



DECEMBER  
2020

# 3-6 Spring Place, Kentish Town, London NW5 3BA

## Planning Statement

Iceni Projects Limited on behalf of  
SEGRO plc

December 2020

ICENI PROJECTS LIMITED  
ON BEHALF OF SEGRO PLC

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**3-6 Spring Place, Kentish Town,  
London NW5 3BA  
PLANNING STATEMENT**

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### APPENDICES

A1. DRAFT S106 HEADS OF TERMS

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# 1. INTRODUCTION

- 1.1 Icení Projects Limited ('Icení') are appointed by SEGRO plc (the 'Applicant') to advise on town planning matters relating to the land at 3-6 Spring Place, Kentish Town, London NW5 3BA (the 'site'), situated within the administrative boundary of The London Borough of Camden ('LB Camden').

## **SEGRO & Spring Place**

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- 1.2 SEGRO is London's leading owner and developer of modern warehouses and light industrial property. It currently manages 1.2 million sqm of space which is home to 450 customers including: Royal Mail, John Lewis & Partners; Brompton Bike; Camden Town Brewery and many more occupiers that provide vital goods and services to residents and businesses across the capital.
- 1.3 SEGRO is the new owner of 3-6 Spring Place, having acquired the site from Brockton Capital in August 2020 and plans to undertake a comprehensive refurbishment of the dilapidated 1,900 sqm industrial unit to lease the property to a local or London based business. The property has been vacant for nearly four years since the previous tenant, Addison Lee, closed their vehicle maintenance depot in 2017.
- 1.4 SEGRO is proposing to invest up to £1.5 million to transform the site into a high-quality, modern industrial facility that could attract businesses from a wide range of sectors. The scheme also incorporates many sustainability measures to mitigate its impact on the local environment. SEGRO has an excellent track record of refurbishing vacant industrial units and letting them quickly to businesses, creating valuable job opportunities for the community.
- 1.5 As a long-term investor, SEGRO will own and manage this property. SEGRO is keen to build a relationship with local residents and businesses, the LB of Camden and key stakeholders in the local area.

## **Structure of the Planning Statement**

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- 1.6 The purpose of this Statement is to provide an overview of the existing site, the site history and to provide an assessment of the key planning considerations for the proposed development. The Statement is structured in the following format:
- Section 2 – The Application Site and Surroundings;
  - Section 3 – Planning History;
  - Section 4 – Pre-application Process;

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- Section 5 – Market Demand for Smaller Units;
  - Section 6 - The Development Proposals;
  - Section 7 – Planning Policy Context;
  - Section 8 – Assessment of Application Proposals; and
  - Section 9 – Summary and Conclusions.

### **Supporting Technical Material**

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1.1 The development proposals have been informed by a wide range of technical assessments, based on an agreed list of technical documents with the Case Officer. The following documents have been submitted in support of this application and should be referred to during the determination of this application:

- Air Quality Assessment;
- Bat Roosting Potential Report;
- Delivery and Servicing Management Plan and Travel Plan Statement.
- Design and Access Statement;
- Energy and Sustainability Statement;
- Environmental Noise Survey and Noise Impact Assessment Report;
- Foul and Surface Water Drainage Strategy;
- Health Impact Assessment Screening Report;
- Statement of Community Consultation; and
- Transport Statement.

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## 2. SITE AND SURROUNDING CONTEXT

- 2.1 The site is situated within the administrative boundary of LB Camden and is located on the south west side of Spring Place, to the south of Kentish Town Business Park and to the north of Talacre Gardens.
- 2.2 The site is bound to the north by an active railway line, beyond which there are residential flats up to seven storeys in height at number 7 Spring Place, with the Veolia Depot to the east. Autograph Sound Ltd (Visual Audio Equipment Hire) neighbours the Site to the south who appear to extend around the corner of Spring Place onto Holmes Road. Bordering the site to the west is an active railway line with office accommodation and residential dwellings fronting onto Grafton Road.
- 2.3 The site currently comprises an industrial building within Use Class B2 with a façade extending up to two storeys in height along Spring Place. The site was last used as a vehicle maintenance depot for Addison Lee. Following the business' relocation to a larger facility in Hayes, this site has been vacant since January 2017, and although new tenants and options were explored for alternative uses, it remains vacant. The property has been vacant and unutilised for nearly 4 years and the existing site needs various refurbishment works and significant investment to ensure the employment space is marketable and operable.
- 2.4 Within the immediate context of the site there is a mix of uses, including residential accommodation to the north west and south, together with industrial, distribution and warehousing units to the north.
- 2.5 In terms of accessibility, the site has a Public Transport Accessibility Level (PTAL) of 5, which is a high level of accessibility on a scale of 1 to 6. Kentish Town station is 0.4 miles (8-minute walk) from the Site with frequent Thameslink services to and from Central London, Luton, Sutton and St Albans City. Gospel Oak station is 0.5 miles (11-minute walk) from the Site with Overground services to and from Stratford, Richmond, Clapham Junction, Barking and South Action. Queens Cres road (6-minute walk) benefits from a number of services and facilities including a Post Office, Library, Community Centre and a number of cafes and restaurants.
- 2.6 Vehicular access to the site is provided by Spring Place, a single carriageway road that is used frequently by vehicular traffic and in particular commercial vehicles associated with the past industrial use at the site and other industrial uses in the vicinity of the site, including the Veolia Council Depot Site located opposite.

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### 3. PLANNING HISTORY

3.1 Following a review of LB Camden's online planning register, the available planning history relating to the site is set out below:

- **LPA ref: PE9606133** – Alterations to front elevation including new fire emergency doors, new industrial doors in existing openings, new access door and metal fascia. As shown on drawing Nos 345/D.01 and one unnumbered O.S plan. Approved 11th February 1997;
- **LPA ref: AE9606134** – Display of externally illuminated signs on doors and internally illuminated projecting sign at fascia level. As shown on drawing No 345/D.01. Approved 11th February 1997;
- **LPA ref: 2016/5181/P** – Erection of a part-six and part-two storey (above single basement level) building comprising Office (Class B1) at ground and upper floors; Cafe (Class A3) and flexible event space (Sui Generis) at ground floor and associated works following demolition of existing two-storey industrial (Class B2) building. Approved 10th January 2018.
- **LPA ref: 2018/2592/P** – Variation of condition 2 (approved plans) of planning permission 2016/5181/P dated 21/12/2017 (for erection of a part-six and part-two storey building comprising office (Class B1) at ground and upper floors; cafe (Class A3) and flexible event space (Sui Generis) at ground floor and associated works) namely, to allow reduction in size of basement, layout changes at ground floor, the relocation of plant at 5th floor and 2nd floor roof level and facade changes including the replacement of metalwork with brick on part of west elevation and removal of fins from windows at ground and 5th floor level of east elevation and removal of perforated metal panel to expose windows of east elevation and other external alterations. Withdrawn June 2018.

3.2 We understand the site was last occupied by Addison Lee until January 2017, who relocated to a larger and fit-for-purpose facility in Hayes. As such, the Site's existing lawful use is Class B2. Following the approval of ref: 2016/5181/P it is understood that there was limited market interest in the site for office uses and the development was not viable. Consequently, the site was sold to SEGRO, who are now seeking to refurbish the existing building and bring it back into productive employment use.

