

PLANNING STATEMENT

69-73 HOLMES ROAD
LONDON
NW5 3AN



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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared by SM Planning in support of a full planning application submitted on behalf of Hallmark Property Group for a change of use of warehouse space (Use Class B8) to office/light industrial/studio space (Use Class B1) at 69-73 Holmes Road, Camden, NW5 3AN. The proposal will include the installation of a mezzanine basement level over a part of the double height warehouse space in order to create additional space for B1 use.
- 1.2 An extant permission originally approved under 2013/7130/P dated 6 March 2014 has been completed for a seven-storey building (plus two basement levels) with student accommodation, warehouse and café uses.
- 1.3 This statement sets out the planning justification for the proposed development and assesses the proposals against national planning policy and the development plan. The document should be read in conjunction with all other supporting documentation which, for clarity, includes the following:

Drawings:

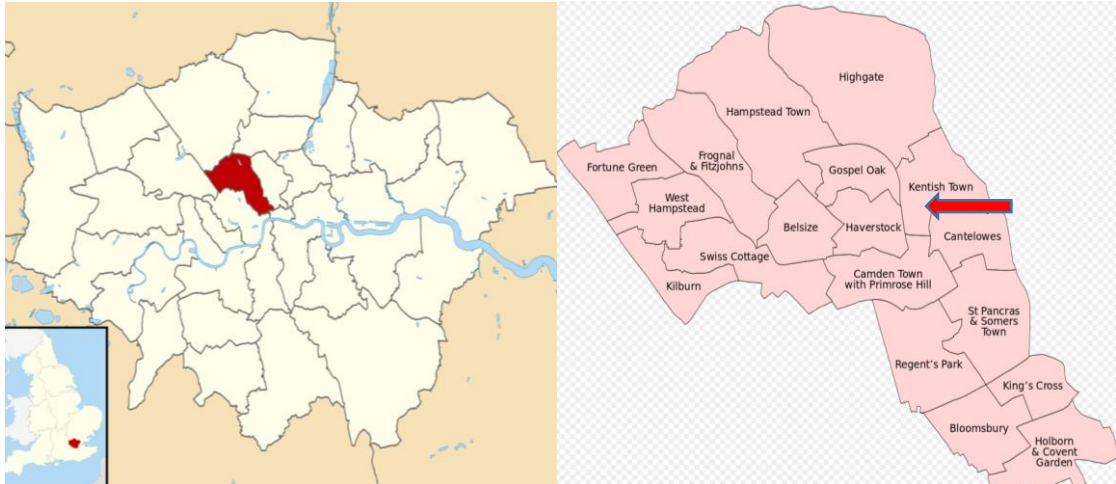
Drawing	Prepared By	Drawing No	Dated
1.Site Location Plan	Contemporary Design Solutions LLP	A(SO)001	September 2018
2.Lower Basement as built	Contemporary Design Solutions LLP	A(SO)080	June 2020
3.Middle Basement as built	Contemporary Design Solutions LLP	A(SO)085	June 2020
4.Upper Basement as built	Contemporary Design Solutions LLP	A(SO)090	June 2020
5.Ground Floor as built	Contemporary Design Solutions LLP	A(SO)100	June 2020
6.Proposed Lower Basement	Contemporary Design Solutions LLP	A(GA)P080	June 2020
7.Proposed Middle Basement	Contemporary Design Solutions LLP	A(GA)P085	June 2020
8.Proposed Upper Basement	Contemporary Design Solutions LLP	A(GA)P090	June 2020
9.Proposed Ground Floor	Contemporary Design Solutions LLP	A(GA)P100	June 2020
10.Proposed Section BB	Contemporary Design Solutions LLP	-	June 2020
11.Proposed Section AA	Contemporary Design Solutions LLP	-	June 2020
12.Proposed Section DD	Contemporary Design Solutions LLP	-	June 2020

Documents:

