

Land and buildings to the north of Regis Road, Kentish Town,  
London NW5 3EW | **Planning Statement**

**Firstplan Ref:** 21370/MM/AB/IK/JH

**Date:** 28 January 2022

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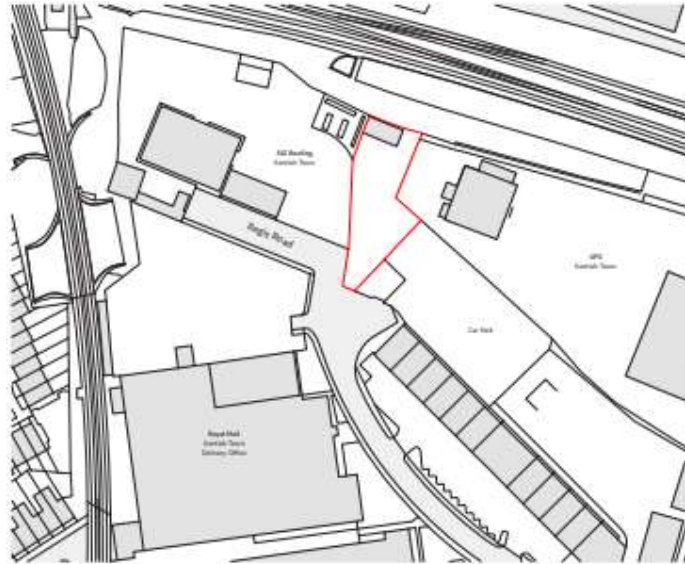
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# Section 1 Introduction

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- 1.1 This Planning Statement has been prepared by Firstplan in support of a part-retrospective planning application by REEF London Limited ('REEF') at the Land and buildings to the north of Regis Road, Kentish Town, London as identified on the site plan at **Figure 1.1** below.



- 1.2 The application submitted to London Borough of Camden ('LB Camden') seeks part-retrospective, temporary planning permission for a period of five years relating to the change of use of a former open storage and parking area at the above location to facilitate the provision of a mixed-use (Sui Generis) development comprising of commercial delivery kitchens, urban farming pod units, a 'dark' food distribution unit, electric vehicle charging bays and an electric bicycle testing/sales unit with staff office.

- 1.3 Specifically, the application is for the following:

**'Part-retrospective application for siting of containers and change of use of open storage and parking area to commercial kitchen units, vertical farming units, online grocery distribution facility, electric bicycle testing and charging facility with staff office and communal staff rest area and electric vehicle charging bays.'**

- 1.4 The application is made on behalf of our client REEF Technology ('REEF'). REEF specialise in in creating mobility and urban logistics hubs, bringing together a range of uses to facilitate sustainable 'last mile'

deliveries, distribution and improve local access to produce, services and infrastructure. REEF are an established and highly successful operator in North America, and have recently begun a programme of expansion in London. The application site will be one of REEF's first UK sites.

- 1.5 REEF are focusing on established, previously developed locations with appropriate infrastructure situated away from residential properties. An opportunity has arisen at the application site which meets the operational and locational requirements for the concept. Indeed, the site is identified as within a designated 'growth area' and located away from any residential properties.
- 1.6 In order to assist the Council with their assessment of the proposals, a full set of planning drawings, a Design & Access Statement, and supporting technical reports have been submitted in support of the application. These documents have assessed key planning considerations including the impact of the proposed development in relation to noise, odour, the local highway network and ecology and are considered in further detail at Section 5 of this Statement. These reports confirm that the proposed use can operate from the site without resulting in a detrimental impact on the existing uses in the area.
- 1.7 As is evidenced within this Statement, the proposals are deemed acceptable in all regards and are therefore in accordance with adopted local and national planning policy. As such, we respectfully request that planning permission is granted without delay.
- 1.8 This Statement is structured as follows:
  - **Section 2** provides the relevant background information, including a description of the site and relevant planning history
  - **Section 3** sets out the application proposals;
  - **Section 4** outlines the national and local planning policies relevant to the application;
  - **Section 5** assesses the proposed development and demonstrates its acceptability; and
  - **Section 6** draws conclusions

## Section 2 Background Information

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### a) Site and Surrounding Area

- 2.1 The application site comprises an existing open yard that lies to the north of Regis Road, Kentish Town, located within the Kentish Town Industrial Estate in the London Borough of Camden. With Regis Road to the south, a large logistics/distribution site lies directly to the east. The premises that lies adjacent to the west also has an employment function, being operated by a roofing materials supplier. Just beyond the northern boundary of the site lies a railway line which runs from east to west to the north of the site. The northern boundary of the site forms the embankment to the railway line and is heavily planted.
- 2.2 Access to the site is provided through a metal gate on the western boundary, where access is taken from Regis Road. Regis Road facilitates two-way traffic and allows for parking on the southern side. Regis Road adjoins Kentish Road (A400) in an easterly direction which later meets Camden to the south and Kentish Town Highstreet to the north.
- 2.3 The storage yard is enclosed by a steel fence which is estimated to be 2.5 m in height apart from the northern boundary of the site in which is bordered by a brick wall. A hardstanding surface covers the entirety of the site with the addition of a portacabin building in the northwest corner which will be retained as part of the application proposals. The application site and its surrounding context is depicted in the aerial photograph at **Figure 2.1** below.



- 2.4 The most prominent land use within the surrounding area are light industrial and logistical uses with several large warehouses in the vicinity of the site. Notably, the Royal Mail Kentish Town Delivery Office is located 14m to the southwest of the site, and the Council's recycling centre 'Regis Road Recycling Centre' is located 150m to the southeast.
- 2.5 To the southeast of the site is an area of surface car parking, and to the south of this is a parade of light industrial/business units which front onto the eastern side of Regis Road. It would appear that a number of dark kitchen/delivery facilities operate from these premises; operators listed on Google include 'Karavlaki Kentish Town' (Units 9-11 Regis Road) and 'Patate French Burgers' which operates from JML House within the same development.
- 2.5 The site does not lie within a conservation area, nor are there any listed buildings within the site boundary. The nearest Conservation Area is the Inkerman Conservation Area, which lies approximately 200m to the south of the site.
- 2.6 The site is not at risk of flooding and is situated in Flood Zone 1. The Public Transport Accessibility Level (PTAL) of the site is 4, on a scale where 0 is the worst and 6b is the best. As such, the site is in an accessible location. Further details of local transport connections are set out in the submitted Transport Assessment.

