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Planning and Borough Development  
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**FAO: Laura Hazelton**

23 November 2020

**Our ref: LJW/NFD/AKG/J10003**

**Your ref: PP-09256413**

Dear Laura

**Arches E4 and E5, Hawley Wharf, London, NW1 8RP  
Application for Full Planning Permission**

We have been instructed on behalf of our client, Stanley Sidings Limited, to submit an application for planning permission in respect of the following change of use of arches E4 and E5 of the Hawley Wharf Masterplan:

**“Change of Use of Arches E4 and E5 from bike store to flexible Class E/Class B2 (general industrial) use”**

**Background**

Planning permission (ref. 2012/4628/P) was originally granted for the mixed-use redevelopment of the site on 23 January 2013.

Since this time, there have been a number of minor material (Section 73) and non-material (Section 96a) amendments to the scheme.

The operative planning permission for the site, being the most recently permitted minor material amendment, is planning permission ref: 2020/0362/P, dated 28 October 2020. On 13 September 2020 an NMA (ref: 2019/2927/P) was approved at the site which allowed the following changes at the site relevant to this application

1. Relocation of bike store from arches N5A, N5 and E1 to arches nos. E4 and E5.

As a result of the approved relocation of the bike store under NMA ref: 2019/2927/P, Condition 32, which requires the provision of 150 cycles within the approved bike store area prior to the occupation of development, was re-discharged under application ref: 2020/1564/P, dated 4 May 2020.

**Site and Surroundings**

Arches E4 and E5 are located at the north eastern corner of the Hawley Wharf Masterplan. The neighbouring Arches: E6 and E7 are in approved Class B2 (general industrial) use and therefore do not form part of this application.

The site is located within the Camden Town Centre and is accessed from Kentish Town Road which leads onto a rear servicing area, external to the masterplan development site.

## Proposals

The applicant has received confirmed interest from a commercial kitchen operator who wishes to sign a lease to occupy Arches E4, E5, E6 and E7 as a 'dark kitchen'. The commercial kitchen operator will use the site solely for cooking operations, which falls under Class B2 'general industrial' use. Class B2 (general industrial) use is a recognised land use class for commercial kitchens in London as demonstrated by The LB of Newham approval of a scheme for commercial kitchens as Class B2 (ref: 18/01871/FUL).

The proposal would deliver the following benefits to the masterplan site:

- i. Occupation of currently vacant Class B2 units at the site for a business in a growing sector, driven even more so by changing dining habits caused by the coronavirus pandemic;
- ii. Redistribution of the 150 public cycle parking spaces throughout the site, allowing for more options and increasing points where visitors to the site would be able to leave their bikes without having to go to a centralised parking facility;
- iii. Increase of 243.19 sqm (GIA) Class B2 'general industrial' floorspace at the site through the conversion of the cycle parking to deliver a total of 400.53 sqm (GIA);
- iv. No loss of active frontage at the site;
- v. Located at the edge of the site and all deliveries and access can be contained to the existing rear service yard area without impacting on the East-West pedestrian route through the site or the ambience of the heart of the masterplan; and
- vi. Utilising existing turning circle space, taking associated traffic out of the masterplan site.

The proposals also seek flexibility to use the site for Class E (light industrial use). Flexibility is sought in order to ensure that a tenant with a light industrial operation could locate at the site without the need for further planning permission should the commercial kitchen operation cease.

This application does not seek any external changes to the arches at the site.

The proposals would lead to the following changes in use of area (GIA sqm) at the site:

Land Use	Approved	Proposed	Uplift
Bike Storage	243.19	0 <sup>1</sup>	-243.19
Flexible Class E/Class B2 (general industrial)	0	243.19	+243.19
<b>Total</b>	<b>243.19</b>	<b>243.19</b>	<b>0</b>

## Planning Assessment

### Land Use – Class B2 (General Industrial)

The principle of Class B2 use at the site is accepted in principle, given that the NMA relocated previously approved Class B2 floorspace from Arches E4 and E5 to Arches N5A, N5 and E1. Furthermore, Camden

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<sup>1</sup> Note: 150 spaces for visitor bike parking will be redistributed throughout the development site.

