



PLANNING STATEMENT

In respect of

400 Edgware Road, Cricklewood, NW2 6ND

On behalf of

Cricklewood PropCo Limited

QUALITY MANAGEMENT

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1. INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Cricklewood PropCo Limited ('the applicant'), in support of a full planning application for the redevelopment of 400 Edgware Road, Cricklewood, NW2 6ND ('the Site').

1.2 The applicant seeks planning permission for the following development works ('the proposal'):

“Erection of rear extension to provide additional self-storage floorspace (Use Class B8) with associated car and cycle parking, landscaping and other works ancillary to the development.”

1.3 The application proposal has been subject to pre-application engagement with the London Borough of Barnet since January 2024. Further information regarding these discussions is provided in Section 4 of this Planning Statement.

1.4 This Planning Statement should be read and considered in conjunction with the following other documents submitted in support of this planning application:

- Completed Application Forms and Certificates, prepared by ROK Planning;
- CIL Additional Information Form, prepared by ROK Planning;
- Planning Statement, prepared by ROK Planning;
- Location Plan, prepared by Threesixty Architecture;
- Design and Access Statement, prepared by Threesixty Architecture;
- Existing and Proposed Plans, Elevations, and Sections, prepared by Threesixty Architecture;
- Accessibility Strategy Plan, prepared by Threesixty Architecture;
- Cycle Strategy Plan, prepared by Threesixty Architecture;
- Fire Strategy Plan, prepared by Threesixty Architecture;
- Refuse Disposal and Recycling Details, prepared by Threesixty Architecture;
- Open Space and Landscaping Plan, prepared by Threesixty Architecture and Keith Wood;
- Air Quality Assessment, prepared by Ardent;
- Delivery and Servicing Management Plan, prepared by Ardent;
- Flood Risk Assessment, prepared by Ardent;
- Noise Impact Assessment, prepared by Ardent;
- Outline Construction Logistics Plan, prepared by Ardent;
- Transport Assessment, prepared by Ardent;
- Travel Plan, prepared by Ardent;
- Be Seen Monitoring Spreadsheet, prepared by Atelier Ten;
- Circular Economy Statement, prepared by Atelier Ten;
- Energy Statement, prepared by Atelier Ten;
- Sustainability Statement and BREEAM Pre Assessment, prepared by Atelier Ten;
- Utilities Assessment, prepared by Atelier Ten;
- GLA Energy Assessment, prepared by Atelier Ten;
- Whole Life Carbon Assessment, prepared by Atelier Ten;
- Overheating and Thermal Comfort Report, prepared by Atelier Ten;

- Lighting Pollution Statement, prepared by Atelier Ten;
- Drainage Strategy (including Barnet Sustainable Drainage Assessment Form), prepared by Will Rudd;
- Preliminary Ecological Assessment, prepared by Ecology Partnership;
- Daylight and Sunlight Statement, prepared by Right of Light;
- Phase I and II Geoenvironmental Reports, prepared by Brownfield Solutions; and
- Heritage Statement, prepared by Handforth Heritage.

2. APPLICATION SITE AND CONTEXT

Site Location and Description

- 2.1 Located in Cricklewood, within the administrative boundary of the London Borough of Barnet ('LBB'), the Site measures 0.5Ha in area and is roughly rectangular in shape.
- 2.2 The Site presently comprises a self-storage facility (Use Class B8) and Use Class E(g)(iii) flexible light industrial space, with associated car parking, landscaping, and other hardstanding.
- 2.3 The Site is bordered by Edgware Road / Cricklewood Broadway to the west and southwest and Roman Road to the southeast. An aggregate / rail freight yard and its access road bound the site to the north and northeast.
- 2.4 Existing vehicular access to the Site is from Roman Road which is accessed from Edgware Road / Cricklewood Broadway and also serves as access for the neighbouring LIDL supermarket and other storage / commercial uses.



Figure 1 - Site Location

Heritage and Environmental Considerations

- 2.5 There are no statutory or locally listed buildings located on or adjacent to the Site, it is also not located within a Conservation area. However, the Railway Terraces Conservation Area is situated some way to the south of the Site. Any impact upon the

setting is discussed below and in the Heritage Statement prepared by Handforth Heritage. All heritage constraints associated with the Site have thus been addressed.

2.6 The Site sits within Flood Zone 1 and is at a very low risk of fluvial and surface water flooding.

2.7 Similarly, there are no Tree Preservation Orders or protected trees located on or in proximity to the Site.

Accessibility

2.8 The Site is highly accessible, with TfL Mapping confirming a PTAL of 3, principally given its location less than 900m from Cricklewood Rail Station and Brent Cross West Rail Station (Thameslink).

2.9 There are also bus stops located adjacent to the Site on Edgware Road / Cricklewood Broadway, serving central and northwest London.

Surrounding Area

2.10 The area surrounding the Site is characterised by a variety of commercial and industrial uses. For instance, to the north of the Site is an aggregate / rail freight yard and a concrete batching plant, whilst to the south is a LIDL supermarket, along with several other commercial and storage buildings. The Site also sits within a triangle of railway lines, and its wider vicinity contains varied residential development.

3. RELEVANT PLANNING HISTORY

- 3.1 A search of the London Borough of Barnet’s online planning records identifies a number of planning applications associated with the Site.
- 3.2 Most recently, in January 2024, LBB granted planning permission ref. 23/4793/FUL, which related to the existing building on the Site. This application was for the:
- Change of use from part education (Use Class F1(a)) and part storage and distribution (Use Class B8) to part light industrial workspace / incubator units (Use Class E(g)(iii)),
 - Retention of part storage and distribution use (Use Class B8),
 - Reconfiguration of parking layout and one access ramp, and
 - Introduction of a trolley bay and a new access gate.

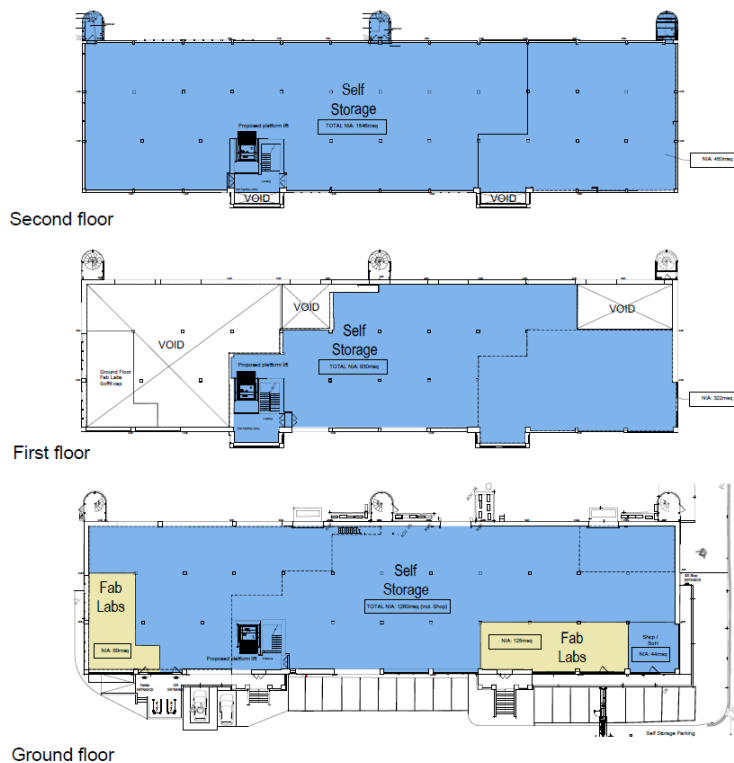


Figure 2 – Layouts as approved in 23/4793/FUL

- 3.3 Prior to this, in October 2023, planning permission was granted for the replacement of the pre-existing cladding and façade alterations to the existing building (application ref. 23/3727/FUL). This application also included reconfiguration of the existing parking layout, addition of an access ramp, the introduction of a trolley bay and a new access gate.