**b) Planning History of the Site**

- 2.7 There is no planning history available for this site on the Council's public access website. Historic aerial imagery from Google Earth shows that the site has previously been used for car sales.

## Section 3      Application Proposals

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### a)      The Proposed Use

#### i)      REEF Technology – The Concept

3.1      REEF Technology is North America’s largest network of mobility and urban logistics hubs, with an ‘ecosystem’ of 5,000 locations and a team of 15,000 employees working across 200 cities. REEF’s mission is to transform underutilised or redundant urban spaces into community hubs that bring new goods, services and experiences to areas; facilitate efficient and environmentally conscious ‘last mile’ deliveries; and yield new local employment opportunities in turn.

3.2      The business started life in 2013 as a parking management tech company called ParkJockey, which used technology to make better and more efficient use of car parks in the USA. The founders soon recognised that many of the car parks in the company’s portfolio were either wholly or at least partially underutilised and that these spaces offered significant potential for redevelopment as community hubs. To create these community hubs, REEF provides the physical and technological infrastructure to establish opportunities for businesses who cannot afford to penetrate or expand in high-density areas because of limited space and high start-up costs. Businesses that are struggling to meet existing demand for quick deliveries or seeking to establish a delivery service can also partner with REEF to reach more customers at a lower cost.

3.3      One of the principal uses or ‘applications’ which will anchor most REEF sites are delivery kitchens, which provide restaurants with the ability to expand their footprint and customer reach without spending any capital on a traditional ‘bricks and mortar’ restaurant. Delivery kitchens also enable those living within the defined radius of the site to get hot and fresh food delivered to their door. REEF refer to their delivery kitchens as ‘vessels’ and configures them based on end user requirements.

#### ii)      REEF Kitchens EK

3.4      These vessels are designed and operated by REEF to provide commercial ‘delivery-only’ kitchen facilities for occupation by a range of different restaurant operators, from start-ups to established restaurants seeking to expand their food offering to a wider catchment. Within each pod, there is space for up to five separate restaurants to operate side-by-side, providing the opportunity for local (or national/



multiple) restaurant operators to ‘test the waters’ for providing their offering for delivery. The key benefit of this arrangement is the financial saving for restaurants in avoiding the often-prohibitive start-up and operational costs associated with establishing a new (or expanding/modifying) an existing ‘bricks and mortar’ restaurant.

iii) REEF Retail

- 3.5 The REEF retail distribution unit will be operated by REEF Kitchens as a food distribution unit selling non-perishable items to customers via delivery service platforms. As such, there will be no customer-facing element and no customer access to the site. The operation will offer start-up, small and medium food and snack brands a platform to expand their reach without capital investment and provide a convenience retail option to the local community.

iv) Wendy’s

- 3.6 Wendy’s is an American international fast food restaurant chain which has been trading since 1969. There are currently in excess of 6,800 Wendy’s restaurants in operation in both the USA and in 29 other countries worldwide. The majority of restaurants are franchised, whilst a small percentage are company-owned (as of 2020, 6,467 restaurants were franchised and 361 were company owned.)
- 3.7 Over 90% of Wendy’s locations are located in North America, although the chain has previously operated in the UK, serving the market from 1980-1986 and again from 1992 to 2000. After a 20 year hiatus, in May 2021 Wendy’s announced their return to the UK market, with plans to eventually open up to 400 new locations nationwide. The first new UK restaurant opened in Reading in June 2021, followed closely by Oxford and Stratford.
- 3.8 To support the company in its UK re-emergence and future expansion, Wendy’s have partnered with REEF to establish commercial delivery kitchen pods at various locations across London either as standalone applications or to be operated alongside a range of other uses within REEF’s neighbourhood hubs.

v) UBCO

- 3.9 UBCO originates from New Zealand and is a Utility Electric Vehicle (UEV) manufacturer producing motorcycles for on and off-road use. Founded in 2015, the company developed the world’s first production Dual Electric Drive Bike. With a focus on function and simplicity, the UBCO utilises advances in electric motor design and battery technology to deliver a whisper-quiet connected utility vehicle that

embraces portable energy. UBCO has rapidly developed into a digitally connected UEV platform including on and off-road transport, portable power, accessories, and subscription software. The company provides a complete solution, from an individual user to a fleet manager across a wide range of applications.

- 3.10 On site, the UBBO container will provide easy access to test riders for potential customers, whilst also providing an office base and meeting space for UBCO members of staff to pursue business and consumer opportunities. Furthermore, bikes will be stored, charged and serviced within the container.

vi) Crate to Plate

- 3.11 Crate to Plate is an urban farming operator, founded with the mission of bringing sustainable, local production of leafy greens to urban communities. The company's founder believes that consumers in cities should have ease of access to a range of high-quality food, free of pesticides, which hasn't been shipped from afar to be consumed several days after harvest. As a result, Crate to Plate are passionate about the concept of '15-minute cities' where everyone has access to fresh produce within 15 minutes from their homes.
- 3.12 Operating from efficiently designed and laid-out containers provide Crate to Plate with a great level of flexibility over the locations in which the vegetables can be produced. As a result, the produce can be grown in a multitude of locations (facilitated by REEF) across Central and Greater London, where it will be delivered to the consumer within 24 hours of harvest.
- 3.13 The urban farms, also known as 'vertical farms' use hydroponic technology to grow vegetables indoors without using soil. Hydroponic technology is the method Crate to Plate use to allow the farmers to carefully control the environment inside the farms. By using the latest technology and eco-friendly innovation, their meticulously monitored vertical farms ensure that greens can be grown locally in urban environments, all year round, using minimal water, with zero carbon footprint in transporting from farm to customer.

vii) bp pulse Electric Vehicle Charging

- 3.14 Chargemaster Limited, branded as bp pulse, is a leading supplier of charging infrastructure for electric vehicles based in the UK. The company provides charging units for home, business and public use, and operates the largest electric vehicle public charging network in the UK. Chargemaster is also the only company in the UK to manufacture rapid chargers for electric vehicles.