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## 4. PRE-APPLICATION

- 4.1 Prior to the submission of this application two pre-application meetings were held with LB Camden, together with pre-application engagement with the Camden Neighbourhood Town Forum and local residents. Full details of local engagement can be found in the Statement of Community involvement prepared by SEGRO. A summary of discussions is provided below.

### London Borough of Camden Pre-application Meetings

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- 4.2 The first pre-application meeting was held on 21st January 2020 (ref: 2019/6390/PRE) for the proposed change of use from Class B2 to flexible Class B1c, Class B2 and Class B8, with minor alterations including new loading doors and a replacement roof.
- 4.3 Within the pre-application feedback the refurbishment of the existing building was welcomed. The creation of light industrial floorspace (Class B1c) in this location was also supported. Given that the property is currently B2 floorspace, the site was considered to have all the features desirable for light industrial floorspace (Class B1c).

### Highways

- 4.4 Notwithstanding, the Council raised concerns with the creation of storage / distribution floorspace (Class B8) in this location. The feedback refers to the Access Study produced for the Kentish Town Planning Framework which states that Spring Place is not considered suitable for high volumes of HGVs. The Council's response suggested that Spring Place could support limited levels of low traffic generating development and should primarily be designed for pedestrian and cyclist access. Given this the Council raised concerns with potentially high traffic generating B8 uses which could have a harmful impact on neighbouring amenity.
- 4.5 In response to the Council's comments, Vectos prepared an updated Scoping Note which provided further detail on the vehicle trips and types of vehicle in relation to the B8 use that would serve the site, and a comparison of last mile case studies in London. This was then discussed at a second pre-application meeting with LB Camden on 2<sup>nd</sup> November 2020. The feedback received from this meeting and how the planning application responds to it is detailed within the table below.

LB Camden Case Officer Comments	Response	Summary
The previous Addison Lee operation benefitted from the historic B2 use of the site,	Planning Statement	Whilst the Council may have had reservations regarding the previous Addison Lee operation, this constitutes the most



<p>which was previously a glassworks and coachworks. If an application for a new B2 use had been sought by Addison Lee, it is not clear that this would have been granted.</p>		<p>recent lawful use of the site and the site remains in B2 use with no restrictions on the nature of the B2 operation. SEGRO are seeking to modernise the unit to attract high quality tenants, and propose a scheme which would lead to an overall improvement in the nature of the employment use. The technical assessment work supporting the application (discussed further below) demonstrates that the proposed uses would be acceptable in terms of their impact on the local area, having regard to relevant policy requirements.</p>
<p>The policy context has changed, and 'last mile' is more suited to other locations in Kentish Town.</p>	<p>Planning Statement</p>	<p>The Kentish Town Planning Framework actively supports employment uses and last mile activities, and there is no policy which specifically restricts such uses in this location.</p>
<p>A change of use would need to be assessed in relation to the impacts of the proposed use on neighbouring amenity.</p>	<p>Transport Statement  Noise and Vibration Assessment  Air Quality Assessment</p>	<p>The conclusions of the Transport Statement state that the proposed uses at the site will not have a detrimental impact on the surrounding highway network and the overall daily vehicle numbers would significantly decrease when compared against the past use at the site. The anticipated trip generation as a result of the proposals is considered to be negligible when spread across the course of a day.</p> <p>The Noise and Vibration Assessment states that for internal operations, the noise breakout from the nearest noise sensitive residential properties is negligible. For limited on-street loading, this is assessed as having Lowest Observed Adverse Effect Level and traffic noise from future traffic flow is perceived as having No Observed Effect Level. Lastly, there would be no adverse</p>

		<p>impact from the increased vibration from traffic flow for any of the proposed uses.</p> <p>The Air Quality Assessment states that due to the low number of trips anticipated to be produced by the proposals, road traffic exhaust impacts are predicated to be negligible.</p>
<p>Rather than focusing on showing that the proposed use would be less harmful than the previous use, it will be necessary to focus on demonstrating that the proposal would be acceptable in its own right.</p>	<p>Transport Statement</p> <p>Noise and Vibration Assessment</p> <p>Air Quality Assessment</p>	<p>The conclusions of the assessments (as set out above) demonstrate that each of the proposed uses are acceptable in their own right and state that the assessments are not reliant on the previous B2 use.</p>
<p>It is expected that significantly more than the 5 vehicles shown parking on site will need to be accommodated within the unit. More evidence is needed to demonstrate all delivery vehicles can be accommodated within the unit.</p>	<p>Transport Statement</p> <p>Planning Statement</p>	<p>The drawing within Appendix C of the Transport Statement demonstrates that there is sufficient space on-site to accommodate smaller HGVs whilst operational vehicles are parking on-site.</p> <p>Last mile/ urban logistics operations are the last stage of the supply chain in urban locations, focused on final mile delivery to local residents and businesses, and by nature are a much lighter operation. This is not to be confused with large National / Regional distribution centres which sort and then redistribute goods to smaller facilities.</p> <p>Limited racking and storage is needed on-site due to the nature of the operations. Small/medium HGVs will unload pre-organised and packaged goods to smaller LGVs that form the delivery fleet. This will comprise a quick operation to offload and</p>

		load straight into the delivery fleet as quickly as efficiently as possible.
Whilst the Council is not necessarily against the provision of a micro depot/ city logistics facility in this area, all vehicles should be serviced on-site, with no on-street loading.	<p>Transport Statement</p> <p>Noise and Vibration Assessment</p> <p>Air Quality Assessment</p>	<p>Where possible, on-site (within the fabric of the building / internally) loading will take place. For example, LGVs and smaller HGVs (up to 7.5 tonnes) will be accommodated on site. However, given the constraints of the site, medium sized HGVs cannot be accommodated on site and will therefore undertake servicing on-street.</p> <p>It should be noted that the likely number of small/medium HGVs (up to 18 tonne) that will serve the site is not considered to be significant and therefore will not cause a detrimental impact on Spring Place. In addition, given the past industrial uses at the site and that on-street servicing has taken place previously, it is considered that on-street servicing is acceptable.</p> <p>Notwithstanding the above, the Applicant is willing to commit to potential controls on vehicle movements, vehicle sizes and external loading hours, which will be imposed and enforced through the Delivery and Servicing Management Plan and secured by condition.</p>

- 4.6 Extensive pre-application scoping discussions have taken place between Vectos and the LB Camden Highways Officer and the feedback received has been considered within the Transport Statement submitted in support of the application.

#### Design

- 4.7 There were concerns raised with the proposed recladding around the entrance. The Officer's recommended a more thoughtful and minimal contribution. The architects considered this feedback, and the scheme provides a finish that is sympathetic to the local built environment. The existing

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defensive render will be removed and renewed, brickwork repainted as necessary and the entire elevation painted white to provide a clean aesthetic.

#### **Neighbouring Amenity**

- 4.8 Officer's raised concerns regarding the impact of the proposed 24/7 use of the site on neighbouring amenity in terms of noise and vibration from traffic movement associated with the site. There was a particular concern in relation to the B8 use. Officers were also concerned that the noise levels within the Noise Impact Assessment (April 2020) may not be representative of the nearby noise sensitive residential dwellings and stated that the report needed to assess vibration.
- 4.9 The report has been updated in response to the Officer's concerns and confirms that based on the predicted and future traffic flow over a typical 24 hours, that there would be 'No Observed Effect Level' from the increase traffic flow for any of the proposed uses.

