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Town Planning Statement

On behalf of: Regent's Place Management Company Limited (British Land),

Regent's Place, Euston Road, Camden

June 2020

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1 Executive Summary

- 1.1 This application seeks planning permission for proposals at Regent's Place to provide a container market within the public realm for a temporary period of five years.
- 1.2 The applicant, Regent's Place Management Company Limited (British Land), is applying for full planning permission for the installation of several containers at Regent's Place, to provide a mix of flexible Class A1, A3, B1, D1 and D2 floorspace for a temporary period of 5 years.
- 1.3 This application follows other successful container markets in London, including Buck Street Market in Camden Town, and provides a temporary use of part of the site.
- 1.4 These proposals sit within the wider strategy for Regent's Place which aims to improve the landscaping and quality of the public realm in the area, including the Plaza within which the site sits, for use by residents and workers on campus, as well as visitors.
- 1.5 The proposals present an opportunity to significantly improve the offering of the public realm at Regent's Place which would provide a more appealing space for people to spend time in.

2 Introduction

- 2.1 Our client, British Land, is bringing forwards a planning application at Regent's Place which seeks to develop a container market which would be in place for a five year period.
- 2.2 The application seeks the installation of five shipping containers to the southern most area at Regent's Place, to provide a mix of A1/A3 /B1/D1 and D2 floorspace for a temporary period of 5 years. This aims to reinvigorate this underused area of public realm, creating an identity and a place for workers and visitors to the area to enjoy.
- 2.3 The proposals will contribute towards British Land's wider and long-term vision for Regent's Place and its public realm which will create a more open, inviting and useable space for everyone who visits, lives and works at the campus. Landscaping and placemaking plans are being developed in parallel to this application, which will complement the proposed landscaping works by creating an attractive retail and food and beverage destination.
- 2.4 Full planning permission is sought for the following:
- “Temporary planning permission (for a period of 5 years) for the installation of 6 shipping containers within the Regent Place Plaza, comprising a flexible mix of uses including Use Class A1, A3, B1, D1 and D2. Works include external seating and other external works.”**
- 2.5 Pre-application discussions have been held with Officers at the London Borough of Camden who are supportive of the principle of the scheme. Further details of consultation are set out within the submitted Statement of Community Involvement and section 5 of this statement.
- 2.6 The benefits that would be provided by the proposal include:
- i. Provision of an improved retail and food & beverage offer for the area;
 - ii. Provision of high quality, inclusive and bespoke container architecture;
 - iii. An opportunity for small, start-up businesses to operate;
 - iv. The use of recycled storage containers which would be able to again be recycled and used at different sites in the future;

- v. Community space; and
- vi. Provision of customer toilets and cycle parking.

2.7 This statement should be read in conjunction with the other documents submitted as part of this planning application, which comprise the following:

- Planning application form;
- CIL form;
- Site location plan;
- Existing and proposed drawings, prepared by Feix and Merlin Architects;
- Construction Management Plan, prepared by M3 Consulting;
- Design and Access Statement, prepared by Feix and Merlin Architects;
- Statement of Community Involvement, prepared by M3 Consulting;
- Acoustic Statement, prepared by Scotch Partners;
- Delivery, Servicing and Waste Management Plan, including Operational Management Plan, prepared by M3 Consulting;
- Ventilation Statement, prepared by Ramboll.

2.8 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.

2.9 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 greatly improve the facilities at Regent Place campus which complementing the wider public realm strategy.

3 Site and Surroundings

3.1 This section describes the site's location and land uses of the existing site. The full extent of the application site is shown on the site plan submitted and the CGIs also sets out the positioning of the proposals within the wider context of the urban environment.

Existing Site

3.2 The site is located within Regent's Place, which is a mixed-use business, retail and residential campus on the north side of Euston Road.

3.3 The site is within the jurisdiction of the London Borough of Camden.

3.4 It is situated just off the northern side of Euston Road, to the south of Regent's Place Plaza, with Euston Tower to the east. It is currently occupied by a "folding lawn", which provides a border between the Plaza and the Euston road to the south.

3.5 The site holds a Public Transport Accessibility Level (PTAL) of 6b, making it highly accessible; Warren Street, Regent's Park and Great Portland Street Underground Stations are nearby, all within 500m, as well as a number of bus routes that run along Euston Road.

3.6 The site itself consists of predominantly hard landscaping with a lawn in the centre. The wider Plaza is also mainly hard landscaping with a few lawns and shrubs dotted around. In the summer, an external screen is erected which screens sports events for people view in the Plaza.

