

27 January 2023

Submitted via Planning Portal (Ref: PP-11669925)

Planning - Development Control
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

UNIT 24, CEDAR WAY INDUSTRIAL ESTATE, LONDON N1C 4PD

APPLICATION FOR FULL PLANNING PERMISSION

On behalf of our client, the London Borough of Camden Community Investment Programme Team ('the CIP Team'), we hereby submit an application for full planning permission to the London Borough of Camden ('LB Camden'), in its role as Local Planning Authority ('LPA'), in respect of the above site for the following proposed development:

Change of use to Class E.

This application is made as part of the CIP Team's wider management of the Cedar Way Estate, 3-30 Cedar Way and neighbouring 120 Camley Street, as freeholder and landlord of these property assets.

The CIP Team has consulted on proposals for the redevelopment of the Cedar Way Estate and 120 Camley Street, to the north. LB Camden also has aspirations for the wider redevelopment of neighbouring commercial sites to the south, under long leasehold to other parties, as outlined in the area-specific Supplementary Planning Document and draft Site Allocations Local Plan.

Whilst the application is for a change of use to the unit, not specific to a particular occupier, the CIP Team has an Agreement for Lease in place with Co Laboratories (Co-Lab), which will occupy this unit as well as others within the Cedar Way Estate already in Class E use. Co-Lab is a female-led incubator and affordable space provider for biotech companies, for which there is an unmet need.

The occupation of this space by Co-Lab is part of the evolution of Camley Street, realising its potential as a more sustainable and distinctive urban neighbourhood and more identifiable place, with its own character and qualities, where more people will be able to live and work. The Council's aim is to make more effective

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use of land, including a mix of new workspaces suitable for different types of business and job opportunities and a range of new homes to meet Camden's housing needs. These will add to a richer mix of activities serving a diverse residential, working and visiting population. The current proposal will establish a strong foundation for the new mixed-use neighbourhood that is anticipated to come forward in the future development.

THE SITE

The site is located within the Cedar Way Estate, which is bounded by Camley Street to the west, the main railway lines (out of St Pancras Station) to the east, with a concrete plant across the nearest railway tracks. The application site is Unit 24, which is located at the southern corner of the estate. To the north are more commercial units within the Cedar Way Estate. To the south, across Cedar Way, is a commercial property (occupied by Alara Wholefoods). The subject property is currently vacant and was last occupied by LBC/Veolia E.S. (UK) Plc as storage (Use Class B8).

Beyond the Cedar Way Industrial Estate and surrounding commercial properties to the north and south, on the eastern side of Camley Street, the surrounding area, to the west side of Camley Street, is characterised by predominantly residential land use, though with a broader mix of uses to the southern end of Camley Street.

The site falls outside of the Central Activities Zone, though its eastern boundary is directly adjacent to the site boundary.

The building is not listed and does not lie within a Conservation Area, nor are there any listed buildings or Conservation Areas immediately adjacent to the site.

The site is located within Flood Risk Zone 1 (the lowest risk).

Camden Road Overground Station (serving Overground services to Stratford, Clapham Junction and Richmond) is approx. 660m to the east, while St Pancras International Station (serving Eurostar as well as domestic services) and King's Cross station (serving London Underground and national rail services) is approx. 950m to the south. Bus services run along Agar Grove, to the north of the site, including no.274 (Angel – Lancaster Gate).



Figure 1: Site and surrounding area (approx. site boundary added in red by Turley, Source: Google)

PLANNING HISTORY

Site Planning History

A review of the LB Camden's planning history records show that the site has a limited planning history:

- **Application ref. 2004/1110/P** for the *"A replacement external staircase with a small single storey ground floor extension underneath to contain electrical equipment, new and replacement of windows and doors throughout (PVCu) and the installation of security shutters on openings throughout."* Granted on 15 April 2004.

However, it is understood that the unit was most recently occupied by LBC/ Veolia E.S. (UK) Plc as a storage/ warehouse (workshop, salt store and vehicle parking) in Use Class B8. The units are understood to have originally been constructed for light industrial uses (Class III light industrial under the Town and Country Planning (Use Classes) Order 1972, as amended) and under Permitted Development rights it would have been permissible to establish a B8 use without the need for express planning permission. We therefore consider the existing lawful use to be Use Class B8 (Storage and Distribution).