#### **Air Quality**

- 4.10 The pre-application feedback confirmed that Air Quality Assessments will be required when a development will significantly increase traffic volumes, congestion, parking or the number of HGVs in the locality.
- 4.11 The application is supported by an Air Quality Assessment which confirms that road traffic exhaust impacts were not predicted to be significant and are therefore not considered a constraint. This is based on a worst-case scenario that all the vehicles would be petrol/diesel, whereas the Applicant is enabling electric charging vehicle infrastructure as part of its refurbishment proposals to encourage the use of electric vehicles, and therefore in reality it is likely that an electric vehicle fleet would be used, and therefore it is possible that the impacts would be even lower than identified.

#### **Nature conservation**

- 4.12 The railway that runs through the site is identified as a green corridor (missing link). The pre-application response states that habitat creation would be important as it has the potential to help maintain wildlife populations located north and south of the railway line. Enhancement options such as installing native climbers on the roofs or facades of the buildings are affordable and may be suitable here.
- 4.13 As set out within the Design and Access Statement, further enhancements will be provided in the form of internal and external living walls, which will provide biodiversity enhancements at the Site and a 'stepping stone' habitat within the green corridor (missing link), providing important habitat creation to fauna located north and south of the railway line.

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### **Energy and Sustainability**

- 4.14 The Council expects the development to achieve “excellent” in BREEAM assessments which has been achieved. LB Camden also encourages zero carbon in new development from 2019.
- 4.15 As set out within the Energy and Sustainability statement, the strategy achieves BREEAM “excellent” and aims to minimise the environmental impact of the proposed development during construction and operation and ensure the development is constructed to rigorous sustainability standards.

### **Pre-application Public Engagement**

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- 4.16 A consultation exercise was undertaken prior to the submission of the planning application. This consultation approach prepared and issued an outreach document which was circulated to various local stakeholders and residents and provided some background of the proposed scheme.
- 4.17 A Q&A document was prepared to provide further detail regarding the proposals, following initial discussions with local stakeholders. In particular, details regarding the transport considerations arising from the proposed use were discussed. Please see Statement of Community Consultation document submitted in support of the application.

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## 5. MARKET DEMAND FOR SMALLER UNITS

- 5.1 Traditionally, SEGRO's portfolio consists of larger scale major industrial and warehousing schemes which contribute towards delivering identified employment land need. In the last five years, SEGRO have delivered over one million sq ft of industrial space, creating and safeguarding some 4,000 jobs.
- 5.2 In recent years there has been a modal shift in the logistics sector towards the need for more centralised employment sites, notably influenced by population growth, land scarcity, the need to promote sustainability and the increase in e-commerce/last mile delivery. A recent example includes SEGRO Park Hayes which is an industrial/residential co-location scheme with Barratt London in Hayes. As such, SEGRO are keen to operate in more urbanised and well-connected sites within the UK to meet market demand.
- 5.3 SEGRO is seeking to provide a high-quality employment space, with flexibility to be used for a range of small-scale industrial or last mile fulfilment purposes. The industrial sector by its very nature provides flexible space that can be adapted to meet the requirements of a wide range of business needs. With a flexible industrial use class SEGRO are confident that the unit will secure strong interest from the following sectors:
- Film and TV Equipment Hire
  - Production / Studio Space
  - Food and Beverage Production
  - High-tech Engineering
  - Last Mile Delivery/City Logistics
  - Building and Construction
- 5.4 Many of SEGRO's customers and the sectors in which they operate require goods to be delivered to customers in London, such as online consumer products to residents, high-value engineered components to manufacturing businesses, food and beverage to retailers or camera and lighting equipment to theatre sets.
- 5.5 As London's population grows and demand for goods and industrial services increases, it is critical that London boroughs provide industrial sites to accommodate 'last mile' delivery facilities. These are not to be confused with logistics facilities found in Greater London and beyond that need to accommodate significant numbers of larger artic lorries.

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5.6 SEGRO provides the space supporting over 25,000 jobs in London, from a range wide range of business sectors.

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## 6. PROPOSED DEVELOPMENT

6.1 The application proposals described below have been informed by local and regional planning guidance. Following the two pre-application meetings, the comments have been taken into consideration when finalising the scheme to ensure it is of highest quality at submission.

6.2 Planning permission is sought for the following:

*“Change of use from industrial (Class B2) to flexible industrial (Class B2)/ storage or distribution (Class B8)/ light industrial (Class E), refurbishment of existing building and associated works.”*

6.3 SEGRO have not yet formally identified an occupier for the unit, and therefore the refurbishment works are necessarily being undertaken on a speculative basis at the current time. It is therefore necessary to seek consent for the range of employment uses in order to maximise the prospects of an occupier being identified and the unit being occupied for employment purposes.

6.4 In order to maximise the potential take-up of the industrial unit SEGRO are thus proposing a change of use from a purely Class B2 to include additional flexibility for B8 uses and E (Light Industrial). This flexibility will increase the potential for the unit to be occupied by a wide range of businesses that operate in the light industrial and small-scale logistics sectors, in addition to general industrial uses.

6.5 The proposals also seek to undertake a comprehensive internal and external redesign and refurbishment of the property, which is currently in a poor state of repair. This will include significant sustainability enhancements, improving efficiency and use of renewable energy to create a high quality, fit-for-purpose flexible employment space.

### **Examples of Last Mile Operations**

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6.6 One potential use for the site is a B8 last mile/ urban logistics facility. This operation is the last stage of the supply chain in urban locations, focused on final mile delivery to local residents and businesses, and by nature is a much lighter operation. This is not to be confused with large National / Regional distribution centres which sort and then redistribute goods to smaller facilities.

6.7 With particular regard to a potential last mile operation, small/medium HGVs will unload pre-organised and packaged goods to smaller LGVs that form the delivery fleet. Vehicles associated with the proposed last mile type operation are likely to comprise cargo bikes, car derived vans and transit vans.



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6.8 Given the nature of these uses they can be operated without having an undue impact on residential amenity and the local highway network. Some comparable examples of these operations seen in central London are included in the following sections.

#### **London Wall Car Park (City of London)**

6.9 City of London is recommending the lease 39 car parking spaces within its London Wall car park for a last mile delivery hub to be operated by Amazon.

6.10 The committee report states that last mile logistics hubs are an effective method of reducing and remodifying freight deliveries. They can be used as either micro-consolidation or micro-distribution hubs:

- Micro-consolidation hubs are where a single provider will deliver various organisations goods through the hub
- Micro-distribution hubs are where a single carrier uses the hub to remodify its own parcels

6.11 This reduces the number of inbound vehicles to the site, ensuring that fewer, larger vehicles load the hub before moving the goods onto the cargo cycles or small, city appropriate electric vehicles.

6.12 The report refers to the City Corporations Climate Action Strategy 2020 – 2027 and states that the proposal would deliver against supporting organisations in the Square Mile to build circular, low-carbon and resilient supply chains.

6.13 The proposal was approved by the Planning and Transport Committee on 15 December 2020.

#### **Westminster Micro Depot**

6.14 DPD's 5,000 sq ft Westminster site acts as a satellite for its larger London City depot (in Southwark), delivering goods to local businesses and residents within the SW1 postcode area.

