers during the preapplication discussions, 2no. new customer car parking spaces will be provided, amounting to a total of 5no. car parking spaces on-site (including 1no. disabled parking space). Currently no cycle parking is provided. To provide a policy compliant

amount of cycle parking for the whole site, which measures 4565sq.m post-extension, 10no. long stay and 6no. short stay cycle parking spaces will be provided with the installation of 8no. Sheffield stands securely within the Site.

Key Characteristics

4.7 In summary, the proposed scheme comprises:

- A 5-storey extension, over ground floor car park, to the existing building to provide 890sq.m of self-storage space (B8 Use Class);
- Provision of 2no. new car parking spaces including 1no. disabled parking space;
- Provision of 10no. long stay and 6no. short stay cycle parking spaces;
- Re-planning of internal fire safety arrangements and provision of fire exit on west elevation; and
- Through route on the ground floor, providing a safe point of egress for vehicles through existing unused exit on York Way.

5. PLANNING POLICY CONTEXT

Development Plan

- 5.1 Section 38(6) of the 2004 Planning and Compulsory Purchase Act requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 The development plan relevant to this planning application comprises:
- London Plan, adopted 2016; and
 - Camden Local Plan, adopted 2017;

Material Considerations

- 5.3 Important material considerations relevant to the planning application include:
- National Planning Policy Framework (NPPF), adopted February 2019;
 - National Planning Policy Guidance (PPG) as amended;
 - Draft new London Plan July 2019 version;
 - Amenity Camden Planning Guidance (CPG), adopted March 2018; and
 - Transport CPG, adopted March 2019.
- 5.4 The emerging London Plan underwent an Examination in Public from 15 January to 22 May 2019. Publication and adoption of the final Plan is anticipated for February/ March 2020, reinforced by the Examiner's Report, published in November 2019. Its policies therefore carry significant material weight in the determination of planning applications.

Site Specific Policies

- 5.5 The policies from the adopted and emerging development plan documents and guidance documents that are relevant to the proposed development are listed below:

Camden Local Plan (adopted 2017)

A1	Managing the Impact of Development
D1	Design
D2	Heritage
CC1	Climate Change Mitigation

CC2	Adapting to Climate Change
T1	Prioritising Walking, Cycling and Public Transport
T2	Parking and Car-Free Development

London Plan (adopted 2016)

4.4	Managing Industrial Land and Premises
5.1	Climate Change Mitigation
5.2	Sustainable Design and Construction
6.9	Cycling
6.10	Walking
6.13	Parking
7.6	Architecture
7.8	Heritage Assets and Archaeology

Draft London Plan (July 2019 version)

D1B	Optimising Site Capacity through the Design-Led Approach
D2	Delivering Good Design
E7	Industrial intensification, Co-Location and Substitution
HC1	Heritage Conservation and Growth
SI2	Minimising Greenhouse Gas Emissions
T4	Assessing and Mitigating Transport Impacts
T5	Cycling
T6	Car Parking
T6.2	Office Parking

National Planning Policy Framework

National Planning Policy Guidance

Amenity Camden Planning Guidance (CPG) (March 2018)

Transport CPG (March 2019)

6. PLANNING CONSIDERATIONS

6.1 This section, under the following headings, addresses relevant development plan policies and highlights the benefits of the proposed extension to provide much needed, high-quality self-storage floorspace:

- Principle of Development
- Design
- Amenity
- Heritage
- Highways & Access
- Energy
- Sustainability
- Contamination

1. Principle of development

6.2 Paragraph 80 of the NPPF states that *‘planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt’*. In addition, *‘significant weight should be placed on the need to support economic growth and productivity’*.

6.3 Policy E7 (Industrial intensification, co-location and substitution) of the draft new London Plan promotes the intensification of business uses in Use Classes B1c, B2 and B8 through a range of methods, including *‘more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary’*. Supporting text (para. 6.7.1) further encourages all boroughs *‘to explore the potential to intensify industrial activities on industrial land to deliver additional capacity’*.

6.4 At the local level Camden Council recognises in its Local Plan that the borough has limited industrial and warehousing stock (para. 5.28). It notes that the cost of industrial locations in Camden is high, which suggests that the demand for industrial land far exceeds supply. There is great pressure to redevelop Camden’s stock of employment land for residential purposes, which command a high rate of return for developers. The Council, therefore, seeks to protect industrial and warehousing sites and premises that are suitable and viable for

continued use. Policy E1 (Economic Development) seeks to promote economic growth in the borough, in particular, by supporting *‘proposals for the intensification of employment sites and premises where these provide additional employment and other benefits’*.