Relevant Surrounding Planning History

A review of the LB Camden's planning history records shows the existing lawful use of the other neighbouring units within the Cedar Way Industrial Estate; the planning history shows a number of successful applications for planning permission or lawful development certificates for change of use to Class E (or formerly B1(c)) at Units 9, 21-22 and 28:

- **Application ref. 2021/3719/P** for the *"Use of premises for business use (Class E)."* At Unit 21-22, Cedar Way Industrial Estate, Cedar Way London N1C 4PD. Certificate of Lawfulness (Existing) Granted on 13 October 2021.
- **Application ref. 2006/2338/P** for the *"Use of the unit as a catering butcher (Class B1)."* At Unit 28 Cedar Way Industrial Estate Cedar Way London NW1 OPD. Certificate of Lawfulness (Existing) Granted on 21 June 2006.
- **Application ref. 2006/0463/P** for the *"Change of use of from storage and distribution (Class B8) to light industrial use (Class B1c), and installation of new extract system."* At Unit 9 Cedar Way

Industrial Estate Cedar Way Elm Village London NW1 0PD. Full Planning Permission Granted on 02 May 2006.

PROPOSALS

Full planning permission is sought for:

Change of use to Class E.

As set out above, the proposals seek to deliver a change of use from storage (Use Class B8) to a Class E use. It should be noted that there will be no physical works externally.

Co-Lab is a female-led incubator for biotech companies. Its vision is to be a collaborative hub for innovation and a leader in scale-up lab spaces, empowering small and growing companies to stay in the local area and develop with support. The proposals will therefore enable Co-Lab to refurbish and reutilise the currently vacant unit into high quality lab spaces for enterprises.

Whilst the change of use is not tied to a specific occupier, we note for context that Co-Lab has committed to a range of measures, as part of its lease with LB Camden, to contribute to key aims of the Camden 2025 strategy. This will include commitments relating to local employment, training and education (including liaising with local schools) and engagement with Camden's Inclusive Business Network. The proposed occupation of Co-Lab within Unit 24 and, under their existing use class, Units 3-8, 9, 15 and 29, is anticipated to provide labs space to accommodate 15-30 small businesses.

Co-Lab's operations fall within Class E (g), predominantly E(g) (ii) and (iii) with ancillary office.

PLANNING POLICY CONTEXT

Development Plan

In accordance with Section 38(6) of The Planning and Compulsory Purchase Act 2004, the proposals must be assessed against the Development Plan and other material considerations. The adopted Development Plan for the site comprises:

- London Plan (2021)
- LB Camden Local Plan (2017)
- LB Camden Policies Map (2021)
- Camley Street Neighbourhood Plan 2019-2034 (2021)

Adopted Policies Map Designations

A review of the Camden Policies Map (2021) shows that the site has no designations. However, the eastern boundary is directly adjacent to the boundaries of Central Activities Zone (CAZ), King's Cross Growth Area and Kings Cross Opportunity Area.



Figure 2: Adopted Policies Map (2021) Extract (Approx. site boundary added in red by Turley)

Relevant Material Considerations

The following are also material considerations when assessing proposals at the site:

National Planning Policy Framework (2021)

The National Planning Policy Framework (updated 2021) is a material consideration in the determination of planning applications. Whilst the NPPF does not change the statutory status of the Development Plan as the starting point in decision making, the NPPF constitutes the Government's view of what sustainable development means in practice for the planning system.

The Government's objective in publishing the framework is to establish a clear presumption in favour of sustainable development, to support LPAs proactively driving and supporting sustainable economic development to deliver the homes, commercial premises and infrastructure the country needs.

At the heart of the NPPF and wider Government guidance is the presumption in favour of sustainable development which is considered to represent a 'golden thread' that runs through both plan-making and decision-taking.

National Planning Practice Guidance (PPG) (2021)

The PPG supplements those overarching objectives of the NPPF. Those elements of the PPG that are considered most pertinent in the determination of this planning application relate to providing Class E use.

Draft Camden Site Allocations Plan (2020)

The Council is preparing a new Camden Site Allocations Local Plan document which will set out the Council's approach to future development on key sites across the borough. Once adopted, this Plan will replace policies in the currently adopted Site Allocations Plan (2013).