6.15 The site receives two electric 7.5 tonne vehicles per day, bringing pre-sorted parcels from the London City depot. At Westminster, the parcels are then sorted on to small final mile electric vehicles for delivery – either 10 car derived vans, or 8 cargo bikes.

6.16 Previously, these parcels were delivered via diesel vehicles straight from DPD London City. This sustainable operation has reduced the 'miles per parcel' figure by 49%, and zero Co2 per parcel (saving 45 tonnes of Co2 per annum).

6.17 DPD Westminster delivers to the SW1 postcode area and its location in this high density area allows for high driver productivity and means some vehicles travel less than five miles a day.

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- 6.18 DPD is redefining the way it operates in an urban environment to ensure its delivery vehicles reduce their impact on air quality, noise levels and road safety. DPD's all-electric vehicles and micro-depot strategy has almost halved the miles travelled per parcel and has enabled a more efficient operation.

### **Layout and Scale**

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- 6.19 The scheme involves internal reconfiguration of the units. All vehicular and pedestrian access routes are to remain as existing.

### **Design and Materiality**

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- 6.20 The proposals reflects SEGRO's ambition to deliver a high quality, exemplar urban logistics scheme, showcasing design, sustainability and providing a development that is not only functionally sound but reconsiders what is considered 'normal' in terms of institutional expectations.

- 6.21 As set out in the accompanying Design and Access Statement, the key design proposals and associated rationale are as follows:

- Removal of the tenant installed mezzanine floor and partitions to create a more usable and flexible open space.
- Removal and replacement of the currently installed WC's with a shower block, changing rooms with associated locker storage and bike storage area. These additions will provide essential facilities and aid in achieving a pleasant working environment for the employees of any prospective tenant.
- Levelling of all floors and installation of a break-out area comprising a staff area and standard and accessible WC's. These facilities will be a benefit for the reasons stated above and also provide full accessibility to wheelchair users through level accesses and ample circulation areas.
- Replacement of existing coverings and associated copings to the pitched and flat roof areas. A new built-up metal roof system is proposed to the pitched roof areas and installation of insulation to upgrade all flat roofs to warm roof systems. These works will increase the thermal performance of the roof structure and therefore reduce the unit's energy consumption.
- Installation of a photovoltaic system to the roof of the unit to maximise the production and use of sustainable energy.

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- Replacement of existing single glazed crittal windows with like-for-like double glazed crittal style units as well as replacement of the entrance doors, roller shutter doors and fire exit doors. Replacement of these elements will serve to improve the buildings' thermal performance.

### **Car Parking, Cycle Parking and Access**

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- 6.22 The proposals comprise a car-free scheme, excluding vehicles associated with the operation use of the site. This is considered appropriate given the highly accessible Central London location of the site. Any vehicle requiring access to the site will do so via the existing access arrangements from Spring Place.
- 6.23 10 secure bicycle parking spaces will be provided by wall mounted bike racks internally adjacent to the main pedestrian entrance off of Spring Place. Cycling will be further promoted by secure lockers as well as shower and changing facilities adjacent to the bike store area.
- 6.24 It is proposed pedestrian and vehicular access to the site will be from Spring Place via the existing arrangements. Further information can be found within the Transport Statement.

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## 7. PLANNING POLICY CONTEXT

7.1 This section outlines the relevant planning policy context for the proposed development at national and local levels, together with considering the statutory development plan policies against which the proposed development should be considered, as well as other material considerations.

### **National Planning Policy Framework**

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7.2 The revised National Planning Policy Framework (NPPF) was adopted on the 19<sup>th</sup> February 2019 and sets out the Government's planning policies for England and how these are expected to be applied. The NPPF focuses specifically upon the delivery of sustainable development. It must be taken into account in the preparation of Local and Neighbourhood Plans and is a material consideration in planning decisions.

### **Sustainable Development**

7.3 Paragraph 8 of the NPPF specifically sets out the basis for the achievement of sustainable development in planning terms and defines three key objectives in the planning system:

- an economic objective – to encourage a strong & competitive economy, by making sure that the right type of land is available in the right places to support growth and improved productivity, as well as coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by making sure that a sufficient number and range of homes can be provided; and
- an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land.

7.4 Furthermore, with regards to sustainable development, paragraph 10 states:

7.5 *“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”*

7.6 Paragraph 11 states that for decision making 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:

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- 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.

### **Building a Strong, Competitive Economy**

- 7.7 Paragraph 80 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local businesses and wider opportunities for development. The paragraph notes planning decisions should recognise and address the specific locational requirements of different sectors, including making provision for storage and distribution operations at a variety of scales and in suitably accessible locations.

### **Promoting Sustainable Transport**

- 7.8 Paragraph 102 highlights transport considerations should be considered from the earliest stages of development proposals. Applications for development should give priority first to pedestrian and cycle movements; address the needs of people with disabilities and reduced mobility; create places that are safe, secure and attractive; allow for the efficient delivery of goods & access by service and emergency vehicles; and be designed to enable charging of plug-in and other ultra-low emission vehicles.

### **Making Effective Use of Land**

- 7.9 Paragraph 117 states that planning decisions should support promote an efficient 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.

### **Achieving Well-Designed Places**

- 7.10 Paragraph 124 notes that the creation of high quality buildings and places are fundamental to the planning process and should ensure that the result is sustainable development that creates better places to live and work in.
- 7.11 The creation of high-quality buildings and places is discussed in paragraph 125. Proposals should meet the six design principles as set out in paragraph 127, which include improving the long-term quality of the overall area; the design, layout and landscaping resulting in visually attractive design; designs that are sympathetic to the local character; ensuring a strong sense of space that creates a welcoming environment to live, work and visit; optimal use of the site in terms of development and green and public spaces; and creating places that are inclusive, safe and accessible to the whole community in the long term.
- 7.12 Paragraph 128 states there is also an obligation for the applicant to engage with planning authorities and the community early in the process to 'clarify expectations' and 'reconcile local and commercial

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interests'; and applications that demonstrate early, proactive and effective engagement should be looked upon more favourably. Similarly, where a proposal accords with the clear expectations in local planning policy, the local planning authority should not object to the application on the grounds of design, as outlined in Paragraph 130.

### **The Development Plan**

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- 7.13 The statutory Development Plan, insofar as it relates to the application site and the proposed development, comprises of the London Plan (March 2016) and LB Camden's Local Plan and Policies Map (2017) and Site Allocations Plan (2013).
- 7.14 The site falls within the Kentish Town Neighbourhood Plan (KTNP) area. The Plan was adopted in September 2016 and forms part of the Town Hall's planning guidelines for development in the area.
- 7.15 LB Camden's Proposals Map highlights that whilst the Site is part of a wider cluster of other employment uses, it has no specific land use designation and is 'white land'.
- 7.16 The site sits adjacent the Inkerman Conservation Area to the south of the site. A review of Historic England's Listed Building Register (as held online) indicates that the site does not contain, and is not within the setting of, any statutory listed heritage assets.
- 7.17 With reference to the Environment Agency Flood Map (as held online) the site is located within Flood Zone 1 and therefore has a low probability of fluvial flooding.
- 7.18 Relevant material considerations also include the following:
- Draft London Plan (December 2019; Intend to Publish Version);
  - Mayor of London's Sustainable Design and Construction SPG (April 2014);
  - Mayor of London's Energy Planning SPG (October 2018);
  - LB Camden Developer Contributions Planning Guidance (March 2019);
  - LB Camden Employment Sites & Business Premises Planning Guidance (March 2018); and
  - Kentish Town Planning Framework (July 2020).

