

Address:	NCP Car Park Drury Lane London WC2B 5PW		3
Application Number(s):	2025/2178/P	Officer: Brendan Versluys	
Ward:	Holborn and Covent Garden		
Date Received:	21/05/2025		
Proposal:	Part change of use of basement car park from car parking (Sui Generis) to a self-storage facility (Class B8)		
Background Papers, Supporting Documents and Drawing Numbers: Existing Drawings: 24.162/01; 46694-001-PCL-FP-B6-DR-Y-00001, rev P01; 46694-001-PCL-FP-B5-DR-Y-00001, rev P01; 46694-001-PCL-FP-B4-DR-Y-00001, rev P01; 46694-001-PCL-FP-B3-DR-Y-00001, rev P01; 46694-001-PCL-FP-B2-DR-Y-00001, rev P01; 46694-001-PCL-FP-B1-DR-Y-00001, rev P01; 46694-001-PCL-FP-00-DR-Y-00001, rev P01; Proposed Drawings: 00, rev E; 01, rev E; 02, rev E; Documents: Noise Impact Assessment Report prepared by CP CO 13 Limited, 15/04/2025; Fire Statement prepared by SOCOTEC UK Ltd, rev 2, 09/05/2025; Planning Statement prepared by Icen Projects Limited, May 2025; Site Specific Working Plan document; CCTV Monitoring & Alarm Receiving document; EFAFLEX roller-shutter door document; Noke Smart Entry System document; Noke Smart Entry System product information document; Access & Monitoring Flow Diagram			
RECOMMENDATION SUMMARY: Grant conditional planning permission			
Applicant: CP CO 13 Limited		Agent: Icen Projects	
CP CO 13 Limited 43-45 Dorset Street London W1U 7NA United Kingdom		Icen Projects Da Vinci House 44 Saffron Hill Farringdon EC1N 8FH	

ANALYSIS INFORMATION

Land use floorspaces				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
Sui Generis	Car park	11,514.5	9,539	-1,975.5
B8	Self-storage facility	-	1,975.5	+1,975.5

Parking details			
Car Type	Existing spaces	Proposed spaces	Difference
Car - General	327	151	-176
Car - Disabled accessible	6	8	+2
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – residential long stay	-	-	-
Cycle – commercial long stay	32	32	-
Cycle – short stay (all uses)	-	-	-

EXECUTIVE SUMMARY

- i) The application relates to the lower three floors of an existing five storey NCP underground car park. The site lies within the Seven Dials (Covent Garden) Conservation Area. The car park sits below a 14-storey mixed use building known as New London House, which features retail, office and residential floorspace with a theatre (Gillian Lynne Theatre)
- ii) The basement car park is accessed off Parker Mews and currently has 327 general access car parking spaces (11,514.5sqm). The applicant's view is that the car park is over-provisioned for the demand of its customers given the site's well-connected location with a PTAL rating of 6b, it has therefore proposed to repurpose part of the underutilised subterranean car park as a self-storage facility.
- iii) The self-storage facility would be operated by 'Here Self Storage' which are an established operator of self-storage facilities at other sites in the UK. The self-storage facility would comprise 822 drive up self-storage units across floors -4 Level B-C, -5 Level C-D and -6 Level D, equating to 2995.3sqm GFA of B8 use. The rest of the car park will remain as a car park use.

- iv) No external alterations are proposed.
- v) The facility would be accessible 24/7 by customers. The existing ticket office will form both a ticket office for the retained car parking and a reception for the self-storage facility. The existing access arrangements will be utilised for the operation of the facility.
- vi) A 'Site Specific Working Plan' has been submitted which describes how the facility is staffed and operated, how customers are verified and granted access, and how security systems (smart entry and CCTV monitoring) protect the site and customers' stored goods.
- vii) The loss of car parking at the site is supported as the Camden Local Plan 2017 supports the redevelopment of existing car parks for alternative uses in order to reduce car use and lead to reductions in air pollution and congestion, and to improve the attractiveness of an area for local walking and cycling. Further, the site benefits from a Public Transport Accessibility Level (PTAL) of 6b, which is the highest achievable level.
- viii) The proposal would bring benefits in terms of delivering increased employment, provides a range of self-storage facilities to cater to local residents and small businesses, and would repurpose existing car parking spaces with the change of use resulting in a predicted reduction in trip generation from the site, which contributes towards reducing carbon emissions and improving air quality in central London.
- ix) On the balance of all material planning considerations, the proposals are acceptable in planning terms. The scheme complies with the development plan as a whole and is recommended for approval.