- 3.15 Chargemaster has partnerships with several vehicle manufacturers including BMW, Kia, Mercedes-Benz, Renault and Mitsubishi to provide home charging units for owners of electric vehicles. The company is also the home charging partner for the London Taxi Company, providing charging units for drivers of its plug-in hybrid taxi models.
- 3.16 The company's workplace charging units are approved by the Government's Office for Zero Emission Vehicles and are eligible for the government's Workplace Charging Scheme, which subsidises the cost of the purchase and installation of electric vehicle charge points, for eligible businesses, charities and public sector organisations. Chargemaster has also installed over 600 charge points for more than 50 local authorities.
- 3.17 The company also operates 'bp pulse' with in excess of 5,000 public charge points. The network is accessible via either a pay-as-you-go 'instant access' scheme or a monthly subscription scheme, with charging points accessed via a card or fob. Bp pulse's goal is to make electric vehicle charging easier for its customers and partners.

**b) Site Layout and Operation**

- 3.18 REEF intend to redevelop the site to establish a mixed-use urban mobility and logistics/distribution hub which provides a range of amenities and services as described above, including commercial kitchens, urban farming pods, grocery dispatch facilities, electric bicycle charging/testing facilities and electric vehicle (EV) charging bays for public use. The proposed buildings will provide a total floor area of 250.9 sqm.
- 3.19 The existing and proposed layouts of the site are detailed in full on the architectural drawings prepared by project architects, Office S&M, and which should be read in conjunction with this Planning Statement as well as the submitted Design & Access Statement. The site is currently part-operational and at present there are two REEF delivery kitchens, one Wendy's delivery kitchen, two Crate to Plate pod units, staff welfare facility and online grocery warehouse in situ. As such, this application is submitted as being part-retrospective. Planning permission is sought for a temporary period of 5 years from the decision date.
- 3.20 The proposed layout introduces 6no. electric vehicle (EV) charging bays along the eastern boundary of the site, opposite the site access point from Regis Road. In the south-eastern corner of the site are the shared refuse and recycling storage facilities. To the site's western boundary, a new pod container unit is introduced to house bicycle storage and charging facilities, as well as a staff office for UBCO. The REEF

kitchen currently in situ in this location is to be relocated to the north-eastern corner of the site and will be 'double-stacked' with an additional REEF delivery kitchen atop. A metal staircase and access walkway will provide access to the first-floor unit. The Wendy's delivery kitchen unit is to remain in its current position, as is the case for the staff welfare facilities, online grocery warehouse and the two Crate to Plate vertical farming pod units.

- 3.21 In terms of the REEF and Wendy's delivery kitchens, the company estimates that the peak periods for deliveries will be after 6pm on Fridays and Saturdays and after 5pm on Sundays. These periods are outside of typical highway network peak hours.
- 3.22 Delivery riders will principally use a mix of pedal cycles and motorised scooters. When not in use during operational hours, delivery bikes and scooters will be taken away from the unit by the riders. There will be no storage of bikes on the site overnight.
- 3.23 The proposals incorporate a dedicated waste, refuse and recycling area within the site boundary as shown on the proposed layout drawing ref. 110.
- 3.24 The proposed operations will create approximately 38no. new jobs in a variety of roles based on site, in addition to additional employment opportunities for delivery riders employed by the associated delivery partners.
- 3.25 To help officers with their assessment, the application is further supported by the following suite of technical reports:
- Design & Access Statement, prepared by Office S&M;
  - Transport Statement, prepared by TTP;
  - Travel Plan, prepared by TTP;
  - Delivery and Servicing Plan, prepared by TTP;
  - Noise Impact Assessment and Ventilation Details , prepared by Tetra Tech;
  - Air Quality Assessment, prepared by Tetra Tech;
  - Odour Assessment, prepared by Tetra Tech (included within Air Quality Assessment);
  - External Lighting Assessment, prepared by Synergy Building Services;
  - Preliminary Ecological Appraisal, prepared by Southern Ecological Solutions.

## Section 4 Planning Policy Context

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4.1 The Statutory Development Plan for the site comprises the London Plan (2021) and the Camden Local Plan and Policies Map (2017). In addition to these documents, there are a number of supplementary planning documents (SPD's) that are of relevance to the site and will be considered. The National Planning Policy Framework (NPPF, 2021) is also a material consideration.

**a) National Planning Policy Framework (NPPF, 2021)**

4.2 The NPPF sets out the overarching planning framework for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development.

4.3 Section 2 discusses sustainable development, which is defined at **Paragraph 8** as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Indeed, the inherent purpose of the planning system is noted as contributing to the achieving of such development, with **Paragraph 10** stating that at the heart of the NPPF lies the presumption of favour of sustainable development. **Paragraph 11** affirms that in terms of decision-making, this is to equate to "approving development proposals that accord with an up-to-date development plan without delay".

4.4 **Paragraph 38** sets out that local planning authorities should approach decisions in both a positive and creative way and that they should work with applicants to secure development that will improve the economic, social and environmental conditions of an area, thereby setting the precedent that applications for sustainable development should be approved wherever possible.

4.5 **Paragraph 47** further stipulates planning applications must be determined in line with the relevant development plan unless material considerations indicate otherwise.

4.6 **Section 6** contains guidance for achieving a strong and competitive economy. **Paragraph 81** states that:

**"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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global**

leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”

- 4.7 **Paragraph 82** goes on to require planning policies and decisions to be flexible enough to accommodate needs not anticipate in the plan, allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances. (Our underlining)
- 4.8 **Paragraph 83** concludes that:
- “Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations”
- 4.9 **Section 8** is centred on promoting healthy and safe communities. In particular, **Paragraph 92 (c)** states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles through the provision of access to healthier food.
- 4.10 **Section 9** focusses on promoting sustainable transport, with **Paragraph 104** advising that transport issues should be considered from the earliest stages of development proposals.
- 4.11 **Paragraph 106** sets out that planning policies should sustain an appropriate mix of uses to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. **Paragraph 111** states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.12 **Section 11** provides guidance on making effective use of land, with **Paragraph 120** stating that planning policies and decisions should encourage multiple benefits from urban land and give substantial weight to the use of suitable brownfield land.
- 4.13 In respect of design principles, **Paragraph 126** establishes that the creation of high-quality buildings and places is a pivotal component of the planning and development process, with good design forming a central facet of sustainable development. In line with **Paragraph 130**, proposals should: function well and contribute to the overall quality of an area; be visually attractive and responsive to the local character of an area whilst optimising the potential of the site.