#### **London Plan (March 2016; consolidated with all alterations since 2011)**

- 7.19 Policy 4.1 'New and Emerging Economic Sectors' outlines the Mayor will seek to promote the continued development of a strong, sustainable and diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises.

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- 7.20 Policy 4.4 'Managing Industrial Land and Premises' indicates that the Mayor seeks to ensure a sufficient stock of land and premises for industrial uses are available to meet future needs of different types of industrial uses.
- 7.21 Policy 5.2 'Minimising Carbon Dioxide Emissions' advises that developments should make the fullest contribution to minimising CO2 emissions, in accordance with the energy hierarchy. For commercial buildings, the policy requires Zero Carbon on 2010 building regulations for non-domestic buildings.
- 7.22 Policy 5.3 'Sustainable Design and Construction' seeks to improve the environmental performance of new developments, including minimising carbon dioxide emissions, efficient use of natural resources, minimising pollution, and promoting and protecting biodiversity and green infrastructure.
- 7.23 Policy 5.7 'Renewable Energy' advises that major development proposals should provide a reduction in expected carbon dioxide emissions through the use of on-site renewable energy generation where feasible.
- 7.24 Policy 6.13 'Parking' sets out the maximum standards for parking in Paragraph 6A.5 – 6A.7, which indicates that parking for commercial vehicles should be provided at a maximum standard of one space per 500 sqm of gross B2 or B8 floorspace. It also relates to SPGs on Town Centres and Land for Industry and Transport. It is also noted that standards for B2 and B8 employment uses should have regard to the B1 standards although a degree of flexibility maybe required to reflect different trip-generating characteristics
- 7.25 Policy 7.2 'An Inclusive Environment' states all new development should support the principles of inclusive design which seeks to ensure that development can be safely used by all, and are convenient, welcoming and realistic.
- 7.26 Policy 7.3 'Designing out Crime' requires all development to reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.

#### **London Borough of Camden Local Plan Policies (2017)**

- 7.27 Policy C1 'Health and wellbeing' states that the Council will improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. The Council will require:
- a) Development to positively contribute to creating high quality, active, safe and accessible places; and
  - b) proposals for major development schemes to include a Health Impact Assessment (HIA).

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

7.29 Policy E1 'Economic Development' states that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. It will:

- Support businesses of all sizes, 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;
- support local enterprise development, employment and training schemes for Camden residents;
- support Camden's industries by:
  - safeguarding existing employment sites and premises in the borough that meet the needs of industry and other employers; and
  - supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2 Employment premises and sites;

7.30 Policy E2 'Employment premises and sites' states that the Council will encourage the provision of employment premises and sites in the borough. They will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents.

7.31 They will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:

- a) The site or building is no longer suitable for its existing business use; and
- b) That the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.



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- 7.32 Policy A1 'Managing the impact of development' states that the Council will seek to protect the quality of life of occupiers and neighbours. Permission for development will be granted unless this causes unacceptable harm to amenity.
- 7.33 Policy D1 'Design' states that the Council will seek to secure high-quality design in development.
- 7.34 Policy CC1 'Climate Change Mitigation' states that the Council will require all developments 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.
- 7.35 Policy CC2 'Adapting to climate change' states that the Council will require development to be resilient to climate change. All development should adopt appropriate climate change adaption measures such as:
- The protection of existing green spaces and promoting new appropriate green infrastructure;
  - not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems; and
  - incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate.
- 7.36 The Council will promote and measure sustainable design and construction by:
- Ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation; and
  - expecting non-domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019.
- 7.37 Policy CC3 'Water and Flooding' states that the Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible.
- 7.38 Policy CC4 'Air Quality' states that the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough. Air Quality Assessments are required where development is likely to expose residents to high levels of air pollution.

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- 7.39 Policy CC3 'Waste' states that the Council will seek to make Camden a low waste borough.
- 7.40 Policy T1 'Prioritising walking, cycling and public transport' states that the Council will promote sustainable transport prioritising walking, cycling and public transport in the borough.
- 7.41 Policy T2 'Parking and car-free development' states the Council will limit the availability of parking and require all new developments in the borough to be car-free.

#### **Kentish Town Neighbourhood Plan (2016)**

- 7.42 Policy GO3 'Biodiverse habitats' states that KTNF supports the protection and encouragement of areas of biodiverse habitat.
- 7.43 Policy CC1 'Pre-application consultation' states that major developments are strongly encouraged to actively engage in consultation with KTNF and the wider community, including hard to reach groups with protected characteristics, as part of the design process prior to any planning application being submitted.

#### **Material Considerations**

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#### **Draft London Plan (December 2019)**

- 7.44 The Draft New London Plan 'Intend to Publish' version was published on 9<sup>th</sup> December 2019 following its Examination in Public which sets out the emerging policy for the Greater London Authority. Whilst the plan is not yet formally adopted, we are aware that the GLA are applying the draft standards when considering development proposals.
- 7.45 The site is designated within a Locally Significant Industrial Site which has seen an increased level of protection since the publication of the Draft London Plan, through applying the principle of no net loss of industrial floorspace capacity for both LSIS and Strategic Industrial Locations, as set out in Policies E4 and E6. Draft London Plan Table 6.2 'Management of industrial floorspace capacity - industrial property market area and Borough-level categorisations' identifies LBH is to retain its industrial capacity. The emerging policy defines 'industrial capacity' as either the existing industrial and warehousing floorspace on site or the 'potential' industrial and warehousing floorspace that could be accommodated on site at a 65% plot ratio (whichever is the greater).
- 7.46 With regards to car parking, Draft Policy T6.2 'Office Parking' of the Draft London Plan sets out a maximum parking provision for office uses. Whilst it does not provide set car parking provision for Class B2 (general industrial) and B8 (storage or distribution) uses, the draft policy states applications should have regard to these office parking standards and take account of the significantly lower employment density in such developments, noting a degree of flexibility may also be applied to reflect different trip-generating characteristics.

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- 7.47 Policy D4 'Delivering Good Design' seeks to deliver high quality developments, with regards to architectural design, materials, scale, height, density and layout.
- 7.48 Policy DM12 'Fire Safety' sets out all major development proposals should be submitted with a Fire Statement, which outlines an independent fire strategy.
- 7.49 Policy D14 'Noise' sets out to reduce, manage and mitigate noise to improve health and quality of life for residential uses through improving and enhancing the acoustic environment and promoting appropriate soundscapes.
- 7.50 Policy E4 'Land for industry, logistics and services to support London's economic function' provides overarching guidance for industry, logistics and service industries and seeks to ensure a sufficient supply to meet the current and future needs for the aforementioned functions, at both a strategic and local level.
- 7.51 Policy E6 'Locally Significant Industrial Sites' reiterates the importance of these industrial sites and encourages local planning authorities to designate and define detailed boundaries and policies for Locally Significant Industrial Sites.
- 7.52 Policy E7 'Intensification, Co-Location and Substitution of Land for Industry, Logistics and Services to Support London's Economic Function' promotes and encourages the intensification of business uses in Use Classes B1(c), B2 and B8 occupying all categories of industrial land.
- 7.53 Policy 'SI 1 Improving Air Quality' sets out that development proposals should not lead to further deterioration of existing poor air quality or create unacceptable risk of high levels of exposure to poor air quality.
- 7.54 Policy SI 2 'Minimising Greenhouse Emissions' states that major development should be net zero-carbon. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development, and it is recommended that non-residential development should achieve 15 per cent through energy efficiency measures.
- 7.55 Policy SI 3 'Energy Infrastructure' outlines that major development proposals within Heat Network Priority Areas should have a communal heating system, including the use of low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network).

