

Employment Viability Report

160 Malden Road, Camden, NW5 4BT

Prepared for: Andreas Kyprianides
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Prepared by: H Goodban
Checked by: B Rogers
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86-90 Paul Street
London
EC2A 4NE

0845 121 3432
www.gradeplanning.co.uk

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1.0 Introduction

Purpose of Report

- 1.1 This Employment Viability Report has been prepared on behalf of Andreas Kyprianides (the applicant) to accompany a planning application for the demolition of the existing buildings at 160 Malden Road, NW5 4BT, consisting of an MOT repair garage (Class B2) and hand car wash, and construction of a new building providing 15 residential apartments (including 4 x affordable units) with 184 sqm of commercial (office) floorspace (Class E) at ground floor level.
- 1.2 This report seeks to respond to the requirements of **Policy E2** (Employment premises and sites) of the **Camden Local Plan 2017** which generally seeks to protect premises or sites that are suitable for continued business use, but may allow redevelopment of these subject to the criteria set out in the policy. This report also seeks to respond to **Camden's Planning Guidance on 'Employment Sites & Business Premises'** (hereafter referred to as 'the **CPG**') January 2021 which sets out factors to be taken into account when assessing proposals that involve the loss of a business use.
- 1.3 This report considers how the proposed development meets the relevant requirements set out in the above policy and guidance. It also includes a survey of other MOT repair garages and car wash facilities in the local area, together with information on the availability of alternative 'mobile' car repair and car wash services. The report also makes reference to supply and demand in the Borough in respect of the existing and proposed uses, as identified in Camden's **Employment Land Study 2014**.

Background

- 1.4 The existing site consists of a former petrol filling station which is now in use as a MOT repair facility and hand car wash. The site comprises single storey buildings (circa 150 sqm of floorspace in total), a parking forecourt fronting Malden Road and a small open yard to the rear of the site. Further details relating to the site and proposed development are set out in the accompanying **Planning Statement**.
- 1.5 The applicant sought pre-application advice from officers at London Borough of Camden in May 2020 in relation to a similar proposed development involving 24 flats at the site but without employment space. A meeting with officers took place on 16th July 2020 (Pre-App Ref. 2020/2451/PRE).
- 1.6 In the pre-application advice letter received from Camden Council dated 9th November 2020, the key feedback received with regard to the proposed loss of employment space at the site was that:
 - Evidence would be required to support an application for a change of use to a non-business use at the site, in accordance with **Policy E2**, including a thorough marketing exercise sustained over at least two years; and
 - While the existing use is sui generis, it is considered to fall within the scope of the Council's 'economy and jobs' policies, and it was noted that the existing MOT centre and car wash are still operating.
- 1.7 Following the above pre-application advice, the applicant amended the proposals to include replacement commercial space at ground floor level with 15 residential units above. At the same time the applicant's

agent sought advice from London Borough of Camden with regard to whether or not a marketing exercise would be necessary in this case in order to justify the loss of the existing business and replacement with a commercial (office) use at the site with residential above. In response, the following advice was received from London Borough of Camden by email on 21st April 2022:

‘The Local Plan’s policies provide support for businesses of all sizes and state (Policy E1 b) stating that we’ll “maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources”. This means that the existing sui-generis employment use does have policy protection so there would need to be very good reasons for us to be convinced we should be allowing the loss of this. Simply proposing a greater floor area of E-class employment in itself would not be enough to make a case. There would need to be evidence of marketing in line with the Camden Planning Guidance to demonstrate that the site is incapable of continued use as a car wash / car repair shop or similar type of industrial activity. The site being occupied would generally suggest that it is still suitable for continued employment use of this type. Marketing would only be waived exceptionally if there were wider strategic benefits which on balance exceeded the contribution this site currently appears to be making to a healthy and diverse local economy as well as locational advantages of having these sorts of services close to Camden’s residential population without necessitating unsustainable travel outside the Borough. I hope this free advice is useful’.

- 1.8 On further review of the relevant planning policy and guidance by the applicant, it is clear to the applicant that the principal use at the site is the MOT repair garage (Use Class B2) which occupies the main building at the site, while the hand car wash facility (sui generis) which occupies a smaller, temporary building and part of the forecourt is considered to be ancillary to the site’s main use. Therefore, the site’s principal use is considered to fall into Class B2 (General Industry) of the Use Classes Order.
- 1.9 With regard to Local Plan **Policy E2**, the current application does not include marketing evidence to support the proposed redevelopment and intensification of development at the site, including the proposed change of business use at the site from B2 (MOT repair garage with ancillary hand car wash) to commercial (office) use (Class E). The applicant considers there are clear reasons to waive any marketing evidence for reasons set out in this report and in the **Planning Statement** accompanying the planning application.

Structure of Report

- 1.10 The structure of this report is as follows:
- **Chapter 2.0** provides an analysis of the existing and proposed business use, taking account of relevant criteria set out in **Policy E2** of the Local Plan and the **CPG** with regard to the proposed change of use at the site.
 - **Chapter 3.0** presents land use survey data on similar existing uses in the local area (MOT/repair garages and car wash facilities), and then considers identified demand for industrial uses and for SMEs/start-up businesses in the Borough.
 - **Chapter 4.0** provides a summary and conclusions.