OFFICER REPORT

Reason for Referral to Committee: Non-residential development involving the change of use of more than 1000sqm of non-residential floorspace (Clause 3(ii)).

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Central Activity Zone	Covent Garden Specialist Shopping Area
Conservation Area	Seven Dials Conservation Area
PTAL (Public transport accessibility)	6b
Contaminated Sites Potential	
Article 4 Basements	You cannot do alterations to a basement or lightwell, without planning permission. The Article 4 Direction applies to the whole of the London Borough of Camden.
Article 4 Land Use	You cannot change the use of a building or any land within it's curtilage from commercial, business and service use to residential use, without planning permission.
Underground development constraints and considerations	<ul style="list-style-type: none">- Subterranean (groundwater) flow- Slope stability

Table 1 - Site designations and constraints

Description

- 1.2 The site is known as New London House and is a 14-storey mixed use building in Covent Garden. The building features retail, office and residential floorspace with a theatre (Gillian Lynne Theatre) and 5 storeys of basement car parking. The site is subject to two leasehold interests whereby the theatre and car parking form part of the same long-term leasehold to the applicant.
- 1.3 The site fronts Drury Lane to the south, Macklin Street to the west and Parker Street to the east. The basement car park is accessed off Parker Mews and currently has 330 general access car parking spaces (11,514.5sqm).

- 1.4 The site has a Public Transport Accessibility Level (PTAL) rating of 6b (Excellent), and is in proximity to three London Underground stations, as well as bus services on New Oxford Street, Shaftesbury Avenue and Kingsway.
- 1.5 The surrounding context is characterised by a mix of uses including residential apartment blocks, commercial buildings, ground floor retail and education (St Joseph's Catholic Primary School).
- 1.6 The site has no designations or allocations under the Camden Local Plan 2017. The site does not contain any listed buildings but is located within the Seven Dials (Covent Garden) Conservation Area. Seven Dials Conservation Area and conservation area statement notes New London House as making a positive contribution to the conservation area. There are no listed buildings in proximity to the site.

2. THE PROPOSAL

- 2.1 The proposal is for the part change of use of the basement car park from car parking (Sui Generis) to a self-storage facility (Class B8).
- 2.2 The proposals would provide 822 drive up self-storage units across floors -4 Level B-C, -5 Level C-D and -6 Level D, equating to 2995.3sqm GFA of B8 use. The rest of the car park would remain as general access car park use and occupy the remaining upper two floors of the existing car park.
- 2.3 No external works are proposed.

Operations

- 2.4 The facility would be operated by 'Here Self Storage'; an established operator providing a range of storage facilities for local residents and surrounding businesses. It is understood Here Self Storage operate similar self-storage facilities at three other locations in the UK, outside of London.
- 2.5 The facility would be accessible 24/7 by customers. The facility would be staffed between 08:00 –18:00, 7 days/week.
- 2.6 The existing ticket office would form both a ticket office for the retained car parking and a reception for the self-storage facility.
- 2.7 Customers first time accessing the self-storage facility would be during staff hours and by appointment only, where they will be greeted by staff and shown around the facility. After that, customers will be able to access the facility through a booking system.
- 2.8 The existing access arrangements would be utilised for the operation of the facility. Customers arriving by vehicle would be informed of the height restriction (2.1m) when booking either over the phone or via the website.

Vehicles larger than a transit van will be denied access to the self-storage centre. Customers would access the self-storage facility (occupying the lower floors of the car park) via the existing car park. The entrance to the self-storage facility would be sign-posted and a barrier constructed at the ramp access to the self-storage facility.

- 2.9 No parking or designated set down bays are to be provided within the car park with the exception of 1 x accessible space for use by staff, if required. For those visiting the facility to load/unload items for storage from a private vehicle or bikes and/or cargo bikes, sufficient width is available within the circulatory throughout the site to enable vehicles to enter, navigate toward their respective storage unit and temporarily set down adjacent to the unit to load (whilst not blocking circulation of the facility for other vehicles), before egressing the site via the vehicular access onto Parker Mews.
- 2.10 Refuse servicing would be undertaken in line with the existing arrangement at the site whereby any rubbish produced will be coordinated with the building operator.
- 2.11 CCTV cameras are installed at entry ways and throughout the facility. These are live monitored continuously, while others (in corridors) are motion triggered.
- 2.12 Both the fire alarm and intruder alarm systems are monitored and integrated within the CCTV system.

For access control, 'Noke Systems' is used throughout the facility which allows building access and activity to be tracked, revoke entry permissions instantly and manage access points remotely via an online portal, without needing to be on site.