**b) London Plan (2021)**

- 4.14 The London Plan was adopted in March 2021 and provides the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of the capital.
- 4.15 **Policy GG1** identifies the need to help deliver strong and inclusive communities within which a wide range of economic and other opportunities continue to be supported and which provide access to good quality services, amenities and infrastructure.
- 4.16 **Policy GG2** goes on to emphasise the need to make the best use of land, particularly on small sites (sub 0.25 hectares) within and on the edge of town centres; whilst also maximising the development potential of sites. The policy seeks to prioritise sites which are well-connected by public transport and proactively explore the potential to intensify the use of land to support additional workspaces.
- 4.17 **Policy GG3** sets out a focus on creating a healthy city by promoting active and healthy lifestyles, improving London's air quality and creating a healthy food environment by increasing the availability of healthy food.
- 4.18 **Policy GG5** relates to growing a good economy and identifies the need to plan for sufficient employment and industrial space in the right locations to support economic development and diversification.
- 4.19 Design principles are provided at **Policy D4**, with **Policy D5** requiring development to achieve the highest standards of accessible and inclusive design.
- 4.20 **Policy D13** relates to the Agent of Change principle, ensuring that new noise and other nuisance generating development proposed close to residential and noise-sensitive uses should mitigate this impact, with **Policy D14** relating specifically to noise and requiring development to manage noise in accordance with Policy D13. It too identifies the need to avoid significant adverse noise impacts and mitigate against them where required.
- 4.21 **Policy E2** sets out that the provision of low-cost business space should be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to 'start up' or expand. The supporting paragraph 6.2.1 sets out that a sufficient supply of business space of different types, uses and sizes will ensure that workspace is available at an appropriate range of rents for SMEs and businesses wishing the start-up or expand.

4.22 The Plan recognises the importance of emerging types of logistics to London's economy. **Policy E4** sets out that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, including making provision for the varied operational requirements of the following (relevant) sectors:

- Light and general industry;
- 'Last mile' distribution;
- Utilities infrastructure;
- Emerging industrial-related sectors;
- Flexible hybrid space to accommodate services that support the wider London economy and population;
- Low-cost industrial and related space for micro, small and medium-sized enterprises.

4.23 The supporting paragraph to the policy (6.4.1) supports this by recognising that London depends on a wide range of industrial, logistics and related uses (including food and drink preparation) that are essential to the functioning of the economy, for servicing the needs of its growing population as well as contributing towards employment opportunities for London.

4.24 **Policy T4** identifies the need to consider the impact of development on the local transport network and be supported by a Transport Assessment where relevant. **Policy T5** goes on to require sufficient cycle parking is provided in accordance with Table 10.2 with **Policy T6** identifying the need for car parking to be restricted in line with levels of existing and future public transport accessibility and connectivity. **Policy T7** relates to servicing and requires development to facilitate safe, clean and efficient deliveries and servicing, with deliveries managed to be received outside of peak hours.

**c) Camden Local Plan (2017)**

4.25 The Camden Plan is key strategic document that sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions.

4.26 **Policy G1** 'Delivery and location of growth' sets out that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs. This includes supporting development that makes the most efficient use of land and the best use of a site subject of course to quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. **Part E** of this policy outlines that



development will be concentrated in growth areas, including the 'Kentish Town Regis Road' growth area which the application site is a part of. The supporting text goes on to note that growth areas are identified as being suitable for significant increases in jobs, and are based around transport interchanges.

- 4.27 **Policy E1** 'Economic Development' confirms that the Council will secure a successful and inclusive economy in Camden by creating conditions for economic growth and harnessing the benefits for local residents and businesses. The supporting paragraph 5.9 confirms that the Council "will seek the provision of innovative new employment floorspace in developments that will provide a range of facilities including flexible occupancy terms, flexible layouts, studios, workshops and networking, socialising, and meeting space that will meet the needs of a range of business types and sizes".
- 4.28 **Policy T4** 'Sustainable movement of goods and materials' sets out that the Council will promote the sustainable movement of goods and materials by encouraging the movement of goods and materials by bicycle where possible and promoting the provision and use of freight consolidation facilities. The supporting text promotes the use of cycle courier services and the consolidation of freight to minimise traffic movements and reduce pollution and congestion.
- 4.29 **Policy A1** 'Managing the impact of development' seeks to ensure that amenity is protected, that development contributes to successful communities, resist development that fails to assess transport impacts and requires mitigation where necessary. Information included within Transport Assessments, Travel Plans and Delivery and Servicing Management Plans will be considered by the Council in their evaluation of proposals.
- 4.30 **Policy A3** 'Biodiversity' seeks to enhance sites of nature conservation across the Borough of Camden. The Council outline that they will grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect a priority habitat or species. The Council additionally outline that they will seek to protect trees and vegetation particularly those that are of significant amenity, or ecological value. In addition, the Council will protect designated nature conservation sites from inappropriate and harmful development, proportionate to the weight afforded by these designations
- 4.31 **Policy A4** 'Noise and vibration' sets out that development that generates noise will only be permitted if it can be operated without causing harm to amenity. The Council will also seek to minimise the impact on local amenity from deliveries.

- 4.32 **Policy D1** 'Design' outlines that the council intends to secure high quality design in development. In order to construct a development to a high standard of quality, the local context and character must be taken into account. Key factors, namely sustainable design and construction methods should be incorporated for climate change mitigation and adaptation. Opportunities for greening is also encouraged to create a high quality landscape.
- 4.33 **Policy CC4** 'Air quality' looks to ensure that the impact of development on air quality is mitigated. The entire borough of Camden is designated as an Air Quality Management Area. An Air Quality Assessment (AQA) is needed, for example, for major applications where occupants will be exposed to poor air quality, or where development that has potential to significantly change road traffic on a busy road.
- 4.34 **Policy CC5** 'Waste' sets out that the Council will seek to make Camden a low-waste borough. New developments should include facilities for the storage and collection of waste and recycling in support of this policy.
- 4.35 **Policy T2** 'Parking and car-free development' outlines the aim to limit the availability of parking and require all new developments in the borough to be car-free. On-site parking will be limited to spaces designated for disabled people where necessary, and essential operational needs.