A consultation on the draft Site Allocation Plan took place between 13 February and 27 March 2020. In response to various requests from local residents and community groups, further consultation was undertaken on the draft Site Allocations Plan between December 2021 and January 2022.

The site is located within the '**Knowledge Quarter**', Section 03 of the draft Site Allocations Plan, which supports future growth and development of academic, cultural, research, scientific and media institutions and organisations, and to ensure that local communities and other businesses in Camden genuinely benefit from new proposals.

The site is also located in the ‘**Camley Street and St Pancras Way Area**’, Section 06 of the plan, and subject to site specific guidance referred to as draft Policy CSP3, as well as over-arching policy guidance referred to as draft Policy CSP1.

Supplementary Planning Documents and Guidance

Supplementary Planning Guidance (SPGs) and Documents (SPDs) prepared by the Greater London Authority (GLA) and LB Camden are also material considerations. In particular, the Canalside to Camley Street SPD (2021) is relevant when assessing proposals at the subject site.

Camden 2025

Camden 2025 sets out the Council’s vision for the Borough in 2025 where residents contribute to the shared goal of achieving a safe, fair, creative and active community. In response to Camden 2025, ‘Our Camden Plan’ has also been prepared which sets out how the Council will achieve the Camden 2025 ambitions.

Camden Renewal Commission

In September 2020, a group of Camden community activists, business owners, academics and organisational leaders came together and produced a Renewal Commission Report (2021) which sets out how the Borough can build a more equal and sustainable society after the pandemic.

KEY PLANNING CONSIDERATIONS

Principle of Class E Use

The proposal is for a Class E use. We consider that the intended occupier, Co-Lab, carries out activities that are within Class E (g) predominantly E(g) (ii) and (iii) with ancillary office. However, the application is not tied to a specific occupier.

The London Plan, Camden Local Plan and draft Camden Site Allocations Plan all support the provision of Class E uses (including commercial/business and light industrial uses) in accordance with the below policies:

- London Plan Policy E2 refers to the need to protect B Use Class space, of which Class E (g) now forms a relevant part. E4 refers to the supply of land and premises for a range of industrial uses, including light industry and R&D, as well as B8; in this case the planning benefits of the proposed light industrial and R&D use outweigh those associated with the previous B8 use and there is no loss of commercial floorspace proposed. As per policy E7, the change of use allows for intensification of an appropriate commercial use on this non-designated industrial land. London Plan Policy E8 states the evolution of London’s diverse sectors should be supported and promoted, including ensuring the availability of suitable workspaces including start-up, incubation and accelerator space for micro, small and medium-sized enterprises, with specific support for laboratory space, innovation and R&D.
- Local Plan Policy E1 sets out that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses, in particular start-ups, small and medium-sized enterprises. Policy E1 supports the provision of ‘a stock of premises...suitable for a variety of business activities’ and refers specifically to support for ‘science growth sectors’ as well the aim to ‘promote the development of the Knowledge Quarter around Euston and King’s Cross’.
- Local Plan Policy E1(g) refers to existing employment sites and in this regard the proposals comply with the policy in terms of protection of an existing employment site whilst implementing LB

Camden's support for 'intensification of employment sites and premises where these provide additional employment and other benefits in line with Policy E2'. Policy E2 states that LB Camden will 'protect premises or sites...suitable for continued business use'. Policy E2 also supports 'higher intensity redevelopment of premises or sites...suitable for continued business use' though this is not directly relevant to the change of use, albeit the new use will enable an intensified light industrial employment use, with increased employment generation, and will be suitable for start-ups and SMEs.