3. RELEVANT HISTORY

The site

- 3.1 **2025/1051/P** – Installation of electric vehicle charging points, installation of internal plant, installation of sprinkler tanks and associated screw piles, removal of car parking spaces. Granted 05/05/2025

The area

- 3.2 None relevant

4. CONSULTATION

Local groups

Seven Dials CAAC (Conservation Area Advisory Committee)

- 4.1 No comments.

Adjoining occupiers

- 4.2 Three site notices were displayed, one on Parker Street at the car park entrance/exit, one on Drury Lane to the site's south-western edge, and one on Macklin Street to the site's north-western edge. The notices were displayed on 04/06/2025 until 28/06/2025 and the application was advertised in the local paper on 05/06/2025 (expiring 29/06/2025).
- 4.3 No responses were received.

5. POLICY

National and regional policy and guidance

[National Planning Policy Framework 2024 \(NPPF\)](#)

[National Planning Practice Guidance \(NPPG\)](#)

[London Plan 2021 \(LP\)](#)

[GG1 Building strong and inclusive communities](#)

[GG2 Making the best use of land](#)

[GG5 Growing a good economy](#)

[GG6 Increasing efficiency and resilience](#)

[SD4 The Central Activities Zone \(CAZ\)](#)

[D11 Safety, security and resilience to emergency](#)

[D12 Fire safety](#)

[D14 Noise](#)

[E2 Providing suitable business space](#)

[E4 Land for industry, logistics and services to support London's economic function](#)

[E8 Sector growth opportunities and clusters](#)

[E11 Skills and opportunities for all](#)

[T4 Assessing and mitigating transport impacts](#)

[T5 Cycling](#)

[T6 Car parking](#)

[T6.2 Office Parking](#)

[T6.5 Non-residential disabled persons parking](#)

[T7 Deliveries, servicing and construction](#)

[DF1 Delivery of the Plan and Planning Obligations](#)

[M1 Monitoring](#)

[London Plan Guidance \(LPG\)](#)

[Sustainable Transport, Walking and Cycling](#)

Local policy and guidance

[Camden Local Plan \(2017\) \(CLP\)](#)

[Policy G1 Delivery and location of growth](#)

[Policy C5 Safety and security](#)

[Policy C6 Access for all](#)

[Policy E1 Economic development](#)

[Policy E2 Employment premises and sites](#)
[Policy A1 Managing the impact of development](#)
[Policy A4 Noise and vibration](#)
[Policy CC5 Waste](#)
[Policy TC2 Camden's centres and other shopping areas](#)
[Policy T1 Prioritising walking, cycling and public transport](#)
[Policy T2 Parking and car-free development](#)
[Policy T3 Transport infrastructure](#)
[Policy DM1 Delivery and monitoring](#)

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

[Amenity - January 2021](#)
[Employment sites and business premises - January 2021](#)
[Town centres and retail - January 2021](#)
[Transport - January 2021](#)

Draft Camden Local Plan (DCLP)

The council has published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation (DCLP). The Proposed Submission Draft Camden Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government on the 3 October 2025 for independent examination, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Plan will now be examined by a Planning Inspector.

Previously, the Council published the draft new Camden Local Plan for consultation in January 2024 and published an updated Proposed Submission Draft Camden Local Plan for consultation from 1 May to 27 June 2025.

The Proposed Submission Draft Local Plan is a significant material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to an emerging plan increases as it progresses towards adoption. In line with paragraph 49 of the National Planning Policy Framework (NPPF), the degree of weight to be given is a matter for the decision-maker, having regard to the stage of preparation, the extent of unresolved objections, and the consistency of the draft policies with the NPPF.

6. ASSESSMENT

- 6.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Land use
8	Crime and security
9	Impact on neighbouring amenity
10	Transport
11	Refuse and recycling
12	Fire Safety
13	Employment and Training Opportunities
14	Biodiversity Net Gain
15	Community Infrastructure Levy
16	Conclusion
17	Recommendation

7. LAND USE

Loss of car parking use

- 7.1 Policy T2 of the Camden Local Plan states that the Council will support the redevelopment of existing car parks for alternative uses in order to reduce car use and lead to reductions in air pollution and congestion, and to improve the attractiveness of an area for local walking and cycling. The site is located within the Central London Area and is highly accessible in terms of public transport.
- 7.2 The existing NCP car parks are understood to be under-used. As discussed under section 2 'The Proposal', the proposals result in the loss of 176 of the total 327 existing underground car parking spaces.
- 7.3 While no parking survey has been undertaken to inform the demands of the existing car park, a significant parking provision of 151 general access car parking spaces, would be retained at the site. An existing public access 'Spokesafe' (secure parking spaces for bikes, e-bikes, cargo bikes & scooters) facility would also be retained.
- 7.4 The parking provision being retained is anticipated to meet the current demand requirements for the local area. These parking spaces will remain accessible from the car park's existing access ramps to the basement levels.
- 7.5 Additionally, the site is not identified in the 2020 Draft Site Allocation Local Plan document as being a car park which supports the functioning of a town centre. As such, the proposed redevelopment of the car park would support sustainable and efficient transport.