- 6.5 The proposed extension offers 890sq.m of new industrial floorspace on-site, which will notably benefit the local and wider Camden economy for the following reasons: -
- Camden has a recognised undersupply of industrial floorspace. Provision of additional self-storage space will help alleviate this pressure;
 - Self-storage supports a higher than usual employment density for B8 uses, and so creates a notable amount of employment opportunities; and
 - Self-storage buildings do not only cater to domestic users, but increasingly also commercial customers who on average rent out 15-20% of self-storage space.
- 6.6 Considering the policy support for the intensification of industrial land and as verified by the Council’s pre-application response dated 27 September 2019, *‘the principle of additional storage floorspace (890sqm GIA) is considered acceptable’*.
- 6.7 The proposal seeks to make efficient use of this longstanding employment site to provide additional Class B8 floorspace, in line with Policy E1 of the Local Plan and draft Policy E7 of the draft London Plan. On this basis the development to provide much needed self-storage floorspace on this brownfield site should be supported. Significantly the proposals will create employment opportunities and protect an existing employment site from redevelopment for other uses.
- 6.8 In summary, the principle of the proposed development is supported at both local and national level. This investment in the Site will also deliver sustainable economic development which is strongly supported by the NPPF. On this basis the principle of development should be fully supported.

2. Design

- 6.9 Paragraph 127 of the NPPF, supported by Policy D2 (Delivering Good Design) of the emerging London Plan and Policy D1 (Design) of Camden’s Local Plan, states that all development should be well designed and of high quality. In particular, the materials used, the scale, density, layout and siting of the

proposed scheme must respect the character, functioning and amenity of the site and its surroundings.

- 6.10 The proposed extension will be undertaken by way of infilling the existing internal courtyard on-site. Therefore, it will sit within the current envelope of the existing building and will sit flush with the south boundary walls. Similarly, its overall height will follow that of the existing roof line.
- 6.11 To match the existing materiality of the building, the extension will be clad in red brick. No alterations will be made to the main facades of the existing building, fronting York Way to the east, Cliff Road to the north and Cliff Villas to the west. The only works to these facades envisaged would be repainting existing window frames and doors, and potential new high-quality signage through a separate advertisement consent application.
- 6.12 As evidenced, the material, scale, layout and siting of the proposed scheme is in keeping with that of the existing site. It is therefore, and as confirmed in the Council's pre-application response, wholly acceptable on design grounds.

3. Amenity

- 6.13 Policy 7.6 (Architecture) of the adopted London Plan states that new developments should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. Policy D1B (Optimising site capacity through the design-led approach) of the draft London Plan similarly states that new development should deliver appropriate outlook, privacy and amenity whilst ensuring the best use of the land.
- 6.14 Policy A1 (Managing the impact of development) of Camden's Local Plan further seeks to protect the amenity of communities, occupiers and neighbours in all new development proposed. Specifically, the Council will consider factors including (e) visual privacy, outlook; (f) sunlight, daylight and overshadowing and (g) artificial lighting levels. The Council's Amenity CPG provides additional guidance on assessing development impacts on amenity.
- 6.15 The proposed extension is contained within the envelope of the existing building. As discussed in paragraph 6.10, the extension will have a minimal impact given that it sits entirely within the existing courtyard and will not extend beyond the existing south boundary wall nor above the existing roof height. No new windows are proposed, and so the extension will not prejudice established residential outlook or have an undue impact on privacy.

- 6.16 The south of the Site currently adjoins the residential building at 141-143 York Way. The northern flank elevation of the residential property is approximately 16m from the northern edge of the application site's existing courtyard space. Its living windows are located on the rear facade, providing an outlook of the properties on Cliff Villas and an oblique view of the largely enclosed courtyard space to the north. The infill extension will be approximately 1.8m from the side elevation of 141-143 York Way, but given the existing location and outlook of existing habitable windows, it will not harm the outlook of the neighbouring flats. In light of the above, the proposals will have minimal impacts on the amenity of neighbouring properties.
- 6.17 As the infill extension is located north of 141- 143 York Way, there will also be no loss of sunlight or issues of overshadowing. This is verified by the Daylight & Sunlight Assessment undertaken by Right of Light Consulting, which upon evaluating the proposed extension against daylight and sunlight guidelines from Building Research Establishment, concludes that the proposed development will not result in a notable reduction in the amount of daylight or sunlight enjoyed by the neighbouring properties. Therefore, the proposed development complies with the development plan in this regard.

