

# PLANNING STATEMENT

**178B ROYAL COLLEGE STREET; AND ARCHES 74  
AND 75 AND PART OF ARCH 73 RANDOLPH STREET;  
LONDON, NW1 0SR**

**ON BEHALF OF JACUNA**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**



**Pegasus Group**

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent

**DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE**

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Group.

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Copyright Pegasus Planning Group Limited 2011. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited

## **CONTENTS:**

Page No:

<b>1.0</b>	<b>Introduction .....</b>	<b>1</b>
<b>2.0</b>	<b>Application site context .....</b>	<b>3</b>
<b>3.0</b>	<b>Proposed development .....</b>	<b>6</b>
<b>4.0</b>	<b>Decision making context.....</b>	<b>9</b>
<b>5.0</b>	<b>Planning assessment .....</b>	<b>10</b>
<b>6.0</b>	<b>Conclusion .....</b>	<b>14</b>

---

---

## **1.0 Introduction**

**1.1** This Planning Statement has been prepared on behalf of Jacuna in support of an application made to London Borough of Camden ("the Council") for (retrospective) full planning permission at 178B Royal College Street; and Arches 74 and 75 and part of Arch 73, Randolph Street; London, NW1 0SR ("the application site"). The application seeks the following "proposed development":

*"Amalgamation of 178B Royal College Street with Arches 74 and 75 and part of Arch 73 to create a single planning unit to be used as a commercial kitchen and delivery centre with ancillary offices (sui generis). External alterations to shopfront of 178B Royal College Street and provision of plant and machinery to the rear of the Arches 73, 74 and 75."*

1.2 As noted above, this is a retrospective planning application – the proposed change of use and physical works sought have been carried out. This includes the provision of plant and machinery that has recently been installed to mitigate noise and odour. This has now ensured that neighbouring residents do not experience any harmful effects to their amenity.

1.3 The purpose of this Planning Statement is to set out why planning permission should be granted for the proposed development. It would comply with the development plan and would have support from national government planning policy, which seeks to facilitate economic growth.

1.4 Jacuna are an emerging business that operates commercial kitchen and delivery centres across London, Birmingham, Manchester, and Leeds. Commercial and kitchen delivery centres provide bespoke kitchen and cooking facilities for restaurants and kitchen businesses, that cook food that is then delivered to customers via an order on a mobile phone application ("app"). They cater for established restaurant brands as well as new start-up kitchen businesses that do not wish to take the financial risk of opening a brick-and-

---

mortar restaurant.

1.5 Many restaurants have failed to meet the expectations of "millennials" and "Gen-Zs" and are struggling to stay in business. The founders of Jacuna have been in the food industry for over ten years and know how hard it is for chefs and caterers to make a living doing what they love. That is why the Jacuna business was created: so that restaurant and kitchen businesses can share the rent and keep their profit. Jacuna's aim is to provide food brands with quality facilities, in the very best locations around London and other UK cities. Jacuna wants to give the next generation of restaurant and kitchen brands everything they need, so they can focus on what's important: their food.

1.6 The Planning Statement is structured as follows:

- Application site context
- Proposed development
- Decision-making context
- Planning assessment
- Conclusion

---

## **2.0 Application site context**

### **Application site and surroundings**

- 2.1 The application site is made up the building at 178B Royal College Street (hereafter referred to as "No178B"); and the railway arches underneath the London Overground railway line known as Arches 74 and 75 and part of Arch 73, Randolph Street.
- 2.2 No178B is a three-storey building set within a terrace that runs along Royal College Street. The ground floor is currently being used as the office for Jacuna (which on its own would be Use Class E). Prior to this, it was used as a café (Use Class E). The upper floors (which do not form part of the application site) are in residential use. The remainder of the terraces are generally in commercial use at ground floor and residential use at the upper floors.
- 2.3 The London Overground railway line runs diagonally north-west to south-east to the rear of No178B, and underneath the railway line within the viaduct are Arches 73 to 80. Arches 74-75, which are being used by Jacuna for its commercial kitchen and delivery centre, are located at the far eastern end of the viaduct, before it runs above Royal College Street. The remaining arches (not part of the application site) are used by Getir and Wineapp as delivery centres for app-based shopping.
- 2.4 Vehicular access to the arches is gained from Randolph Street and runs to the rear of the viaduct and where the frontage to the arches is located. The rear of Arches 73-75 internally adjoin with the rear of No178B.



