

## Sainsbury's Supermarkets Ltd

# 17-21 CAMDEN ROAD, LONDON, NW1 9LJ

Planning and Heritage Statement

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Planning and Heritage Statement

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### 1 INTRODUCTION

### 1.1 OVERVIEW AND PROJECT BACKGROUND

1.1.1. This statement has been prepared on behalf of our client Sainsbury's Supermarkets Limited and accompanies an application seeking full planning permission and listed building consent for:

"Internal alterations to the listed building and installation of new plant and associated equipment"

- 1.1.2. At the existing Sainsbury's Store at 17-21 Camden Road, London, NW1 9LJ (hereafter referred to as 'the site').
- 1.1.3. This application is submitted to The London Borough of Camden as the determining Local Planning Authority (LPA) under the Town and Country Planning Act 1990 (as amended) and the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- 1.1.4. A full description of the Proposed Development is set out in Section 4 of this Statement and the location of the site and the extent of the Proposed Development area are shown on the enclosed Location Plan.
- 1.1.5. The supporting documents are submitted to accompany the planning application and application for listed building consent.
  - Completed application form, prepared by WSP;
  - Package of application drawings, prepared by Steve Ritchie Partnership Limited;
  - Planning and Heritage Assessment, prepared by WSP;
  - Acoustic Assessment, prepared by WSP; and
  - Schedule of Works, prepared by Steve Ritchie Partnership Limited.

#### STRUCTURE OF THIS DOCUMENT

- 1.1.6. This statement sets out the context and need for the Proposed Development and includes an assessment of how it accords with relevant national and local planning policies, drawing on relevant supporting information where applicable.
- 1.1.7. Following this introductory section, the remainder of this Planning Statement is structured as follows:

Section 2 describes the application site and surrounding context;

Section 3 describes the planning history relating to the application site;

Section 4 sets out a detailed description of the Proposed Development;

Section 5 provides a summary of the relevant planning policy context;

Section 6 provides the Heritage Statement;

Section 7 provides an assessment of the key planning issues; and



Section 8 provides a summary and overall conclusion.

## 2 SITE AND SURROUNDINGS

- 2.1.1. The application site comprises the existing Sainsbury's store on Camden Road within the London Borough of Camden. The site is Grade II listed and is an architecturally significant building, designed by Nicolas Grimshaw and is the first purpose-built supermarket to achieve National Heritage status in England.
- 2.1.2. The building comprises of Grimshaw's prominent "High Tech" style architecture which centres on revealing the construction techniques used, rather than hiding them away. At street-level, the supermarket is set back from the pavement and enclosed by full-height glazing with the upper level be wrapped in aluminium panelling and features strip windows.
- 2.1.3. Camden Road is a busy road within a mixed use area of predominantly commercial and residential uses. Ground floor retail use is a common feature along Camden Road with residential properties located above.
- 2.1.4. The application site is extremely well connected and has a PTAL rating of 6b, which is considered excellent. The site fronts onto Camden Road and Camden Town Underground station is located approximately 150 metres to the south west of the site and Camden Road over ground station is located approximately 300 metres to the north west. Furthermore, the Camden Street bus stop (Stop R) is located immediately opposite the entrance of the site.
- 2.1.5. The Camden Policies Map 2021 shows that the site is subject to the following planning designations:
  - Located within the Regent's Canal Conservation Area; and
  - Includes a protected frontage.
- 2.1.6. The site is Grade II listed and lies immediately adjacent to the Church of St Michaels (Grade II\*) and the War Memorial at the Church of St Michael (Grade II). To the north of the site lies 1-12 Grand Union Walk (Grade II) and also opposite the site lies 18-62 Camden Road (Grade II). A full heritage assessment is included in Section 6 of this Statement.

