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Dear Andrew Deller,

Re: Alpha House, Regis Road, NW5 3EQ

Proposal

Pre-application advice is requested in relation to the full demolition of the existing building, and erection of new five-storey building accommodating self-storage facility (Use Class B8) and flexible office space (Use Class E(g)).

Site description

The application site is part of Regis Road Growth Area, and lies on the northern side of Regis Road. The site is covered by Kentish Town Neighbourhood Area and Forum, defined within the Site Allocation Plan Policies (SALP), and Kentish Town Framework 2020.

The site includes a two storey warehouse, currently occupied by The Purpose Group, on a short-term lease, and is used as a combination of warehouse and office space.

Site history

Relevant planning history at the application site:

APP: PEX0200392

DATE: 09/12/2002

TYPE: FULL

DESCRIPTION.: Insertion of a mezzanine floor (area approx. 1340 sq metres) in connection with the use of the premises as an office and distribution plant (Use Classes B1(a)/B8) as shown on

DECISION: Granted (Committee)

APP: PEX0100963

DATE: 22/04/2002

TYPE: FULL

DESCRIPTION.: Change of use from Class B1 (Business) to Class B8 (Storage and Distribution).

DECISION: Granted (Committee)

Assessment

In line with policy G1 of the Camden Local Plan 2017, the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden. There are certain areas in the borough identified for their growth

potential and one of them is Kentish Town Regis Road. To ensure strategic and coordinated approach to redevelopment, this is supported by the Kentish Town Framework, adopted in July 2020.

The application site lies at the north of Kentish Town Regis Road development area. In line with policy G1, the aim of the Kentish Town Framework is to achieve a comprehensive mixed-use employment-led redevelopment for the area, focused on industrial floorspace (Use classes B1c, B2, B8 and sui generis of a similar nature) whilst considering an appropriate amount of supporting office uses (B1) in suitable locations.

Given the above, the Council seeks to ensure that any development in the interim would not prejudice the future goals for the wider redevelopment of the area and ensure this remains a functional industry area by only considering industrial floorspace uses.

As detailed in the Kentish Town Framework, for applications relating to interim development the Council will take into account:

- Whether the works are absolutely necessary for the continued functioning of the site as an industry area in the interim of comprehensive development
- Whether the scale and nature of the proposal and whether this is commensurate to interim development.
- Whether the proposals are linked to an existing or identified commercial occupier.
- Whether the site has been marketed for occupation in its current condition.
- Whether the property is being offered with short-term/flexible lease arrangements.
- Whether the proposals could prejudice the physical delivery of a comprehensive scheme on the site. For example, by blocking potential access, providing inactive or unsuitable street frontages, being of a nature that could be incompatible in a mixed-use environment.
- Whether the proposals could prejudice the viability of a comprehensive scheme. For example, by making significant investment into buildings that are likely to be redeveloped.

The current building operates as storage and distribution (Class B8) and office (current use class E) unit, which are uses that align with the aspirations for the area. The proposed demolition and rebuild to provide the same uses in this location would result in a significant investment into the building, which is likely to be redeveloped in the near future. The submission is for a piecemeal development of the site without a wider approval of the masterplan for the whole area as required by the Council's policies and guidance. As there is no adopted masterplan for this area, it is unclear whether the proposed development would block potential access, or expand in a location incompatible in a mixed-use environment. Therefore, the proposed scheme would not be supported by officers in the event of a future formal planning application as it would likely prejudice the comprehensive redevelopment of the Regis Road Growth Area. Officers can therefore not give any advice on these proposals and would recommend the applicant discusses them with the Council's Placeshaping team to develop a masterplan and come forward as one or a consortium of landowners.

In line with policy CC1, as part of further development of the site you would need to demonstrate that the existing building cannot be retained, improved and reused in a way that resources are optimised efficiently. You should undertake a Condition and Feasibility Study to appreciate if the existing building has potential to be reused. Chapter 9 on Reuse

and optimising resource efficiently of CPG 'Energy efficiency and adaptation' provides detailed information about the hierarchy of this study and further development options following for refit, refurbish, substantial refurbishment and extension, reclaim and recycle. If the study shows that the building could only be used to reclaim and recycle materials, a Whole Life Carbon assessment (including embodied carbon) would be required in line with the GLA draft SPG, where circular economy principles are applied.

If the principle for demolition has been agreed, as part of the Whole Life Carbon Assessment for the new structure, it should be demonstrated how passive design measures have been adopted into the design of the scheme from the outset. The energy strategy for the building should be based on renewable energy and electricity. An energy statement would be required in the event of future planning application. Due to the proposed demolition a detailed Air Quality Assessment would be also required.

Given the nature of the site and its location within Regis Road Growth Area and the future prospects of comprehensive redevelopment, it is likely that any new demolition and rebuild in this location would result in significant amount of carbon emissions without any public benefit to outweigh the harm. As such, the proposal would be contrary to the Council's policies and guidance and would not be supported in the event of a future planning application.

Please see appendix 1 for supplementary information and relevant policies.

If you have any queries about the above letter or the attached document please do not hesitate to contact Nora Constantinescu (0207 974 5758)

Please Note: This document represents an initial informal officer view of your proposal based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

Thank you for using Camden's pre-application advice service; I trust this is of assistance in progressing your proposal.

Yours sincerely,

Nora Constantinescu

Planning Officer
Planning Solutions Team

Appendix 1:

Relevant policies and guidance:

- **National Planning Policy Framework 2021**
- **The London Plan 2021**
- **Camden Local Plan 2017**
- **Kentish Town Planning Framework July 2020**
- **Kentish Town Neighbourhood Plan 2015**