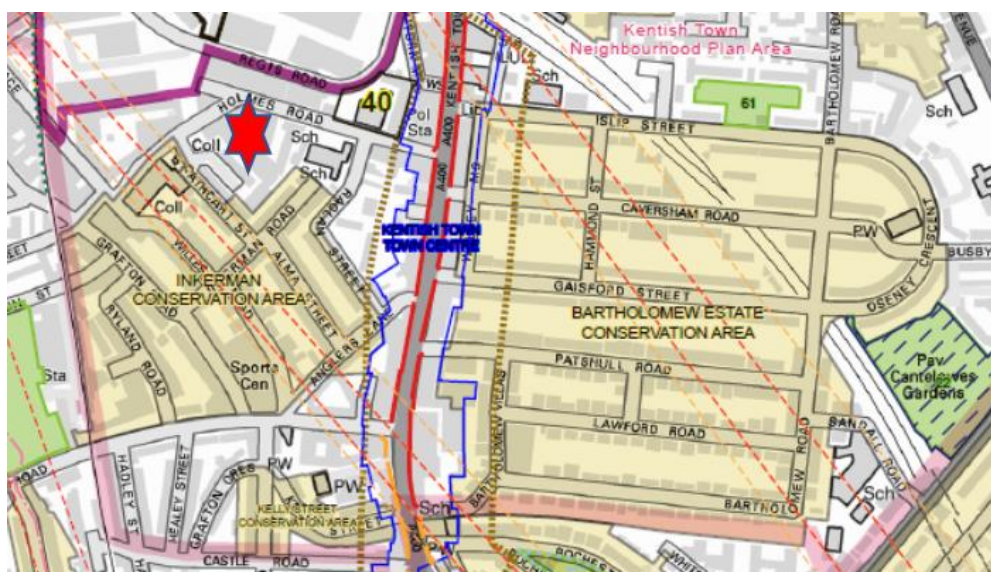
Document	Prepared By	Dated
13. Design & Access Statement	Contemporary Design Solutions LLP	July 2020
14. Planning Statement	SM Planning	August 2020
15. Transport Statement	AECOM	July 2020
16. Energy Statement	Hodkinson	July 2020
17. Marketing Letter	Altus Group	21 July 2020
18. Marketing Brochure	Altus Group	-

2. SITE & SURROUNDING CONTEXT

- 2.1 In terms of context the application site is located within the administrative area of the London Borough of Camden, a Borough in north-west London (partly within inner London) divided into 18 three-member wards. The application site is located within the administrative ward of Kentish Town.



- 2.2 The ward of Kentish Town is a suburban area of north London, primarily residential in character but with a mix of commerce and industry. The ward is well connected, benefiting from several bus routes as well as underground and overground rail services into and out of central London. Accordingly, the site has a Public Transport Accessibility Level (PTAL) rating of 5 which is equivalent to 'very good' accessibility, highlighting the highly sustainable location of the application site.
- 2.3 The site is located outside of, but sandwiched between the Inkerman and Bartholomew Estate Conservation Areas, highlighted in the image below which shows the site (red star) in the context of these conservation areas and the Kentish Town Town Centre.



- 2.4 The Inkerman Conservation Area, to the immediate south and west of the application site, is largely residential in character but also comprises a limited mix of commercial, employment and academic uses on Holmes Road on the approach towards the application site. In that regard there is a substantial differential in architectural and historic value between built development within the conservation area and that of the application site and its immediate surroundings.
- 2.5 Similarly, the Bartholomew Estate Conservation Area to the east of Kentish Town Road is largely residential in character, comprising a regular grid pattern of continuous ribbon development from the Victorian era.
- 2.6 The site is located at 69-73 Holmes Road and previously comprised a low-rise commercial building generally overwhelmed by surrounding development. That building has been demolished and construction work is complete on development approved under planning application reference 2017/6786/P which granted permission for a 7-storey building (with 2 basement levels) for the purposes of student accommodation, warehouse space and a coffee shop.



- 2.7 Cathcart Street and the residential housing on Azania Mews bound the southwest of the application site and low-rise residential and commercial buildings surround the site to the south and west. A six-storey residential building is located to the immediate northeast of the site.

3. THE PROPOSED DEVELOPMENT

- 3.1 The planning permission originally approved under application reference 2013/7130/P dated 6 March 2014 and latterly amended under application 2017/6786/P has been completed for a seven-storey building (plus two basement levels) with student accommodation, warehouse and café uses. These permissions accommodated 2317sqm of warehouse storage spread across four main levels: lower basement, upper basement, upper basement mezzanine and ground floor.
- 3.2 In response to the changing economic situation and commercial/practical viability of accommodating an industrial storage use in a primarily residential area, this application seeks to make better use of the space by introducing B1 office / light industrial workspaces to replace the B8 warehouse storage space.
- 3.3 Full planning permission is therefore sought for the change of use of warehouse space (Use Class B8) to office/light industrial/studio space (Use Class B1). The proposal will include the installation of a mezzanine basement level over a part of the double height warehouse space in order to create 957 sqm of additional space for B1 use.
- 3.4 For full details on the proposed development please refer to the Design and Access Statement that supports the application.