**d) Kentish Town Planning Framework Supplementary Planning Document (2020)**

- 4.36 The framework is a Supplementary Planning Document (SPD) designed to provide further guidance on the on Local Plan policies and allocations.
- 4.37 A key objective within the policy area as explained in **Section 3.2.1**, is to promote employment-led mixed use development which provides a significant number of new jobs. In addition, developments are expected to Provide innovative and sustainable industrial floorspace that achieves higher densities, allows for co-location of uses.
- 4.38 A further consideration of **Section 3.2.1**, is that new developments will be expected to "Provide efficient and sustainable industrial floorspace that achieves higher densities in a format that allows for co-location of uses (use classes B1c, B2, B8 and sui generis of a similar nature)"
- 4.39 **Section 3.3.2** explains that development should provide electric vehicle charging points required to support the move to electric vehicles.

4.40 **Section 3.4.1** sets out that development will be zero carbon in operation, as assessed via planning policy, and emit no local combustion-based pollutants. The carbon dioxide emissions resulting from the construction process and materials are also of key consideration.

4.41 As detailed in **Section 3.2.4**, meanwhile uses can have an important role in maintaining activity in the area, by avoiding the blight of vacant buildings and maintaining activity. Until a comprehensive redevelopment of the Regis Road site is proposed, Proposals for meanwhile uses will be encouraged where it can be demonstrated that they will not prejudice redevelopment, conflict with existing uses or construction.

**e) Camden Planning Guidance Employment Sites & Business Premises (2021)**

4.42 The Camden Planning Guidance document is a SPD that further explains the Council's approach to the provision and protection of employment sites and business premises

4.43 **Paragraph 37** states that “In response to the popularity of takeaway delivery apps there has been a growth in industrial scale kitchens to cook food off site on behalf of restaurants. The food is then delivered locally, usually by scooter. The Council considers that **existing industrial areas are the most appropriate location for such uses**. However, their impact in terms of noise, odour, fumes and dust generation needs to be carefully considered and managed and they should not have a detrimental impact on nearby uses and / or residents.”

4.44 **CPG: Amenity** gives further guidance as to the assessment of amenity considerations. Section 6 refers to noise and vibration and confirms that acoustic reports should be submitted in support of applications for noise generating commercial uses and plant, ventilation, air extraction and/or air conditioning equipment and flues. **Paragraph 6.11** confirms that (where necessary), proposals will be expected to mitigate the impact of noise to an acceptable level and that the Council will consider the use of planning conditions or a legal agreement to ensure that these are provided and regulated.

4.45 **CPG: Air Quality** states that as all of Camden is designated as an Air Quality Management Area, all developments are to limit their impact on local air quality and be at least air quality neutral. Development is not to lead to further deterioration of existing poor air quality. As identified above, it is the entire borough is located within an AQMA, an Air Quality Assessment has been included within the planning application submission.

4.46 **CPG: Transport** offers guidance and information on transport impacts, travel plans, delivery a servicing plans, parking, cycle parking, as well as vehicular access. This document states that a Transport Assessment, Statement or Note is required for all applications that involve a change in the way that a site is accessed from the highway. These documents must clearly demonstrate what measures will be required to mitigate the transport impact of the development.

**f) Kentish Town Neighbourhood Plan**

4.47 In relation to the Regis Road site, the Kentish Town Neighbourhood Plan identifies that the site is currently underused, with the buildings being mainly low rise and surrounded by car parks, extensive areas of hard standing and landscaped and incidental areas. The potential intensification of the use of the site through additional mixed-use development, including industry, offices, start-ups, and other uses is supported by the local community.

## Section 5 Planning Assessment

5.1 This section of the Statement demonstrates the acceptability of the proposals within the context of the relevant planning policies identified in Section 4. The main planning considerations in relation to REEF's proposals are:

- Principle of the use;
- Impact on the highway network;
- Impact of the proposals on the amenity of the surrounding area; and
- Refuse storage.

5.2 Each matter is discussed in turn below.

Planning Policy	Summary	Planning Assessment
Employment and Land Use Policies		
Camden Local Plan (2017)		
<b>Policy E1</b> 'Economic Development'	Sets out the Council's objective to secure a successful and inclusive economy to the benefit of residents and businesses. Supporting paragraph 5.9 confirms that the Council will seek the provision of innovative new employment floorspace in developments that will provide a range of facilities including flexible occupancy terms, flexible layouts, studios, workshops and networking, socialising, and meeting space that will meet the needs of a range of business types and sizes.	<p>The proposals are considered to comply with the thrust of Policy E1, comprising an innovative, multi-faceted and highly sustainable mixed-use scheme that will create up to 38no. new jobs, whilst offering a multitude of services, access to produce and infrastructure for local residents, encouraging more sustainable access to goods and services.</p> <p>In compliance with Policy E1, the scheme provides a range of amenities and services including commercial kitchens, urban farming pods, grocery dispatch facilities, electric bicycle charging/rental facilities and electric vehicle (EV) charging bays for public use.</p> <p>Furthermore, the structures on site are in the form of 'pods' and are therefore not permanent in their construction. This enables flexibility in terms of layout and that the units on site can be occupied flexibly by different tenants in the future if operational requirements change. As such, the development can be adaptable to future changes in demand for floorspace from businesses and for services from local residents. Crucially, the temporary nature of the structures on site also mean that the council's long-</p>