3.7 The site is not listed, nor is it located within the vicinity of any listed buildings.

3.8 The site is not located within an area at risk of flooding.

3.9 According to the London Borough of Camden's Policies Map (adopted March 2019), the site holds the following designations:

- Public Open Space (no. 294)
- Viewing Corridor

- Adjacent to, but not within, HS2 Safeguarding Area

Surrounding Area

- 3.10 Regent's Place Plaza is situated within a wider Regent's Place campus which is of mixed use, hosting retail, commercial and residential uses.
- 3.11 The surrounding area and campus of Regent's Place is being redeveloped, with a masterplan emerging; 1 Triton Square has been redeveloped and Euston Tower may be redeveloped in the future. The Plaza is also subject of significant public realm improvements, forming part of a new masterplan concerning the landscaping on the campus, to provide a more open and inviting green and open space for those residing within and visiting the campus.
- 3.12 The wider area is a predominantly commercial area of London, with high rise, glass office blocks which continue along the north side of Euston Road.

4 Proposed Development

4.1 Planning permission is sought for the following:

“Temporary planning permission (for a period of 5 years) for the installation of 6 shipping containers within the Regent Place Plaza, comprising a flexible mix of uses including Use Class A1, A3, B1, D1 and D2. Works include external seating and other external works.”

4.2 This application proposes a two-storey container market for a five-year period. This would consist of five recycled shipping containers being stacked, together with recycled timber cladding with green walls and roof. It will provide a focal point and hub for the public realm space which is currently lacking in clarity and activities.

4.3 Recycled material forms part of the principle of the wider masterplan design at the site, and to provide activation and improve the local environment. The pavilion can be entered from Euston Road and from within the Plaza.

4.4 The containers would be designed off-site so that they can be installed on-site quickly, causing the minimum level of disturbance to the surrounding area.

4.5 The containers would facilitate the space to hold the public screen that is usually erected in the summer on the site, which would instead fixed to the containers and used in the summer to screen public displays eg Wimbledon, encouraging people to congregate in the Plaza and make better use of the space. Note, the application for this year’s screen has been granted and forms a separate planning permission, refs. 2020/1574/A and 2020/0642/P.

4.6 The proposed development would provide a mix of different food and beverage retailers, community space for local organisations, WC’s and a publicly accessible terrace at first floor level. The development will be accessible with a lift to the first floor.

4.7 In land use terms, this proposal seeks flexible use throughout the containers for Classes A1/A3/A4/B2//D1/D2, with associated outside seating provided on the terrace

and in open spaces. The flexible uses are sought to attract a range of tenants to the space, and these have not yet been confirmed at the time of submission.

- 4.8 It is proposed that the retail element of the market would be open between 7am and 10.30pm in line with the other retail occupiers surrounding the Plaza.
- 4.9 There would be a secure waste and recycling area at the ground floor as well as cycle racks which would provide space for bicycles for the employees and visitors of these units.

5 Consultation and Engagement

- 5.1 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process.
- 5.2 In respect of pre-application engagement, paragraph 39 of the National Planning Policy Framework (NPPF) confirms that “early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.”
- 5.3 In addition, paragraph 41 of the NPPF states that: “The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.”
- 5.4 Furthermore, the City of London adopted a Statement of Community. Involvement in July 2016. Section 3.3 of the statement notes that: “prior to any application being submitted it is considered of considerable importance for both the City Corporation and the applicant, that discussions are held so that advice may be provided and any issues of concern discussed. Such discussions can significantly speed up the application process as well as ease the understanding of planning considerations and ultimately reduce the likelihood of an application being refused”.

Pre-application discussions with Camden

- 5.5 Pre-application discussions were held with Camden officers, which were positive and the principle of the use was accepted.

Local Consultation

- 5.6 Paragraph 42 of the NPPF confirms that “The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle,

even where other consents relating to how a development is built or operated are needed at a later stage. Wherever possible, parallel processing of other consents should be encouraged to help speed up the process and resolve any issues as early as possible.”

- 5.7 Consultation with local residents and business owners took place as part of the design process.
- 5.8 In lieu of a public exhibition due to social distancing measures under Covi-19 implications, our client was still determined to include interested parties on the proposals, and emails have been sent to local businesses and residents on Regent’s Place campus.
- 5.9 Further details of responses and feedback are included within the submitted Statement of Community Involvement.

6 Planning Policy Framework

- 6.1 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.
- 6.2 The statutory development plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
- a) the London Plan, Consolidated with Alterations since 2011 (published in March 2016); and
 - b) The London Borough of Camden’s Local Plan (published July 2017).
- 6.3 The draft London Plan (showing Minor Suggested Changes) 2018 has been heard at Examination in Public and therefore this document carries ‘weight’ in planning terms. On this basis, it is considered to be material consideration and the proposed development has been assessed against relevant draft policies within this document. Therefore the draft London Plan - Consolidated Changes (July 2019) which should be taken into account on the basis explained in the NPPF.