2.0 Existing and Proposed Business Use

Overview

- 2.1 This Chapter provides a review of the existing business operating at the site and the proposed commercial (office) space, with reference to **Policy E2** of the Local Plan and in response to the criteria in **paragraph 7 of the CPG**. Paragraph 7 states that:

“When assessing proposals that involve the loss of a business use the Council will consider whether there is potential for that use to continue. We will take into account various factors including:

- whether the premises are in a reasonable condition to allow the use to continue;*
- the range of unit sizes it provides, particularly suitability for small businesses;*
- the suitability of the location for any business use;*
- how the business use is related to other neighbouring/nearby land uses;*
- whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space.”*

- 2.2 This Chapter has been structured to consider each of the above factors in turn, looking at both the existing use of the site and the proposed use. The final section then discusses ‘other considerations’ at the end of the Chapter.

Condition of Buildings / Facilities

- 2.3 This section considers: ‘*whether the premises are in a reasonable condition to allow the use to continue*’.
- 2.4 As set out above, the existing site consists of a former petrol filling station, constructed circa 1960, now in use as an MOT repair garage and car wash facility. As such the existing business is not a purpose-built repair garage. The existing buildings are now in very poor condition and detract from the street scene on Malden Road. The condition of the site and buildings can be seen in the photos at **Appendix B** of this report.
- 2.5 The proposed development would bring new, purpose-built commercial (office) floorspace to the site, which will secure the long-term employment use at the site while bringing a new development which will enhance the street scene and quality of the local environment.

Range of Units and Suitability for Small Businesses

- 2.6 This section considers: ‘*the range of unit sizes it provides, particularly suitability for small businesses*’.
- 2.7 The existing buildings provide limited accommodation and floorspace (circa 150 sqm) in very poor condition. As such the site does not provide floorspace that would be suitable for a wide range of small businesses. The existing site is only considered to be suitable for its existing MOT and car wash facility use without being redeveloped.

- 2.8 By contrast the new proposed commercial floorspace will provide 184 sqm of brand new, flexible, ground floor accommodation, with convenient and direct access to Malden Road, within walking distance to public transport connections and a range of local services. It will be suitable for occupation by start-up businesses or SME's (in accordance with **Policy E2 (f)**), therefore providing an opportunity for small and growing businesses and social enterprises in the local area. The proposal therefore supports **paragraph 12 of the CPG** which states that the Council will support the re-provision of employment space "*particularly where this consists of space that is suitable and affordable for micro and small businesses and particularly where this space is suitable for our growth and other important sectors and business clusters*".
- 2.9 The proposed office accommodation is likely to be suitable for businesses within the professional and business administration growth sector or creative industries sector. These are both key growth sectors in Camden as identified in **paragraphs 5.19-5.22 of the Local Plan**.
- 2.10 The office accommodation provides a suitable floor to ceiling height of 2.7m and is designed to have clear separation from the residential element in line with **paragraph 5.41 of the Local Plan**. The space also offers a flexible layout that will allow for networking, socialising and meeting space (including outdoor space) to meet the needs of a range of business types in line with **paragraph 5.9 of the Local Plan**. There is also an opportunity to provide flexible occupancy terms to further support local businesses.
- 2.11 It is also relevant that the application is accompanied by an **Employment and Training Strategy** (in accordance with **Policy E1** (Economic Development) of the Local Plan and supporting **paragraphs 5.11 to 5.16**, as well as the **CPG**. The Strategy includes proposed measurable obligations and financial contributions, to be secured by Section 106 Agreement, which will help to maximise the benefits for the local community in terms of employment and training associated with the delivery of the proposed development. Therefore, the proposal will increase employment opportunities for local residents including training and apprenticeships in line with **Policy E2 (g)**.

Suitability of Location for any Business Use

- 2.12 This section considers: '*the suitability of the location for any business use*'.
- 2.13 While the site may be well located for much of its existing customer base as an MOT repair garage and car wash facility, benefiting from a large frontage on Malden Road (a 'B' road) within a predominantly residential area, the site does not form part of a wider industrial area is not surrounded by any similar, compatible land uses (as discussed in the next sub-section below).
- 2.14 Importantly, the site is limited in size, extending to approximately 735 sqm. It is not a designated employment site and is not part of comprehensive scheme. For these reasons the suitability of the location for B2 industrial use is limited.
- 2.15 A further related consideration which is highlighted in both **Policy E2** (Employment premises and sites) and the **CPG**, is whether or not the loss of the existing business will impact on both the Central Activities Zone (CAZ) or the local economy.
- 2.16 **Policy E2** states that:

'The Council will encourage the provision of employment premises and sites in the borough. We will protect premises or sites that are suitable for continued business use, in particular premises for

small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy.'

- 2.17 With regard to proposals for higher intensity redevelopment of premises or sites that are suitable for continued business use, **Policy E2 (d)** states that these will be considered provided that:

"...the redevelopment retains existing businesses on the site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or the local economy".

- 2.18 The **CPG states at paragraph 42** that:

"The loss of a business supporting the CAZ or the local economy as part of a redevelopment scheme will only be permitted if it is demonstrated that it is possible for the existing business to be relocated to a sustainable location and that this would not cause harm to CAZ functions or Camden's local economy. A sustainable location in this regard is considered to be one that allows for continued successful operation of the business and does not lead to an excessive increase in motor vehicle trips".