Figure 3 – Elevation approved in 23/3727/FUL

3.4 This permission allowed for the refresh of the existing building to provide a cohesive and more contemporary appearance, considered suitable for its current use as a new self-storage facility (Use Class B8). The approved elevational changes are shown in the above image.

3.5 This application was amended under application ref. 23/5332/NMA. This application, which was approved in December 2023, sought non-material amendments to the façade on the southern elevation. These amendments comprised reductions in glazing in order to balance the appearance of the façade, as seen in the below image.

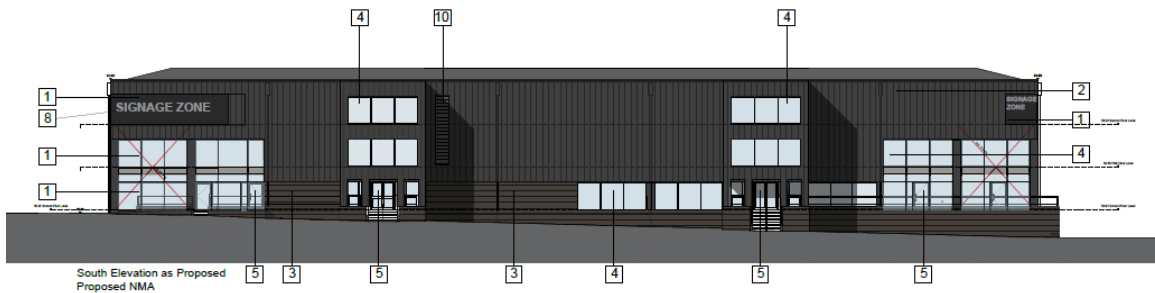


Figure 4 - Elevation as approved in 23/5332/NMA

3.6 The following table sets out the chronology of earlier applications relating to the Site and shows how the existing development / uses on the Site have evolved over time:

Date	Reference	Description
1988	C07951B	<ul style="list-style-type: none"> • 3 production/ storage /distribution units • with associated offices at mezzanine and first floor • a “Clutch Care” unit on the ground floor
1989	C07951E	<ul style="list-style-type: none"> • Replacement of the partial mezzanine floor with a larger new first floor • New first floor to be over the 3

		<p>production/ storage/ assembly units</p> <ul style="list-style-type: none"> • New first floor to be used for ancillary office use.
1995	C07951U	<ul style="list-style-type: none"> • Conversion of the Clutch Care unit to warehousing (Use Class B8) • Introduction of a part mezzanine floor to the former Clutch Care unit at first floor level for ancillary office and distribution use
2001	C07951AR/01	<ul style="list-style-type: none"> • Conversion of part of the first floor from office use to an information technology training centre • Condition was added to the permission stating that it could only be used for An IT Training Centre and for no other use even if it falls within the same use class.
2002	C07951AW/02	<ul style="list-style-type: none"> • Conversion of part of the second floor from office use to an information technology training centre • Condition was added to the permission stating that it could only be used for an IT training Centre and for no other use even if it falls within the same use class.

4. PRE-APPLICATION CONSULTATION

- 4.1 Prior to the submission of this application pre-application discussions have been held with the London Borough of Barnet.
- 4.2 A formal pre-application meeting was undertaken with EFDC officers on the following date:
- LPA Pre-application Meeting – 17 January 2024.
- 4.3 As part of these pre-application discussions LPA officers supported the scheme in principle overall, subject to successful resolution of the issues they had raised. These issues are summarised in the table below.

Officer Comments	Response
Policy considerations	
<p>The site is not located in a Locally Significant Industrial site, however given that the established use of the existing building predominantly comprises of B8 use, and following the principle established in the previous recent consent, the proposed additional Class B8 space by way of the rear extension would not be objectionable or deemed to be in conflict with policy, particularly given that the totality of the B8 use would operate as a single self-storage facility.</p>	N/A
Character and appearance	
<p>The LPA cited some concern in regard to the proposed height of the extension. Measuring c17.5m the extension would rise significantly higher than the already substantial height of the original building fronting Edgware Road, which has an eaves height of c11m. Whilst it is acknowledged that the extension would be set back from Edgware Road, behind the main building, officers are of the opinion that the excessive height will still result in a visually obtrusive and overbearing impact. This impact is exacerbated by the large box style appearance, spanning the full width of the original building and dark material palette.</p>	<p>The documents enclosed with the application include assessments of the impact of the proposed development upon the amenity of the surrounding area and demonstrate its acceptability in terms of visual impact. The proposed extension would not be visible to a pedestrian on Edgware Road and would not harm views from other locations. Since this pre-application consultation, the ridge height of the roof has been reduced to 17.18m. The parapet height has been more substantially reduced to 16m, which also reduced the perceived height and mass of the extension.</p>
<p>Officers have no objection to the proposed footprint and note that the building would occupy a similar proportion of its plot as compared to the Access Self-Storage building to the south. In addition, the large flat roof form is considered to be acceptable in</p>	<p>Visually, the black cladding of the proposed extension has been amended in order to increase visual interest and address concerns about a dark palette and ‘box style appearance’. On the north façade, grey</p>

<p>principle, and officers welcome the proposed green roof and SV panels. The immediate context of the site, with the rear boundary abutting the Rail Freight Facility aggregates yard, allows for a rear extension of the scale proposed to be implemented without in principle prejudicing the amenities of any neighbouring properties.</p>	<p>elements and patterned cladding have been introduced in order to break up the previously black façade. On the east and west, new vertical elements have been introduced. These changes are discussed below and in the Design and Access Statement.</p>
<p>Neighbouring amenities</p>	
<p>It should be noted that the Railway Terraces Conservation Area sits c150m from the applicant site to the south. The visual impact of the extension, which at a height of c17.5m, may very well be easily visible from the Conservation Area, would affect the skyline of this community and would be a material consideration in the planning assessment.</p>	<p>A Heritage Report is enclosed with the application, which demonstrates that the proposed development will not harm the setting of the Conservation Area. The application considers the effects on townscape and the visual impact of the proposed development.</p>
<p>Highways safety, parking, and access</p>	
<p>Table 10.4 (Maximum office parking standards) states that for Outer London Opportunity Areas up to 1 space per 600sqm gross internal area (GIA) is standard. A provision of 27 parking spaces would therefore be more than sufficient.</p>	<p>A transport assessment has been submitted as part of this application.</p> <p>The proposed development includes policy-compliant levels of disabled persons' parking, which is set out in the proposed plans and Design and Access Statement.</p>
<p>Regard must also be had to Policy T6.5 and the requirements to provide access to on or off-street disabled persons parking bay, no less than five percent the total parking provision.</p>	<p>The proposed plans and Design and Access Statement show that the cycle parking on-site will be both secure and weatherproofed. The majority of cycle parking will be situated either in the undercroft area or in cycle shelters, as shown in the aforementioned documents.</p>
<p>The proposal provides for 33 cycle parking spaces, which should be acceptable in principle. Cycle storage / parking should be secure and weatherproofed. Officers would encourage details of the cycle storage / parking to be provided as part of any formal planning application to reduce the reliance on conditions.</p>	

- 4.4 The previous application for the Site, 23/4793/FUL, which gave permission for the Change of Use of the existing building on-site, underwent pre-application consultation prior to its submission. The applicant participated in formal pre-application consultation with London Borough of Barnet in August 2023. This consultation informed the approach taken during the submission of the application.
- 4.5 Further details concerning consultation processes can be found in the Design and Access Statement included with this application.