## **3 PLANNING HISTORY**

- 3.1.1. A review of the London Borough of Camden online planning register reveals there have been a number of planning decisions on site which reflect the supermarket use of the building. These are set out below:
  - On the 3 April 1985, outline planning permission was granted for the redevelopment of the land known as the ABC Bakery site (17-21 Camden Road 131-147 Camden Street Camden Gardens and frontage to Kentish Town Road NW1) by the erection of buildings a retail store with associated creche. (LPA ref. 8401869);
  - On the 21 October 1986 full planning permission was granted for six structural-support members on the public highway (LPA ref. 8601494)
  - On the 21 November 1990 planning permission was granted to change the use of the part of the shop unit from A1 retail, to mixed us of art gallery/café (LPA ref. 9003222)
  - On the 5 June 1991, full planning permission was granted for the installation of a new shopfront to Unit One (LPA ref. 9003444)
  - On the 5 May 1992 full planning permission was granted for the erection of a first floor rear extension to the bulk stock warehouse area. (LPA ref. 9200430).
  - On the 21 August 2007, full planning permission was granted for the alterations to front and rear elevations to enlarge the two main entrance doors and to relocate an internal ATM to an external wall. (LPA ref. 2007/2868/P).
    - Full planning permission was subsequently granted on 26 November 2007 to install a second ATM facility and further minor alterations to the existing entrance. (LPA ref. 2007/4906/P).

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## 4 THE PROPOSED DEVELOPMENT

4.1.1. This application is seeking full planning permission and listed building consent for the following works

"Internal alterations to the listed building and installation of new plant and associated equipment"

- 4.1.2. In response to the changing retail environment, Sainsbury's Supermarkets Limited are seeking to rationalise the existing floor space across their stores to create a simpler and more efficient business. This creates an opportunity to focus investment back into Sainsbury's core business of selling food. The Camden supermarket has back of house space at the first floor which has been used as office space and more recently as a training area used by colleagues from across several stores in London. The space is not the permanent home for any training staff, but an area set up to accommodate the delivery of Sainsbury's extensive training programme. A review of this programme and the space needed means that this area in the Camden store is no longer required, training can be accommodated in more purpose built facilities Sainsbury's has in London and online.
- 4.1.3. Sainsbury's have identified an opportunity to locate their Food Lab facility within the Camden store. The Food Lab is in essence a food product testing facility which replicates the at home experience of cooking and tasting potential new food product ranges. The Food Lab will involve the relocation of eight skilled workers into the Borough.
- 4.1.4. The Food Lab is an existing part of Sainsbury's business and can be easily accommodated within the listed building without requiring significant change. The Camden store is also conveniently located for existing Food Lab staff to travel to via public transport and the servicing arrangements are suitable for their needs.
- 4.1.5. At present, the existing first floor comprises of under-utilised office space, toilet and storage facilities. Internal alterations are required to ensure that the first floor can accommodate the relocated Food Lab facility. Therefore, the proposals seek to make the following internal alterations at first floor level:
  - Minor alterations to the existing entrance door
  - Installation of 1 x electrical panel within the existing plant room;
  - Installation of 1 x domestic hot water plant within the existing plant room;
  - Installation of ducting in the ceiling void; and
  - Reconfiguring the internal layout

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- 4.1.6. The proposals seek to make the following alterations at roof level:
  - Installation of 20 x small ventilation cowls;
  - Installation of 2 x condenser units;
  - Removal of 1 x decommissioned supply fan; and
  - Removal of 1 x training centre decommissioned condenser

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### 5 PLANNING POLICY

5. In this section we identify the planning policies that are most relevant to the determination of this planning application and that form the basis for the assessment in **Section 7.** 

### 5.1 THE DEVELOPMENT PLAN

5.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the Development Plan unless there are material considerations that indicate otherwise. The Development Plan for the purpose of the determination of this planning application comprise of the Camden Local Plan (2017) and the London Plan (2021). The key policies are set out below.