		<p>term aspirations for the comprehensive redevelopment of the wider area will not be compromised.</p> <p>Finally, the indoor and outdoor staff facilities in the form of seating, rest and relaxation areas provide space for employees of the various businesses to take breaks and socialise, creating an active and attractive employment setting to the benefit of employees, improving their welfare.</p>
<b>Policy G1</b> 'Delivery and location of growth'	<p>Seeks to ensure that the conditions needed to secure the deliver the homes, jobs, infrastructure and facilities are put in place to meet Camden's needs, particularly in identified growth areas.</p> <p>Development should also make efficient use of land subject to the quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations are also relevant to the site.</p> <p>Furthermore, development will be concentrated in growth areas, including Kentish Town Regis Road, which the application site is a part of.</p>	<p>The proposals comply with Policy G1 and specifically Part E of the policy, which emphasises that growth should be concentrated in the Growth Areas such as the Kentish Town Regis Road growth area, where the site is located. This area has been allocated for mixed-use development which offers a range of business premises and sectors on site, providing significant additional jobs.</p> <p>The development comprises of a compact, yet multi-faceted and highly sustainable, mixed-use scheme site that offers a wide range of service and infrastructure uses for the surrounding area, yielding additional local employment in turn.</p>
<b>Camden Planning Guidance (CPG) Employment Sites and Business Premises (2021)</b>		
<b>Paragraph 37</b>	<p>In response to the popularity of takeaway delivery apps there has been a growth in industrial scale kitchens to cook food off site on behalf of restaurants. The food is then delivered locally, usually by scooter. The Council considers that existing industrial areas are the most appropriate location for such uses.</p>	<p>The proposals fully comply with the Council's guidance regarding the location of commercial kitchens. The application site is within an existing and well-established industrial estate and in a designated Growth Area. As previously highlighted, within the growth areas, proposals which provide additional jobs and a range of business premises on site are supported.</p>
<b>London Plan (2021)</b>		
<b>Policy GG1</b> 'Building Strong and Inclusive Communities'	<p>Seeks to deliver strong and inclusive communities within which a wide range of economic and other opportunities and access to good quality services, amenities and infrastructure are provided.</p>	<p>The proposals seek to consolidate a wide range of industrial, service and infrastructure uses in an accessible location within close proximity to local communities, which will in turn enable ease of access to employment opportunities for local people, yielding tangible economic benefits. The proposals are therefore considered to comply with the objectives of Policy GG1.</p>
<b>Policy GG2</b> 'Making the	<p>Development should make the best use of small sites (under 0.25 hectares in area) within and on the edge</p>	<p>The application proposals are considered to fully comply with the objectives of Policy GG2. The</p>

Best Use of Land'	of town centres; prioritising those which are well-connected by public transport and exploring opportunities to intensify the use of land to support additional workspaces.	application site is a small site measuring approximately 0.1 hectares with a PTAL designation of 4. The proposals seek to intensify and make efficient and effective use of the formerly vacant site to provide a significant uplift in employment generation by providing a range of well-designed, affordable workspaces.
<b>Policy GG5</b> 'Growing a Good Economy'	Seeks to enable the development of sufficient employment and industrial space in the right locations to support economic development and diversification.	The proposals seek to transform a formerly vacant yard site, which provided no physical employment or industrial floorspace into an active light industrial, urban mobility and last mile logistics and distribution hub. The site is in an accessible location within a designated growth area where economic intensification and diversification is supported. As such, the proposals are considered to comply with the objectives of policy GG5.
<b>Policy E2</b> 'Providing Suitable Business Space'	Supports the provision of low-cost business space to meet the needs of micro, small and medium sized enterprises and to support firms wishing to 'start up' or expand. Supporting paragraph 6.2.1 sets out that a sufficient supply of business space of different types, uses and sizes will ensure that workspace is available at an appropriate range of rents for SMEs and businesses wishing the start-up or expand.	It is considered that the proposed mix of uses for the site is entirely compliant with the objectives of Policy E2. REEF propose to redevelop the site to contribute to the supply of business space for micro, small and medium sized enterprises, enabling them to extend their reach to the local community with low start-up/expansion costs when compared to traditional 'bricks and mortar' premises. The REEF business model for commercial kitchens allows restaurants to flexible occupy the premises, in return for a share of profit as opposed to a traditional rent payment. Overall, it is considered that the business model and proposed uses at the site foster start-ups and SMEs by providing flexible and affordable business space.
<b>Policy E4</b> 'Land for Industry, Logistics and Services to Support London's Economic Function'	<p>A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, including making provision for the varied operational requirements of the following (relevant) sectors:</p> <ul style="list-style-type: none"> <li>• Light and general industry;</li> <li>• 'Last mile' distribution;</li> <li>• Utilities infrastructure;</li> <li>• Emerging industrial-related sectors;</li> </ul>	The application proposals are clearly fully aligned with the objectives of Policy E4. The proposals seek to provide premises for industrial and related functions for a range of sustainable uses which include, but are not limited to the sectors identified in the policy. Overall, it is considered that the site will contribute to the wide range of economic and employment-generating uses that provide varied employment opportunities for Londoners and contribute to a successful local and London-wide economy.

	<ul style="list-style-type: none"> <li>• Flexible hybrid space to accommodate services that support the wider London economy and population;</li> <li>• Low-cost industrial and related space for micro, small and medium-sized enterprises.</li> </ul> <p>The supporting text recognises that London depends on a wide range of industrial, logistics and related uses (including food and drink preparation) that are essential to the functioning of the economy.</p>	
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## Amenity Policies