- 2.19 Firstly, with regard to the CAZ, it is clear that the existing use of the site does not directly support the CAZ, taking account of the CAZ functions listed at **paragraph 43 of the CPG**. Therefore, the loss of the existing MOT repair garage and car wash facility on Malden Road is not expected to harm these functions.
- 2.20 In relation to any potential impacts on the local economy arising from the loss of the existing use at the site, this is considered further in Chapter 3.0 below. Chapter 3.0 assesses impacts in terms of alternative and comparable facilities in the local area and changing habits within the wider population for buying goods and services.
- 2.21 With regard to the proposed commercial (office) use of the site, whilst it is considered that there is no specific feature of this site which makes it particularly suitable for an SME or start-up business to be located here, the site is reasonably well located in terms of access to public transport and this sort of use will complement other ground floor commercial uses along Malden Road.

Relationship with Neighbouring Uses

- 2.22 This section considers: *'how the business use is related to other neighbouring/nearby land uses'*.
- 2.23 In terms of surrounding land uses, the site abuts three-storey Georgian terraced property (no.162 Malden Road) which forms a terrace of properties (along with no.164) and the three-storey Gypsy Queen pub beyond this. No.162-164 appear to provide residential or office space on upper floors (partly vacant) with commercial units at ground floor.
- 2.24 Immediately to the north of the site is Wellesley Road Care Home. Adjacent to the site to the south-east is a public open space which includes the Malden Road sports pitches. On the other side of Malden Road opposite the site are three/four-storey Georgian properties mainly in residential use, some with commercial/retail units at ground floor.

- 2.25 Given these surrounding land uses, particularly the sensitive residential receptors, it is considered that the existing MOT repair garage and hand car wash uses conflict with the surrounding uses in a number of ways.
- 2.26 Firstly, the existing use is likely to have a detrimental impact on the amenity of occupiers of the neighbouring residential properties (for example by way of noise, disturbance and emissions), particularly in relation to the adjacent care home. The presence of sensitive land uses adjacent to a proposal for an industrial related use is commonly seen as a constraint for the industrial related use, as it can result in restrictions for example in terms of hours of operation, noise, deliveries and emissions. By contrast, businesses that are located away from sensitive receptors can often benefit from more flexible hours of operation and are less constrained by surrounding land uses.
- 2.27 The existing use also conflicts with the adjacent public open space / green space land use where the local community can go for exercise, relaxation, contact with nature, socialising or fresh air. The noise and disturbance arising from the garage and car wash, together with the poor quality of the environment of the site at 160 Malden Road, are considered to detract from the quality of this green space.
- 2.28 It is also relevant that the existing use represents a very low density of development, whilst surrounding built development is at a considerably higher density. In this way the site at 160 Malden Road offers a unique opportunity to provide additional homes (including much needed affordable housing units) whilst also retaining business use at the site in form that is more compatible with the surrounding land uses.
- 2.29 In summary the existing MOT repair garage and hand car wash use at the site is clearly not well related to nearby land uses, which is an important factor in assessing the loss of this use in line with **paragraph 5.37 of the Local Plan**. The site is not considered suitable for the existing use due to amenity impacts (such as noise and disturbance) on surrounding residential uses arising from the use, particularly the adjacent care home, as well as impacts on users of the public open space. The site also detracts from the quality of the street scene and does not make efficient use of land in this urban location, as it currently has a very low density of development.
- 2.30 The proposed replacement business space, consisting of ground floor office space (suitable for start-ups and SMEs) is considered to be very compatible with existing surrounding land uses and built form, including the adjacent care home. It provides an excellent opportunity for replacement ground floor commercial floorspace with residential use above and also supports **Paragraph 5.36 of the Local Plan** which states that: *'We will seek to ensure that existing and future employment uses can operate effectively without being in conflict with other sensitive uses such as housing'*. In this way the proposed development would bring benefits for the occupiers of neighbouring sites and users of the open space.

Quantum of Floorspace

- 2.31 This section considers: *'whether a lower quantum of replacement employment space is proposed as part of the development, and if so whether the nature of this space is considered to have the potential to offer equal or greater benefits to local people or businesses than the existing space'*.
- 2.32 The proposed commercial (office) space (Class E) which extends to 184 sqm is a greater quantum than the existing built floorspace which extends to circa 150 sqm. This supports Local Plan **Policy E2 (c)** as the level of employment floorspace is to be increased.

- 2.33 Using the employment density guide figures for B1a office use provided at Appendix 1 of the **CPG**, the proposed development is likely to directly generate around 14-18 jobs (full time equivalent) (FTE). This compares with the MOT repair garage and car wash facility which are understood to provide approximately 5 full-time jobs (FTE) across the site.
- 2.34 As the above indicates that the proposal will increase employment opportunities at the site by supporting a higher number of full-time equivalent jobs in comparison with the existing use, it is considered that the proposal offers greater benefits to local people and businesses than the existing use both in terms of job opportunities and provision of new business floorspace.

Other Considerations

- 2.35 **Policy E2 (h)** of the Local Plan states that the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business provide that: *'the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the site'*.
- 2.36 The proposed development provides a 'higher intensity' development which includes housing and affordable housing. At the same time, the residential floorspace has been carefully designed to ensure the effective operation of the proposed commercial (office) space at ground floor, whilst protecting the residential amenity of new occupants. This is achieved by providing a separate entrance to the office space direct from Malden Road and minimising or eliminating any overlooking between the two uses. In this way the proposed development fully accords with **Policy E2 (h)** and the provision of housing and affordable housing at the site is considered to be an important benefit which supports the proposal for a change of use.