4. PLANNING HISTORY

The Application Site

- 4.1 The application site has been the subject of a detailed planning history which is set out in chronological order below.
- 4.2 On 13 October 2009 full planning permission (**2009/3187/P**) was refused by the Council. The application sought the erection of a part six, part three storey building with three and two basement levels respectively to provide student accommodation comprising 358 self-contained study rooms with ancillary facilities (Sui Generis), storage and distribution use (Class B8) at lower basement and ground floor level and restaurant (Class A3) at ground floor level. (Following the demolition of the existing warehouse building). The decision notice listed 26 individual reasons for refusal which were later consolidated and/or addressed through further applications listed below.
- 4.3 On 4 February 2011 full planning permission (**2010/6039/P**) was refused by the council. The application sought the erection of a part six, part three storey building with two basement levels to provide student accommodation comprising 268 student rooms housed within 245 units with ancillary facilities (sui generis), storage and distribution use (class B8) at lower basement and ground floor level and coffee shop (class A1) at ground floor level.
- 4.4 An appeal was lodged (**APP/X5210/A/11/2153696**) and subsequently allowed by the Planning Inspectorate on 1 December 2011.
- 4.5 On 25 March 2013 full planning permission (**2012/6548/P**) was refused by the council. The application sought the erection of a part seven, part three storey building with two basement levels to provide student accommodation comprising 313 student rooms housed within 278 units with ancillary facilities (sui generis), office use (Class B1) at lower basement and ground floor level.
- 4.6 An appeal was lodged (**APP/X5210/A/13/2197192**) and subsequently dismissed by the Planning Inspectorate on 4 October 2013.
- 4.7 In his judgement of ‘over-concentration’, important in defining the residential character of the area, the Inspector was uncategorical but applied a cautious approach in stating:

I find it impossible to say categorically whether the proposed increase (133, or about 30% compared with the approved scheme) in student numbers would bring about a harmful over-concentration. However, I am cautiously inclined to believe that it might cross an ill-defined threshold. I am in little doubt that there would be more occasions or events of noise and disturbance locally, arising from the effects of the aforementioned student exuberance, and this would be likely to provoke more complaints from the general public living in the area. And I note that there are many more new flats in the immediate vicinity than there were a few years ago. To my

mind, this consideration, while not by itself decisive in the appeal, does little to commend the current scheme.

- 4.8 On 6 March 2014 full planning permission (**2013/7130/P**) was granted, subject to a Section 106 legal agreement, by the council. The application sought the erection of part seven, part three storey building above two basement levels to provide student accommodation comprising 273 units (337 rooms and 439 bed spaces) with ancillary facilities (sui generis), warehouse (Class B8) at basement and ground floor levels and coffee shop (Class A1) at ground floor level following demolition of existing B8 buildings.
- 4.9 The scheme effectively amalgamated the two previous proposals combining those elements that were considered acceptable by the respective Inspectors.
- 4.10 On 27 May 2016 full planning permission (**2015/5435/P**) was granted, subject to a section 106 legal agreement, by the council. The application sought a variation to condition 20 (approved plans) of planning permission 2013/7130/P.
- 4.11 The amendments to the approval included the extension of the lower basement level to relocate part of the approved warehouse (B8) use from the mezzanine floor; the provision of supplementary space for student accommodation use on the mezzanine floor; changes between double and twin rooms of the student accommodation; various minor internal alterations and external alterations to the lift overrun and new rooflights and lightwells.
- 4.12 On 3 May 2017 full planning permission (**2016/4664/P**) was granted, subject to a section 106 legal agreement, by the council. The application sought a variation to condition 20 (approved plans) of planning permission 2013/7130/P (as varied by 2015/5435/P). The amendments to the approval included the reconfiguration of the warehouse levels and ground floor areas to provide an enlarged social area for the student accommodation use; an additional row of windows on the Holmes Road elevation; additional rooflights into basement and changes to the positioning of windows.
- 4.13 On 27 July 2018 full planning permission (**2017/6786/P**) was granted, subject to a section 106 legal agreement, by the council. The application sought a variation to condition 20 (approved plans) of 2013/7130/P (as varied by 2015/5435/P and 2016/4664/P). The amendments to the approval included the lowering of the basement level by 950mm, internal changes, the increase in area and volume of warehouse space and the reduction of ancillary student space (including the gym facility).
- 4.14 On 4 March 2019, full planning permission (**2018/4871/P**) for a 7th floor extension to facilitate the creation of 42 student accommodation rooms was refused by the council and subsequently dismissed at appeal (**APP/X5210/W/19/3229042**).
- 4.15 On 2 May 2020, full planning permission (**2018/4877/P**) was granted by the council. The application sought the formation of a mezzanine floor (at basement level) to