5. PROPOSED DEVELOPMENT

- 5.1 Planning permission is sought on behalf of Cricklewood Prop Co Limited for the following Proposed Development:

“Erection of rear extension to provide additional self-storage floorspace (Use Class B8) with associated car and cycle parking, landscaping and other works ancillary to the development.”



Figure 5 - Proposed Development

- 5.2 The Site is currently occupied by the existing STOREX Self Storage facility and associated landscaping, and parking and other hardstanding.
- 5.3 The proposal seeks to develop an extension to the existing self-storage facility on the northern part of the Site to provide 2,143sqm of self-storage floorspace (Use Class B8).

Self-Storage Facility

- 5.4 The proposed new self-storage facility will be owned and operated by STOREX Self Storage, a business delivering self-storage facilities across many European cities.
- 5.5 The self-storage units will be used as secure spaces to store goods by both individuals and businesses, meaning it is a source of support for employment. Studies of existing facilities have demonstrated that 62% of customers are likely to live within a ten-minute drive of their unit. The facility will therefore be of direct benefit to the local community.

- 5.6 The proposed development will seek to deliver all non-mezzanine floorspace within the proposed warehouse extension on opening. This will ensure availability of 2,143sqm of B8 floorspace for domestic and business customers.
- 5.7 The floorspace will comprise 2,143sqm GIA. However, a maximum of 5,872sqm GIA can be accommodated within the warehouse building through the use of demountable mezzanine floors.
- 5.8 In accordance with Section 55(2)(a) of the Town and Country Planning Act 1990, planning permission is not required for the carrying out of maintenance, improvement, or other alteration to a building where works affect only the interior of the building and do not materially affect the external appearance of the building; this includes mezzanine floors for non-retail use.
- 5.9 As such, additional floors can be installed at a later date through the use of demountable mezzanines, without requiring planning permission.
- 5.10 The self-storage warehouse has been designed to align with the building strategy of STOREX Self Storage and looks to utilise a suite of materials chosen to give it a distinct individuality while remaining honest to its function.
- 5.11 Key design principles for STOREX Self Storage include a black box, a brick plinth, brand signage and the inclusion of a revealed corridor. All these elements have therefore been incorporated into the proposed design.

Overall Floorspace

- 5.12 As discussed above, the proposed floorspace of the extension will initially totally 2,143sqm GIA, with potential for expansion as needed in future to 5,872sqm GIA.
- 5.13 The table below shows how the proposed floorspace totals will supplement that of the proposed development:

Use	Use Class	Floorspace (sqm)
Existing B8	Class B8	4,153
Existing Light Industrial (Fab Labs)	Class E(g)(iii)	362
Proposed Extension Full Capacity Floorspace	Class B8	+ 5,872
TOTAL		10,387

5.14 It is important to note that there will be a material uplift in floorspace on the proposal Site from that which currently exists on the Site. Accordingly, the proposed development will make a more efficient use of the land while also offering significant placemaking benefits.

Opening Times

5.15 The proposed extension floorspace (Use Class B8) will be accessible to existing customers with the same operational hours as the existing facility.

5.16 Opening hours from Monday to Friday will be 09:00 to 18:00.

5.17 Opening hours on Saturdays will be 09:00 to 17:00.

5.18 Opening hours on Sundays and Bank Holidays will be 10:00 to 16:00.

Parking Provision

5.19 Currently, there are 32no. parking spaces on the Site, all servicing the existing self-storage facility.

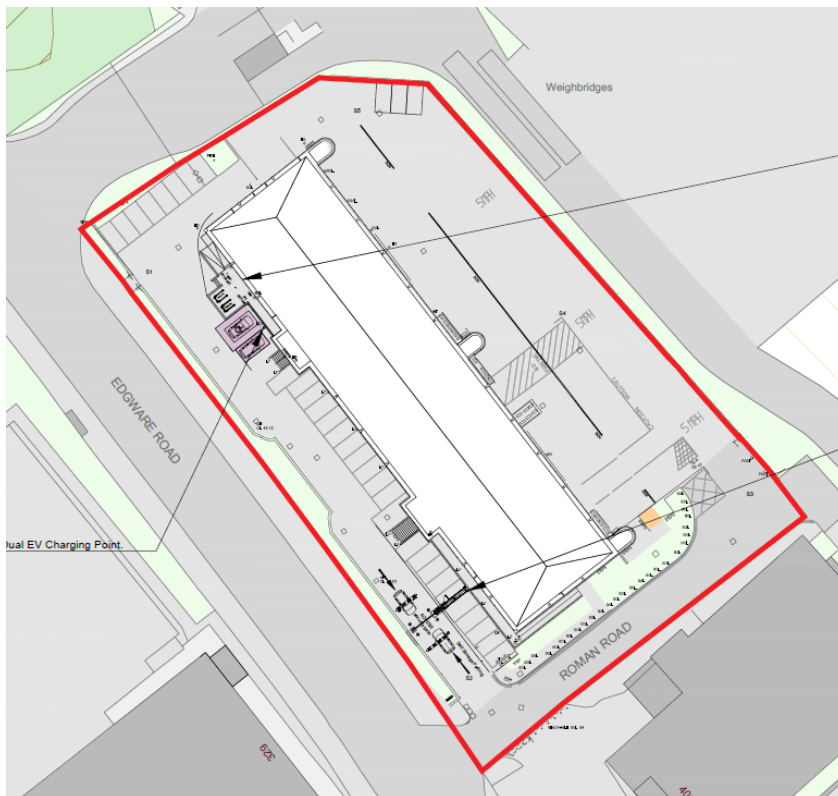


Figure 6 - Existing Parking on Site, as shown in 23/4793/FUL and associated condition submissions

5.20 The Proposed Development includes 27no. parking spaces, including 3no. disabled persons' spaces.

5.21 7no. of these spaces, including 1no. disabled persons' space, are in the undercroft area beneath the extension.

