

15 February 2021

Dear Kristina Smith,

Via email: Kristina.Smith@camden.gov.uk

Cc: patricia.callaghan@camden.gov.uk; richard.cotton@camden.gov.uk

RE: Arches 30-38 Site adjacent to 5 Prowse Place and 156 Camden Street London NW1 9PN

I am writing, as Chair of TRACT (Tenants Residents Associations, Camden Town) to comment on the above change of use application.

As you will be aware the site has been vacant for some time following the closure of Warren Evans bed shop and then for a short period following the use of the premises was a Dreams bed showroom. We were disappointed that St Mungo's were forced to pull out of occupying the premises with what we felt would be a suitable use of the space given its situation in a quiet residential area.

Our concern regarding the current application is to ensure that conditions are in place to protect residents from new forms of 24/7 online delivery businesses and other operations that would require significant vehicle movements. I note from the planning statement that the Landlord is open to conditions.

Background Information

The Arch Co also owns several arches in Randolph Street close by which have planning restrictions as to the use (A1 on Royal College Street and B8 for all of the arches) and conditions on times of operation (09:00-17:30hrs mon-sat only for the arches). Unfortunately, they are advertising them to tenants without these restrictions and for use as "Warehousing, Light Industrial, Storage, Office". Because of this, all the arches have been let to businesses that want to run 24/7 convenience deliveries or late-night dark kitchen meal deliveries from the arches. So far TRACT has managed to contain these to licensing framework hours and we have made a planning enforcement complaint. Refer attached planning decision for the arches in Randolph Street for your information.

Neighbourhood Concerns

Our key concern for this application is to ensure we avoid this situation arising by having appropriate conditions that are enforceable and that the Arch Co are signed up to.

Since the installation of the trial bollards at the junction of Ivor Street and Prowse Place it has made the Jeffrey's Street Conservation area access only. This has significantly reduced traffic, pollution and noise and increased safety for pedestrians, children and pets.

Currently Ivor Street is 2-way and if the gates at the end of Ivor Street were to be used for vehicles, they would almost certainly all use Ivor Street for both access and egress as Prowse Place is narrow and unsuitable for larger vehicles and difficult to turn into from the site.

We do not want these improvements to be reversed by allowing high frequency or large-scale vehicle movements on and off the site. We do not want this site to become operational 24/7, although we agree some uses 24/7 (e.g. gym) would not impact the residential amenity if appropriate conditions were in place for access via Camden Street etc.

Proposals for Discussion

If 100% of the space were used as office space it could accommodate c.130 occupants based on c.10sqm per occupant. We would like to engage with the Landlord to understand the impact of other maximum use percentages that all parties feel could work. Can this be facilitated via the Council? We have a similar approach with Lab Tech for their sites and have a good working relationship with them with regular meetings.

An initial set of conditions for discussion are set out below:

- Pedestrian access via all 3 entrances during normal office hours (08:00-19:00hrs) after which the entrance from Camden Street should be used (except disabled access/egress)
- 2. Deliveries and waste collections to and from the premises to be after 08:00hrs and before 19:00hrs.
- 3. Delivery and distribution of goods to be limited to 7.5t truck with loading and off loading in the yards within the curtilage of the building. All vehicles to move into and off the site in forward gear.
- 4. Maximum of 2 deliveries allowed per day mon-fri with no deliveries on weekends or public holidays.
- 5. Operation of the site should be limited to normal business hours (08:00-19:00hrs) with exceptions for limited use for late office / professional services type working or other agreed and stipulated uses.
- 6. No use allowed for dark kitchens delivering produce off site via cycles, electric scooters or any other small delivery vehicle.
- 7. No use of the site as a distribution centre for convenience store type businesses e.g. late night or 24/7 groceries, alcohol etc

- 8. Cycle parking bays to be provided on the premises for use by tenants.
- 9. No noise to emanate from the premises, including the service yards, so as to cause noise nuisance to local residents e.g. staff talking in the service yard late at night, operating noisy equipment / machining etc
- 10. No music (live or recorded) to be played within either of the service yards at any time.

I look forward to discussing the above with you at a convenient time in the coming weeks. I hope you will support the needs protect the amenity of residents when considering conditions for this application.

Yours sincerely,

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Kate Gemmell TRACT Chair