provide study rooms, administration, storage areas, kitchen and gym facilities within the student area of the building.

The Surroundings

- 4.16 Several development proposals have been granted planning permission in the recent past. The most relevant are summarised in address order below.
- 4.17 61-63 Holmes Road - Full planning permission (**2011/0201/P**) for a 5 storey plus basement building with light industrial (B1) at basement and ground floor level and 8 residential flats above, was refused by the council on 27 September 2011. Permission was subsequently granted on appeal under appeal reference **APP/X5210/A/11/2163152** on 12 March 2012.
- 4.18 55-57 Holmes Road – Full planning permission (**2008/1304/P**) for two additional storeys to the building to create 3 residential flats was refused by the council on 21 January 2009. Permission was subsequently granted at appeal under appeal reference **APP/X5210/A/09/2104541** on 18 September 2009. Subsequent applications to allow a change of use to parts of basement and ground floor from warehouse (B8) and office (B1a) to residential were approved by the council under applications **2010/6016/P** and **2011/2627/P**.
- 4.19 Full planning permissions **2018/0622/P** and **2017/6322/P** were latterly granted for an extension at sixth floor level and a rear extension to provide additional residential floor space on 3 April 2018 and 26 January 2018 respectively.
- 4.20 Simone House (formerly 74a Holmes Road) – Full planning permission (**2005/3264/P**) for the demolition of a vacant vehicle repair workshop and erection of a 5 storey mixed use building with flexible business (B1) space on the ground floor and 27 affordable units above was approved by the council on 3 November 2005.
- 4.21 54-74 Holmes Road – Full planning permission (**2003/1212/P**) for the demolition of a warehouse/industrial (B8) building and the erection of a 5 storey building comprising business use (B1) at ground floor with 4 studios and 27 cluster flats (182 bed rooms/spaces) for students above was approved by the council on 23 November 2004.
- 4.22 52 Holmes Road – Full planning permission (**2016/1986/P**) for the demolition of an existing building and its replacement with a new build mixed use development of 6 storeys (plus basement) comprising of 9 self-contained units (8x2 bed and 1x3 bed) and 377sq.m of industrial employment space (B1c) at basement and ground floors was approved by the council on 25 May 2017.
- 4.23 41-43 Holmes Road – Full planning permission (**2012/6344/P**) for extensions to a hostel in order to facilitate an increase from 43 to 59 rooms as ancillary office/commercial and storage space was approved by the council on 7 October 2013.
- 4.24 45 Holmes Road – Full planning (**2015/3131/P**) for a 3 storey extension to provide 8 residential units was approved by the council on 28 January 2016.

5. PLANNING POLICY CONTEXT

- 5.1 This Section provides an overview of national and local planning policy relevant to the determination of the planning application proposal, as well as any other relevant national or local planning guidance.