- 2.5 The surrounding area is made up of a mix of uses. Royal College Street intersects with Camden Road, where Camden Road London Overground station is located and which contains a variety of commercial and residential uses. Randolph Street is mainly residential in use, and adjacent Rousden Street contains residential buildings that overlook the front of the arches.
- 2.6 Camden Town is located approximately 250m to the south of the application site, and Kentish Town is located approximately 300m to the north of the application site.
- 2.7 The application site is located within Flood Zone 1, which has the lowest risk of flooding. There are no statutorily listed buildings at the application site. The buildings at 25-28 Randolph Street, adjacent to the application site, are statutorily listed (Grade II).

## Planning history

- 2.8 The governing planning permission for the use of 178A and 178B Royal College Street and Arches 73, 74, 75, 76, 77, 79 and 80 is planning permission 2018/0565/P, granted 29 May 2018. This allowed:

*"Change of use of arches (73, 74, 75, 76, 77, 79 and 80) from offices (B1) to storage (B8). Change of use at ground floor of 178A and B Royal College Street from retail (A1), tattoo parlour (sui generis) and cafe uses (A3) to retail use (A1). Erection of a covered access extension to rear of arches 73-75."*

- 2.9 It is understood that Getir is operating under this permission. Jacuna were previously also of the belief that its commercial kitchen and delivery centre was within Use Class B8 and could operate under this permission. However, the Council served a Planning Contravention Notice on Jacuna on 21 May 2021 to advise that its operation is sui generis, and that planning permission is required to change the use from Use Class B8. This planning application therefore seeks to rectify the situation.

---

### **3.0 Proposed development**

3.1 The description of development for the proposed development is the following:

*"Amalgamation of 178A Royal College Street with Arches 74 and 75 and part of Arch 73 to create a single planning unit to be used as a commercial kitchen and delivery centre with ancillary offices (sui generis). External alterations to shopfront of 178A Royal College Street and provision of plant and machinery to the rear of the Arches 73, 74 and 75."*

3.2 As explained in the Introduction, the proposed development is for retrospective planning permission.

3.3 The proposed development would comprise the following:

#### **Use and its operation**

3.4 The proposed development seeks to amalgamate all aforementioned arches and No178B to form a single planning unit. The use of the newly created planning unit would be "sui generis." The delivery element on its own would be within Use Class B8, and the commercial kitchen and office element on their own would be within Use Class E; however when mixed they do not fall squarely within any use from the Use Class Order and the mix of uses are therefore sui generis.

3.5 The arches would contain the commercial kitchen element of the proposed development – there would be 16 kitchen "pods" each used by different chefs / brands / businesses. Cooking at the kitchen pods would take place between 10:00 and 24:00 and the arches would be open from 08:00 till 24:00 for cleaning and general management and maintenance.

3.6 No178B would act as office space for Jacuna and the management of the operation. It would also be open from 08:00 to 24:00 for cleaning and general



---

management and maintenance, and since it would be physically linked to the arches behind.

## **Deliveries and servicing**

- 3.7 Full details are set out in the submitted Operational Management Plan (OMP). By way of summary the delivery and servicing will operate as follows:
- 3.8 Delivery riders would enter the application site at Randolph Street and immediately turn left, to park their bikes at the designated waiting area (which is a yard in front of the arches and under the railway line). They would then walk by foot to the arches to pick up the cooked food from the kitchen before walking back to their bikes. For avoidance of doubt, delivery riders are not permitted to enter the arches using their bikes – bikes are to remain in the designated area. In addition, a marshal will manage the application site from 12:00 till 00:00 Monday to Sunday.
- 3.9 The application site would be serviced by vehicles from suppliers of fresh food, oil and packaging. It would also receive several small independent deliveries, most likely from local London-based suppliers.
- 3.10 To avoid conflicts with delivery riders, supplier deliveries to the application site would only be permitted during the hours of 08:00 to 16:00, Monday to Saturday. Supplier deliveries would not be permitted on a Sunday or a Bank Holiday. Typical delivery amounts would be nine in the morning hours and six in the afternoon hours.
- 3.11 Refuse will be stored in general waste and recycling bins to the rear of the designated delivery rider area. It is then managed and picked up by Biffa.