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- 7.56 Policy SI 4 'Managing Heat Risk' notes development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- 7.57 Policy SI 13 'Sustainable Drainage' outlines that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.
- 7.58 Policy T5 'Cycling' sets out that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. The Policy also sets out the cycle parking standards for Use Classes B1, B2 and B8 for both long-stay and short-stay.
- 7.59 Policy T6.2 'Office Parking' outlines the maximum car parking standards in Table 10.4 for new office development. The Policy also sets out that car parking provision at Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards and take account of the significantly lower employment density in such developments. A degree of flexibility may also be applied to reflect different trip-generating characteristics.

**Mayor of London's Sustainable Design and Construction SPG (April 2014)**

- 7.60 The Supplementary Planning Guidance document (SPG) provides further guidance with regard to London Plan Chapter 5, policies responsible for addressing 'London's Response to Climate Change'.

**Mayor of London's Energy Planning SPG (October 2018)**

- 7.61 The SPG provides further guidance with regard to London Plan Policy 5.2, the policy related to energy, and provides further guidance with regards to preparing Energy Assessments to ensure they meet the relevant standards.

**LB Camden Developer Contributions SPG (March 2019)**

- 7.62 The Supplementary Planning Document (SPD) sets out the Council's approach, policies and procedures in respect of the use of planning obligations.

**Employment Sites & Business Premises SPG (March 2018)**

- 7.63 The guidance supports Camden Local Plan policies E1 Economic development and E2 Employment premises and sites. These policies work together to provide the Council's approach to the provision and protection of employment sites and business premises.

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### **Kentish Town Planning Framework (July 2020)**

- 7.64 The framework sets out a vision and key objectives for this area of the borough as an innovative and sustainable mixed-use new neighbourhood with industrial, commercial and creative activity, harmoniously provided alongside high quality homes that support a diverse local community.
- 7.65 The framework is a Supplementary Planning Document (SPD) designed to support the Local Plan objectives and guide future development proposals in the area.

### **Other Guidance**

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#### **Camden Climate Action Plan (2020-2025)**

- 7.66 The Camden Climate Change Alliance's Climate Action Plan proposes a five-year programme of projects and initiatives that brings to life a vision of a zero-carbon borough by 2030. This is the first of two plans.
- 7.67 The projects and initiatives outlined in the plan are themed around People, Places, Buildings and Organisations and deliver on the 17 Citizens' Assembly recommendations. The recommendations set out how carbon emissions can be reduced in residents' homes, in their neighbourhood and by the council.

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## 8. KEY PLANNING CONSIDERATIONS

- 8.1 This section identifies the key planning considerations and assesses the proposed development against the development plan policy and other material considerations. This section should be read together with the Design & Access Statement and other supporting technical documentation accompanying this application, which provide further detail on how the proposed development is being delivered and the principles that have influenced the design, and justification for its acceptability.

### **Principle of Development**

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#### **Employment Floorspace (B2, B8 & E (Light Industrial))**

- 8.2 LB Camden's Proposals Map highlights that whilst the Site is part of a wider cluster of other employment uses, it has no specific land use designation and is 'white land'. However, the site has an existing Class B2 use and is considered a Non-Designated Industrial Site, as such we understand that the local planning authority is supportive of a continued employment use.
- 8.3 In accordance with Local Plan Policies E1 and E2, Camden seek to safeguard existing employment sites and premises in the borough which meet the needs of industry and other employers, together with supporting proposals for the intensification of employment sites and premises where these provide additional employment and other benefits. This also includes those that support the functioning of the Central Activities Zone (CAZ) and/or the local economy.
- 8.4 The Council's Kentish Town Planning Framework promotes employment-led development in this area, requiring new development to provide efficient and sustainable industrial/ warehouse floorspace. In particular, it promotes 'last mile' storage and logistics/ distribution uses to support the Core Activity Zone. SEGRO is seeking to provide a facility at Spring Place that could accommodate a wide range of businesses operating in these sectors.
- 8.5 Furthermore, the draft London Plan sets out that LB Camden should retain its industrial land capacity and also seeks to prevent the loss of Non-Designated employment sites where possible, so to protect their vital economic function and role in London. Their importance was also highlighted in the Inspectors Report to the Mayor on the London Plan. It was suggested that draft Policies E4 – E7 only relate short / medium term requirements and there was no long-term need planned for as the market is difficult to predict. Notwithstanding, they concluded that it is likely more industrial land is required to meet future demand over the plan period, with recommendations to explore releasing sites from the Green Belt. As such, it was recommended existing industrial land is used much more intensively as there is an increased need for new locational and site specific requirements in and around the CAZ and other accessible locations (likely in response to online shopping and the need

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to promote more sustainable travel), resulting in added protection for Non-Designated Sites in the GLA through suggested amendments to the wording of Policy E7D.

8.6 As such, we consider the principle of the proposed development, including the widening of the permitted employment use classes, is supported by relevant planning policy and the proposed change of use for flexible Class B2, B8 and E (Light Industrial) should be considered acceptable.

8.7 We note that following a review of LB Camden's most recent AMR, during 2017/18, a total of 1,347 sqm Class B1(c) and 2,123 sqm Class B8 floorspace were lost to other uses. The site has been vacant for nearly 4 years and this proposal provides a realistic opportunity to provide flexible Class B2, B8 and E (Light Industrial) floorspace in the short term, together with associated local employment opportunities.

8.8 Whilst the Council has previously identified concerns regarding a B8 use in pre-application discussions, we understand that these objections are primarily related to concerns regarding the perceived transport impacts, such as the types of vehicles serving the site, the use of on-street loading and the number of vehicle trips, and related issues such as noise affecting nearby residents. There is however no in-principal policy objection to a B8 use in this location, and indeed the policy summarised in the section above actively encourages B8 uses, subject to the relevant detailed and technical considerations. We discuss in further detail below how these technical issues relating to highways and residential amenity have been addressed and how it is demonstrated that the proposals will be acceptable in all relevant respects.

### **Design and Materiality**

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8.9 As detailed within the Design & Access Statement, the scheme has been designed to encapsulate the following key design principles:

- A unit configuration that maximises the site space in terms of flexibility whilst offering a range of essential and additional amenities to promote sustainability of incoming tenants through design (bike storage areas, shower facilities, EV charge points etc).
- Use of high quality, robust and sustainable materials to create a modern aesthetic.
- Simple and clean elevations that offer a modern and premium appearance.
- A sense of security; design to reduce crime.

8.10 In accordance with the pre-application advice from Officer's, minimal intervention has been carried out in terms of the external treatment, retaining the building and restoring the brickwork on the office

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extension to match the railway arches. Hollis is currently investigating green wall systems that may be employed to soften the internal elevation of the main reception area.