LEGISLATION

Planning (Listed buildings and Conservation Areas) Act 1990

- 5.2 Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 requires the Council to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

Planning and Compulsory Purchase Act 2004

- 5.3 Section 38 of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

NATIONAL PLANNING POLICY

National Planning Policy Framework (2019)

- 5.4 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in formulating local planning policies and taking decisions on planning applications.
- 5.5 At the heart of the NPPF is a presumption in favour of sustainable development (paras 7-14) and paragraphs 8, 9 & 11 are helpful in applying this presumption.
- 5.6 Paragraph 11 sets out how this is to be applied. It states that, *for decision-taking, this means:*
- *Approving development proposals that accord with an up-to-date development plan without delay; or*
 - *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

- 5.7 The NPPF introduces three dimensions to ‘Sustainable development’ (Economic, Environmental & Social - para 8), and advises that they are interdependent and need to be pursued in mutually supportive ways. The applicant considers that the development meets all three threads of sustainable development.
- 5.8 Further, the decision-taker is required to consider whether the development accords with an up-to-date development plan – and if it does planning permission should be granted unless material considerations indicate otherwise. The applicant considers that the development accords with the development plan.
- 5.9 Finally, the decision-taker is required to determine whether there are any relevant development plan policies, or the policies which are most important for determining the application, that are out-of-date and if not, grant permission unless:
- *the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.*
- 5.10 Section 6 refers to need to build a strong, competitive economy. Paragraph 80 highlights the importance of planning decisions in helping to create the conditions in which businesses can invest, expand and adapt and states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 5.11 Section 8 refers to the promotion of healthy and safe communities and states at paragraph 91 that planning policies should promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other. Paragraph 92 states that planning policies should plan positively for the provision and use of shared spaces and community facilities.
- 5.12 Section 9 refers to transport and states at paragraph 104 that planning policies should support an appropriate mix of uses across an area in order to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. In this instance, the application site is located with good links to alternative facilities and is therefore an inherently sustainable location.
- 5.13 Section 11 refers to the effective use of land and states at paragraph 117 that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. It states further at 118(c) that policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.
- 5.14 Section 12 refers to well-designed places. Paragraph 127(c) states that *planning policies and decisions should ensure that developments are sympathetic to local*

character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

- 5.15 paragraph 127(f) states that *planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.*
- 5.16 Paragraph 130 states that *where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.*
- 5.17 Section 16 refers to the historic environment and requires the decision maker to consider whether the proposal sustains and enhances the significance of a heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset (paras 193-197).

National Planning Practice Guidance

- 5.18 The National Planning Practice Guidance (NPPG) was launched in March 2012 as a web-based resource to bring together planning practice guidance for England in an accessible and usable way.
- 5.19 The NPPG sets out guidance on a wide range of topics including, but not limited to, the historic environment; design; the determination of applications; health and well-being; housing; planning obligations; transport; and planning conditions.
- 5.20 To conclude, the golden thread running through the NPPF is a presumption in favour of sustainable development. The proposed development is located in an inherently sustainable site making the best use of land available. It is therefore, subject to the detailed consideration in section 6 of this statement and all other supporting documents, wholly in keeping with the concept of sustainable development detailed within the NPPF.

LOCAL PLANNING POLICY

- 5.21 For the purposes of this application, the adopted Development Plan for the London Borough of Camden comprises the London Plan (2016), the Local Plan (2017), the Kentish Town Neighbourhood Plan (2016) and the Camden Planning Guidance Documents.

London Plan 2016

- 5.22 The London Plan (2016) is the spatial development strategy for London. It recognises the need for mixed use development and the redevelopment of office provision to improve London's competitiveness and to address the wider objectives of the Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises.

5.23 Other London Plan Policies of relevance to this application are:

- Policy 4.1: Developing London's Economy
- Policy 4.2: Offices
- Policy 4.3: Mixed Use Development and Offices
- Policy 6.9: Cycling
- Policy 6.10: Walking
- Policy 7.1: Lifetime Neighbourhoods
- Policy 7.2: An Inclusive Environment
- Policy 7.3: Designing Out Crime
- Policy 7.4: Local Character

Emerging London Plan

5.24 While the 2016 London Plan is still the adopted Development Plan and carries full weight, the Draft London Plan is nevertheless a material consideration in planning decisions. The significance given to it is a matter for the decision maker, but it gains more weight as it moves through the process to adoption. In December 2019, the Mayor issued his intention to publish the New London Plan to the Secretary of State and in its current form, it therefore carries near to full weight.

5.25 The Plan emphasises the need to develop sites at a higher density, particularly on sites near to town centres or good public transport, reducing the need for car parking spaces within developments.

5.26 The new Plan also emphasises the importance of good design and will be applicable to buildings of all types. All development is expected to respect the urban form and structure of the locality and requires all development to make best use of the land available following a design led approach that optimises the capacity of sites.