3.0 Alternative Local Facilities and Demand

Overview

- 3.1 As set out in Chapter 1.0, feedback received from Camden Council following the initial pre-application process indicates that the Council normally seeks to protect existing businesses unless there are/were:

“wider strategic benefits which on balance exceeded the contribution this site currently appears to be making to a healthy and diverse local economy as well as locational advantages of having these sorts of services close to Camden’s residential population without necessitating unsustainable travel outside the Borough” (words taken from email from Camden dated 21st April 2022).

- 3.2 In order to help assess the impact of the loss of the existing MOT repair garage and car wash facility on the local economy and residents, Grade Planning has undertaken a survey of other comparable facilities in the local area.

MOT/Car Repair Garages

- 3.3 **Plan 1 at Appendix A** of this Report identifies a range of car repair garages, the majority of which also offer MOT testing, located within a 2 km radius of Malden Road. The Table on Plan 1 is replicated here:

Number (shown on Plan 1)	Name	Address	Driving distance from site (minutes)	Driving distance from site (km)
1	The Car Surgery	2-4 Arctic Street	5	1.4
2	West Hampstead Motors	155-161 Grafton Road	5	1.4
3	Cresta Motors	3 Patshill Road	7	1.6
4	M&A Coachworks	52 Fortress Grove	7	2
5	M&A Coachworks	135 Highgate Road	4	1.6
6	Dar Cars	132-134 Highgate Road	4	1.6
7	Kwik Fit	6 Lissenden Gardens	3	1.6
8-12	Belsize Motors Little & Pace Motors Hampstead Motor Services Autotech Hampstead Porschewax Engineering	Lambelle Place	4	1.6
13	Modern Motors	95 Adelaide Road	5	1.6

14	Buchanan Motors	128A Camden Road	8	1.9
15	J&J Autos	17 Camden Mews	9	2.5
16	Lucky Motors	61 Camden Mews	8	2.5
17	London TVR	Bush Industrial Estate	8	2.5
18	Kar Dok	97 Avenue Road	9	2.7
19-25	D&J Motors AW Motors Mikes Mechanics German Car Centre Transauto Garage BMW Auto Services Mikes Coachworks	120-136 Camley Street	11	3.7

- 3.4 The survey found 25 repair garages within a 2 km radius of the site, including 8 garages within 1.6 km 'driving distance' from the site. This indicates a reasonable selection of alternative MOT/car repair facilities in the local area.
- 3.5 In addition to these local garages, it should also be noted that there appears to be a growing market for 'mobile' car repair services (including MOT) where individuals can opt to pay for such services to be carried out at their home or place of work, or via a car collection service. It is likely that demand for these sorts of services will continue to rise with the increasing use of the internet for purchasing goods and services, and with the recent shifts towards 'working from home' since the start of the Covid 19 pandemic.
- 3.6 **Table A** below provides examples of companies offering these sort of 'mobile' car repair services serving the local area, most of which also offer MOT services. This list is in no way exhaustive but provides examples of companies that are currently offering these sorts of services to residents in the local area.

Table A: Examples of 'mobile' MOT/car repair services serving the local area

Company Name	Contact Details / Location	Comments
J B Mechanics	Serves 40 mile area Based in North West London www.jbmechanics.com	Website says: 'We provide a personal service at your doorstep – whether at home or at your work place – no need for you to travel. We also provide a car collection service, arrange MOTs & bodywork etc.'

Auto Eng Repair	Serves Kentish Town www.clickmechanic.com	Website says: 'You'll be able to select either for a mobile mechanic to come out to you or for a garage to collect the vehicle to undertake the work in their workshop.' It also says: 'Save time on your next MOT test – we collect and drop off your car for you!'
CMS Engineering Ltd	Serves North London www.cmsengineeringltd.com	Website says: 'Cms Engineering is a mobile service which comes to you at your door step. We also work on cars to carry out Diagnostic servicing and general repairs.'
Mobile Mechanics Finchley	157 Fortress Road, NW5 2HR Tel. 07948 090149	Business address located approximately 1.3 miles from the site.
Mobile Mechanic Kentish Town	Lissenden Gardens, NW5 1LX Tel. 07818 005902	Yellow pages webpage says: 'Here at QX mobile mechanic has over 20 years experience. We come to your home or work place to assist with any car problems. We provide guaranteed work on Parts and labour.'
Servicing Stop	Nationwide www.servicingstop.co.uk	For MOTs the website states: 'Free nationwide collection & delivery from home or work'.
AA	Nationwide www.theaa.com	Website says: 'AA approved MOTs, services & repairs, brought to you through the convenience of our local garage network' and 'Free vehicle collection and drop off when you book a service, subject to availability'.

3.7 It is clear from the list of businesses shown in Plan Table 1 and in Table A, that there are a wide range of options available in terms of car repair/MOT services in the local area.

3.8 It is also relevant that any move towards these more 'mobile' services will tend to support more sustainable patterns of development and travel, as these businesses tend to be associated with a reduced land requirement (or more efficient use of land) and less vehicle trips.