## Highways

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8.11 Given the site currently has consent for Class B2 use, the Transport Statement prepared by Vectos assesses the suitability of using the Site for Class B8 and E (Light Industrial) uses.

8.12 The Transport Statement notes the following points in response to the Council's concern regarding the proposed flexible uses:

- The proposals comprise a car-free scheme excluding vehicles associated with the operation use of the site.
- Spring Place is suitable for commercial vehicular traffic and was used by the previous Addison Lee functions and is currently used by the Veolia Council Depot Site located opposite the site.
- The trip generation assessment indicates that all potential uses at the site would lead to a significant reduction in overall two-way daily vehicle movements. Whilst it is noted that LGV and HGV movements may increase for some of the potential land uses, these increases are not considered to be material and would not lead to a detrimental impact on the surrounding highway network.
- The majority of the movements would be smaller vehicles under 3.5 tonne, which will service on site and the vehicles associated with this are likely to come forward as a fully electric fleet. Charging points will be provided in anticipation of this. These types of vehicles are seen all over London and regularly service nearby businesses.
- Where possible, on-site (within the fabric of the building / internally) loading will take place. For example, LGVs and smaller HGVs (up to 7.5 tonnes) will be accommodated on site. The Transport Statement demonstrates that there is sufficient space on-site to accommodate the smaller HGV whilst operational vehicles are parked on-site (within the fabric of the building / internally). If medium sized HGVs, (up to 18tonne vehicles) come to the site, and they are unable to unload internally, then they will utilise the proposed on-street loading bay.
- It should be noted that the likely number of small/medium HGVs (up to 18 tonne) that will serve the site is not considered to be significant and therefore will not cause a detrimental impact on Spring Place. In addition, given the past industrial uses at the site and that on-



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street servicing has taken place previously, it is considered that on-street servicing is acceptable.

- The existing situation would be improved due to provision of dedicated loading bay and Delivery and Servicing Management Plan to manage deliveries and the ability for 7.5 tonne vehicles to be accommodated onsite.
- In addition, a dedicated routeing strategy will be implemented as to avoid roads which are sensitive with regard to school children such as Holmes Road.

8.13 It is considered that the proposed use at the site will not have a detrimental impact on the surrounding highway network and the overall daily vehicle numbers would significantly decrease when compared against the past use at the site. The anticipated trip generation as a result of the proposals is considered to be negligible when spread across the course of a day.

8.14 This is a recognised employment site that has previously been occupied by industrial uses as is proposed. In all cases the traffic to a future use is predicted to be less than the previous use on the site (identified as the relevant baseline position) with no material increase in servicing vehicles, particularly HGVs.

8.15 Notwithstanding the above, the Applicant is willing to commit to potential controls on vehicle movements, vehicle sizes and external loading hours, which will be imposed and enforced through the Delivery and Servicing Management Plan and secured by a condition.

8.16 On the basis of the above, it is considered that the proposals can be accommodated without detriment to the operation of the local transport networks and there is no technical justification on the grounds of highways or transport to refuse planning permission.

### **Energy and Sustainability**

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8.17 As detailed within the submitted Energy and Sustainability Statement prepared by Icen Projects, the strategy aims to minimise the environmental impact of the proposed development during construction and operation, and ensure the development is constructed to rigorous sustainability standards.

8.18 The proposed strategy has been based around the objectives of the London Borough of Camden Local Plan. In summary, based on this strategy, the proposed development:

- will aim to achieve BREEAM certification, targeting a rating of 'Excellent';
- makes efficient use of land by reusing an existing building;

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- will incorporate measures to improve site biodiversity, including the provision of an external and internal living wall;
  - will include measures to reduce potable water consumption, including rainwater harvesting;
  - will ensure air, noise and vibration pollution are minimised as far as possible;
  - will minimise waste production during construction and maximise the proportion of waste to be diverted from landfill;
  - will minimise energy demand through the specification of low U-values to reduce heat loss;
  - will utilise rooftop photovoltaic panels to generate renewable electricity on site; and
  - will follow the Energy Hierarchy methodology to achieve an 83% reduction in carbon dioxide emissions when compared with the PartL2A:2013 baseline.

8.19 This demonstrates that the proposed refurbishment works will provide a building with a level of carbon dioxide emissions significantly reduced over that required for a new building, demonstrating the applicant's commitment to sustainable design principles and proactively responding to the climate emergency.

8.20 As set out within the Design and Access Statement, in accordance with Policy CC2 a number of sustainable technologies were considered, including green and blue roofs to further improve the thermal performance of the building envelope and provide SUDs. Further to extensive feasibility studies these technologies are not deemed viable options for the site. Rainwater harvesting was deemed a more viable option and will be utilised within the design.

8.21 In addition, a BREEAM Pre-Assessment carried out by Harley Haddow shows that the proposed development has the potential to achieve a BREEAM rating of 'Excellent', based on the 2014 Refurbishment and Fit Out methodology, with an anticipated BREEAM score of 78.91%.

8.22 The scheme has an ambitious sustainability strategy in which SEGRO are investing £1.5 million in the refurbishment, over-delivering in comparison to any other warehousing supply in Camden. The scheme meets 2 of the 17 initiatives set out within the Climate Change Alliance Action Plan (2020-2025), through enabling electric transport within infrastructure and incentives and funding energy efficiency retrofits of old buildings.

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8.23 Overall, the proposals constitute sustainable development in accordance with national and local policy requirements and will provide a development that seeks to promote these principles in operation.

### **Residential Amenity**

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8.24 The proposals have been designed to protect the amenity of nearby residents and will be compatible with the mixed-use vision for the Kentish Town Planning Framework Area.

8.25 One potential use for the refurbished building is as a 'last mile' urban logistics facility. Given the proposed proximity of these sites to residents and businesses, many occupiers can operate a highly efficient and sustainable modes of delivery through electric vans or cargo bikes. Developing a network of smaller, last-mile delivery facilities situated close to communities enables the following advantages:

- Shorter delivery routes;
- Reduction in CO2 emissions;
- Less road congestion;
- Ability to fulfil deliveries with an all-electric / sustainable fleet; and
- More flexible / efficient operation to cope with the demand for next day / hour delivery slots.

8.26 The application is proposing a 24-hour use as this is necessary to meet the meet the business requirements of prospective tenants and make efficient use of this employment site within the setting of the CAZ.

8.27 The significant disruption caused by the Coronavirus pandemic has demonstrated the importance of a resilient and localised supply chain. The delivery of essential goods and services remains critical to supporting and safeguarding many residents and businesses in Camden through the pandemic and as part of the borough's economic recovery.

8.28 The applicant has recent experience of developing employment uses in close proximity to residential dwellings, such as SEGRO Park Hayes and SEGRO Park Tottenham, and will work closely with the community to address any concerns. The small-scale nature of the Spring Place site means that it will not be serviced by high numbers of large HGVs (as summarised above and discussed in detail in the Transport Statement), and as such concerns around traffic, noise and disturbance will be easier to address.

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- 8.29 The planning application is supported by a full range of technical documents to assess the impact of the proposals, the conclusions of which are set out within the subsequent sections.