National Guidance – National Planning Policy Framework (‘NPPF’) (2019)

- 6.4 The NPPF published in February 2019, which supersedes the previous versions from July 2018 and March 2012, sets out the Government’s economic, environment and social planning policies for England and supersedes the vast majority of Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 6.5 The NPPF sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their

own distinctive local and neighbourhood plans, which reflect the needs and priorities for their communities.

- 6.6 The NPPF establishes the presumption in favour of sustainable development. Specifically, paragraph 80 states that the planning system should do all that it can to create the conditions in which businesses can invest, expand and adapt. The NPPF states that significant weight should be placed on the need to support economic growth and productivity allowing each area to build on its strengths, counter any weaknesses and address future challenges.

Planning Practice Guidance ('PPG') (March 2014 and subsequently updated)

- 6.7 In March 2014, the Department for Communities and Local Government launched the web-based planning practice guidance resource. This aims to provide planning practice guidance which is useable in an up-to-date and accessible manner.
- 6.8 With regard to decision taking, the PPG is a material consideration in the determination of planning applications.

Regional Planning Policy – The London Plan (The Spatial Development Strategy for London, consolidated with alterations since 2011) (adopted March 2016)

- 6.9 The London Plan is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas and forms part of the statutory development plan.
- 6.10 Revised Early Minor Alterations (REMA) to the London Plan were published in October 2013. The alterations ensured the Plan was in accordance with the NPPF and provide updates to certain policies.
- 6.11 Further Alterations to the London Plan (FALP) were published in March 2015.

- 6.12 Minor Alterations to the London Plan (MALP) were published in March 2016. The Minor Alterations were made in order to bring the London Plan in line with the national housing standards and car parking policy.

Emerging Policy

- 6.13 The Mayor of London consulted on the draft New London Plan between 1 December 2017 and 2 March 2018. The Examination in Public (“EiP”) for the Plan concluded on 22 May 2019. A revised draft was published following the EiP in June 2019 which included the minor suggested changes incorporated in August 2019 and further suggested changes arising from Matters Statements which we discussed prior to the EiP. The “Intend to Publish” version of the plan was made public on 9 December 2019 and was submitted to the Secretary of State. The Secretary of State issued his response on 13 March 2020 to the ‘Intend to Publish’ version of the New London Plan. The response raised some objections to the Draft New London Plan and in a letter to the GLA, the Secretary of State states that under section 337 of the Greater London Authority Act 1999, the GLA cannot publish the London Plan until they have incorporated the Directions given in Annex 1 of the letter. Until the New London Plan reaches formal adoption it can only be attributed limited weight.
- 6.14 The draft Plan is centred around Good Growth, with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The draft Plan recognises the key role of Central London as a driver for London and the wider UK economy with the City of London and the wider CAZ being critical in supporting growth.

Local Planning Policy

- 6.15 In July 2017 the London Borough of Camden Local Plan was adopted. This replaced the Council’s Core Strategy and Development Policies Document.
- 6.16 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).

7 Planning Considerations

- 7.1 This section identifies the key planning considerations that are relevant to the determination of the Applications.
- 7.2 The key planning considerations affecting the Proposed Development are considered to include:
- a) Land Use
 - b) Design;
 - c) Transport, Waste and Servicing;
 - d) Energy and Sustainability;
 - e) Amenity (including Noise, Air Quality, Ventilation).
- 7.3 The proposals will achieve a significant improvement in the quality and appearance of the site than is currently provided.
- 7.4 The NPPF promotes sustainable development and significant weight is placed on the need for the planning system to support economic growth by planning proactively to meet development needs.
- 7.5 We address each of the planning considerations in the sections below, outlining how the Proposed Development is in accordance with specific planning policies, which contribute to the overall strategic planning aims.

8 Land Use

- 8.1 Under this section, the proposed land uses across the site are further explained and assessed against relevant regional and local planning policies. Flexible use of A1, A3, A4, B1, D1 and D2 is sought to create a 'market' across the site. This range of uses combine to provide a wider public benefit, encouraging visitors to the site. At this time a range of uses is sought to attract independent tenants and provide maximum flexibility, enhancing the possibility of the units being occupied.

Policy Context – Markets

- 8.2 Both the current and emerging London Plan provide very strong policy support for markets across London.
- 8.3 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.
- 8.4 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.
- 8.5 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.
- 8.6 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, transport and pedestrian movement, local centres and shopping provision, the storage and disposal of litter and refuse, community safety and noise, and toilet provision.
- 8.7 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. The council will support businesses of all sized, in particular start ups, small and medium sized enterprises, maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources.

- 8.8 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 - Market Use

- 8.9 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.