- 7.6 Overall, the principle of the self-storage use at the site is acceptable and an assessment of the more specific aspects of the self-storage facility's operation are outlined further in the report.

Proposed self-storage use

- 7.7 The Camden Local Plan identifies the terms 'business' and 'employment' to refer to uses such as storage and distribution (Use Class B8). Policy E1 (Economic Development) and Policy E2 (Employment premises and sites) of the Local Plan identifies 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, and will encourage the provision of employment premises and sites in the borough.
- 7.8 The principle of the proposed change of use of an existing car park (Sui Generis) to a self-storage facility (B8) is in line with local policy as it will result in an increase in 1,975.5qm of employment floor space within an existing car park, therefore intensifying the provision of employment floor space in central London. Here Self Storage is considered a medium sized enterprise and therefore the change of use to facilitate the operation of the facility is directly in line with Policy E2.
- 7.9 The site is located in the Central Activities Zone where 'rich mix of strategic functions and local uses, should be promoted and enhanced'. Part M of Policy SD4 of the London Plan (The Central Activities Zone (CAZ)) identifies that *"sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions.... to support the needs of business and activities within these areas."* The proposed Class B8 Use will support this policy and thus accord with the wider strategic policies for London.
- 7.10 Self-storage is an ever-growing sector in the United Kingdom and the applicant attests, is in high demand from local residents and small businesses alike. The adaptive re-use of existing car parks in central London for the use of self-storage offers a sustainable solution to storage problems for households and local small businesses.
- 7.11 Overall, the principle of the proposed self-storage facility within the existing basement, would provide a convenient amenity for local residents and businesses, and provide additional economic benefits namely through providing new employment opportunities.

8. CRIME AND SECURITY

- 8.1 Policy C5 (Safety and security) of the Local Plan requires appropriate security and community safety measures in buildings to ensure community safety and limit antisocial behaviour.

- 8.2 As detailed under the 'Proposals' section above, customers first time accessing the self-storage facility would be during staff hours and by appointment only, where they will be greeted by staff and shown around the facility. After that, customers will be able to access the facility through a booking system. CCTV cameras are installed at entry ways and throughout the facility. These are live monitored continuously, while others (in corridors) are motion triggered.
- 8.3 The Metropolitan Police's Design Out Crime Officer (DOCO) was consulted regarding the proposals. The DOCO noted that the car park has historically experienced high levels of crime (theft from motor vehicle). The DOCO further noted that *'Having another use within the existing car park could increase natural and formal surveillance. It can provide a legitimate activity and reduce the risk of crime and antisocial behaviour.'*
- 8.4 The DOCO initially raised concerns about the proposed self-storage facility and it not properly mitigating against the risk of theft and other forms of acquisitive crime. The DOCO's specific concerns were that the facility would be:
- accessible to customers 24/7 but unstaffed outside of 08:00 –18:00.
 - incorporate CCTV, but uncertainty as to whether this was actively monitored.
 - Utilise the existing entrance but this not being upgraded with security rated products as part of the change of use.
- 8.5 The applicant subsequently provided a 'Site Specific Working Plan' (SSWP) which describes how the facility is staffed and operated; how customers are verified and granted access; and how security systems (smart entry and CCTV monitoring) protect the site and customers' stored goods. With regard to CCTV, the SSWP details the site as monitored 24/7 by a private security company. Security events are verified by operators who filter false alarms, issue live audio challenges (where installed), and escalate to emergency services when warranted.
- 8.6 While the facility would not be staffed overnight, the existing car park entry (utilised for both the car park and the proposed self-storage facility) is fitted with a 'Efaflex' shutter door (certified to Resistance Class RC 3 under DIN/TS 18194:2020) and provides a strong level of burglary resistance, designed to withstand attacks using tools such as crowbars and screwdrivers for several minutes, creating a significant physical delay for intruders.
- 8.7 The car park would be accessible 24/7 but through the sliding gate which will be operated through an app, so only by staff or existing customers. The car park will also be covered by 24/7 remote monitored CCTV. The site would have a Tannoy to be able to speak with anyone loitering or who does not

appear to be a customer. The monitoring company would escalate to the police, key holder or branch manager dependent on the situation on site.