3.9 With regard to the car repair industry as a whole, evidence has been found that overall demand for car repairs in the UK has fallen over recent years. According to an article dated July 2019 on the website www.marketingdonut.co.uk (article found at <https://www.marketingdonut.co.uk/market-research/sector-trends/car-repairer-sector-trends>) this fall in demand is for a number of reasons including:

- *the improved reliability of new cars*
- *longer servicing intervals*
- *increasing use of replacement parts rather than making repairs*
- *extended warranties on new cars*
- *the economic recovery stalling due to the uncertainty over the Brexit negotiations following the vote in 2016 to leave the EU. To reduce expenditure, many motorists chose to skip scheduled services and ignore minor damage to their vehicles*

3.10 The article concludes that '*the independent car repair sector is forecast to slowly decline in real terms in the years to come and further falls are expected in the number of independent car repair businesses in the UK.*' This is a further consideration which is relevant in assessing any impacts relating to the loss of the MOT/car repair garage at this site.

3.11 Given the range of alternative local services identified above, together with the possible future falls in demand for car repair at independent garages, the loss of the car repair facility at the site is not expected to impact on local people in terms of access to any of these services or harm Camden's local economy.

Car Wash Facilities

3.12 In respect of the existing car wash facility, **Plan 2 at Appendix A** of this Report identifies 5 car wash facilities within a 2 km radius of Malden Road. The table on Plan 2 is replicated here:

Number	Name	Address	Driving distance from site (minutes)	Driving distance from site (km)
1	BP Car Wash	215 Haverstock Hill	4	1.4
2	Car Wash Valeting Centre	128A Camden Road	8	1.9
3	Car Carers	Rochester Square	8	1.9
4	Car Wash and Valeting Centre	869 Kentish Town Road	8	2
5	Imo Car Wash	02 Centre	12	3.2

3.13 The survey found 5 formal car wash facilities within a 2 km radius of the site, including 4 within 2 km 'driving distance' from the site.

3.14 It should be noted that the above list of car wash facilities is unlikely to provide a true representation of the local services available, as there are also likely to be informal or temporary car washing facilities

located within other business sites, for example within supermarket car parks, Council car parks and at community centres. Therefore there may be a much higher number of car wash facilities in the local area than those identified on Plan 2.

- 3.15 In addition to these businesses, as with the car repair services, there a number of 'mobile' car washing businesses that operate in the area, that will come to your home to wash your car on the driveway, on the street outside your house or your place of work. **Table B** below provides a list of local companies offering these sort of 'mobile' car wash services serving the local area. This list is not exhaustive but provides a good indication of services that are available.

Table B: Examples of 'mobile' car wash services serving the local area

Company Name	Address / Location	Comments
Car Cleanic	Serves Kentish Town and other London areas www.kentish-town.carcleanic.co.uk	Website describes the company as a: 'Mobile car valet'.
Mr Shine Mobile Car Valeting	Based in North London. www.mrshinemobilecarvaleting.co.uk	Website says: 'We are a small and successful car valeting company based in London'.
The London Car Wash Company	London, NW1 www.thelondoncarwashcompany.co.uk	Website says: 'We are London's most trusted mobile carwash and we come direct to you.'
Go Wash My Car	National www.gowashmycar.com	Website allows you to book a car wash at any location of your choosing.

- 3.16 Taking account of all the services identified above, it is considered that there is a reasonable selection of alternative car wash services available in the local area and the loss of this facility at the site is not expected to harm Camden's local economy.

Employment Land Supply and Demand

- 3.17 London Borough of Camden's **Employment Land Study 2014** highlights the importance of maintaining industrial land in the Borough due to the constrained availability of this land (page 31) and generally identifies low levels of vacancy for industrial uses within the Borough – with a tendency for any vacancies to be among smaller units.
- 3.18 It is noted that page 34 of the **Employment Land Study** states that '*Kentish Town is emerging as a hub providing workspace for start-up, micro and small business and there is evidence that former industrial buildings have recently been converted to accommodate these types of occupiers*'.
- 3.19 More specifically on the protection of industrial sites, the **Employment Land Study** recognises that clusters of industrial related facilities are generally preferable, stating on page 48 that:

This analysis suggests that LB Camden should be seeking to protect industrial land and properties, particularly where the businesses are viable and sustainable. In this context, viable

and sustainable will translate into sites that are in locations where industrial activities are in some sense concentrated, and where the properties are purpose built and/or renewable. Industrial properties in residential areas, properties isolated in minor streets and properties that are clearly obsolete should be looked at differently.

- 3.20 As indicated by the low staff levels at the existing site and the limited built floorspace, this is a small car repair garage and car wash facility on an 'isolated' industrial site within a predominantly residential area. It is considered that larger sites (including those with purpose-built facilities), which are more appropriately located in predominantly industrial areas and away from sensitive residential receptors, support a more sustainable pattern of development and more efficient use of land.
- 3.21 In line with the findings of this Study, it is not considered that the existing site would be an appropriate site for the intensification of industrial (B2) uses due to the surrounding sensitive receptors and the lack of other industrial uses in the surrounding sites.
- 3.22 It is further noted that page 49 of the Study recognises a growth in opportunities in 'clean industries' such as *'building services, catering, cleaning, courier services, design, hospitality services, IT back-up services, marketing services, media production, office supplies, printing, security, training and many others'* and also states that:
- 'Because of their attractiveness to growth sectors and SMEs, it is such properties that LB Camden could be looking to re-provide within the borough. As noted elsewhere, Kentish Town has been successful in attracting SMEs and micro-businesses to converted industrial buildings, and such conversions should be encouraged.'*
- 3.23 As discussed in Chapter 2.0 above, the proposed development provides accommodation that is considered highly suitable for SMEs or start-up businesses, in a suitable location in the Kentish Town area.