- 8.10 Regents Place is currently an underused public space despite being surrounded by offices and restaurants and regularly used as a thoroughfare. Markets feature within the public realm for a temporary period of several weeks over the Christmas period and it is partly due to the success of these markets that British Land is seeking a development to occupy the space for a temporary five year basis.

- 8.11 The objective of the installation of the containers is to create a place for office workers to sit and dwell; residents to enjoy and provide a local attraction at the weekend and also encourage visitors to come to the area, creating a sense of place and an exciting new destination point. It will enliven the area, which currently has no focal point and is dominated by the Euston Road and tall commercial buildings.

- 8.12 The principle of a new market is encouraged through local and regional planning policies. Whilst Local Plan Policy TC6 is primarily focused on the protection and enhancement of existing markets, it recognises the character a market can bring to a local area. Part ‘c’ of this policy recognises that the Council will support new markets that will not cause individual or cumulative harm to the local area. These factors are assessed in turn below:

Local residents and environmental conditions

- 8.13 the nearest residential property is located to the north east of the site, overlooking the plaza. The majority of the land uses in the surrounding area are offices and other

restaurants and community spaces. Notwithstanding this, a noise assessment has been prepared by Scotch and Partners and assesses any potential impact on these residential units. The report concludes that due to the proximity to the proposed development and the high levels of background noise (from the existing uses and the surrounding road network), the site will not have an impact on the amenity of the residents. Furthermore, the proposed opening hours for the proposed development are proposed to be between 0700 and 2230, therefore any noise impact from the proposal will be limited to between these times.

- 8.14 In terms of other environment considerations, extract flues are proposed on some of the containers to accommodate for an A3 use, however these are located to mitigate any impact to the quality of the wider environment and are not in close proximity to any residential development. Further details of this are within the ventilation station and Design and Access Statement.

Transport and pedestrian movement

- 8.15 The containers are proposed in a location that does not interrupt pedestrian flow in and out of the square. Particular consideration has been given to the pedestrians arriving from the east, south of Euston Tower. The containers will not block key entrances to the square but will encourage those passing through to sit and dwell in the space.
- 8.16 The containers will also compliment the wider landscaping proposals that British Land are currently working on.

Local centres and shopping provision

- 8.17 Whilst one of the flexible uses proposed is Use Class A1 (Retail), it is not anticipated that the provision of a retail unit in this space will detract from existing centres. The use of containers offers a unique space to sell goods and will complement the other proposed uses on the site, including cafes and a community space.
- 8.18 Each container is just over 20sqm in size (GIA) and therefore is ideal for a pop up retail unit, which could change according to the season or the other uses in the market at the time. It could also complement the proposed community or office use, selling goods associated with the tenants in this unit.

The storage and disposal of litter and refuse

- 8.19 Appropriate refuse and storage facilities have been built into the design of the proposals, in line with planning policy. Further details of the waste, storage and collection is set out within the submitted Deliveries, servicing and Waste Management Strategy document, prepared by M3.

Community safety and noise, and toilet provision

- 8.20 The containers are positioned to maximise natural observation, enhancing the sense of safety for the visitors and users of the space. A disabled toilet is provided as part of the proposals at ground floor level.
- 8.21 To summarise, the proposed installation of recycled containers at Regents Place will provide a safe and enjoyable space for the local neighbourhood, office workers and visitors to dwell and appreciate the wider Regents Place campus seven days a week. The principle of a market is supported in planning policy terms, and the design and layout of the containers and external seating will create an atmosphere and sense of place throughout the day and evening. These are further explained and assessed against relevant planning policy below.

Land Uses – Community Use

- 8.22 London Plan policy 3.16 recognises that London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population.
- 8.23 This is echoed in emerging London Plan policy S1 which states Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
- 8.24 Furthermore, part 'E' of this policy recognises that "new facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres."
- 8.25 Local Plan Policy C2 states that the Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services. The policy continues to note that the Council will facilitate multi-purpose

community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community.

- 8.26 It is proposed that at least one of the containers will provide a space for a local community group to operate from the space. It is anticipated this would be let out to a local group who would benefit from having a space in this easily accessible, central location in line with London plan policy S1 (part E specifically).
- 8.27 The objective of proposing a community use within the proposed development is to provide a space to encourage the integration of the community, meeting the needs of the local people and local groups.

Policy Context - Retail and Café Use

- 8.28 London Plan Policy 2.11 seeks to identify, enhance and expand retail capacity to meet strategic and local need within the CAZ, particularly in identified CAZ frontages. London Plan Policy 4.7 states that retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport.
- 8.29 Camden Local Plan Policy TC5 promotes the provision of small shop premises suitable for small and independent businesses.
- 8.30 Local Plan policy TC3 notes that Camden has many individual shops, cafés and small shopping and service parades, complementing the role of larger town and neighbourhood centres. It recognises that these provide for the day to day needs of the local population, workers and visitors and help provide locally accessible facilities for people with mobility difficulties. They also play an important social role in the surrounding community, as well as contributing to the character and identity of the local area.