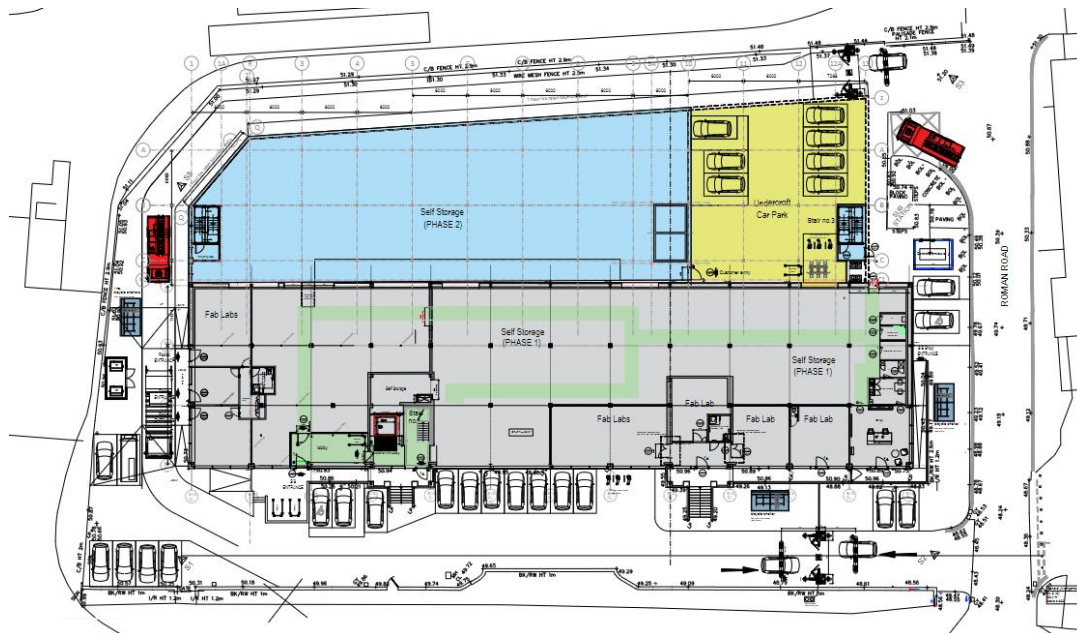


Figure 7 - Parking Proposed by the Applicant

5.22 In addition to the proposed car parking, the proposed development includes 42no. cycle parking spaces. This figure includes 6no. cargo bike parking spaces.

5.23 Further detail on cycle parking provision can be found in the design documents enclosed with the application.

6. PLANNING POLICY CONTEXT

- 6.1 Section 38(6) of the Planning and Compulsory Act 2004 requires any planning application to be determined in accordance with the development plan (i.e. Planning Policy), unless 'material considerations' indicate otherwise. This section identifies the specific development plan relevant to the appraisal site and then specifies relevant 'material considerations' that site alongside the development plan in determining any planning applications at the site.

National Planning Policy and Guidance

National Planning Policy Framework (NPPF)

- 6.2 The National Planning Policy Framework (NPPF) sets out national planning policy. The NPPF was originally published in 2012 and replaced all previous planning policy statements and guidance notes. The NPPF was revised in July 2018, replacing the 2012 version, and an updated version was published in February 2019, July 2021 and December 2023.
- 6.3 At the heart of the NPPF is the presumption in favour of sustainable development, including building competitive economics, strong, vibrant, and healthy communities and contributing to, protecting and enhancing the natural, built and historic environment.

National Planning Policy Guidance (NPPG)

- 6.4 In addition to the NPPF, the Department for Communities and Local Government (DCLG) published the National Planning Policy Guidance (NPPG) in March 2014. The NPPG is a web-based resource which delivers planning procedures and practical guidance in an accessible format and is continually updated when necessary.
- 6.5 Both the NPPF and NPPG are material considerations in the determination of a planning application but do not form part of the Development Plan.

Development Plan

- 6.6 The Development Plan for the London Borough of Barnet comprises the following documents:
- The London Plan (2021);
 - Barnet Local Plan (2012); and
 - Brent Cross and Cricklewood Saved Policies (2006).
- 6.7 The following documents constitute relevant material considerations:

- Barnet Draft Local Plan (currently at Regulation 22);
- Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG (2005);
- Brent Cross Cricklewood 2010 masterplan consent (ref. C/17559/08);
- Brent Cross Cricklewood 2014 S73 masterplan consent (ref. F/04687/13); and
- Brent Cross Cricklewood 2017 'drop in' masterplan consent (17/5761/EIA).

6.8 In October 2021 the emerging Local Plan was approved by the council for submission to the Secretary of State. Following submission, the Local Plan will now undergo an Examination in Public.

Site Designations

6.9 Within LB Barnet's adopted planning proposals map, the Site is designated within the following:

- Rail related employment land – EMP1;
- Cricklewood Regeneration Area;
- Air Quality Management Area (AQMA); and
- Brent Cross Cricklewood opportunity area.

6.10 Within LB Barnet's emerging planning proposals map, the Site is designated within the following:

- Air Quality Management Area (AQMA); and
- Brent Cross Cricklewood Opportunity Area.

6.11 The Site sits adjacent to:

- Railway Terraces Cricklewood Conservation Area; and
- Wildlife corridor and a Grade 1 Site of Importance for Nature Conservation (Dudding Hill Loop between Cricklewood and Harlesden BI06C).

Brent Cross Cricklewood Opportunity Area and Regeneration Masterplan

6.12 Brent Cross/Cricklewood was identified in 2004 within the Mayor's London Plan as an Opportunity Area with potential for *9,500 new homes and 26,000 new jobs*.

6.13 In 2005 the *Cricklewood, Brent Cross and West Hendon Regeneration Area Development Framework SPG* was adopted as a framework for development within the Opportunity Area. Within this framework the application Site was designated for a new Rail Freight Facility ('RFF').

6.14 An outline masterplan consent was approved in 2010 (ref. C/17559/08) for the comprehensive re-development of Brent Cross Cricklewood. This consent largely reflected the above 2005 framework, with the application Site remaining designated for a new RFF.

6.15 In 2014, planning permission under Section 73 of the Town & Country Lanning Act 1990 (as amended) consented for a variation to the 2010 consent and an illustrative masterplan for the Brent Cross Cricklewood Opportunity Area (App Ref: F/04687/13). The consent divided the masterplan into development zones. Within this consent the application Site, Plot 60, again remained designated for a new RFF.



Figure 8 - Brent Cross Cricklewood Regeneration Masterplan – shows the application Site as designated for Railway Lands

- 6.16 Two rail freight studies in 2015 and 2016 determined that there was no longer a demand for the type of facility envisioned within the 2005 framework and consented under the 2010/ 2014 outline masterplan consents.
- 6.17 This change in the type of facility required, and in turn the revised operations of the facility, required less land than that which had been previously allocated within the 2005 framework and approved under the 2010/2014 outline consents.
- 6.18 Therefore in 2017 a ‘drop in’ application was submitted (ref. 17/5761/EIA) although the principle of delivering a new RFF on Plot 60 remained unchanged, the RFF to be provided no longer accorded with all the parameters and controls established by the 2014 Permission. This included the reduction in the extent of land required.

6.19

Consequently, under the 2017 drop in consent, the current application Site was therefore **removed** from the red line of the RFF designation, as shown in the below image. As this land was no longer needed for the delivery of the RFF.