4.0 Summary and Conclusions

- 4.1 This Employment Viability Report supports a planning application for the demolition of the existing buildings at 160 Malden Road, NW5 4BT, consisting of an MOT repair garage (Class B2) and hand car wash, and construction of a new building providing 15 residential apartments (including 4 x affordable units) with 184 sqm of commercial (office) floorspace (Class E) at ground floor level.
- 4.2 This report seeks to respond to the requirements of **Policy E2** (Employment premises and sites) of the **Camden Local Plan 2017** which generally seeks to protect premises or sites that are suitable for continued business use, as well as **Camden's Planning Guidance on 'Employment Sites & Business Premises' (CPG) January 2021** which provides further guidance on assessing proposals that involve the loss of a business use. This report also includes a survey of other MOT repair garages and car wash facilities available to the local community and makes reference to Camden's (latest) **Employment Land Study 2014** with regard to supply and demand for the existing and proposed uses.
- 4.3 The applicant has received pre-application advice in respect of an initial proposal for a change of use to residential at the site (without any replacement business space). The applicant has since amended its proposals to include 184 sqm of ground floor commercial (office) space (Class E).
- 4.4 A review of relevant policy and guidance together with research into alternative similar services which are available to the local community indicates that there are a number of factors to justify a change of use to office and residential at the site, rather than reprovision of the MOT repair garage and hand car wash. This includes the following factors:
- The site consists of a former petrol filling station, not a purpose-built repair garage, and these buildings are now in very poor condition and detract from the street scene. The proposed development would bring new, purpose-built commercial (office) floorspace to the site.
 - The existing site which provides limited, poor quality floorspace is only considered to be suitable for its existing MOT and car wash facility use without being redeveloped. The new commercial floorspace will be suitable for occupation by start-up businesses or SME's in accordance with **Policy E2 (f)** and supported by the **CPG**.
 - Importantly the proposed office accommodation is likely to be suitable for businesses within the professional and business administration growth sector or creative industries sector which are both key growth sectors in Camden as identified the Local Plan.
 - The **Employment and Training Strategy** accompanying the application includes measurable obligations and financial contributions which will help to maximise benefits for the local community in terms of employment and training associated with the delivery of the proposed development (in support of **Policy E2 (g)**).
 - The site location is not ideally suited to B2 industrial use as it is not surrounded by any similar, compatible land uses, it is not part of a wider industrial area and is not a designated employment site. With regards to the proposed commercial (office) use, the site is reasonably well located in terms of access to public transport for employees, and this sort of use will also complement other ground floor commercial uses along Malden Road.

- The existing use of the site does not directly support the CAZ and is not expected to harm the strategic functions of the CAZ.
- Surrounding land uses generally consist of residential with commercial/office uses to the ground floor (to the west and south), with a residential care home to the north and public open space to the east. The existing MOT repair garage and hand car wash is considered to conflict with these land uses due to the likely amenity impacts such as noise, disturbance and emissions arising from the existing use. In turn, the surrounding uses may also constrain the industrial use of the site for example in terms of hours of operation, noise and deliveries.
- The existing site is very low density whilst surrounding built development is considerably higher density. Therefore the site offers a unique opportunity to provide additional homes (including much needed affordable housing units) whilst also retaining business use at the site.
- The proposed commercial (office) space (184 sqm) is a greater quantum than the existing built floorspace (circa 150 sqm). This proposed increase in the level of employment floorspace is supported by **Policy E2 (c)**. The proposed development is also expected to generate around 14-18 jobs (full-time equivalent) compared with the existing site which generates approximately 5 jobs FTE.
- The proposed development provides a 'higher intensity' development including housing and affordable housing which are priority uses in Camden, as supported by **Policy E (h)**.
- A review of alternative facilities available to the local community (similar to the existing uses at the site) indicates that local residents are able to access a wide range of similar services at other locations within the local area or via 'mobile' car repair and car washing services. In this way the existing uses at the site are not necessarily dependent upon close proximity to their client base. At the same time, evidence has been found that overall demand for car repairs in the UK has fallen over recent years.
- Given the range of alternative local services identified, together with the possible future falls in demand for car repair, it is considered that local residents will continue to have good access to alternative services and the loss of the car wash facility at the site is not expected to harm Camden's local economy.
- London Borough of Camden's **Employment Land Study 2014** highlights the importance of maintaining industrial land in the Borough due to the constrained availability of such sites. It also identifies Kentish Town as an emerging hub providing workspace for start-up, micro and small business. The Study suggests that the Council's protection of industrial sites should focus on properties that are purpose built and/or renewable and where there are clusters of employment uses. As the existing site is an isolated industrial site providing poor quality accommodation, it is considered that redevelopment and intensification of this site for office and residential is appropriate and supported by the findings of this Study.

4.5 When considering the proposed redevelopment of the site at 160 Malden Road there is a clear need to take a balanced approach which is sensitive to the direction and changing shape of the affected businesses,

also taking account of the potential benefits that redevelopment of the site would bring to the local community, local environment and other business sectors.