- Policy CS EM1(a) of the Camley Street Neighbourhood Plan relates to proposals for the 'redevelopment and/or intensification of existing employment sites' and major development proposals and as such is not directly applicable. Nevertheless, we note that Policy CS EM1 states that 'the development of employment premises and sites for non-business use will be resisted unless the criteria a. and b. in Policy E2 of the Camden Local Plan are met'. In this case the proposals will retain business use of the premises. CS EM1 also contains provisions supporting space suitable for SMEs.
- Policy CS EM2 states that 'premises and sites in existing business use in the Camley Street area will be protected, and the uses retained on site in redevelopment schemes, as far as is possible'. Again, the proposals are not for a redevelopment scheme so the policy does not directly apply. In this case the proposal will retain the premises in business use and provide a beneficial use compared to the current occupier, with greater employment generation.
- Draft Policy KQ1 of the draft Camden Site Allocations Local Plan – 03 Knowledge Quarter provides firm support for proposals which create 'suitable floorspace for priority growth sectors...such as life sciences...' and offer a suitable mix of workspace types including business accelerators, start-up and move on spaces to ensure sustainable growth and success of the Knowledge Quarter Innovation District.
- Draft Policies CSP1 and CSP3 of the draft Camden Site Allocations Local Plan (06 Camley Street and St Pancras Way Area) are more relevant to redevelopment of the wider estate and surrounding sites. Notwithstanding this, draft Policy CSP1 refers to 'the potential to strengthen [the area's] role as an employment location'. CSP3 supports the delivery of 'various employment spaces and facilities that meet the needs of both new and existing business uses', including light industrial and knowledge economy uses (in the context of anticipated mixed-use redevelopment).
- Again, Canalside to Camley Street SPD is more relevant to any future plans for redevelopment of the wider estate and surrounding sites. The SPD sets out that the Council will support a mix of workspaces to accommodate a range of business uses, including light industrial, knowledge quarter uses, including spaces of different sizes such as for small and medium-sized enterprises (SMEs).
- In addition, Our Camden Plan (in support of Camden 2025) and the Camden Renewal Commission Report set out the Council's vision for the Borough in 2025. Both documents state the Council will support the life sciences, technology and creative sectors, and ensure clear pathways, resources and opportunities are available for local people, in particular young people.

The proposals will provide 196sqm of Use Class E floorspace, contributing towards the vitality and economy of this key location, which forms part of the Knowledge Quarter and makes an appropriate use of a premises which sits within an existing commercial estate, in accordance with the above noted policies. The change of use will enable a greater density of employment generation from the unit, compared to its current B8 use class. The Class E (g) (ii) and (iii) use is aligned with the focus on growth sectors outlined in the policies and material considerations referenced above.

The planning benefits and wider social value benefits of the change of use and the proposed occupier are as follows:

- Provision of appropriate Class E use within the existing commercial estate.
- Optimising the use of the site for an employment-generating use that is aligned with growth sectors supported by Camden within the Knowledge Quarter and will provide greater employment opportunities than the current B8 use class.
- Supporting, through an appropriate land use, the implementation of Development Plan policies, the area-wide SPD and emerging draft policy, as well as the Camden 2025 vision.
- Facilitation of occupation for a beneficial use for unit 24, as well, by extension, Units 3-8, 9, 15 and 29, to provide the space required for Co-Lab to occupy. The proposed occupation of Co-Lab within these units is anticipated to provide labs space to accommodate 15-30 small businesses.
- The proposed use and occupier will provide opportunities for empowering and upskilling local residents. It is envisaged, though not specifically within the scope of this change of use application, that the occupation of Unit 24 and the other units mentioned, will create and facilitate a range of enterprise, employment and skills opportunities for Camden residents which could include, for example, local recruitment campaigns, apprenticeships, engagement with Camden STEAM and work experience placements. Co-Lab will also offer accessible start-up and move-on space for small businesses. These measures will be addressed in the lease agreement between Co Labs and LB Camden.
- Similarly, the proposed occupier will contribute to and support the local economy through local purchasing and procurement and provide opportunities for collaboration with other local businesses through research expertise and facilities on site.
- The proposed occupier will implement a number of sustainable measures to support LB Camden's net-zero ambitions, including minimising waste, implementing a sustainable supply chain, encouraging active and sustainable modes of travel for staff.

SUBMISSION DOCUMENTS

This application is submitted via the Planning Portal under reference PP-11669925. This application for full planning permission is accompanied by the following documents:

- Application Form and Ownership Certificates
- Completed CIL Form
- Planning Cover Letter (this document)
- Site Location Plan
- Existing and Proposed Floor Plans (no changes proposed)

A payment for the requisite planning application fee of £494.20 has been made via the Planning Portal.

We trust the enclosed provides you with adequate information to progress and validate the application. We will be in touch shortly, but in the meantime, if you require any further information or clarifications, please contact me or my colleague Kinari Tsuchida (Kinari.Tsuchida@turley.co.uk) at these offices.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'O. Jefferson', with a stylized flourish at the end.

Oliver Jefferson
Director

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