Local Plan Policy TC4 relates to town centre uses, and notes that the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours.

This policy goes on to state that to manage potential harm to amenity or the local area, we will, in appropriate cases, use planning conditions and obligations to address the following issues:

- i. hours of operation;
- ii. noise/vibration, fumes and the siting of plant and machinery;
- iii. the storage and disposal of refuse and customer litter;
- iv. tables and chairs outside of premises;
- v. community safety;
- vi. the expansion of the customer area into ancillary areas such as basements;
- vii. the ability to change the use of premises from one food and drink use or one entertainment use to another (within Use Classes A3, A4, A5 and D2); and
- viii. the use of local management agreements to ensure that the vicinity of premises are managed responsibly to minimise impact on the surrounding area.

Assessment - Retail and Café Use

- 8.31 The total floor area of the 5 containers is 114sqm (GIA) and includes some external seating and the ground and first floors.
- 8.32 Whilst a flexible use is being sought it is anticipated that some of the containers would be used as a café / restaurant use, serving the local community, office workers and visitors to the area.
- 8.33 Due to the nature and size of the containers, these will encourage smaller, independent tenants and could accommodate a pop up unit, which could be updated depending on the season. This supports local occupiers and will encourage a diverse and interesting range of occupiers.
- 8.34 The space will also encourage people to use the area more effectively and dwell for longer periods of time, thus creating an inviting atmosphere and enhancing the character of the plaza.

The proposals have been assessed against the criteria set out in policy TC4 below:

- i. hours of operation: the proposed opening hours are 0700-2230 on each day
- ii. noise/vibration, fumes and the siting of plant and machinery: the noise and ventilation of the café units has been carefully considered in light on design

and amenity considerations. Further details are within the ventilation statement.

- iii. the storage and disposal of refuse and customer litter: details are further explained within the submitted Servicing, Deliveries and Waste Management Report.
- iv. tables and chairs outside of premises: tables and chairs are proposed at ground and first floor level. These will be kept within the demise of the proposal and will encourage visitors to remain in the area for shopping, work and leisure purposes.
- v. community safety: the orientation of the containers facing into the plaza itself will enhance natural surveillance, reducing the fear of crime. British Land are committed to ensuring Regents Place is a safe and inviting space for all visitors from any age or background.
- vi. the expansion of the customer area into ancillary areas such as basements;
- vii. the ability to change the use of premises from one food and drink use or one entertainment use to another (within Use Classes A3, A4, A5 and D2): the proposal seeks flexible uses however this application seeks A1, A3, B1, D1 and D2 Use Classes..
- viii. the use of local management agreements to ensure that the vicinity of premises are managed responsibly to minimise impact on the surrounding area: this proposal forms part of a wider public realm strategy brought forward by British Land. The use of temporary containers will act as a catalyst for enhancing the quality of the area, however will be carefully managed to ensure the development integrates well into the local community and surrounding public realm.

8.35 The principle of the scheme therefore complies with policy objectives at a regional and local level.

Policy Context - Office

8.36 The London Plan recognises that the CAZ is the country's most important strategic office location. Policy 2.10 recognises that the CAZ forms a globally iconic core of one of the world's most attractive and competitive business locations.

- 8.37 The draft new London Plan Policy E1 Offices states that improvements to the quality, flexibility and adaptability of office space of different sizes (micro, small, medium and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.
- 8.38 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 will be recognised. The council will support businesses of all sized, in particular start ups, small and medium sized enterprises, maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources.

Assessment - Office

- 8.39 An element of B1 Use Class Office floorspace is proposed as part of the application.
- 8.40 The size of the containers are between 20 and 25sqm, and are therefore ideal for a small start up business or offices for a community facility. This will complement the surrounding office provision which currently comprises large floorplates for larger corporate businesses. Encouraging business to work alongside each other in this way will encourage innovation and collaboration and create an integrated community.
- 8.41 Possible options being explored by British Land include running competitions for local start-ups and small businesses to win the use of the space as a short term office and/or offering the space to local organisations to host workshops, meetings and events.
- 8.42 The proposals are therefore considered to be in accordance with planning policy at all levels in terms of office floorspace provision.