#### **Noise**

- 8.30 An Environmental Noise Survey and Noise Impact Assessment Report has been prepared by Hann Tucker Associates to establish the currently prevailing noise climate. Based on the results of the survey and in line with appropriate acoustic design criteria, a Noise Impact Assessment has been undertaken at the nearest noise sensitive residential dwelling.
- 8.31 Based on the predicted and future traffic flow over a typical 24 hours, the assessment indicates that there would be 'No Observed Effect Level' from the increase traffic flow for any of the proposed uses.
- 8.32 Hann Tucker also undertook a vibration survey at the site to measure typical vibration levels from vehicle pass-bys. The assessment indicates that there would be no adverse impact from the increased vibration from traffic flow for any of the proposed uses.
- 8.33 This is in accordance with Local Plan Policy A1 which seeks to seek to protect the quality of life of occupiers and neighbours.

#### **Air Quality**

- 8.34 An Air Quality Assessment has been prepared by Redmore Environmental in order to determine baseline conditions at the site and assess potential air quality effects as a result of the scheme.
- 8.35 The report assesses the potential for air quality impacts as a result of traffic exhaust emissions associated with vehicles travelling to and from the site during the operational phase. These were assessed against the relevant screening criteria.
- 8.36 Due to the low number of trips anticipated to be produced by the proposals, road traffic exhaust impacts were predicted to be negligible. This is based on a worst-case scenario that all the vehicles would be petrol/diesel, whereas in reality it is likely that an electric vehicle fleet would be used, and therefore it is possible that the impacts would be even lower than identified.
- 8.37 Based on the assessment results, there is no technical justification on the grounds of Air Quality to refuse planning permission.

#### **Ecology**

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- 8.38 A Bat Roost Potential Survey has been undertaken by Delta-Simons Environmental Consultants, in accordance with the relevant guidance. The site was considered to have negligible potential for roosting bats since it lacked suitable structural features and climatic conditions. Furthermore, the

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building was subject to regular disturbance due to noise and vibration from the DLR line which ran over the top of the Site, such that it is considered bats would be discouraged from using the building.

- 8.39 The site featured external lighting on its north-eastern aspect and street lighting was present along Spring Place. Small areas of green space were present to the west of the Site surrounding residential properties, and immature trees were present along Spring Place, however, overall foraging opportunities and commuting corridors within the local area were limited and of poor quality.
- 8.40 As set out within the Design and Access Statement, further enhancements will be provided in the form of internal and external living walls, which will provide biodiversity enhancements at the Site and a 'stepping stone' habitat within the green corridor (missing link), providing important habitat creation to fauna located north and south of the railway line.
- 8.41 This is in accordance with Local Policies A2 and A3 which aim to protect and enhance green infrastructure and achieve an overall net gain for biodiversity. Given that the Site currently supports no vegetative habitats, the addition of the living walls, specifically that on the external elevations, will enhance the Site and provide a clear net gain in biodiversity appropriate to the Site and the surrounding landscape.

### **Drainage Strategy**

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- 8.42 A Foul and Surface Water Drainage Strategy has been prepared and designed by Hydrock. The entirety of the site is at low risk of flooding from fluvial and tidal sources or from surface water flooding. As the site is less than 1 ha, in flood zone 1 and is not affected by sources of flooding other than rivers and the sea, a flood risk assessment will not be required.
- 8.43 Foul drainage for the refurbishment will utilise existing drainage on site with stack points reconfigured to suit the change to internal layout. This will be via conventional gravity pipe system which connects into the existing off-site public network. The foul drainage system will be designed in accordance with the Building Regulations Approved Document H and the relevant British Standards.
- 8.44 Surface water run-off will be collected by way of rainwater pipes into the existing below ground surface water drainage system which will discharge to an existing connection points south and east of the site. A portion of roof area will be used for rainwater harvesting, which will be used within the toilet facilities on site.
- 8.45 There is no increase in impermeable area due to this site being a refurbishment of an existing building with no external areas within the site boundary. Existing discharge locations are to be utilised and existing drainage to be utilised or repaired dependent on its suitability.

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- 8.46 There being no increase in flow rates from the site it is deemed that this strategy does not adversely impact on flood risk either within the site or beyond the development boundary.
- 8.47 Due to the nature of the existing development and its current arrangement, the peak run-off rate for this site cannot be designed as reasonably practicable to the greenfield runoff rates and the 50% reduction would see disproportionate construction costs for a project of this size.

### **Health Impact Assessment**

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- 8.48 A Health Impact Assessment Screening has been prepared by Icen Projects to assess the likely health impacts of the proposals.
- 8.49 The report looked to consider potential health impacts during both construction and operational phases of the Proposed Development at 3-6 Spring Place, Kentish Town. Through analysis of the supporting technical drafts and baseline conditions of the area, it has been estimated there are no adverse impacts with regards to residential amenity in the surrounding area in terms of acoustics, vibration and air quality. Therefore, no potentially significant adverse health impacts have been identified through the Screening assessment to trigger a need for a full Health Impact Assessment.

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## 9. SUMMARY AND CONCLUSIONS

- 9.1 Icen Projects Limited ('Icen') are appointed by SEGRO plc (our 'Client') to advise on town planning matters relating to the land at 3-6 Spring Place, Kentish Town, London NW5 3BA (the 'site'), situated within the administrative boundary of The London Borough of Camden ('LB Camden').
- 9.2 The Site currently comprises an industrial building within Use Class B2 (although currently vacant), with a façade extending up to two storeys in height along Spring Place. The property has been vacant and underutilised for almost 4 years and the existing site needs various refurbishment works and significant investment to ensure the employment space is marketable and operable, including the provision of a replacement roof at significant cost and new access doors fronting Spring Place.
- 9.3 The investment that SEGRO will put into the scheme aims to attract a reputable business to occupy the space. Without a high level of investment into the development, the industrial unit will continue to remain vacant and not contribute to the local economy or create additional jobs for the local community.
- 9.4 The proposals will secure the change of use from industrial (Class B2) to flexible industrial (Class B2)/ storage or distribution (Class B8)/ light industrial (Class E), and refurbishment of existing building. The development will provide significant improvements to not only enhance the physical appearance of the site, but also contribute to delivering high quality employment floorspace in the Borough, attracting investment and jobs into this part of Camden. In particular, the proposed development has been designed to be of a very high-quality materiality and architectural design, together with focusing on design features which will contribute to the improving the overall wellness of its future occupiers and minimise impacts on neighbours.
- 9.5 The development proposals have been informed by two pre-application meetings with LB Camden. The range of technical reports accompany this application and demonstrate that the proposals are entirely acceptable and as discussed above.
- 9.6 SEGRO's refurbishment of this site represents a significant long-term investment in the area. The proposals will:
- Create employment opportunities for local people and long-term investment to support the wider planned regeneration of Kentish Town;
  - Contribute business rates to support local services as well as supply chain opportunities for local SMEs;

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- Facilitate (subject to the occupier) the more efficient and sustainable delivery of goods to local residents and connect local businesses with customers; and
  - Bring the vacant site back into use, creating a modern, vibrant and sustainable space.

9.7 The proposals are considered to satisfy the three aspects of sustainable development identified within the NPPF and accord with the relevant requirements of the London Plan and Local Plan. Consequently, we consider that planning permission should be granted, having regard to relevant guidance and the clear planning justification for the development.



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**A1. DRAFT S106 HEADS OF TERMS**