## **External alterations to shopfront**

- 3.12 The shopfront to No178B would be subject to external alterations. The

previous café and its dilapidated frontage would be refurbished and painted in a black and white colour palette. The glazed shopfront would also be kept open and active during normal business hours.

### **Provision of plant and machinery**

- 3.13 External plant and machinery would be provided at the rear, attached to the arches and above the entrance to the arches. This plant and machinery is comprised of extractors and other equipment that mitigates noise and odours from the proposed development.

---

## **4.0 Decision making context**

- 4.1 Section 38 of the Planning and Compulsory Purchase Act 2004 requires applications for development to be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The Council's Development Plan is made up of its Local Plan (2017), Site Allocations Plan (2013), Euston Area Plan (2015), and the Mayor's London Plan (2021).
- 4.3 The Council's adopted Policies Map, which shows development plan allocations and designations, shows No178B to lie within Camden Road Conservation Area. The railway arches are not part of this conservation area, however the properties to the rear at Rousden Street are. The Policies Map also shows No178B to lie within Royal College Street Neighbourhood Centre.
- 4.4 Relevant development plan policies, including those related to the application site's designations, are assessed in the next chapter.
- 4.5 The Site Allocations Plan is under review and a draft version was consulted upon in early 2020 – it does not however contain any proposed allocations for the application site and is therefore not relevant.
- 4.6 The government's National Planning Policy Framework (NPPF) (2021) is a material consideration of significant weight. Its relevant policies are assessed in the next chapter.

---

## 5.0 Planning assessment

- 5.1 The following matters are considered relevant to the proposed development and are assessed: (1) principle of development, (2) design and heritage, (3) deliveries and servicing, and (4) noise and odour.

### Principle of development

- 5.2 The principle of development is considered to be acceptable and firmly in line with the relevant development plan policies and the NPPF. It is assessed in the following subheadings in relation to: (1) the use of Arches 74, 75 and part of Arch 73 for a commercial kitchen and delivery centre, and (2) the use of No178B as ancillary office space.

### Use of commercial kitchen and delivery centre in Arches 74, 75 and part of Arch 73

- 5.3 The creation of a commercial kitchen and delivery centre at the application site would comply with London Plan Policy E2, and Local Plan Policy E1, both of which seek to support businesses of all sizes and in particular start-ups and small and medium enterprises (SMEs), and Local Plan Policy E2, which supports the continues provision of employment premises, in particular those for small businesses.
- 5.4 The arches, although not specifically designated by policy, were established by planning permission 2018/0565/P as previously being in office use and accepted for a storage and distribution use, albeit they have had periods of vacancy for many years. Therefore, the principle of an employment use has a longstanding establishment and the continued use for the site for employment purposes is thus acceptable.
- 5.5 In fact, the particular use proposed for the arches ought to gain an emphasised level of support on account of it being a start-up and an SME. Jacuna is a

young and innovative business and their economic growth is exactly that which should be facilitated by planning policy. Jacuna itself would employ only a modest amount of people at the application site for management and administration purposes, but the application site would indirectly generate approximately 40 amount of new jobs – these would be chefs working in the kitchens, delivery riders, and marshals. In other words, the proposed use for the application site would have a high job density, particularly when compared with a normal storage and distribution use, as permitted. Plus, the Jacuna model acts as a platform for chefs to test the market before going on to potentially opening their own restaurants as well.