Local Plan Policy E2 supports and encourages the provision of employment floorspace, including general industrial uses.

The commercial kitchen operator 'Karma Kitchen' will support start-up businesses, Camden Town tenants and run an established programme for young people to get them into the cooking industry. The tenant has received interest from 20 potential tenants prior to the facility being marketed. The site will provide for 13 kitchens.

Therefore, the principle of introducing an additional 243.19sqm (GIA) of Class B2 floorspace at the site is supported in planning policy and would be in line with previous planning permissions at the site.

#### Land Use – Class E (light industrial use)

This application also seeks to introduce flexibility at the site and enable light industrial operations to take place. Should the commercial kitchen operator wish to leave the site, the applicant wishes to have the flexibility to locate a light industrial tenant in arches E4 and E5.

The acceptability of Class E (light industrial use) at this location within the masterplan site is established as there is planning permission for Class B1c use (as per the Use Classes Order prior to 1 September 2020) in the neighbouring Arches E2 and E3.

The introduction of up to 243.19 sqm (GIA) of Class E (light industrial use) is in line with Camden Local Plan Policy E2 and would contribute to the mix of uses established at the masterplan site by the Applicant.

Should the site be used for Class E (light industrial use) the Applicant would submit an Operational Management Plan prepared by the prospective tenant for approval by Camden.

#### Operational Management

The tenant has prepared an Operational Management Plan (OMP) which sets out how the site will be operated in relation to: delivery and servicing, hours of operation, staffing and employment and training opportunities. The OMP also confirms that only 10% of the offer will have a home-delivery element and therefore this would only form an ancillary function to the proposed use of the site for commercial cooking.

The OMP demonstrates that the operations at the site will fall under Class B2 of the Use Classes Order (as amended) as the site will be used solely for commercial cooking operations.

#### Amenity

Through Local Plan Policy A4, Camden seek to ensure that noise and vibration is controlled and managed.

A Ventilation Strategy (including noise assessment), prepared by Scotch Partners assesses the proposed use of the arches at the site for Class B2 use. For completeness the neighbouring arches (nos. E6 and E7) which will form part of the single commercial kitchen operation have been included in the report to demonstrate that together the units will comply with Camden's local plan requirements. A further application for planning permission for any associated external changes will be submitted in due course, following any approval received in respect of this application.

The noise assessment has found that condition 53 of the wider masterplan permission ref: 2020/0362/P can be complied with. The report also sets out how the equipment will be maintained and cleaned and provides equipment specification details.

Overall, the proposals have been demonstrated to comply with Policy A4 of Camden's Local Plan.

#### Bike Store Relocation

The bike store will be relocated as a result of the proposals. The committee report for the original planning permission (paragraph 2.4) states that these spaces would be a 'public storage facility' for visitors/tourists. The committee report states that the applicant has agreed that the public cycle store facility will be free of charge and will be managed by the on-site management/security team.

The applicant has prepared an indicative plan showing the cycle parking spaces distributed externally throughout the masterplan site. The even distribution of the 150 spaces throughout the site is considered a better solution as it allows for more parking options for cyclists and increasing points where visitors to the site would be able to leave their bikes without having to go to a centralised parking facility.

Should this planning application be approved, Condition 32 of planning permission 2020/0362/P would be re-discharged to reflect the new external parking locations.

#### **Application Documentation**

As part of the submission of the application on the Planning Portal, we enclose the following documents:

- Application forms and notices;
- Site Location Plan;
- Existing and proposed plans;
- Indicative cycle parking layout plan;
- Operational Management Plan, prepared by Karma Kitchen;
- Noise Report, prepared by Scotch and Partners; and
- CIL forms.

The application fee of **£462** has been paid concurrent to the submission of this application.

In the meantime, should you have any questions, please do not hesitate to contact Anna Gargan or Andrew Jackson of this office.

Yours faithfully,



**Gerald Eve LLP**

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