### Camden Local Plan (2017)

<b>Policy A1</b> ‘Managing the Impact of Development’	<p>The intent of this policy is to protect amenity and create developments that contribute to successful communities and resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours, and the existing transport network. Transport Assessments will be considered by the Council in the evaluation of proposals.</p>	<p>The application is supported by a full suite of technical studies which demonstrate that the proposals can operate effectively and successfully without resulting in a detrimental impact on neighbouring amenity and transport. These technical studies include a Transport Statement, External Lighting Assessment, Noise Impact Assessment, and Air Quality / Odour Assessment.</p> <p>The External Lighting Assessment prepared by Synergy provides the following conclusions in relation to the proposed lighting scheme:</p> <p><i>“The calculated lighting levels are very close to the target levels. The difference is considered to be not significant.</i></p> <p><i>Uniformity levels are better than the target values.</i></p> <p><i>Overspill is kept to a minimum by the optical control of the luminaires, and the aiming and positioning, but will be further cut off by the fitting of baffles.</i></p> <p><i>The plot shows minimal intrusion into the surrounding areas, with only very low levels of light traveling a short distance over the boundary.</i></p> <p><i>There are no residential properties within the light-fall area. Therefore the requirement for the reduction of obtrusive light, as defined in BSEN 12464-2, which sets a maximum of 2 lux measured at the nearest residential buildings is not a concern.”</i></p> <p>In relation to odour, the Odour Impact Assessment prepared by Tetra Tech concludes that a high level of</p>
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		<p>control measure will be required. The assessment recommends the following odour mitigation measures:</p> <p><b><i>“Odour screening assessment has identified in Section 9 that the control odour system will include:</i></b></p> <p><b><i>1. Fine Filtration or ESP followed by carbon filtration (carbon filters rates with a 0.2 – 0.4 second residence time); and,</i></b></p> <p><b><i>2. Fine Filtration followed by counteractant/neutralising system to achieve the same level of control as detailed above in measure 1.”</i></b></p> <p>The conclusions from the Transport Statement, Noise Impact Assessment and Air Quality Assessment are considered against the relevant planning policies later in this section.</p>
<b>Policy A4</b> <b>‘Noise and Vibration’</b>	<p>This policy sets out that development that generates noise will only be permitted if it can be operated without causing harm to amenity. The Council will also seek to minimise the impact on local amenity from deliveries.</p>	<p>The application site is situated within a designated ‘Growth Area’ within which the Council promote intensification of business and employment uses. As such, the neighbouring sites and wider industrial estate are characterised by business/employment and industrial uses. Furthermore, the site is bounded to the north by the Midland Mainline. These factors all contribute to an existing background noise environment into which the proposals will be integrated.</p> <p>Notwithstanding the above, the applicant has commissioned Tetra Tech to prepare a Noise Impact Assessment (NIA) to demonstrate that the use can operate without detriment to the amenities of neighbouring uses, which has been submitted in support of the application.</p> <p>The NIA concludes that:</p> <p><b><i>“Cumulative operational noise levels are predicted to be below the guideline noise intrusion criteria at nearby properties during the daytime period assuming both a windows-open and a windows-closed scenario, and are predicted to fall below the Lowest Observed Adverse Effect Level. As such, no additional mitigation is proposed for the site.</i></b></p>

		<p><b><i>Additionally, plant noise levels do not exceed the BS 4142 rating criteria of 10dB below existing background noise level at nearest sensitive receptors.</i></b></p> <p><b><i>Overall, noise from the proposed redevelopment is predicted to have a low impact and noise levels fall within the Lowest Observed Adverse Effect Level (LOAEL)."</i></b></p>
<b>London Plan (2021)</b>		
<b>Policy D13</b> 'Agent of Change'	Relates to the 'Agent of Change' principle, ensuring that new noise and other nuisance generating development proposed close to residential and noise-sensitive uses should mitigate this impact.	The application proposals, as demonstrated through the submission of a full suite of technical studies relating to amenity, are able to operate effectively from this location without detriment to the amenities of neighbouring occupiers. Furthermore, the reports have not recommended any mitigation measures to ensure this. As such the proposals are considered to comply with Policy D13.
<b>Design Policies</b>		
<b>Policy D1</b> 'Design'	The intention of this policy is to secure high quality design from developments. To achieve a high standard of design quality, the local context and character must be taken into account. Key factors, namely sustainable design and construction methods should be incorporated for climate change mitigation and adaption. Opportunities for greening is also encouraged to create a high quality landscape.	<p>The site is situated within a predominantly industrial area surrounded by large format, metal clad warehouse buildings. As such, the surrounding context can be described as functional and industrial. The design of the proposed development is functional, yet of a high quality that is entirely appropriate within its surrounding context.</p> <p>The proposed buildings are neatly arranged around the perimeter of the site to maximise circulation and manoeuvring space. The temporary structures are in the form of pre-fabricated 'pods' which are similar in form and scale to shipping containers.</p> <p>In line with REEF's sustainability objectives, green roofs are proposed to the UBCO bicycle testing facility and the crate to plate unit to provide urban greening in an otherwise predominantly hard surfaced environment. The inclusion of green roofs would contribute towards improvements to the appearance of the surrounding area.</p>
<b>Sustainability Policies</b>		
<b>Policy CC4</b> 'Air Quality'	As set out in Policy CC4, the council aims to reduce the exposure of poor air quality, ensuring new development does not negatively impact air quality.	The site is situated within a borough-wide air quality management area and as the scheme introduces additional vehicular movements, Tetra Tech have been instructed to prepare an air quality assessment to

		<p>assess road traffic emission and construction dust impacts relating to the development.</p> <p>The Air Quality Assessment concludes in relation to the construction phase that:</p> <p><b><i>“During the construction phase, site specific mitigation measures detailed within this assessment will be implemented. With these mitigation measures in place, the effects from the construction phase are not predicted to be significant.”</i></b></p> <p>In terms of the operational phase, the assessment confirms that:</p> <p><b><i>“The long-term (annual) assessment of the effects associated with the proposed development with respect to Nitrogen Dioxide (NO2) is determined to be ‘negligible’. With respect to PM10 and PM2.5 exposure, the effect is determined to be ‘negligible’ at all identified existing sensitive receptor locations.”</i></b></p> <p>In addition, the proposals propose to provide electric vehicle (EV) charging bays to be operated by BP and a testing facility for electric bicycles for UBCO. This not only taps into an existing market given the uplift in EV ownership in the past few years, but also provides an additional recharging facility that will make EV ownership more accessible and convenient for local residents. Supporting an uplift in EV take up will therefore also yield tangible benefits in terms of improving local air quality.</p>
<b>Policy CC5</b> <b>‘Waste’</b>	<p>This policy aims to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan. A key facete of achieving this goal is to make sure that developments include facilities for the storage and collection of waste and recycling.</p>	<p>The submitted plans demonstrate that a bin storage area will be conveniently adjacent to the site entrance, to minimise the distance that bins are required to be pulled from the store to the collection point on the road outside the site. The bin storage area will be furnished with the appropriate quantity of refuse and recycling bins to ensure that the development benefits from sufficient facilities. Operators will be encouraged to maximise recycling, in line with REEF’s wider sustainability objectives. It is also expected that the operators utilising the commercial kitchen pods will seek to pursue their own sustainability and waste reduction objectives to ensure that waste production is kept to a minimum.</p>