The Camden Local Plan (2015)

- Policy G1 Delivery and location of growth;
- Policy E1 Economic development;
- Policy E2 Employment premises and sites;
- Policy A1 Manging the impact of development;
- Policy A4 Noise and vibration;
- Policy D1 Design; and
- Policy D2 Heritage

The London Plan (2021)

- Policy D3 Optimising site capacity through the design-led approach;
- Policy D5 Inclusive design;
- Policy D14 Noise;
- Policy HC1 Heritage conservation and growth; and
- Policy GG2 Making the best use of land

### 5.2 NATIONAL PLANNING POLICY FRAMEWORK

- 5.2.1. The revised National Planning Policy Framework (NPPF) was published on 24 July 2018 and was updated on 19 February 2019. This sets out the government's planning policies for England and how these are expected to be applied. The national planning guidance (NPPF) provides guidance on how the policies should be applied.
- 5.2.2. The NPPF is an important material considerations in the determination of planning applications. Central to the NPPF is the presumption in favour of sustainable development in paragraph 11. It advises that, for decision-taking, this means approving development proposals that accord with the development plan without delay.
- 5.2.3. With reference to the proposed development, key chapters from the NPPF (2019) include:
  - Paragraphs 7-10 Achieving Sustainable Development;
  - Paragraphs 111-123 Making effective use of land;
  - Paragraphs 80 -84 Building a strong, competitive economy; and

Paragraphs 184-202 Conserving and enhancing the historic environment

### 5.3 OTHER MATERIAL CONSIDERATIONS

5.2.4. The following Camden Planning Guidance (CPD's) are also relevant to this application:

- Amenity; and
- Employment sites and business premises

### 6 HERITAGE STATEMENT

### 6.1 THE PROPOSAL

- 6.1.1. The proposed development comprises of works at first floor level, consisting of stud partitions within existing office space and back of house areas; the installation of ducting and plant in the ceiling void where other, existing services are located; the installation of new plant equipment within the existing plant room; and the installation of new plant upon the roof, including twenty small cowls, an Air Source Heat Pump, and two small condenser units consistent with the appearance of existing equipment. Some existing, redundant roof plant is proposed to be removed.
- 6.1.2. All of the proposals are the minimum necessary to accommodate the Food Lab facility, which will bring jobs and vitality to the heart of Camden Town.
- 6.1.3. The proposed works are relatively minor in nature and will cause no harm to the building's special architectural or historic interest.

### 6.2 THE HERITAGE SIGNIFICANCE OF POTENTIALLY AFFECTED HERITAGE ASSETS

6.2.1. The application site is a grade II listed building located within the London Borough of Camden. The site sits on a corner plot, fronting onto Camden Road to the south, and the side elevation faces Camden Street to the east. The site lies within the Regents Canal Conservation Area and there are a number of listed buildings within the immediate vicinity, including the Church of St Michael (grade II\*), War Memorial at the Church of St Michael (grade II), 1-12 Grand Union Walk (grade II) and 18-62 Camden Road (grade II).

#### Sainsbury's Supermarket (grade II listed)

- 6.2.2. The existing building is part of the Grand Union Complex built 1986-88, designed by Sir Nicholas Grimshaw, and is the first purpose built supermarket to achieve national listing status in England.
- 6.2.3. J Sainsbury took ownership of the site in the early 1980s with the intention to develop an urban supermarket and the scope was revised to also include a terrace of houses (1-12 Grand Union Walk, listed Grade II), and a commercial building (known as Grand Union House).
- 6.2.4. The building comprises a 'High Tech' style architectural design, which centres on revealing the construction techniques used, rather than hiding them away.
- 6.2.5. The architectural significance of the listed building is principally expressed in its 'High-Tech' architectural style, which integrates an overtly modern aesthetic into Camden's historic urban grain. Furthermore, the building features a technological innovation with its intumescent

coating, which allows the steel frame to be left exposed. The building is a distinctive landmark within a dense urban setting.

- 6.2.6. The design of the exterior of the building includes the display of its structure, and a glazed shopfront revealing the retail activity within. The building materials comprise of an exposed steel frame with aluminium and glass cladding.
- 6.2.7. Historic England's National Heritage List for England describes the reason for designation as being:

#### Architectural interest

'As a powerful piece of contextual inner-city High-Tech, integrating an overtly modern aesthetic into Camden's historic urban grain; in the creative use of structure to meet a challenging brief, boldly and exaggeratedly expressed to striking effect; in the technological innovation of its intumescent coating, allowing the frame to be left exposed in a densely developed environment; as a resourceful piece of retail planning which successfully meets the complex, space-hungry demands of a supermarket on a tight urban site; as the centrepiece of a successful mixed-use scheme which marked a turning point in the career of Nicholas Grimshaw, one of the country's leading proponents of High-Tech architecture.'