4. Heritage

- 6.18 Chapter 16 of the NPPF emphasises the importance of assessing the impact that a proposed development may have on the historic environment. Paragraphs 195-6 suggests that any impact on designated heritage assets can be categorised into substantial harm or less than substantial harm. Applications that lead to substantial harm should be refused planning consent, whilst those that lead to less than substantial harm should be decided against the public benefits of the proposal.
- 6.19 Whilst the Site does not lie within a Conservation Area, it is within the setting of the Camden Square Conservation Area to the north and west. The proposed extension will sit within and be aligned to the current envelope and height of the existing building and will be clad in red brick to match the materiality and architecture of the building. Its scale, layout, material and siting will therefore be in keeping with that of the existing site, and so will cause less than substantial harm to the historical setting of the 4-5 storey Victorian townhouses within the Camden Square Conservation Area.
- 6.20 With regards to non-designated heritage assets, NPPF Paragraph 197, reinforced by Policy D2 (Heritage) of Camden's Local Plan and Policy HC1 (Heritage conservation and growth) of the emerging London Plan, states that in *'weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'*.

- 6.21 The existing building, which was built in the late 19th century, is locally listed and so constitutes a non-designated heritage asset. As evaluated in Bidwells' Heritage Statement, the present building holds a moderate level of heritage value. However, the demolition of the metal-framed glazed roof and erection of two replacement columns of window and louvres, as part of the proposed extension, will cause a negligible adverse impact on the building's historical significance.
- 6.22 The proposed development will further provide public benefits through increased storage floorspace, enhanced vehicular safety and retention of the historic use of the building, which outweigh the minimal impact that the extension will have on the locally-listed building.
- 6.23 As such, the proposed development is deemed acceptable on heritage grounds, particularly mindful of the benefits yielded by the proposals against any harm caused to its significance. The impact of the proposal upon adjacent designated heritage assets (principally the Conservation Areas) is negligible.

5. Highways & Access

- 6.24 Policy T1 (Prioritising walking, cycling and public transport) of the Local Plan, supported by paragraph 108 of the NPPF, states that Camden Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough. To do so, new developments must be permeable for pedestrians, and should provide accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan. Local Plan Policy T2 (Parking and car-free development) seeks to limit the availability of parking in new developments, through (b) limiting on-site parking to:
- '(i) spaces designated for disabled people where necessary, and/or
(ii) essential operational or servicing needs.'*
- 6.25 As detailed in paragraph 10.18, *'Parking will only be considered for new non-residential developments where it can be demonstrated that the parking provided is essential to the use or operation of the development'*.
- 6.26 The original scheme also proposed an additional 4no. car parking spaces, which the Council deemed excessive in light of emerging London Plan requirements which promote car-free developments. However, mindful of the nature of the proposed use, the provision of vehicle parking spaces on-site is required especially for customers with bulky goods. The Transport Statement, prepared by Ardent Consulting Engineers, submitted to support this application confirms

that ‘*whilst many site users will need to travel to/from the site using a vehicle owing to the nature of the use, a substantial number will be able to travel using sustainable modes of travel*’. This includes staff employed on site.

- 6.27 As a result, the amended scheme has since reduced the proposed additional provision to 2no. car parking spaces, as recommended by the Council, amounting to a total of 5no. car parking spaces on-site (including 1no. disabled parking space).
- 6.28 The original scheme submitted as part of the pre-application process did not provide any cycle parking facilities. In response, the Council emphasised that subsequent amendments should provide cycle parking in accordance to the requirements set out in Chapter 8 of Transport CPG. Therefore, the scheme has been amended to provide 10no. long stay and 6no. short stay cycle parking spaces through the installation of 8no. Sheffield stands, to reflect the cycle parking needed for the entirety of the site post-extension (4,565sq.m) and to support the requirements of the development plan in promoting sustainable travel.
- 6.29 The proposed scheme seeks to open up the currently unused second entrance/exit that fronts onto York Way. This will create a through route for pedestrians, cyclists and vehicles on the ground floor, across the courtyard space. Vehicles will be able to access and exit the Site in forward gear which represent a notable improvement in highways safety to the current development which requires cars to reverse onto York Road in order to exit the Site. Therefore, the proposals enhance the permeability and safety of the Site for pedestrians in line with Local Plan Policy T1.
- 6.30 Considering the above, specifically the amendments made to cycle and car parking provisions in response to Officers’ concerns raised during pre-application discussions, the proposed development is policy compliant on the grounds of highways and access. The submitted TS concludes that:
- ‘It is therefore considered that the development will have a negligible impact on the operation of the local road network and in view of this we consider that there are no grounds to object to the application on highways and transportation grounds.’*