5.27 Relevant policies in the emerging London Plan include:

- Policy GG1: Building Strong and Inclusive Communities
- Policy GG2: Making the Best Use of Land
- Policy GG5: Growing a Good Economy
- Policy D1: London's Form, Character and Capacity for Growth
- Policy D3: Optimising Site Capacity Through the Design-Led Approach
- Policy D4: Delivering Good Design
- Policy E1: Offices
- Policy E2: Providing Suitable Business Space
- Policy HC1: Heritage Conservation and Growth
- Policy T5: Cycling

Camden Local Plan 2017

5.28 The Camden Local Plan sets out the Council's planning policies and covers the period from 2016-2031.

- 5.29 Policy E1 refers to economic development and aims to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. The policy states that the council will support businesses of all sizes and in particular, start-ups and small/medium sized enterprises.
- 5.30 Policy E2 provides further guidance on the Council's approach to maintaining and securing a range of premises for businesses to support Camden's economy and provide employment opportunities for the borough's residents. The terms 'business' and 'employment' are used to refer to the uses in B use class.
- 5.31 Policy A1 aims to manage the impact of development in terms of residential amenity; transport impact and general community impacts. This covers a wide range of matters including visual privacy and outlook; sunlight, daylight and overshadowing; noise and vibration levels, odour impact, contaminated land etc.
- 5.32 Policy D1 seeks to ensure high quality design in all development and requires development to respect local character and the historic environment amongst a number of other criteria.
- 5.33 Policy CC1 states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 5.34 Policy T1 states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.
- 5.35 Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free.

Camden Planning Guidance Documents

- 5.36 Camden Planning Guidance (CPG) provides advice and information on how the Council will apply planning policies. The documents are largely linked to policies in the Local Plan and the following are relevant to the consideration of this application:

Access for all CPG (March 2019)
 Amenity CPG (March 2018)
 Design CPG (March 2019)
 Employment Sites and Business Premises (March 2018)
 Energy Efficiency & Adaptation CPG (March 2019)
 Planning for Health & Well Being CPG (March 2018)
 Transport CPG (March 2019)

NEIGHBOURHOOD PLANNING

- 5.37 Once a Neighbourhood Plan has been agreed at a referendum and is made (brought into legal force) by the local planning authority, it becomes part of the local planning

authority's development plan as an official development plan document which carries statutory weight. If a policy contained in the development plan for an area conflicts with another policy in a development plan, the conflict must be resolved by the decision maker in favour of the policy which is contained in the latest document to become part of the development plan.

Kentish Town Neighbourhood Plan 2016

- 5.38 The Council formally adopted the Kentish Town Neighbourhood Plan on 19 September 2016. The Plan is part of the statutory 'development plan' for the area and therefore should be used alongside the Council's own adopted planning documents when making decisions on planning applications in the neighbourhood area. The policies of the Neighbourhood Plan are largely in conformity with the Local Plan.

6. PLANNING ASSESSMENT

6.1 PRINCIPLE OF DEVELOPMENT

- 6.1.1 Law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. In terms of the principle of development, the planning history is a material consideration in determining the principle of development in this instance. Detailed consideration of specific impacts are discussed in the latter parts of this statement.
- 6.1.2 In order to accommodate Camden's growing population, the Local Plan makes clear that the Council needs to make the best use of the borough's limited land and resources and promotes the most efficient use of land in the borough.

The provision of office / light industrial workspace

- 6.1.3 The local plan is clear that premises suitable for small businesses are currently under pressure from rising land values, limited land availability and 'permitted development' rights which allow the change of use from offices to housing without the need for planning permission.
- 6.1.4 Therefore, in order to secure a strong and successful economy, the Local Plan supports businesses of all sizes. By proxy therefore, the local plan supports the provision of office space, particular that to serve the start-up, and small and medium sized demographic.
- 6.1.5 Explicitly, Policy E2 of the Local Plan encourages the provision of employment premises in the borough and accepts higher density redevelopment schemes which improve functional efficiency, maintain or, preferably, increase the amount of employment floorspace and number of jobs and provide other priority uses, such as housing.
- 6.1.6 In this instance, the proposal replaces ill-conceived warehouse provision with more suitable and flexible office/light industrial/studio space. This falls to be considered under the B1 use class, defined as employment space by national and local planning policy, and is therefore supported by Local Plan policy E2 and the wider strategic objective of Policy E1 which directs office development to the central London area in order to meet the forecast demand for office space for the period 2014-2031. The proposed development therefore accords with the principle aim of securing a successful and inclusive economy.