- 8.8 The Noke Ion locks to storage units are fail secure so should there be a power cut they remain locked. For the shutter door, with third party automation Here Self Storage provide an input signal only to open the doors via the Storage Smart Entry mobile app (or Bluetooth key fob). In the event of a power cut, the door can still be manually opened using a lockable, dedicated emergency release handle connected to a pre-tensioned spring system, allowing controlled lifting without power and ensuring only authorised personnel can operate it. Once power is restored, the system automatically re-engages and locks securely. The entry door control automation and fire egress strategy would be outside of the Noke Smart Entry scope of work.
- 8.9 Having reviewed the further information provided by the applicant, the DOCO is satisfied that the security measures detailed in the SSWP (including the existing roller shutter door) would be sufficient in minimising crime and anti-social behaviour at the site. In particular, despite the facility being open to customers but unstaffed overnight, the risk of crime is adequately minimised.
- 8.10 A condition (condition 4) is attached to ensure the self-storage facility operates in accordance with the submitted SSWP.
- 8.11 The proposed operation of the self-storage facility is therefore in line with Local Plan Policy C5.

9. IMPACT ON NEIGHBOURING AMENITY

- 9.1 CLP policies A1 (Managing the impact of development) and A4 (Noise and vibration) and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and future occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.
- 9.2 The Amenity CPG, and the BRE Guidelines focus on impacts to residential properties with protection of their amenity being given greater weight.
- 9.3 In this case, the self-storage facility's operations would generally be confined to within the site (i.e. the basement car-parking floors) and not impact on the amenity of persons residing in the nearby area in terms of loss of light, outlook or privacy. The proposal will also reduce the existing vehicle parking capacity and therefore vehicle movement associated with the car park and potential noise disturbance and fumes from that are expected to decrease.

- 9.4 The applicant's Noise Assessment Report indicates that noise emissions from the storage unit operations that are external (delivery vehicles entering and exiting the car park) are not expected to have an adverse impact on the nearest residential receptors.
- 9.5 Council's Environmental Health Officer is satisfied that the submitted acoustic submission and associated technical details meets Camden Local Plan 2017 guidelines and is therefore acceptable in environmental health terms. A condition (condition 6) is attached to ensure the operational noise levels emitted from the proposed use as a storage facility ensure that the rating level of the noise emitted from the facility does not exceed the existing background level at any noise sensitive premises when measured and corrected in accordance with BS4142:2014 +A1:2019 "Methods for rating and assessing industrial and commercial sound."

10. TRANSPORT

- 10.1 Policy T2 (Parking and car free development) of the Local Plan states that the Council will limit the availability of car parking across the borough and, most importantly, support the redevelopment of existing car parks for alternative uses.
- 10.2 Policy T6 (Car Parking) of the London Plan identifies that car parking should be restricted in line with the levels of existing and future public transport accessibility and connectivity.
- 10.3 Policy T1 requires the Council to promote sustainable transport by prioritizing public transport throughout the Borough. This includes ensuring that accessible and secure cycle parking facilities are provided in line with the London Plan requirements for cycle parking and design standards.
- 10.4 Marked parking bays are not demarcated on the proposed layout of the self storage facility as vehicles will access the site on an ad-hoc basis and will park adjacent to the self-storage units to undertake loading/unloading. For those visiting the Site to load/unload items for storage from a private vehicle or bikes and/or cargo bikes, sufficient width is available within the circulatory throughout the Site to enable vehicles to enter, navigate toward their respective storage unit and temporarily set down adjacent to the unit to load (whilst not blocking circulation of the facility for other vehicles), before egressing the Site via the vehicular access onto Parker Mews.
- 10.5 The provision of an alternative use (B8) within the existing car park is supported by Policy T2. The site has a PTAL rating of 6b which signifies the site has excellent public transport accessibility with the site conveniently located centrally between both Holborn (Picadilly Line) and Covent Garden (Picadilly Line / Central Line) underground stations. The existing use of the

site as a car park is no longer consistent with the objectives of the London Plan and the Local Plan (Policy T6) in such a high accessibility location.