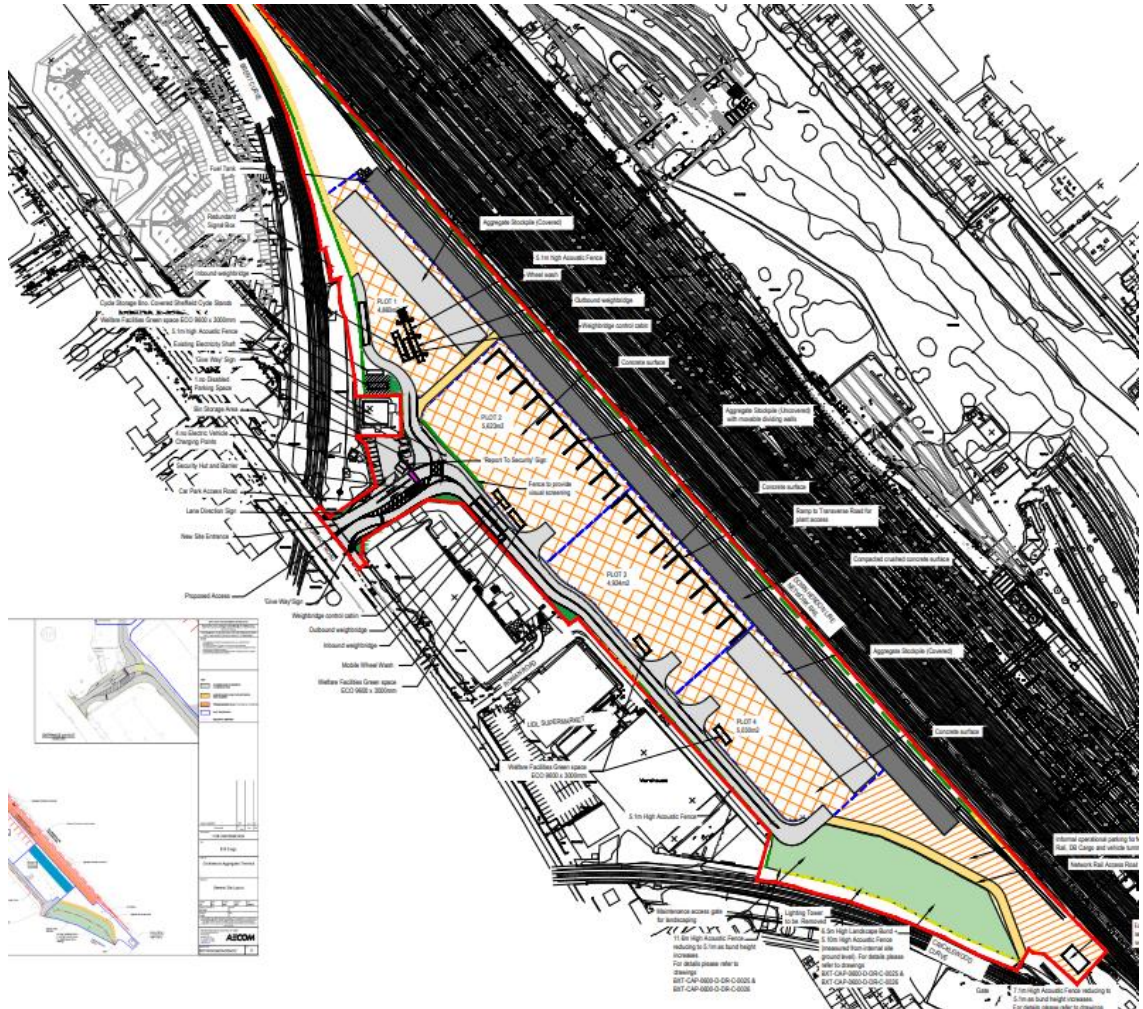


Figure 9 - Amended red line of the Rail Freight Facility – shows the application Site as no longer within the red line boundary (2017 'drop in' application ref. 17/5761/EIA)

7. PLANNING ASSESSMENT

7.1 This section of the Planning Statement assesses the Proposed Development against relevant national, regional, and local planning policy and guidance, and any other relevant material considerations.

7.2 The Proposed Development will be assessed against the following key topics:

- Land Use
- Employment Generation
- Design
- Heritage
- Landscaping
- Biodiversity and Ecology
- Transport
- Energy and Sustainability
- Amenity

Land Use

Principle of Self Storage (Use Class B8) and Fab Labs (Use Class E(g)(iii))

7.3 The proposed extension will provide an additional 2,143sqm of self-storage floorspace (Use Class B8) on the application Site and have the capacity for 5,872sqm.

7.4 Prior to the recent change of use consent (ref. 23/4793/FUL), the existing building on Site consisted of 3,178sqm of storage floorspace (Use Class B8) and 772sqm of education floorspace (Use Class F1a). This change of use consent removed the education floorspace, with 339sqm of the existing floorspace approved for light industrial workspace (Use Class E(g)(iii)) and 3,736sqm of self-storage floorspace (Use Class B8). The principle of providing storage floorspace on this Site has therefore already been established.

7.5 Adopted Local Plan Policy DM13 and emerging Local Plan Policy ECY01 both take a similar approach to the provision of new industrial and warehousing space stating that:

- New industrial/warehousing space will be expected to locate in Locally Significant Industrial sites;
- Warehousing uses or uses which generate high levels of movement should be located in close proximity to tier one and two roads and;
- Minimise impact on residential areas.

7.6 In justification of the principle of providing new additional B8 floorspace on the Site, the following policy criteria is therefore noted. The subject Site is not located within a Locally Significant Industrial Site, however previous pre-application advice received in

August 2023 stated that this is not a requirement of the policy, rather an **expectation** where appropriate.

- 7.7 The Site is located on the A5, a tier 1 road, therefore satisfying the second limb of both adopted and emerging policy. There are no residential uses in proximity to the Site, the proposed extension will therefore result in minimal impact to established amenity enjoyed by residential uses.
- 7.8 The formal pre-application advice received in February 2024, in relation to the proposed extension, similarly confirmed the above stating:

*The site is not located in a Locally Significant Industrial site, however given that the established use of the existing building predominantly comprises of B8 use, and following the principle established in the previous recent consent, **the proposed additional Class B8 space by way of the rear extension would not be objectionable or deemed to be in conflict with the aforementioned policy, particularly given that the totality of the B8 use would operate as a single self-storage facility.***

- 7.9 Additionally, as stated above, the application Site was removed from the red line of the RFF designation and is no longer needed for the delivery of the RFF and is therefore unallocated for a specific use.
- 7.10 An extension to the existing Use Class B8 / Use Class E(g)(iii) building to provide additional Use Class B8 floorspace on the proposal Site is therefore considered appropriate in land use terms.

Employment Generation

- 7.11 The proposed extension will also have the benefit of providing additional employment generation on the Site. The additional floorspace will therefore provide enhanced employment opportunities, which is in line with the aims of adopted Policy CS8. This seeks to encourage development that improves the quality and quantity of existing employment provision in the Borough.
- 7.12 It is important to note that self-storage is considered an employment-generating use. This is demonstrated within the following paragraphs, together with reference to the relevant planning policy context.
- 7.13 The NPPF states that one of the overarching objectives of the planning system is to build “*a strong, responsive and competitive economy*” (Paragraph 8a). The entirety of section 6 of the NPPF is therefore dedicated to this. It is stated within that planning policy and decisions “*should help create the conditions in which businesses can invest, expand and adapt*” (Paragraph 85), and that “*significant weight*” should be placed on supporting the economic benefits of development (Paragraph 85).