The loss of existing warehouse (Use Class B8) provision

- 6.1.7 The consented warehouse provision has been marketed for a period of 24 months, partly during, and subsequent to, the construction of the building. The feedback received from interested parties offers useful context as to the appropriateness of the site for B8 use.

- 6.1.8 Firstly, while the property is sustainably located, the presence of a Primary School on the eastern approach to the site (St Patrick's Catholic) and a French language school on the western approach, make the site undesirable for serious warehouse occupiers. Such conflicting land use is reinforced by the widespread presence of residential use immediately surrounding the application site and beyond. This is exacerbated by the high-density nature of the residential accommodation.
- 6.1.9 Vehicular access to the site, notwithstanding the conflicting land uses, is difficult with narrow road widths more suited to the prevailing residential land use. For these reasons, the manoeuvrability of large commercial vehicles is difficult with highly limited yard space and no vehicular parking.
- 6.1.10 Internally, the shared goods lift is not desirable unless the space is let by a single entity and the internal heights only allow for limited storage capability and restricted forklift operation.
- 6.1.11 The 24-month marketing exercise for B8 use has been persistently discounted by prospective occupiers for the reasons outlined above. The application is supported by a marketing letter and brochure from Altus Group to substantiate this position.
- 6.1.12 It is therefore considered that the site is no longer suitable for B8 uses. The NPPF states that:

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

- 6.1.13 Furthermore, Camden Planning Guidance on Employment Sites usefully contextualises the consideration of applications that involve the loss of a business use. Paragraph 8 states that various factors will be taken into account including:

- whether the premises are in a reasonable condition to allow the use to continue;
- the range of unit sizes it provides, particularly suitability for small businesses;
- the suitability of the location for any business use;
- how the business use is related to other neighbouring/nearby land uses;
- whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space.

- 6.1.14 In this case, it is not plausible to suggest that the loss of the B8 use will have a detrimental individual or cumulative impact on the area's economic function. The site has never provided a contribution to the area's economic function and therefore its

loss, individually or cumulatively, is nil. In any case, it is important to note that the proposed development would not result in the net loss of employment use. The type of employment use will change but the overall quantum of employment floor space will be increased to better align with the context of the site itself. This accords with the principles of the NPPF and the development plan and the proposed development is therefore considered acceptable in principle.

6.2 IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

6.2.1 Section 12 of the NPPF refers to well-designed places. Paragraph 127(c) states that *planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.* Further, paragraph 130 states that *where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.*

6.2.2 Policy D1 of the local plan provides further detail on local requirements and, importantly, states that the council will require that development respects local character and context, guidance that is consolidated by Camden Planning Guidance on Design.

6.2.3 The proposed development does not depart from the primary residential use of the site and the employment use would better align to the prevailing residential use in the surroundings by virtue of its low-key nature. The activity associated with the site would therefore have little impact on the character and appearance of the area.

6.2.4 The physical changes to the building would reflect entirely positively on the character and appearance of the area. Curtain wall glazing would replace the industrially perceived roller shutter door on the Cathcart Street elevation which would relate more sympathetically to the residential surroundings.

6.2.5 The application is supported with a Design and Access Statement which provides detail of the architectural evolution of the scheme and its impact on the surroundings, concluding that the proposal is contextually appropriate. Please refer to the Design and Access Statement for full details.

6.3 IMPACT ON RESIDENTIAL AMENITY

6.3.1 Policy A1 of the Local Plan seeks to ensure development protects neighbouring residential occupiers from the adverse impact of development. This is echoed in guidance contained within the NPPF and the London Plan. Further guidance is provided in CPG Amenity which sets specific standards of development.

6.3.2 The existing B8 use has the most potential to cause harm to the amenity of neighbouring residents by virtue of the nature of that operation. This would primarily be based on the regular movement of articulated lorries and the transfer of heavy

goods. The associated harm would be exacerbated by the narrow road layout which would emphasise general noise and disturbance.