#### Historic interest

'As a rare example of the important but typically mundane post-war building type, the supermarket, being designed as a highly original, bespoke piece of architecture; a project made possible by the ambition of the architects, the client and the local authority.'

6.2.8. An important part of the listing description clarifies which areas are not of special interests:

'Pursuant to s1 (5A) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act') it is declared that the car park and, with the exception of the curved ceiling over the shop floor, the interior fittings, fixtures and non-structural partitions within the shop and in all back-of-house areas are not of special architectural or historic interest, however any works which have the potential to affect the character of the listed building as a building of special architectural or historic interest may still require LBC and this is a matter for the LPA to determine.'

6.2.9. Photographs of the existing site are shown in Appendix 1.



#### Impact of the proposed scheme

- 6.2.10. At present, the first floor of the Sainsbury's supermarket comprises of offices, communal kitchen areas, lavatories, and storage facilities. All of these 'back-of-house' areas are expressly recorded as being of no special architectural or historic interest in Historic England's listing description, pursuant to s1 (5A) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act').
- 6.2.11. The proposed works include:
  - Installation of new electrical panel and domestic hot water plant and ventilation cowls
  - Installation of new ducting to support the proposed plant, which is proposed to be above existing suspended ceilings housing existing ductwork, suspended from steel members
  - Reconfiguring the internal layout with light weight partitions
  - New plant at roof level to include an Air Source Heat Pump (ASHP), two smaller condenser units, and 20 small cowls
- 6.2.12. The proposed roof plant equipment comprises of a new Air Source Heat Pump (ASHP) measuring 1.86m in height, and two smaller condenser units, which would replace the redundant supply fans. This plant is proposed to be positioned on the roof covering the retail area, which is an area of roof hidden from public view. Approximately 20 ventilation cowls are proposed to be fixed upon the roof above the first floor offices, where the new Food Lab use is proposed to be located. The proposed cowls are small structures, designed to complement the High Tech, industrial aesthetic of the building. These would be of grey steel colour to blend in with the existing roof. This will ensure that that they would have a negligible impact upon the appearance of the listed building and would cause no harm to its special architectural or historic significance.
- 6.2.13. The internal works at first floor level include the subdivision of the office space with lightweight partitions, and provision of plant in the existing plant room, and service runs within the existing suspended ceiling, all of which will cause no harm to the building's special architectural or historic interest.

#### 1-12 Grand Union Walk

- 6.2.14. 1-12 Grand Union Walk lies to the rear of the Sainsbury's store and comprises of a series of ten terraced houses and two flats. These were also designed by Sir Nicholas Grimshaw as part of his wider vision for the area in the early 1980's.
- 6.2.15. The buildings comprise of a "High Tech" architectural style, which complements the Sainsbury's supermarket. The buildings are faced in aluminium cladding facing the canal, together with motorised glass walls on the northern elevation. The terraces fronting onto the Regents Canal have historically been industrial in character and therefore, the 'High Tech' architectural style ensures that the buildings integrate well within the existing setting and character of the area.



#### Impact of the proposed scheme

6.2.16. The proposed scheme will cause no harm to the setting or heritage significance of 1-12 Grand Union Walk as there will be no inter-visibility between the proposed internal works or roof plant, and this listed terrace.

#### Church of St Michael and War Memorial

- 6.2.17. Immediately adjacent to the site on the western side, lies the Church of St Michael, which is Grade II\* listed. St Michael's Church is of a Gothic Revival style, designed in 1878 by the influential architect, G. F. Bodley. St Michael's was Bodley's first building in London, although by that date he had completed works elsewhere. It is an outstanding late Gothic Revival building by one of the most important Victorian and Edwardian church architects of the time.
- 6.2.18. The war memorial at the Church of St Michael is grade II Listed. This was constructed in 1920 to commemorate residents of Camden who died during the first world war.

#### Impact of the proposed scheme

6.2.19. The proposed scheme will cause no harm to the setting or heritage significance of the Church of St Michael or associated War Memorial as there will be no significant inter-visibility between the proposed internal works or roof plant and the church or war memorial.