6. Sustainability

- 6.31 Policy 5.2 (Sustainable Design and Construction) of the adopted London Plan, supported by Policy CC1 (Climate change mitigation) of Camden’s Local Plan and draft Policy SI2 (Minimising greenhouse gas emissions) of the emerging London Plan, requires all developments to minimise the effects of climate

change. To do so, Councils should promote zero carbon development and require all developments to reduce carbon dioxide emissions through following the steps in the energy hierarchy, supporting and encouraging sensitive energy efficiency improvements to existing buildings, and requiring all developments to optimise resource efficiency.

- 6.32 A detailed evaluation of the proposed extension against current policy on energy reduction is provided in the Energy Assessment prepared by Butler Consulting Engineers. It is concluded that through the demand reduction design measures (Be Lean), inclusion of south facing Photovoltaic on the roof, and use of Air Source Heat Pumps technology for both heating and cooling (Be Green), carbon dioxide on-site can be reduced to zero. The proposed scheme is therefore policy compliant in this respect.
- 6.33 Policy CC2 (Adapting to climate change) of the Local Plan further states that all new development must adopt appropriate climate change adaptation measures to enhance resilience against climate change. The Council will also promote and measure sustainable design and construction by:
- ‘(e) ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation; (g) encouraging conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings to achieve ‘excellent’ in BREEAM domestic refurbishment; and (h) expecting non-domestic developments of 500 sqm of floorspace or above to achieve ‘excellent’ in BREEAM assessments and encouraging zero carbon in new development from 2019.’*
- 6.34 The BREEAM Pre-Assessment produced by Atelier Ten confirms that the proposed extension will achieve a BREEAM rating of ‘excellent’.

7. Contamination

- 6.35 Paragraph 178 of the NPPF states that planning decisions should ensure that *‘a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination’*.
- 6.36 This is supported by paragraph 002 of Land Contamination PPG, which states that *‘to ensure a site is suitable for its new use and to prevent unacceptable risk from pollution, the implications of contamination for development should be considered through the planning process’*.
- 6.37 A Geo-Environmental Desk Study has been undertaken by Woolgar Hunter Engineers, which concludes that the given the former use of the application site

as a depot, there is potential for contamination and recommends that future intrusive investigations should be undertaken.

Summary

- 6.38 Overall the proposed development is in line with adopted and emerging policy objectives to provide a high-quality infill extension of additional self-storage space.
- 6.39 The proposals ensure the most efficient and sustainable use of this brownfield site to provide much needed self-storage floorspace whilst providing a development that is in-keeping with and sensitive to its surroundings.
- 6.40 The principle of development is acceptable and all relevant development management considerations have been properly assessed and adequately addressed, with mitigation proposed where necessary. Consistent with paragraph 11 of the NPPF, planning permission should therefore be granted without delay.

7. CONCLUSION

- 7.1 The Planning Statement has been prepared by ROK Planning, on behalf of Shurgard UK Ltd., in support of a full planning application for the erection of an industrial extension at 145- 147 York Way, Camden, providing additional self-storage space, car parking and cycle parking spaces, and other associated improvements to the Site.
- 7.2 The site comprises a six-storey depository warehouse and internal courtyard area, used as a self-storage facility. The proposals seek to infill the existing courtyard from the first to fifth floors, offering a scheme that respects the architecture and character of the existing site and surrounding area.
- 7.3 The development, which has been amended subject to pre-application discussions with the Council, will create local employment opportunities and will make the best use of existing industrial land. Furthermore, the development contributes towards one of the Council's key priorities of safeguarding existing employment land.
- 7.4 The proposal has been sensitively designed to avoid any undue impact on the amenity of neighbouring properties. Traffic management measures are also proposed, which will enhance traffic safety on site and promote sustainable travel to and from the site. Additional internal re-planning of the existing building will further enhance fire safety on site.
- 7.5 Overall, it has been demonstrated that there are no adverse impacts that would significantly and demonstrably outweigh the benefits brought about as a result of this proposal. The presumption in favour of sustainable development therefore applies in this case.
- 7.6 This Planning Statement demonstrates that the proposed development accords with local, strategic and national policies. Overall, the proposed self-storage development will result in a number of economic and design merits as well as supporting the aims of the planning and economic policy at a local and national level. On the basis that the proposal accords with the development plan, the presumption in favour of sustainable development should be applied and planning permission granted without delay.