Trip generation

- 10.6 The existing car park facility currently comprises 327 existing car parking spaces across five separate lower levels. A total of no. 176 car parking spaces are to be removed from the Site to provide 822 no. self storage units. This will reduce the existing car parking facility to no. 151 car parking spaces.
- 10.7 According to the Transport Statement (TS), the interrogation of TRICS database showed no comparable surveyed sites were available to determine trip generation.
- 10.8 A review of 'recently' approved planning application of a similar nature in Central London with an excellent level of accessibility to public transport identified an application 17/03780/FULL that was approved by Westminster City Council in July 2017 for the change of use of part of the existing NCP Edgware Road basement car park at Water Gardens on the Hyde Park Estate in Paddington to be used as storage space (Use Class B8). The trip generation presented within the TS in support of the consented scheme consisted of survey data collected from operational Safestore self-storage facilities in Paddington and Notting Hill which was assessed to understand how many trips the proposed storage would likely generate.
- 10.9 The Paddington site is located in the City of Westminster, has 2,306sqm (GIA) of floor space, 389 storage units and two parking spaces. The Notting Hill store is located in the Royal Borough of Kensington and Chelsea (RBK&C), has 4,491sqm (GIA) of floor space, 536 storage units and four parking spaces.
- 10.10 The daily trip rate, based on the quantum of storage units, shows the proposal has the potential to generate up to 30 weekday and 25 weekend vehicle trips per day, fewer vehicle trips than the existing car park could. Considering the removal of 176 existing car parking spaces and predicted reduction in trip generation, Council's Transport Officers consider this trip generation as acceptable.

Access and permeability

- 10.11 Vehicular access into the site is by the use of a ramp from Parker Mews via a priority junction with Parker Street. It is proposed to retain the vehicle circulation access aisles that connect the various levels throughout the site, to enable easy access into the storage facility from the adjacent car park. Once through the controlled storage facility entrance, the retained circulatory access aisles allow vehicles and/or cycles/cargo bikes to navigate toward their respective storage unit and temporarily set down adjacent to the unit to

load, whilst not blocking circulation for other vehicles. The headroom restrictions of 2.1m height clearance at the entry to the car park restrict vehicles to motorcycles, cars, and vans. This restriction would be communicated to all customers of the storage facility through the marketing and sign-up processes, website and over the phone. Vehicles larger than a transit van would be denied access to the self-storage centre.

Cycle parking

- 10.12 The site benefits from 32 cycle parking spaces comprising a mix of a two-tiered rack system and several Sheffield stands, inclusive of spaces dedicated for larger cargo styled bikes. The development proposes to rely on the existing cycle parking provision. Considering the fact that only two employees would be required to be on-site at any one time and that any cycle trips to the storage facility involve the loading/unloading of the goods and not the actual parking, this is considered acceptable.

Car parking

- 10.13 The site is located in controlled parking zone CA-C (Single Yellow lines), which operates 08:30-18:30 Monday to Friday and 08:30-18:30 on Saturday, with 24hrs Residents Bays.
- 10.14 The existing car park comprises 327 car parking spaces across five separate lower levels. 176 car parking spaces are to be removed to provide 822 self-storage units. The proposed site is intended to operate on a 'drive through' basis, with all vehicles required to temporarily set down to load adjacent to their respective storage unit. A swept path analysis has been provided which confirms vehicles (up to a Ford Transit L4 H3 van) can pass by parked vehicles easily within the circulation space of the self-storage facility.
- 10.15 As the proposal involves a significant reduction in on-site car parking spaces, and the self-storage facility would only employ two staff, it is not considered necessary to secure the use as business car park permit free.

Construction management

- 10.16 Councils' Transport Officers considers Construction Management Plan is unnecessary, namely due to the limited scope of works and ability for construction vehicles to park within the existing basement parking during the construction works.

Deliveries and Servicing

- 10.17 There are no changes proposed to the existing servicing arrangements. As such, a Delivery and Servicing Management Plan is unnecessary.

Summary

- 10.18 Overall, the proposal is acceptable in terms of transport implications, involving a significant reduction in on-site car parking and being located in a highly sustainable and accessible location in line with planning policy. The proposal will not generate a significant level of vehicular traffic and as such, would not have a significant impact on the capacity of the surrounding highway network. Conveniently accessible long-stay and short-stay cycle parking would be retained.

11. REFUSE AND RECYCLING

- 11.1 Policy CC5 (Waste) seeks to ensure that appropriate storage for waste and recyclables are provided in all developments.
- 11.2 The self-storage site is anticipated to produce limited volumes of commercial waste. The majority of commercial waste associated with the self-storage industry takes the form of disused boxes and packing materials, which are typically collected on a weekly or fortnightly basis, depending on the scale of the operation on-site.
- 11.3 Refuse servicing will be undertaken in line with the existing arrangement at the site whereby any rubbish produced will be coordinated with the building operator.
- 11.4 Condition 3 would secure the approval of a Waste Management Plan prior to the operation of the self-storage facility.