#### 18-62 Camden Road and attached railings

6.2.20. The terrace of 23 houses opposite the Sainsbury's supermarket, date from the early nineteenth century, and include some later shops. They are constructed in yellow stock brick (No. 28, is painted at first floor level) with rusticated stucco ground floors or stucco shopfronts. They are three storeys tall, (Nos. 26-62 with attic storeys, and basements).

#### Impact of the proposed scheme

6.2.21. The proposed scheme will cause no harm to the setting or heritage significance of 18-62 Camden Road or the attached railings and the only possible inter-visibility might be that from the uppermost windows of some of the houses within the listed terrace, the tops of the proposed cowls on the roof of the proposed Food Lab might be seen, but the cowls will be the same colour as the roof and the visual impact is considered to be negligible. The application site is already used as a training centre and as such the activity associated with the proposed use will not significantly affect the way that the listed Sainsbury's supermarket building is used or experienced.

#### Camden Town Conservation Area

- 6.2.22. The Camden Town Conservation Area lies approximately 50 metres to the west of the application site and there is limited inter-visibility between the Conservation Area and the Sainsbury's supermarket, looking down the Camden Road.
- 6.2.23. The Camden Town Conservation Area lies central to the Borough of Camden and the ancient north-south route, which has become Camden High Street, formed a spine along which development started over two hundred years ago.

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- 6.2.24. Typical of 19th century speculative development the plan form of the area evolved as a series of grid patterns, with streets of terraced houses. Around the two major junctions the plot sizes are more random particularly where larger late 19th and 20th century buildings occupy prominent focal positions and break the tight pattern.
- 6.2.25. Camden Road, running north-east from Britannia Junction, is flanked by a progression of terraces, commencing on the north side with the landmark public house, the Devonshire Arms, which was built on the corner of Kentish Town Road in the 1920s in a mock-Tudor half-timber style. It is abutted by a short row of three-storey later Victorian buildings topped by gables inspired by the architecture of the Low Countries. The World's End public house stands on the south side alongside Britannia Junction. Known as the Mother Red Cap until 1986, it is part of a terrace of buildings also designed by Henry H Bridgman originating from 1875.

#### Impact of the proposed scheme

6.2.26. The proposed scheme will cause no harm to the character or appearance of the Conservation Area and the proposed roof plant will not be visible from any public view (the sloping front section of the roof will obscure the cowls). The proposed Food Lab will be a positive addition that promotes the vitality and viability of the surrounding area.

#### Regents Canal Conservation Area

- 6.2.27. The application site stands within the Regents Canal Conservation Area boundary.
- 6.2.28. The special character of the Conservation Area is largely derived from the almost hidden nature of the canal. The surrounding townscape largely turns its back on the canal creating a tranquil space distinct from the business of the surrounding city. This character has in part arisen from the topography of the canal located as it is in shallow cuttings along part of its length and partly as a result of canal side development forming an effective barrier, cutting off views towards the canal.
- 6.2.29. Many of the industrial buildings and structures include interesting architectural details and fine examples of industrial brickwork, illustrating styles of engineering and construction techniques of the 19th and early 20th centuries; some building materials were produced in London and others brought in by the railways from the regions. Cast iron and wrought iron are well represented. The historic industrial use of the canal meant that warehouses and similar buildings on the canal edge had to be secure, as did the canal itself, so the ground floors often comprise solid brick structures. These add to the sense of enclosure of the canal and are an important part of its historic character. The change in use of the canal from industrial to leisure will be reflected in new approaches to the treatment of the canal edge, and this can be accommodated without necessarily losing the industrial quality of the area.

#### Impact of the proposed scheme

6.2.30. The proposed scheme will cause no harm to the character or appearance of the Conservation Area and the proposed roof plant will not be visible from any public view. The

proposed Food Lab use will be a positive addition that promotes the vitality and viability of Camden Town, and the Conservation Area.