- 6.3.3 The proposed development would remove this element of harm and would therefore represent an entirely positive form of development, contextually appropriate in this location, in accordance with Policy A1 of the local plan and the general principles of the NPPF.

6.4 HERITAGE IMPACT

- 6.4.1 Case law dictates that decision makers are required to give *great weight* to any harm to the significance of a heritage asset and how this should be applied is set out under section 16 of the NPPF. This refers to the historic environment and requires the decision maker to consider whether the proposal sustains and enhances the significance of a heritage asset, making a balanced judgement having regard to the scale of harm or loss and the significance of the heritage asset.
- 6.4.2 In respect of the proposal considered in its own right, and the relationship between the proposed development and its surroundings, the effect will be positive. By virtue of a more appropriate mix of uses, the proposed development will enhance the quality of the townscape of the area which, it is noted, is of far less historic/architectural importance than the adjacent conservation area. Overall, the proposed development would have a positive impact on locally identified heritage assets.

6.5 HIGHWAYS IMPACT

- 6.5.1 The application is supported with a Transport Statement dated July 2020.
- 6.5.2 The statement sets out the proposed trip generation for the B1 Office use based on trip rates from TRICS, with B1 Office being appraised in the interests of robustness and as a worst case. This shows that the change in use would result in an increase of approximately 728 additional two-way person trips each day. The majority of these movements would be undertaken by public transport, with the remainder undertaken by walking and cycling. No movements will be undertaken by car due to the car-free nature of the development on an average day.
- 6.5.3 Therefore, the proposals are not expected to materially alter the number of vehicles using the road network and are also likely to involve smaller vehicles such as vans when compared to the consented B8 Warehouse scheme. A loading bay is proposed on street at Cathcart Street to accommodate deliveries associated with the site (and other local uses) and to mitigate the removal of the goods yard. The loading bay will be formed across the redundant goods yard entrance and will require modification to the existing parking bay arrangement.
- 6.5.4 The car-free nature of the development in combination with the infrastructure on site and the workplace travel plan will assist in encouraging the use of sustainable modes of travel by employees of the site.

- 6.5.5 In light of the above, it is considered that the proposed change of use from B8 Warehouse to B1 Office / Light Industrial use will have no material, significant or detrimental impact on the operation of the surrounding highway network. Consequently, there are no evident transport related reasons why planning permission for the proposed development should not be granted.

6.6 **SUSTAINABILITY**

- 6.6.1 The application is supported with an Energy Statement which demonstrates that the proposed development is sustainable, as measured against relevant local, regional and national planning policies.
- 6.6.2 A range of energy efficiency (Be Lean) measures are proposed to enable the development to meet Part L 2013 Target Emissions Rate (TER). This represents a good level of sustainable design and construction and indicates the Applicant's commitment to reducing energy demands of the proposed development. The combination of energy efficiency measures will achieve a reduction of 29% in Regulated CO2 emissions over Part L (2013) baseline. Please refer to the Energy Statement for full details.

7. SUMMARY & CONCLUSION

- 7.1 The residential nature of the surrounding area, which is continually being intensified, does not create an appropriate environment for the co-existence of B8 and C3 uses in terms of amenity and safety. The proposed development is a high quality, site specific response that will sit comfortably within the confines of the existing built envelope, significantly increasing and improving the employment offer.
- 7.2 The proposed development is a specific response to locally identified context and will optimise the use of this sustainable brownfield site, supporting the local economy and Camden as an economic centre.
- 7.3 The proposed development would accord with the general principles of the National Planning Policy Framework. The site is located within an inherently sustainable location in close proximity to existing public transport services and is consistent with the objectives of the NPPF and the development plan. The site will contribute to the creation of a socially inclusive community.
- 7.5 Careful consideration has to be given to the nature of the site including its relationship to its immediate surroundings, and the amenities of neighbouring occupiers. The proposed development will reflect entirely positively in terms of the existing surroundings and is therefore contextually preferred.
- 7.6 In summary, the proposed development fulfils the three dimensions of sustainable development as defined by the NPPF and therefore the presumption in favour of sustainable development applies. The proposal is fully in accordance with national and local planning policy providing a scheme that contributes towards the aim of building a strong and competitive economy.
- 7.7 This Planning Statement should be read alongside the other supporting documentation and drawings which have been submitted as part of the Full Planning Application.