12. FIRE SAFETY

- 12.1 London Plan policy D12 Fire Safety requires all development proposals to achieve the highest standards of fire safety and incorporate the necessary measures to ensure the safety of occupants. All major development proposals should be accompanied by a Fire Statement produced by a suitably qualified assessor detailing how the development proposal will function in terms of 1) construction methods, products and materials; 2) means of escape; 3) features reducing risk to life; 4) access for fire services and equipment; 5) provision within the site curtilage for fire appliances to access the building; 6) ensuring any potential future modifications to the building will not compromise the base build fire safety/protection. Policy D5 (Inclusive Design) is also relevant in this respect which provides for safe and dignified emergency evacuation for all building users.
- 12.2 The Mayor introduced the London Plan policy to ensure fire safety is addressed at the outset when planning permission is applied for, instead of the issue being first considered at the Building Control stage. The London Plan policy is accompanied by the Fire Safety London Plan Guidance which was issued in draft form for consultation purposes on 11 February 2022. This informs how the mayor will expect developers to address the policy in terms

of providing supporting information and also clarifies the planning authority's role in its determination of applications. The guidance states that the onus is on the applicant to demonstrate compliance with D12 and D5 through its use of fire safety professionals and that it is for the planning officer to ensure the information has been provided. The review of the fire safety measures and their compliance against building regulations and standards will still take place at the Building Control stage and shall not be undertaken by planning officers.

- 12.3 The application is accompanied by a Fire Statement document outlining the key fire safety features incorporated within the development. The submitted document has been prepared by SOCOTEC Ltd which is a firm of qualified fire engineering consultants. It provides information on means of escape (including disabled refuge spaces), fire resistance to building structure elements, smoke clearance vents, fire-fighting staircase core provision, alarm systems and fire suppression measures.
- 12.4 A condition (condition 5) is attached to ensure the development shall at all times be occupied and managed in strict compliance with the Fire Safety Statement.
- 12.5 In view of the above it is therefore considered that the proposals comply with London Plan policies D12 and D5.

13. EMPLOYMENT AND TRAINING OPPORTUNITIES

- 13.1 Camden Local Plan policies E1, E2 and CPG – Employment sites and business enterprises seek to secure a successful and inclusive economy. Camden will support local enterprise development, employment and training schemes for Camden residents, and recognises the importance of other employment generating uses including retail, education, health, markets, leisure and tourism.
- 13.2 The proposed self-storage would provide jobs both during the construction and operational phases.
- 13.3 The Council's Inclusive Economy Team have been consulted on the application and their comments are incorporated below.
- 13.4 As the build cost would exceed £1,000,000, in terms of Local Procurement, the applicant must also sign up to the Camden Local Procurement Code, as per section 70 of the Employment sites and business premises CPG. Camden's local procurement code sets a target of 10% of the total value of the construction. A Local Procurement Plan would generally be secured via a s106 legal agreement, detailing opportunities for local businesses to bid/tender for the provision of goods and services in the construction phase of the development. However in this case, as the

proposal is only for a material change of use of the land, the associated physical works are internal and the scope/nature of the construction works (namely transporting to and installing storage containers at the site) mean it would be difficult to apply the local procurement requirement to the scheme, despite the fact that the works might exceed £1m. In this case it is accepted that it would not be appropriate to require this of the applicant.

- 13.5 With regard to the end use phase, once the self-storage facility is operational, the operator can recruit for staff locally by using our Good Work Camden recruitment service. If the operator proposed to hire an apprentice, they can do so through Camden's Future Talent team.

14. BIODIVERSITY NET GAIN

- 14.1 Biodiversity Net Gain (BNG) requirements came into effect for small sites on 02 April 2024, however, there are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this proposal will not require the approval of a Biodiversity Gain Plan before development is begun because it is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).

15. COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 15.1 The CIL applies to all proposals which add 100m² of new floorspace or an extra dwelling. The amount to pay is the increase in floorspace (m²) multiplied by the rate in the CIL charging schedule. The final CIL liability will be determined by the CIL team.
- 15.2 No new floorspace is proposed at this stage so it will not be CIL liable.