### 6.3 SUMMARY OF THE IMPACT OF THE PROPOSED SCHEME UPON HERITAGE SIGNIFICANCE, AND HOW THE PROPOSED DESIGN WOULD MITIGATE ANY POTENTIAL HARM

- 6.2.31. This Heritage Assessment has been produced in accordance with paragraph 189 of the National Planning Policy Framework (NPPF), which requires that an applicant undertake an assessment of significance to inform the application process to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected.
- 6.2.32. The heritage statement has been produced by Nick Corbett BA Hons BPI MA IHBC MRTPI, who has over 25 years of heritage planning experience and has visited the listed building and surrounding conservation area to assess the heritage significance of potentially affected heritage assets. He has walked extensively around the site to appreciate the contribution of the listed building's setting to their significance. Historic England advice explains that significance is the sum of the heritage assets archaeological, architectural, historic, and artistic interest.
- 6.2.33. This Heritage Assessment follows the correct methodology as set out in the Historic England publication: 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' (Historic England Advice Note 12, October 2019); and Good Practice Advice (GPA) No 2, 'Managing Significance in Decision Taking in the Historic Environment' (July, 2015); which explain that the first step for any applicant is to identify the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance.
- 6.2.34. The proposed works are minor in nature and have been carefully designed to ensure that no harm will be caused to the listed Sainsbury's supermarket or to the setting of neighbouring heritage assets including St Michaels Church, War Memorial, 1-12 Grand Union Walk, the early nineteenth century terrace at 18-62 Camden Road, nor will there be any harm caused to the Camden Town and Regents Canal Conservation Areas, on the contrary the character of the Conservation Areas will be enhanced by the activity associated with the proposed Food Lab use.

### 6.4 LEGISLATION AND POLICY

6.2.35. The Planning (Listed Buildings and Conservation Areas) Act 1990 provides the statutory test for consideration of proposals affecting a listed building or its setting. Section 66 (1) states:

"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"

6.2.36. Section 72 of the Act requires that LPAs pay special attention in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area. An important issue to remember is that when considering harm, 'preserving' for the purposes of 1990 Act means 'doing no harm' (South Lakeland v Secretary of State [1992]). This is clarification that preservation does not preclude change to or within the setting of heritage assets. Preserving means not causing harm to the elements which comprise the asset's significance.

#### National Planning Policy Framework

- 6.2.37. The preservation and enhancement of heritage assets forms an important part of the National Planning Policy Framework (NPPF, 2019). Section 16, paragraphs 184 to 202 deals specifically with conserving and enhancing the historic environment.
- 6.2.38. The NPPF defines significance as being the "value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic interest". Importantly, it adds that significance is not only derived from an asset's physical presence, but also from its setting, that is "the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve" (Annex 2: Glossary).
- 6.2.39. Paragraph 189 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Similarly, there is a requirement on local planning authorities, having assessed the particular significance of any heritage asset that may be affected by a proposal, to take this into account when considering the impact of a proposal on a heritage asset (paragraph 190).
- 6.2.40. In determining planning applications, local planning authorities should take account of the following three points:
  - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 192).
- 6.2.41. Heritage assets can be harmed or lost through alteration, destruction or development within their setting. This harm, in respect to designated heritage assets, ranges from less than substantial through to substantial. With regard to designated assets, paragraph 193 states that the more important the asset, the greater the weight should be on its conservation. Distinction is drawn between those assets of exceptional interest (e.g. grade I and grade II\* listed buildings), and those of special interest (e.g. grade II listed buildings).

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- 6.2.42. In instances where development would cause substantial harm to, or total loss of significance of a designated asset, consent should be refused unless that harm or loss is 'necessary to achieve substantial public benefits that outweigh that harm or loss' (paragraph 195). In instances where development would cause less than substantial harm to the significance of a designated asset, the harm should be weighed against the public benefits of the proposal, including its optimum viable use (paragraph 196).
- 6.2.43. Paragraph 194 states that, 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'
- 6.2.44. Paragraph 197 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non designated heritage assets, a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage asset.
- 6.2.45. Paragraph 200 states that local planning authorities should look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting, that make a positive contribution to or better reveal the significance of the asset, should be treated favourably.