9 Design

Policy Context - Design and Public Realm

- 9.1 The Government attaches great importance to the design of the built environment in the NPPF. Chapter 12, paragraph 124 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.
- 9.2 At paragraph 127, the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.
- 9.3 London Plan Policy 7.1 advises that new development should be designed so that the layout, mix of uses and interface with the surrounding land will improve people's access to community infrastructure. Policy 7.2 requires all new development in London to achieve the highest standards of accessible and inclusive design.
- 9.4 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'.
- 9.5 Policy 7.5 of the London Plan, on Public Realm, seeks to ensure that London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Public realm should be comprehensible at a human scale using gateways, focal points and landmarks as appropriate to help people find their way.
- 9.6 The policy continues that social infrastructure should be included where appropriate and opportunities for public art and greening should be maximised. In terms of details, landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose. Boroughs should develop local objectives for enhancing the public realm.

- 9.7 London Plan policy 7.6 on architecture states that ‘Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.’ It goes on to set out a list of requirements of new buildings and structures including, inter alia, that they should be ‘of the highest architectural quality’; they should ‘be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm’; they should include details and materials that ‘complement, not necessarily replicate’ local architectural character; they should not cause ‘unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings’ which is said to be particularly important for tall buildings; and they should ‘optimise the potential of sites’.
- 9.8 Draft London Plan Policy D3 Inclusive Design, requires development proposals to achieve the highest standards of accessible and inclusive design. Design and access statements for development proposals should include an inclusive design statement. When dealing with historic buildings and heritage assets, careful consideration should be given to inclusive design at an early stage.
- 9.9 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:
- Part (a) respects local context and character;
 - Part (b) preserves or enhances the historic environment and heritage assets;
 - Part (d) is of sustainable and durable construction and adaptable to different activities and land uses;
 - Part (e) comprises details and materials that are of high quality and complement the local character;
 - Part (i) is secure and designed to minimise crime and antisocial behaviour; and
 - Part (k) incorporates high quality landscape design and maximises opportunities for greening.
- 9.10 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.

9.11 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.

9.12 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.

Access

9.13 Policy C6 Access for all The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities.

9.14 We will:

- a. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;
- b. expect facilities to be located in the most accessible parts of the borough;
- c. expect spaces, routes and facilities between buildings to be designed to be fully accessible;
- d. encourage accessible public transport; and e. secure car parking for disabled people. The Council will seek to ensure that development meets the principles of lifetime neighbourhoods.

Assessment - Design and Public Realm

- 9.15 The aim of this development is to reuse and reimagine the use of shipping containers to create an inclusive, exciting new market / mixed use development in this currently underused public space.
- 9.16 The design concept is focused on sustainability and the circular economy, reusing materials wherever possible to create an interesting and dynamic space. The design also focuses on creating additional sustainable features to contrast this dense urban environment such as green walls and green roofs, which add colour and vibrancy to this largely sterile office space.
- 9.17 The five shipping containers have previously been used not only for their original purpose, but also at other temporary sites, and will be used again after their use at Regent's Place. This reuse of materials is not only a sustainable approach to design and development, but it creates an exciting and innovative environment, complimenting the local surroundings and enhancing the quality of the public realm. This is line with Local Plan policy D1.
- 9.18 The development has been designed to be accessible and inclusive for all users, with a lift to the first floor and all doors will comply with accessible standards. In addition, an accessible WC is to be provided at ground floor, in line with London Plan Policy 7.2 and Local Plan policy C6.
- 9.19 The design and installation of the containers would be an improvement on the existing site which consists of a 'folding lawn' which is not inviting to the open space at the entry off Euston Road into Regent's Place.
- 9.20 Further details of the design approach are within the submitted Design and Access Statement.

10 Transport, Waste and Servicing

Policy Context - Transport

- 10.1 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives.
- 10.2 London Plan policy 6.1 'Strategic Approach' examines the integration of transport and development and as such:
- Encourages patterns and forms of development that reduce the need to travel especially by car;
 - Seeks to improve public transport capacity and accessibility where it is needed, for areas of greatest demand and areas designated for development and regeneration, including the CAZ and Opportunity Areas;
 - Supports, in general, high trip generating development only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect levels of public transport accessibility;
 - Supports measures that encourage shifts to more sustainable modes and appropriate demand management; and
 - Promotes walking by ensuring an improved urban realm.
- 10.3 London Plan Policy 6.9 (Cycling) states that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with minimum standards.
- 10.4 London Plan Policy 6.10 (Walking) states that developments should ensure high quality pedestrian environments.
- 10.5 Draft Policy T5 (cycling) requires development proposals help to remove barriers to cycling and create health environments in which people choose to cycle. This can be

achieved through the provision of cycle parking in accordance with the minimum standards.

- 10.6 Draft Policy T6 (car parking) restricts car parking in line with levels of existing and future public transport accessibility and connectivity. Appropriate disabled persons parking for Blue Badge holders should however be provided, as under Policy T6.5.
- 10.7 Local Plan Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport in the boroughs.
- 10.8 Local Plan Policy T1 'Prioritising walking, cycling and public transport' states that the council will promote sustainable transport, through providing pedestrian friendly environments, and providing cycle parking.