16. CONCLUSION

The proposed development is a well-considered scheme which would be in accordance with local and national policies. The proposals would provide an employment generating land use on otherwise underutilised land. It has been justified that the proposed change of use of an existing car park, will not cause harm in the context of heritage, amenity and traffic impacts. The

proposals provide numerous economic, social and environmental benefits that weigh in support of the scheme being granted planning permission.

17. RECOMMENDATION

17.1 Grant conditional Planning Permission.

18. LEGAL COMMENTS

18.1 Members are referred to the note from the Legal Division at the start of the Agenda.

19. CONDITIONS

Standard conditions

1 Time limit

The development hereby permitted must be begun not later than three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

2 Approved drawings

The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

24.162/01; 46694-001-PCL-FP-B6-DR-Y-00001, rev P01; 46694-001-PCL-FP-B5-DR-Y-00001, rev P01; 46694-001-PCL-FP-B4-DR-Y-00001, rev P01; 46694-001-PCL-FP-B3-DR-Y-00001, rev P01; 46694-001-PCL-FP-B2-DR-Y-00001, rev P01; 46694-001-PCL-FP-B1-DR-Y-00001, rev P01; 46694-001-PCL-FP-00-DR-Y-00001, rev P01; 00, rev E; 01, rev E; 02, rev E;

Noise Impact Assessment Report prepared by CP CO 13 Limited, 15/04/2025; Fire Statement prepared by SOCOTEC UK Ltd, rev 2, 09/05/2025; Planning Statement prepared by Icen Projects Limited, May 2025; Site Specific Working Plan document; CCTV Monitoring & Alarm Receiving document; EFAFLEX roller-shutter door document; Noke Smart Entry System document; Noke Smart Entry System product information document; Access & Monitoring Flow Diagram

Reason: For the avoidance of doubt and in the interest of proper planning.

Prior to occupation or use

3 Waste and refuse storage

Prior to the operation of the self-storage facility, a Waste Management Plan with details of storage of waste and recycling which shall be stored separately, shall be submitted to and approved by the local planning authority in writing.

The waste and recycling storage facilities shall be provided in accordance with the approved plan prior to first occupation of the development and thereafter permanently maintained and retained.

The facilities must be clearly marked and should be available at all times to everyone using the self-storage facility. You must not use the waste and recycling store for any other purpose.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CC5, A1 and A4 of the London Borough of Camden Local Plan 2017.

Compliance conditions

4 Site Specific Working Plan (SSWP)

The storage facility hereby approved shall operate in accordance with the approved Site Specific Working Plan at all times.

Reason: To ensure the development minimises the opportunities for crime and anti-social behaviour and ensures community safety in accordance with policy D1 and C5 of the Camden Local Plan 2017 and policy D11 of the London Plan 2021.

5 Fire Safety

The development shall at all times be occupied and managed in strict compliance with the Fire Safety Statement prepared by SOCOTEC, rev 2, dated 09/05/2025.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 and D12 of the London Plan.

6 Operational noise limits

The operational noise levels emitted from the proposed use as a storage facility shall ensure that the rating level of the noise emitted from the proposed use shall not exceed the existing background level at any noise sensitive premises when measured and corrected in accordance with BS4142:2014 +A1:2019 "Methods for rating and assessing industrial and commercial sound."

Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from mechanical installations/ equipment in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.

20. INFORMATIVES

1	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
2	This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a

	<p>requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
3	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden.gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
4	<p>Biodiversity Net Gain (BNG) Informative (1/3): The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless: (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan.</p> <p>The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.</p> <p>There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below, but you should check the legislation yourself and ensure you meet the statutory requirements.</p> <p>Based on the information provided, this will not require the approval of a BGP before development is begun because it is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat).</p>
5	<p>Biodiversity Net Gain (BNG) Informative (2/3): + Summary of transitional arrangements and exemptions for biodiversity gain condition</p> <p>The following are provided for information and may not apply to this permission:</p> <ol style="list-style-type: none"> 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024. 4. The permission is exempt because of one or more of the reasons below: - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024.

	<ul style="list-style-type: none"> - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
6	<p>Biodiversity Net Gain (BNG) Informative (3/3):</p> <p>+ Irreplaceable habitat: If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits.</p> <p>+ The effect of section 73(2D) of the Town & Country Planning Act 1990 If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as approved if the conditions attached (and so the permission granted) do not affect both the post-development value of the onsite habitat and any arrangements made to compensate irreplaceable habitat as specified in the earlier BGP.</p> <p>+ Phased development In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.</p>

Planning Committee

13th November 2025

2025/2178/P

NCP Car Park, Drury Lane
London
WC2B 5PW