#### Historic England Guidance

- 6.2.46. Historic England Advice Note 12 Statements of heritage significance: analysing significance, is the Historic England advice note that covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets. The guidance has been consulted in the production of this heritage statement.
- 6.2.47. Historic Environment Good Practice Advice in Planning: 3 (2nd Edition), published 22 December 2017, has also been consulted as it sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

#### Camden Planning Policy

- 6.2.48. The Camden Local Plan includes Policy D2 Heritage. This sets out that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.
- 6.2.49. This policy also states the following:

"The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss"

6.2.50. Furthermore, the council places a strong emphasis on maintaining the character of Camden's conservation areas. The council requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area. With regard to listed buildings, the council will resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and resist development that would cause harm to significance of a listed building through an effect on its setting.

### 6.5 CONCLUSION

- 6.2.51. The proposed development comprises of internal works at first floor level within the existing grade II Sainsbury's supermarket and the installation of new plant equipment on the roof. These works are to facilitate the Food Lab facility, which seeks to locate within the existing store.
- 6.2.52. The detailed design proposed has been informed by a thorough heritage assessment and will ensure that whilst there will be some change to the internal layout of the first floor and roof level, this will cause no harm to the building's special architectural or historic interest. This is reinforced by fact that the works will be largely internal and that the Historic England listing states that the interior fittings, fixtures and non-structural partitions within the shop and in all back-of-house areas are not of special architectural or historic interest.
- 6.2.53. The public benefits of the scheme include job creation and promoting the commercial vitality and viability of Camden Town, as well as ensuring the listed building has a long-term viable future, including at first floor level.
- 6.2.54. The proposals are considered to be compliant with all relevant heritage legislation and policy.

### 7 KEY PLANNING ISSUES

### 7.1 PRINCIPLE OF DEVELOPMENT

- 7.1.1. Sainsbury's Supermarket Limited seek to rationalise existing floorspace across its stores as part of the transition to creating a more efficient business. The proposal involves the re-use of back of house space that is no longer required for office and training purposes, to create a space for Sainsbury's Food Lab, which trials and helps to create new food product ranges.
- 7.1.2. Policy G1 of the Local Plan sets out that the council will create the conditions for growth to deliver jobs and facilities and harness the benefits for those who live and work in the borough. This policy further states that the council will support development that makes best use of its site. Policy E1 further adds that the council will secure a successful and inclusive economy by creating the conditions for economic growth.
- 7.1.3. Furthermore, Chapter 11 of the NPPF (2019) emphasises that decision should promote the effective use of land and give substantial weight to the value of using suitable brownfield land in meeting an identified need.
- 7.1.4. The existing first floor of the store comprises of under-utilised office and conference space, storage and toilet facilities. The proposed development will enable the first floor to facilitate the Food Lab facility ensuring a successful relocation and requires minimal change to the building to facilitate. This will allow the Food Lab to continue to operate and will bring eight additional skilled jobs to the borough. Significant weight should be placed on the need to support economic growth and productivity, taking into account the business needs.
- 7.1.5. The benefit of relocating to this location not only that it is currently underutilised space but also that it is a highly sustainable and accessible location. All new staff would be able to travel to site by public transport or active methods of travel. There will be no additional requirement for car parking for staff and the existing basement parking arrangements are unaffected by this proposal.
- 7.1.6. The Transport CPG document sets out that applicants must provide, as a minimum, the quantity of cycle parking spaces as set out in the London Plan. London Plan Policy T5 sets out that for the first 1000sqm floorspace, 1 space is required per 250sqm and then 1 space per 1000sqm (GEA) thereafter. The proposed development <u>will not</u> create new floorspace and therefore, providing new cycle parking spaces is not required.
- 7.1.7. The site is also highly suitable because the site is able to accommodate deliveries and has a large existing service yard where deliveries for the Food Lab can be accommodated alongside the usual deliveries for the store.
- 7.1.8. The new ASHP and condenser units are required to facilitate the operations and additional storage of the Food Lab facility. These will replace redundant and decommissioned

equipment creating a highly efficient facility. The new plant is appropriately located and lie adjacent to existing plant equipment and have been carefully designed to complement the High Tech, industrial aesthetic of the building.

7.1.9. As such, the proposed development complies with Policies G1, E1, T1, T2, T3 and T4 of the Local Plan, Policy T5 of the London Plan and the NPPF (2019).