		It is envisaged that waste would be collected by First Mile, who operate a fleet of smaller vehicles across London.
Transport Policies		
Camden Local Plan		
<b>Policy T1</b> ‘Prioritising Walking, Cycling and Public Transport	The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.	<p>The site is situated in an area with a Public Transport Accessibility Level (PTAL) of 4, on a scale where 0 is the worst and 6b is the best. As such, the site is considered to benefit from a good level of accessibility to public transport, to the benefit of prospective employees.</p> <p>Policy T1 seeks to prioritise walking and sustainable modes of transport. With regard to cycle parking, the policy sets out that the site must provide for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan.</p> <p>The applicant has commissioned TTP to advise on transport matters relating to the development. Within the Transport Statement prepared by TTP, mitigation measures in the form of a Travel Plan are set out to encourage the use of sustainable transport. The draft Travel Plan forms part of the planning application submission. The Transport Statement provides the following details in this regard:</p> <p><i>“Employees and visitors will be encouraged to travel to the site by sustainable modes through the implementation of a Travel Plan. A draft Travel Plan has been prepared and included as a separate document as part of the planning application.</i></p> <p><i>The primary objective of the Travel Plan will be to set out a long-term strategy to facilitate and encourage sustainable modes of travel to the site. It will also seek to promote a shift from travel by public transport to active modes such as walking and cycling as these offer health benefits. The initiatives and measures that form part of the Travel Plan will be a mixture of ‘hard’ and ‘soft’ measures. The ‘hard’ measures include the provision of facilities such as safe and secure cycle parking and changing facilities and zero car parking. The ‘soft’ measures include initiatives such as providing information on public transport services and walking and cycling routes.”</i></p>

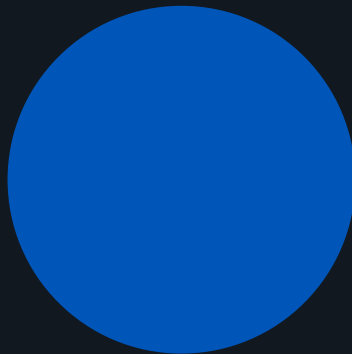
<b>Policy T4</b> 'Sustainable Movement of Goods and Materials'	The Council will promote the sustainable movement of goods and materials by using sustainable modes of transport and by freight consolidation.	The application proposals are considered to comply with the objectives of Policy T4. The ethos of the proposed use is to consolidate goods for 'last mile' deliveries by sustainable modes of transport including bicycle, electric bicycle and electric motorcycles. The proposals reduce congestion on roads by allowing multiple deliveries to be made in the local area by a single vehicle movement.
<b>London Plan</b>		
<b>Policy T1</b> 'Strategic Approach to Transport'	All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.	As previously highlighted, the development makes effective use of a formerly vacant site in an accessible location with a PTAL of 4. Furthermore, the development also consolidates 'last mile' deliveries, which is in line with the London Plan's objective to consolidate and minimise freight trips and promote safe, clean and efficient freight functions, including by road, and for shorter distances by bicycle.
<b>Policy T4</b> 'Assessing and Mitigating Transport Impacts'	Transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Development proposals should not increase road danger.	<p>The application is supported by a Transport Statement prepared by TTP to assess and mitigate the transport impacts of the proposed development. As previously discussed, a Travel Plan will be implemented to encourage the use of sustainable modes of transport.</p> <p>The application is also supported by a Delivery and Servicing Plan (DSP) prepared by TTP. Delivery and servicing activity will be accommodated on-site, thus limiting any impacts on the local highway network. The Transport Statement provides the following details in relation to the DSP:</p> <p><b><i>"The purpose of the DSP will be to mitigate the potential impacts of servicing activity associated with the development. The key aims and objectives of the DSP are:</i></b></p> <ul style="list-style-type: none"> <li><b><i>• To minimise disruption to the local roads;</i></b></li> <li><b><i>• To manage deliveries effectively to avoid peaking of deliveries and departures that may have a detrimental impact on the local highway network; and,</i></b></li> <li><b><i>• To manage the number/volume of service vehicle movements during the morning and evening peak periods; and,</i></b></li> </ul>

		<p><b>• To reduce the dwell time of the vehicle by increasing the efficiency of the delivery.”</b></p> <p>The DSP is submitted as a standalone document with the planning application.</p> <p>Overall, the Transport Statement provides the following conclusion in respect of the transport impacts of the development:</p> <p><b><i>“The proposed scheme is consistent with relevant transport planning policy guidance and will not give rise to any material transport-related impacts. It, therefore, meets the test of the NPPF and Paragraph 111, which states that: “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”</i></b></p>
<b>Ecology and Biodiversity Policies</b>		
<b>Policy A3</b> ‘Biodiversity’	<p>The aim of Policy A3 is to enhance sites of nature conservation across the borough. The Council will protect designated nature conservation sites from inappropriate and harmful development, proportionate to the weight afforded by these designations. The policy sets out that the Council will grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect a priority habitat or species.</p>	<p>Within close proximity to the boundary of the application site is a designated ‘Borough Grade 1 Site of Importance for Nature Conservation (SINC)’ and an ‘Open Space’ designation, which runs along the railway embankment to the north of the site.</p> <p>In order to assess the potential implications of the proposals on the SINC, the applicant commissioned Southern Ecological Solutions (SES) to prepare a Preliminary Ecological Appraisal (PEA), which will be submitted in support of the application.</p>

## Section 6      Conclusions

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- 6.1      This planning application seeks part-retrospective planning permission to use the formerly vacant industrial yard and existing portacabin building at land and buildings to the north of Regis Road, Kentish Town, London to accommodate a sustainable sui generis mixed-use development forming an urban mobility and last mile distribution hub on a temporary basis for five years.
- 6.2      This Planning Statement and the accompanying suite of professional studies has demonstrated that the application is in accordance with the planning policies set out in Camden's Local Plan for the following reasons:
- The proposed operations are acceptable in land use terms given that the site is within an established industrial estate and designated growth area and that the operations comprise light industrial uses.
  - The proposal will bring an active, employment generating use to the existing formerly vacant site.
  - The surrounding area is predominantly industrial and commercial in nature and designated as a growth area where industrial and employment uses are supported.
  - There are no sensitive neighbouring uses or residential dwellings that may be impacted by the application proposals in terms of noise, odour or visual amenity.
  - There will be no ecological impacts caused by the proposed operations.
  - The design and scale of the proposal is entirely appropriate within the context of the site and surrounding area whilst also taking opportunities to maximise urban greening and provide a visual uplift.
- 6.3      Accordingly, it is respectfully requested that planning permission is granted for the proposed development.



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