7.14 A self-storage facility will employ around 3-4 direct full-time employees and provide significant further indirect employment generation through the provision of space for SMEs and start-up businesses. Although the proposed extension is unlikely to increase the number of direct full-time employees, the amount of indirect employment provided by the facility will increase.

7.15 Occupier data from the self-storage industry confirms that 75% of occupiers are based within 10-15min drive of a typical store thus focusing employment generation within the borough. The SSA UK Industry Report 2018, produced by the Self-Storage Association UK, states **that around 40% of self-storage occupiers comprise business users.** This data is set out within the below table:

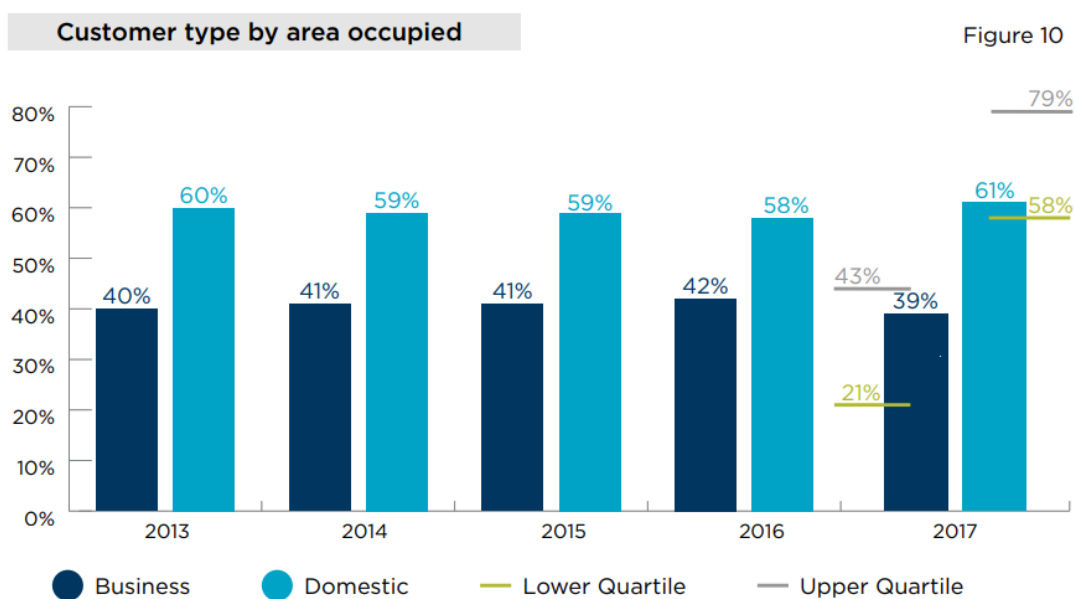


Figure 10 - Self-storage user statistics from SSA UK Report 2018

7.16 The majority of these business users will be start-ups and small-medium enterprises (SMEs). The Self-Storage Annual Report 2022 (Cushman & Wakefield, Self-Storage Association UK) identifies key findings of the self-storage sector over the 2022 year. This includes that 84% of businesses that use self-storage facilities have less than 100 staff. The UK definition of a small and medium-sized enterprise (SME) is one which has less than 250 employees; therefore, the Annual Report identifies a significant usage of self-storage facilities by SMEs.

7.17 The Annual Self-Storage Report 2022 goes on to identify the customer profile for business users over the period 2021-2022. These are summarised in the below table:

Business User	Percentage
E-Commerce	20%
Retail	19%
Other	14%

Professional Services	14%
Media and Entertainment	5%
Not for Profit/Charity	8%
Construction and Building	9%
Wholesale	7%
Healthcare	4%
Manufacturing	3%
Education	3%
Information Technology	5%
Transport	2%
Automotive	1%
Telecommunications	2%
Travel	0.5%
Personal Services	0.5%
Banking and Financial Services	1%
Utility Companies	0%
Government	0%

- 7.18 As demonstrated by the Annual Self Storage Report, the self-storage facility will act as an incubator and provide support to help such businesses grow. Through providing flexibility of unit sizes and licenses, it allows businesses the flexibility to upsize and downsize their units as required, whether that be due to seasonal demand or cost management.
- 7.19 This represents flexibility that would not come with a fixed term lease on a small industrial or business unit, thus allowing business to manage costs effectively and grow especially at incubator / early stages, therefore supporting sustainable economic growth in the area.
- 7.20 Similarly, self-storage facilities provide the perfect business base for individuals who travel to their customers but need somewhere to keep their equipment, whether that be IT equipment, design materials/ textiles or general supplies. Self-storage therefore provides the ideal support base for many businesses.
- 7.21 Taking the average business / commercial user ratio of rented sqm floorspace of 40% (see graph above), the existing building (inc. the fab labs) and the additional proposed extension would therefore likely support and generate the following number of jobs, based upon metrics in the London Employment Sites Database 2017:

Use Class	Total Floorspace to be Calculated	Employment Sites Database 2017 Ratio	Number of jobs
Existing B8	1,494 sqm (40% of total existing SS floorspace capacity)	1 job per 36sqm of floorspace	42
E(g)(iii) (<i>Fab Labs</i>)	214 sqm	1 job per 11.3sqm of floorspace	19
Proposed Additional B8	2,349sqm (40% of total proposed SS extension capacity)	1 job per 36sqm of 40% floorspace	65
TOTAL JOBS			126

Design

- 7.22 National and local planning policy places significant emphasis on the high-quality design of development, requiring new schemes to respect the architectural character of the surrounding area and to minimise any amenity impacts on neighbouring properties.
- 7.23 This is evidenced in paragraph 131 of the NPPF which states that “*the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve*”. Similarly, paragraph 130 states that new development should function well and add to the overall quality of an area, should be visually attractive and sympathetic to the local character in terms of its architecture.

7.24 Emerging Local Plan Policy CSH05 applies to all extensions, commercial, public as well as residential uses. The policy states that extensions should follow good design principles, including:

- Complement the character of the existing building, particularly in terms of scale, style, form and materials;
- Be subordinate to the existing building in terms of size, scale or and height and in the case of upward extensions of tall buildings, comply with Policy CDH04.
- Avoid adverse impacts on the sunlight/daylight to neighbouring properties.
- Improve energy efficiency and incorporates renewable sources of energy.

7.25 In response to policy requirements, the design team have therefore sought to ensure that the proposal is of the highest quality design, that it responds to both emerging and existing contexts while considering the amenity of current and future residents in the area.

7.26 The proposed extension has been designed to integrate with the existing building, using the same façade treatment as that approved under permission ref. 23/3727/FUL.