### 7.2 NOISE

- 7.2.1. Policy A1 of the Local Plan states that the Council will seek to protect the quality of life of occupiers and neighbours. This is further reinforced by Policy A4 which states that the Council will seek to ensure that noise is controlled and managed and permission will not be granted if the development is likely to generate unacceptable noise impacts. Furthermore, this policy states that the Council will only grant permission for noise generating development, if it can be operated without causing harm to amenity.
- 7.2.2. The nearest residential properties are located approximately 25 metres to the south east and Camden Road separates these properties from the site.
- 7.2.3. An Acoustic Report, prepared by WSP, supports this application. The assessment concludes that the predicted values for noise associated with the proposed plant, including the night and day time values are highly unlikely to cause a disturbance to any nearby residents and would comply with local policies.
- 7.2.4. Therefore, the proposed development will not cause significant harm from adverse impacts from noise on the health and quality of life of future residents in accordance with the policy aims of the Policy A1 and A4 of the Local Plan, Policy D14 of the London Plan and the NPPF.

### 8 CONCLUSION

- 8.1.1. The proposals seek internal alterations to the listed building and the installation of new plant and associated equipment. These proposals are to facilitate the locate the Food Lab facility within the existing Sainsbury's store at 17-21 Camden Road, London, NW1 9LS.
- 8.1.2. The proposals are fully integrated into the building and are there are very minor in nature. The proposals have been carefully designed to ensure that they will not harm the significance of the Grade II Listed Building's special architectural and historic interest. Furthermore, the proposals will respect the character of the Camden Town and Regents Canal Conservation Area.
- 8.1.3. The proposals do not create any new floorspace or require variation to existing consents as the proposed use falls within current permitted development rights. The proposal utilises back of house space no longer required for its current use and brings an integral part of Sainsbury's business to the Borough, adding vitality to the area. The existing operational arrangements of the store can accommodate the Food Lab's requirements.
- 8.1.4. The site is located in a highly sustainable and accessible location and it is expected that all new staff will travel to and from site by public or active transport. There will be no adverse noise impact from the new rooftop plant on the nearest residential properties.
- 8.1.5. The proposed development will allow the Food Lab to continue operating within the local area during a period of economic uncertainty. The proposed development will provide employment opportunities and bring eight skilled jobs to the Borough.
- 8.1.6. Overall, the proposed development is in accordance with national and local planning policy and should be granted planning permission and listed building consent. We trust that you have sufficient information to validate and determine this application. However, should you require any further information, please do not hesitate to contact me.

### 9. APPENDICES

### 9.1. APPENDIX 1: SITE PHOTOGRAPHS

Image 1: View of the Sainsbury's store from Camden Road

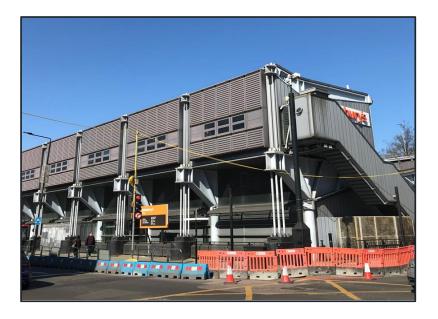


Image 2: View of the Sainsbury's store from Camden Road



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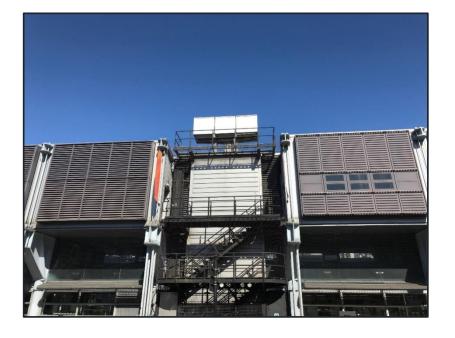


Image 3: View of the Sainsbury's store from Camden Road

Image 4: View of the Existing First Floor of the Sainsbury's store



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Image 5: View of the Existing Roof of the Sainsbury's store

Image 6: View of the Existing Roof of the Sainsbury's store



# vsp

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wsp.com