- 5.6 The economic benefits of the proposed development would also comply with the NPPF and paragraph 81, which states: "*Planning policies and decisions should **help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.***" [our emphasis]

#### **Use of office in No178B**

- 5.7 The use of No178B as office floorspace, ancillary to the commercial kitchen and delivery operation, would be acceptable in principle.
- 5.8 The previous use of the unit was as a café, which was previously within Use Class A3 and is now within Use Class E. An office use was previously within Use Class B1 and is now within Use Class E. Therefore, an office use for the unit on its own would therefore not require planning permission as a café and an office are now within the same Use Class E. This is a material consideration that should be given significant weight. Thus, the Council should have no in-principle objection to the use of this unit as ancillary office floorspace.

#### **Design and heritage**

- 5.9 The external alterations to the shopfront of No178B would preserve the

character and appearance of Camden Road Conservation Area and improve the character and appearance of Royal College Street Neighbourhood Centre. This would comply with Local Plan Policy D1, which seeks high quality design generally and including design that preserves or enhances the historic environment, and Local Plan Policy D2, which seeks to preserve, and where appropriate, enhance heritage assets and their settings, and Local Plan Policy D3, which seeks a high standard of design for altered shopfronts at neighbourhood centres.

5.10 As set out in the submitted Heritage Statement, the previous shopfront for the café was in a dilapidated state and was considered to detract from the character and appearance of both the of Camden Road Conservation Area and Royal College Street Neighbourhood Centre. The new shopfront would be repainted in a simple black and white colour palette and with a large glazed and open frontage. The appearance of the shopfront itself would be contemporary but the positively-contributing elements on the building, such as the arched recesses at first floor level and flat arches above the windows at the upper levels, will continue to be understood. Given modern shopfronts are present in the immediate surroundings, the proposals are entirely in keeping with the character of the area.

5.11 The external alterations to the rear at the arches comprises the installation of machinery related to noise and odour mitigation. This is not seen from any public viewpoint and therefore its effect is considered to be negligible.

### **Deliveries and servicing**

5.12 The deliveries and servicing associated with the proposed development would be managed, safe, and would not harm the amenity of neighbouring residents, in accordance with Local Plan Policy A1.

5.13 The submitted OMS sets out in detail how deliveries and servicing would take place (and as summarised in Chapter 3 of this Planning Statement) in a managed way and during non-noise sensitive hours of the day. The provision

---

of a dedicated delivery rider area at the front of the arches (away from neighbouring properties) is of particular relevance in ensuring amenity would not be harmed.

## **Noise and odour**

- 5.14 Noise and odour levels from the cooking of food and the associated plant and extraction would not be harmful to neighbouring residents, in accordance with Local Plan Policy A1.
- 5.15 An Odour Assessment is submitted with the application, and it sets out how the proposed mitigation (the ventilation extraction within and at the outside of the arches) ensures that the neighbouring residents experience a negligible effect in terms of odours, and as calculated using the industry-standard IAQM guidance.
- 5.16 Similarly, a Noise Assessment is submitted with the application and it sets out how the proposed mitigation (duct silencers and acoustic enclosures fitted within the ventilation extraction) does not harm neighbouring amenity and ensures the relevant British Standards for noise are complied with.

---

## **6.0 Conclusion**

- 6.1 Planning permission ought to be granted for the proposed development, because it complies with the adopted development plan and receives support from the NPPF, which is a material consideration of significant weight.
- 6.2 The principle of development would be acceptable. The Council's development plan seeks to support businesses of all sizes and in particular start-ups and SMEs (which would include Jacuna). The proposed development would see the creation of over 40 jobs at the application site and the NPPF gives significant weight to proposals that facilitate economic growth.
- 6.3 The shopfront at No178B would be improved and would retain the significance of the Camden Road Conservation Area; and this part of the application site's use would be as an office, which is appropriate for its Neighbourhood Centre designation.
- 6.4 Deliveries and servicing would be managed in a comprehensive manner and in accordance with an OMP. The provision of a dedicated delivery rider area at the front of the arches (away from neighbouring properties) is of particular relevance in ensuring amenity would not be harmed. Amenity of neighbouring residents would also not be harmed by virtue of noise or odours – technical reports are submitted to explain how the plant and machinery to be installed would mitigate any adverse effects.