7.27 The design / appearance of the proposed extension has evolved following pre-application discussions. Officers stated at this stage that they would like to see the volume broken down, potentially through the introduction of lighter coloured materials and breaking up the elevation visually. As a result, the rear elevation was re-designed to introduce a lighter grey cladding and visuals. The below images provide a comparison of the changes made to the rear east facing elevation:

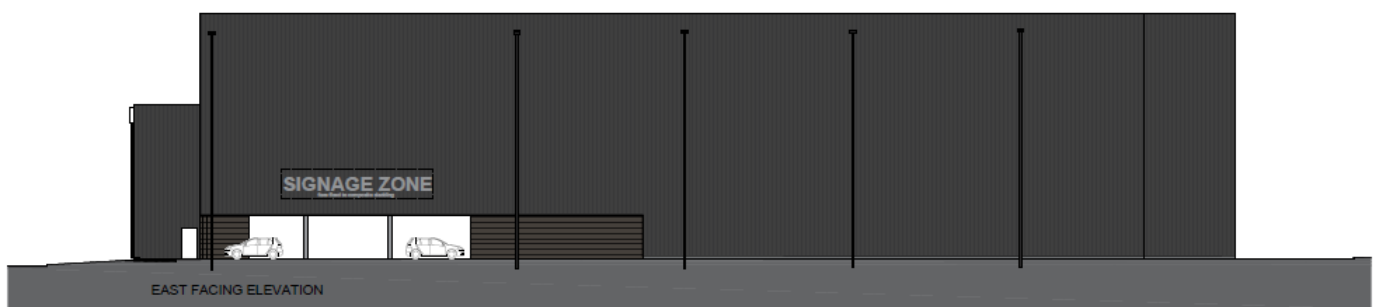


Figure 11 - East Facing Elevation presented at pre-application stage

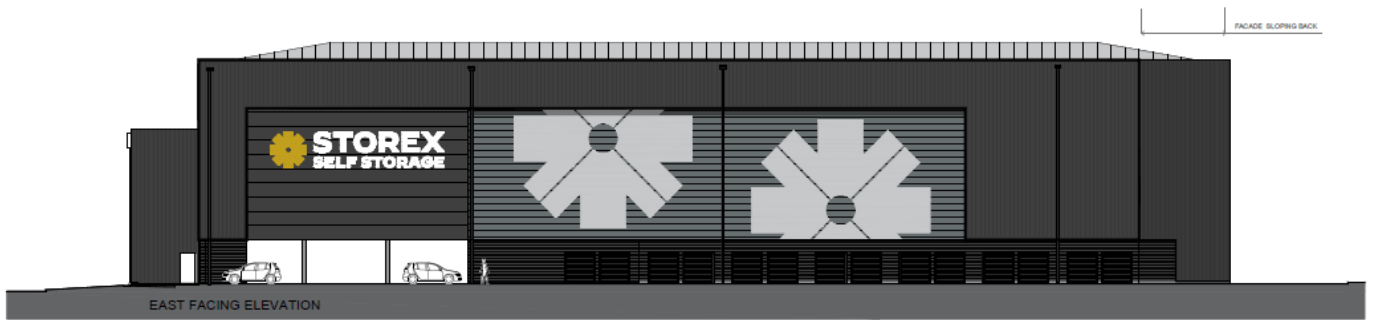


Figure 12 - Proposed rear east facing elevation

- 7.28 The above images also show the amends that have been made to the height and roof form following feedback provided by officers at pre-application stage. Officers stated that although they supported the proposed footprint of the extension, they had concerns that the previous box style appearance would have an overbearing impact.
- 7.29 The design team have responded to these comments by reducing the height of the proposed extension to 16m and introducing a pitched roof which will reflect that of the existing building. These changes arguably assist in softening the overall box style appearance of the extension, and the reduction in the amount of black cladding also helps in reducing the impact of the extension's massing.
- 7.30 The below image shows the existing commercial buildings situated to the south and east of the Site. The Site can be seen in the upper left corner of the image. The extension includes a wider array of measures to mitigate its box style appearance than many of these existing buildings.



Figure 13 - Commercial buildings in the vicinity of the Site

Heritage

- 7.31 Paragraph 200 of the NPPF states that when determining application, local authorities should require applicants to “*describe the significance of any heritage assets affected, including any contribution made by their setting*”. Paragraph 201 of the NPPF expands on Paragraph 200 stating that: “*Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise*”.
- 7.32 Adopted Local Plan Policy DM06 similarly states that all heritage assets will be protected in line with their significance and that all developments are to have regard to local historic context. Paragraph 7.2.1 of the adopted Local Plan goes on to state that “*Conservation Areas are defined as areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance*”.
- 7.33 Paragraph 6.25.2 of the emerging Local Plan states that the council will oppose proposals located outside Conservation Areas that it considers as causing harm to its character, appearance, and setting.
- 7.34 Although the proposal Site is not located within a Conservation Area, the Railway Terraces Conservation Area sits around 150m to the south of the Site. A Heritage Impact Assessment has therefore been produced, and submitted in support of this application, to assess any potential impact of the proposal on the setting of the Conservation Area. Similarly, the design team have produced Verified Views to assess the visual impact of the proposed extension on the Conservation Area.
- 7.35 The Verified Views demonstrate that the proposed extension will be barely visible from the Conservation Area, and when visible, sits within the context of existing urban development.



Figure 14 - Verified View from Railway Terraces Conservation Area

7.36 Both the Heritage Assessment and the Verified Views therefore conclude and demonstrate that the extension will provide a neutral contribution to the Conservation Area's significance. The proposal will not adversely impact on the heritage asset, preserving its special interest in accordance with section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Landscaping

7.37 Policy DM01 of the adopted Local Plan states that development proposals will be required to include hard and soft landscaping that is well laid out, provides an appropriate level of new habitat, makes a positive contribution to the surrounding area and contributes to biodiversity.

7.38 Emerging Local Plan Policy CDH07 similarly states that proposals should include hard and soft landscaping that contributes positively to the street scene, is sympathetic to local character and provides an appropriate level of new wildlife habitat.

7.39 The Site currently comprises a large area of hardstanding with minimal areas of grassland on the periphery. There is therefore an opportunity to enhance the landscaping on the Site, provide greater variety in the landscaping and in turn create a more attractive public realm.