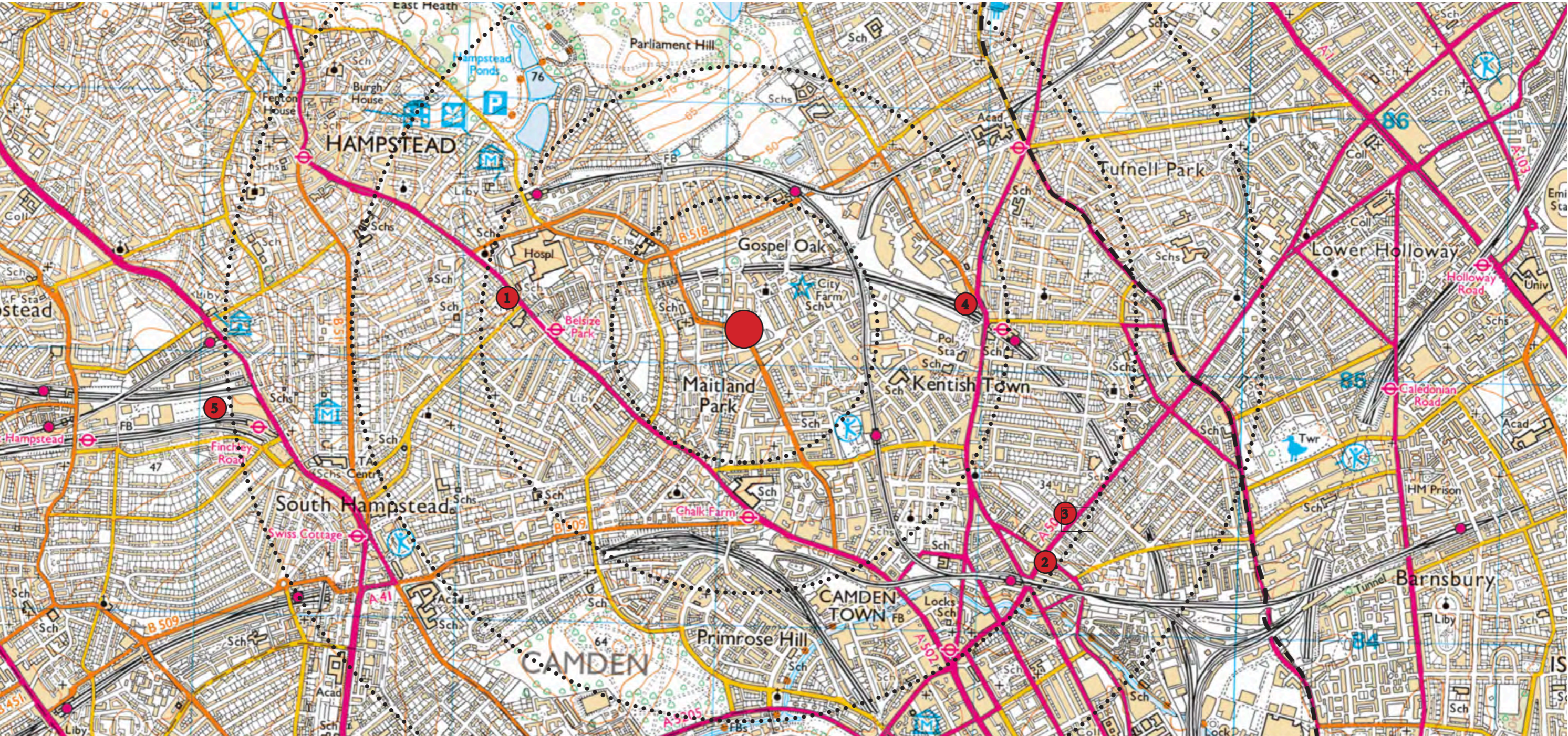
- 4.6 In summary the existing site is currently very low density and consists of poor quality buildings. Research shows that local residents will continue to have good access to similar, alternative services without the existing uses at this site. By contrast the proposed development will bring new, purpose-built business space to the site, suitable for Camden's key growth sectors such as professional and business administration and creative industries sectors, while also delivering new housing including affordable housing which are key priorities in Camden. Any redevelopment would also bring considerable improvements to the quality of the site's environment and an increase in job opportunities, with subsequent benefits to the local community.

