

**Parnjit Singh**

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[REDACTED]

**Subject:** FW: Consultee letter for PlanningApplication Application: 2022/0652/P

Hello

[REDACTED]  
Thank you

Josh Lawlor  
Senior Planning Officer

Telephone: 020 7974 2337



The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.

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**From:** Kentish Town Neighbourhood Forum KTNF [REDACTED]  
**Sent:** 04 April 2022 23:37  
**To:** Josh Lawlor <Josh.Lawlor@camden.gov.uk>  
**Subject:** Re: Consultee letter for PlanningApplication Application: 2022/0652/P

[REDACTED]

Dear Josh,

This is KTNF's response to planning application 2022/0652/P: **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, Land and Buildings to the North of Regis Road, NW5 3EW**

Regis Road where the applicant's site is positioned is a prominent part of the Kentish Town Neighbourhood Plan, and is safeguarded as KENTISH TOWN POTENTIAL DEVELOPMENT AREA (KTPDA). KTNF monitors the progress of its development closely (policies CC1 & SP2). KTNF was surprised that the kitchens were established in August 2021 but no planning permission was sought until March 2022, nor was prior advice from KTNF requested by the applicant.

As stated in the plan, KTNF regards the site as a hub for start-ups, micro and small businesses and it is the plan's ambition to establish a variety of businesses. As such, KTNF welcomes the applicant's green endeavours, such as vertical farming and electric bicycle testing.

When visiting the site, KTNF noticed that the applicant's core business are several commercial kitchens units, including for the international burger chain Wendy's and other fast food chains, situated in containers (similar to shipping containers). However, there are already more than one hundred existing commercial kitchen units, so-called "dark kitchens" on the Regis Road site. Adding another fifteen such units would not create a greater variety of small businesses.

What concerns KTNF in particular, is that dark kitchens by their very nature – last-mile delivery - contribute heavily to air pollution and traffic congestion since every one of these units attracts a vehicle for each order that is placed at these kitchens. At our visit we saw predominantly cars and motored bikes. The application for 15 commercial kitchen units and online grocery distribution would add undue pressure onto the road network and on the 65, or so, households that border directly onto Regis Road. Neither noise nor traffic assessments included the (predominant) use of motorbikes for delivery and their impact.

The hours applied for – up to 24/7 for some parts of the business - exceed the Framework hours by far and do not fit with residential neighbours.

KTNF appreciates that the applicant cannot apply for permanent development to not jeopardise the development of the whole Regis Road site, however the poor quality of the "buildings", i.e. containers, does not meet KTNF's policy SP2a to create new employment space with provision of good quality employment space.

Were the application to go ahead with use of commercial kitchen units and grocery B8 last-mile delivery – KTNF would like to see the following:

- \* tight controls and heavy restrictions on working hours to mitigate the adverse impact on the residential units adjoining and on the wider community
- \* evidence of an appropriate ratio of worker to work space and that health and food safety standards are being met.
- \* that there is proper insulation and temperature control to ensure acceptable working conditions during high temperature periods in summer (during our visit on a cold evening the workers kept the doors of the containers open, the site looked like a shanty town)
- \* evidence for the quality and variety of jobs newly created, and that there are jobs provided for local people. In general, KTNF welcomes the additional employment opportunities that the application proposes (up to 38)
  
- \* electric vehicles and bicycles as delivery vehicles allowed exclusively

Overall, KTNF suggests a more comprehensive and higher quality approach to the whole site, in line with KT Neighbourhood Plan Policy SW1. We fear that this application may seek to set a precedent for a series of developments of poor quality in Regis Road while awaiting a comprehensive redevelopment of the whole Regis Road site, sought through Policy SP2.

KTNF objects to this planning application as it currently stands.

KTNF Neighbourhood Forum

Sent from [Outlook](#)

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