Assessment - Transport

- 10.9 The site is in a highly accessible, central London location and is situated in close proximity to Underground stations and bus stops.
- 10.10 It is expected that the majority of visitors to the pavilion will be by foot as they work or live in the area, and therefore do not expect trips to be made by cars, or for there to be an increased pressure on the surrounding transport network, in line with Local Plan Policy T1.
- 10.11 Cycle parking will be provided, in line with London Plan Policy 6.9 where 8 spaces are required, and this development proposes 8 cycle spaces in the form of Sheffield Stands within the plaza.

Policy Context - Waste, Delivery and Servicing

- 10.12 Draft new London Plan Policy S17 Reducing waste and supporting the circular economy seeks to reduce waste and increase material reuse, recycling and reduction in waste. Developments should be designed to have separate collection of dry recyclables and food.

- 10.13 Draft Policy T7 Deliveries, servicing and construction states proposals should facilitate safe, clean and efficient deliveries and servicing. Developments should provide adequate space for servicing, storage and deliveries should be made off-street. Construction Logistics Plans and Delivery and Servicing Plans are required.
- 10.14 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.
- 10.15 Policy CC5 'Waste' states the Council will make sure that developments include facilities for the storage and collection of waste and recycling, with a target of 60% of waste to be recycled by 2030.

Assessment - Waste, Delivery and Servicing

- 10.16 A Delivery, Servicing and Waste Management Plan has been developed, and is submitted in support of the application.
- 10.17 Occupiers of the shipping containers will be required to comply with the Regent's Place Campus delivery strategy, in order that the pavilion will work alongside the other uses around the Plaza. They will register all deliveries on the management system in advance of their arrival on site, and will be delivered to the servicing bay under Euston Tower.
- 10.18 Waste will be transported from the site to the Euston Tower loading bay refuse store twice daily, and will be split between recyclables and general waste.
- 10.19 A Deliveries, Servicing and Management Plan has been submitted as part of this application.

11 Energy and Sustainability

Policy Context - Energy and Sustainability

- 11.1 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 11.2 NPPF paragraph 20 encourages strategic polices that consider the natural built and historic environment including landscapes, green infrastructure and planning measures to address climate change mitigation and adaptation, this includes taking full account of flood risk and coastal change, provision of minerals and energy.
- 11.3 NPPF paragraph 118 sets out that Planning policy should recognise that undeveloped land maybe a function of flood risk mitigation, recreation, carbon storage or food production. It therefore encourages the use of brownfield land where appropriate.
- 11.4 NPPF Chapter 14 discusses how planning policy should meet the challenge of climate change, flooding and costal change.
- 11.5 NPPF Paragraph 148 sets out that Planning policy should consider a low carbon future in a changing climate. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.
- 11.6 London Plan Policy 5.1 focuses specifically on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this. Policy 5.3 states that developments should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process in accordance with the Mayor's sustainable design principles.
- 11.7 Developments are required to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions (Be Lean), adopting sustainable design and

construction measures and prioritising decentralised energy (Be Clean), including renewables (Be Green), in accordance with Policy 5.2. This Policy sets out the LP requirement to reduce carbon emissions by 40% over a Part L2A 2010 baseline for new buildings during the period 2013-2016.

- 11.8 Furthermore, Policy 5.5 of the London Plan states that the Mayor expects 25% of the heating power used in London to be generated through the use of localised decentralised energy systems by 2025.
- 11.9 Decentralised Energy; Heating, Cooling and Power is addressed through Policy 5.6 in the LP which requires all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions.
- 11.10 In support of the policies of the London Plan, the Mayor's SPG on Sustainable Design and Construction provides the context for all developments and provides a mechanism for addressing climate change impacts through new developments. As an update to the 40% carbon reduction target set out in LP Policy 5.2, the SPG states that the Mayor will adopt a flat carbon dioxide improvement target beyond Part L 2013 of 35% to both residential and non-residential development.
- 11.11 Draft London Plan Policy G5 Urban Greening states major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage.
- 11.12 At local level, Camden Local Plan Policy CC1 'Climate Change Mitigation' requires all development to minimise the effects of climate change, and encourages development to meet the highest feasible environmental standards during construction and occupation. To do this, it will expect development to optimise resource efficiency, ensure the development and land use minimises the need to travel by car.
- 11.13 Policy CC2 'Adapting to climate change' requires measures such as protecting existing green spaces, and incorporating bio-diverse roads and green walls where appropriate.

11.14 With regard to construction, Policy CC2 goes on to state that schemes should demonstrate how sustainable development principles have been incorporated into the design and proposed implementation.