Appendix A




Plan 1: Location of Hand Car Washes within 2km of 160 Malden Road

Plan 2: Location of Car Repair/MOT Centres within 2km of 160 Malden Road

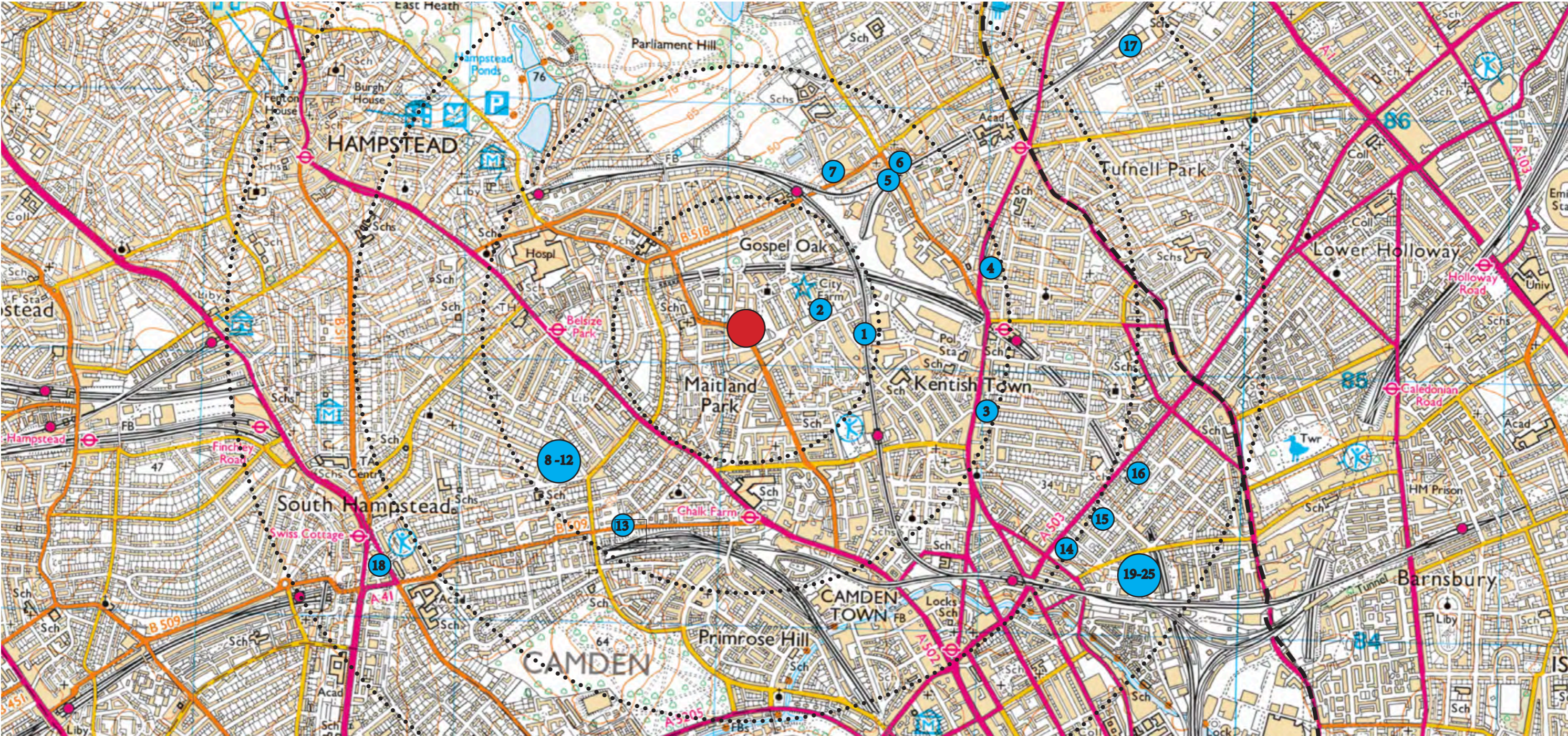
Plan 1: Location of Hand Car Washes within 2km of 160 Malden Road



Number	Name	Address	Driving distance from site (minutes)	Driving distance from site (km)
1	BP Car Wash	215 Haverstock Hill	4	1.4
2	Car Wash Valeting Centre	128A Camden Road	8	1.9
3	Car Carers	Rochester Square	8	1.9
4	Car Wash and Valeting Centre	869 Kentish Town Road	8	2
5	Imo Car Wash	02 Centre	12	3.2

-  160 Malden Road (the site)
-  LB Camden Boundary
-  500m radius lines from site

Plan 2: Location of Car Repair/MOT Centres within 2km of 160 Malden Road



Number	Name	Address	Driving distance from site (minutes)	Driving distance from site (km)
1	The Car Surgery	2-4 Arctic Street	5	1.4
2	West Hampstead Motors	155-161 Grafton Road	5	1.4
3	Cresta Motors	3 Patshill Road	7	1.6
4	M&A Coachworks	52 Fortess Grove	7	2
5	M&A Coachworks	135 Highgate Road	4	1.6
6	Dar Cars	132-134 Highgate Road	4	1.6
7	Kwik Fit	6 Lissenden Gardens	3	1.6
8-12	Belsize Motors Little & Pace Motors Hampstead Motor Services Autotech Hampstead Porschewax Engineering	Lambelle Place	4	1.6

Number	Name	Address	Driving distance from site (minutes)	Driving distance from site (km)
13	Modern Motors	95 Adelaide Road	5	1.6
14	Buchanan Motors	128A Camden Road	8	1.9
15	J&J Autos	17 Camden Mews	9	2.5
16	Lucky Motors	61 Camden Mews	8	2.5
17	London TVR	Bush Industrial Estate	8	2.5
18	Kar Dok	97 Avenue Road	9	2.7
19-25	D&J Motors AW Motors Mikes Mechanics German Car Centre Transauto Garage BMW Auto Services Mikes Coachworks	120-136 Camley Street	11	3.7

- 160 Malden Road (the site)
- LB Camden Boundary
- 500m radius lines from site

Appendix B

Site Photos

Photo 1: View of existing site from Malden Road looking north-west (with Wellesley Road Care Home immediately adjacent to the rear)



Photo 2: View of northern boundary of site adjoining Wellesley Road Care Home



Photo 3: View of site looking west along Malden Road



Photo 4: View of site looking east along Malden Road