Assessment - Energy and Sustainability

11.15 It is expected that the majority of visitors to the site will arrive by foot, as they live or works in the vicinity, thereby reducing the need to travel to the site by car. This is in line with Local Plan Policy CC1, which requires development to minimise the need to travel by private modes of transport.

11.16 It is proposed that the pavilion would have a green wall and roof, which in line with Local Plan Policy CC2 which requires sustainable development principles within the design, the living green wall would help to remove air pollutants to the public realm which sits alongside the busy Euston Road, together with improving the site's biodiversity.

11.17 The shipping containers are to be brought in from another site, together with recycle timber cladding demonstrating resource efficiency in terms of design as the pavilion is to be constructed of recycled material and sustainable design in line with London Plan Policy 5.3 and Local Plan Policy CC1.

11.18 In terms of the construction phase, the contractors will utilise off site manufacturing, to reduce construction activity onsite, and the twelve operatives required for the construction will be encouraged to use public transport, where possible, to travel to and from work, in line with Local Plan Policy CC2.

11.19 Within the containers, a number of energy saving strategies have been incorporated into the design, including efficient LED and automatic lighting, maximum fan powers, energy efficient cooling equipment in kitchens where ventilation is required, and prioritising natural ventilation where possible to minimise carbon emissions.

12 Other Considerations

Policy Context - Noise

- 12.1 The NPPF contains guidance on noise management in planning decisions. Paragraph 123 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development, and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise'.
- 12.2 Policy 7.15 of the London Plan, 'Reducing Noise and Enhancing Soundscapes' aims to support the Mayor's Ambient Noise Strategy. The reduction of noise resulting from developments, and screening of them from major noise sources, is sought under this policy.
- 12.3 Draft Policy D12 'Agent of Change' of the London Plan places the responsibility for mitigating impacts from existing noise on the proposed new noise-sensitive development. New noise and nuisance-generating development proposed to noise sensitive uses should put measures in place to mitigate and manage any noise impacts. This can be achieved through:
1. Ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area.
 2. Exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations.
 3. Separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.
- 12.4 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.
- 12.5 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, setting out the noise thresholds for entertainment uses during the daytime, evening and night. 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.

12.6 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.

12.7 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

12.8 A Noise Assessment has been prepared by Scotch Partners to assess the noise impact of the proposed market.

12.9 Customer noise from future patrons to the development has been assessed against the criteria given in the London Borough of Camden's Local Plan. Based on existing survey data of the site, and of developments similar to that proposed, it is predicted that the noise impact will be below the threshold for Lowest Observed Adverse Effect Level.

12.10 Indicative limits for activity noise have been provided within the submitted Noise Report for information.

12.11 Indicative noise level limits for building services plant have also been provided, targeting a Lowest Observed Adverse Effect Level according to the thresholds in the London Borough of Camden Local Plan. It is believed that these can be readily met with typical unit selections.

12.12 The proposed development therefore accords with Local Plan policy TC6.

Policy Context - Ventilation

12.13 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.

- 12.14 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

- 12.15 The ventilation design of the scheme has been planned with three A1/A3 units in mind as this is the current use mix envisaged by the applicant. As such, provision for installation of kitchen ventilation by tenants to enable usage of units for hot cooking will be provided to three of the units designated for food and beverage uses. The provisions will enable tenant installation of kitchen ventilation systems.
- 12.16 To facilitate flexibility in potential tenants and types of cooking whilst avoiding negative impact on the immediate surroundings, spatial provision will be made for the installation of extract air treatment equipment capable of removing grease and odours with a high level of odour abatement. There is no gas supply proposed to the development; cooking will utilise electric appliances only.
- 12.17 Kitchen extract ventilation will be ducted away from each unit to a centralised plant room housing fans and air treatment equipment. The plant room will be contained within the volume of one of the units, in order to conceal the equipment and minimise visibility of services from overlooking adjacent buildings on the campus.

13 Summary and Conclusions

- 13.1 This application seeks planning permission for proposals at Regent's Place to provide a container market within the public realm for a temporary period of five years.
- 13.2 The applicant, British Land, is applying for full planning permission for the installation of several containers at Regents Place, to provide a mix of flexible Class A1, A3, B1, D1 and D2 floorspace for a temporary period of 5 years.
- 13.3 These proposals sit within the wider strategy for Regent's Place which aims to improve the landscaping and quality of the public realm in the area, including the Plaza within which the site sits, for use by residents and workers on campus, as well as visitors.
- 13.4 The proposals are in accordance with Camden's development plan and should therefore be granted planning permission in accordance with Section 38(6) of the Planning & Compulsory Purchase Act 2004.
- 13.5 This Town Planning Statement concludes that the proposed development complies with the aims and objectives of national, regional and local planning policy and should be granted planning permission accordingly.