Figure 15 - The Site as existing prior to development

7.40 A landscape architect has therefore been appointed to create the following proposed landscaping scheme:

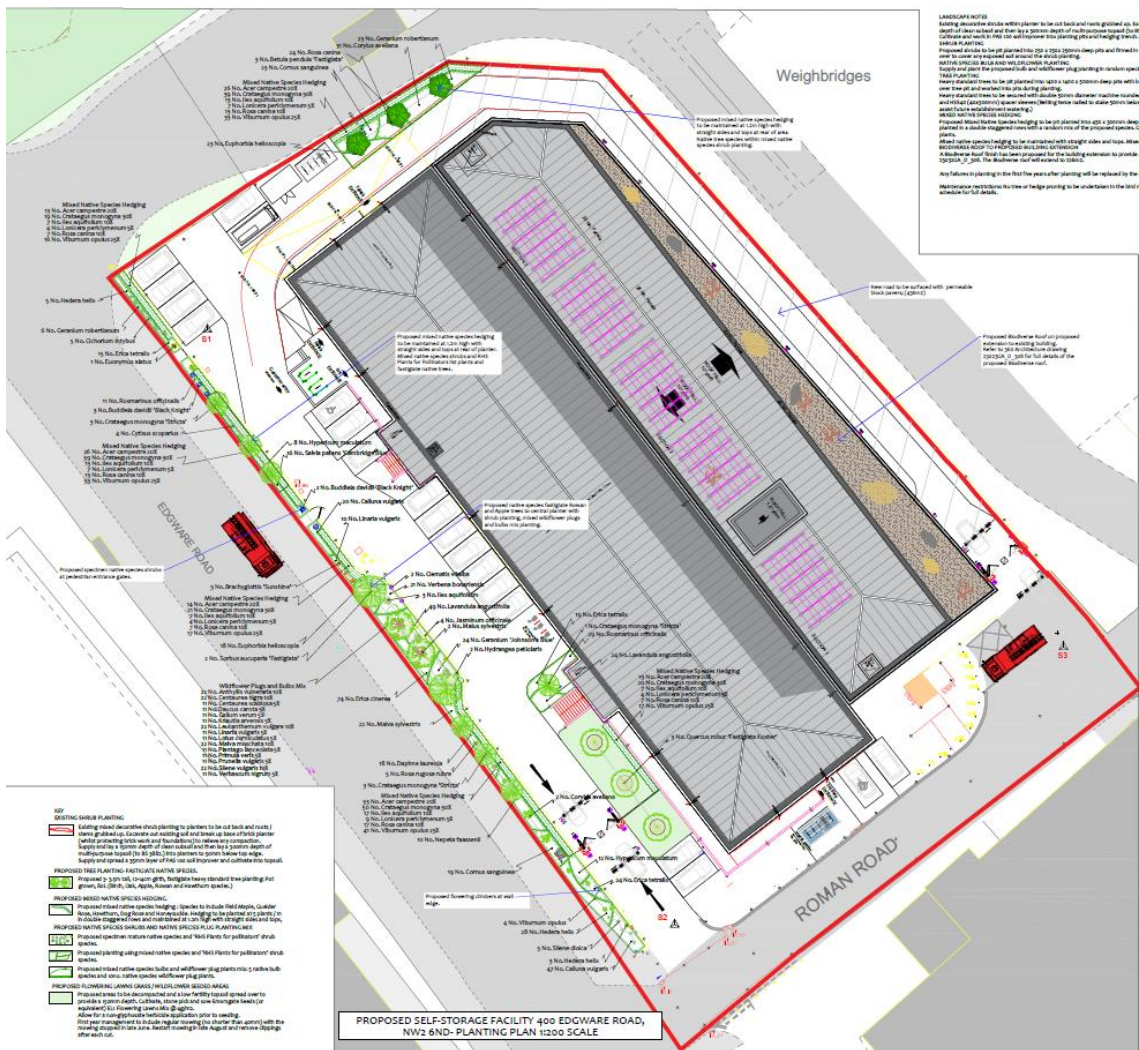


Figure 16 - Proposed Landscaping Plan

- 7.41 Existing trees will be retained along the building frontage and a native species hedge planned along the footpath boundary fronting Edgware Road. Flowering lawn areas will be added containing native species wildflower and apple trees. The proposal will also include 226sqm of biodiverse roof.
- 7.42 London Plan Policy G5 and the London plan Guidance Urban Greening Factor states that “Where Local Plans do not have UGF scores 0.3 for predominantly commercial developments should be applied” however it is noted that this does not apply to B8 uses. Instead, the guidance requires that B8 uses set out the measures taken to achieve urban greening on site, and to quantify what the UGF score is.
- 7.43 This planning submission is therefore supported by an urban greening calculation showing that, with the landscaping and biodiverse roof being introduced, an UGF of 0.1 is achieved.

Biodiversity and Ecology

- 7.44 The NPPF states that “*opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity*”. (Paragraph 186)
- 7.45 Similarly, providing biodiversity net gain on sites is now mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Under this legislation developers are now required to deliver a BNG of 10%.
- 7.46 Emerging Policy CDH07 reflects this approach, requiring that all development delivers net biodiversity gain of 10% either within the development or offsite.
- 7.47 A Preliminary Ecological Appraisal (PEA) has been carried out Ecology Partnership and submitted in support of this application. This report assesses the potential of the site to support species of conservation concern or other species which could present a constraint to the development. The assessment concludes that the majority of the site is made up of hardstanding with a lack of suitable habitat on site for birds, bats and other species.
- 7.48 A Biodiversity Net Gain Assessment (BNG) has also been carried out by Ecology Partnership and submitted in support of this application. The assessment indicates that the development proposal will deliver a net gain of 10% and in turn an improvement to biodiversity on the Site. This is therefore in line with the requirements of both national and local planning policies.

Transport

- 7.49 The NPPF states that planning proposals should consider opportunities to promote sustainable modes of transport, safe and suitable access to Sites for all users and that any significant impacts from development on the transport network or on highway safety should be mitigated to an acceptable degree.
- 7.50 The NPPF goes on to state that “*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*” (Paragraph 115).
- 7.51 The London Plan encourages sustainable transport, with Policy T1 stating that development proposals should aim to support the delivery of the Mayor of London’s strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041.
- 7.52 London Plan Policy T2 continues by stating that development proposals should facilitate residents making shorter, regular trips by walking or cycling.

- 7.53 Similarly, emerging Local Plan Policy TRC01 states that the council will work to deliver a more sustainable transport network, encouraging sustainable modes of transport and promoting active travel.
- 7.54 In response to these policy requirements, the Proposed Development looks to encourage and fully accommodate sustainable modes of transport.
- 7.55 Both a Transport Assessment and a Travel Plan have been submitted in support of this application and provides further detail on how the Applicant looks for this to be achieved on the Site.
- 7.56 Existing access arrangement to the Site will remain unchanged with pedestrian and vehicular access from Roman Road.
- 7.57 All servicing will take place from within the curtilage of the Site and not from the public highway. Swept path analysis has been carried out by Ardent and included within the supporting Transport Assessment.
- 7.58 London Plan Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time.
- 7.59 In line with this policy requirement, a detailed servicing and management plan has been submitted in support of this application to provide a framework to manage all delivery and servicing movements to and from the Site.

Cycle Parking

- 7.60 Local Plan Policy TRC03 states that cycle parking should be delivered in accordance with the London Plan Standards set out in Policy T5.
- 7.61 Policy T5 of the London Plan states that development should provide secure, integrated, convenient, and accessible cycle parking facilities. For B8 uses, 1no long stay space is required per 500sqm (GEA) and 1no short stay space required per 1000sqm (GEA).
- 7.62 The following number of cycle parking for the self-storage facility will be located within secure units within a secure compound:

	Number of Cycle Spaces
Long Stay	24
Short Stay	12

Cargo bike	6 (3no. long stay, 3no. short stay)
Total	42

Vehicle Parking

7.63 The council do not have specific commercial parking standards. Instead, adopted Local Plan Policy DM17 states that the council will expect development to provide parking in accordance with the London Plan standards.

7.64 London Plan Policy T6.2 states that Use Class B8 employment uses should have regard to the office parking standards and take account of the office parking standards and take account of the significantly lower employment density in such developments. The policy goes onto state that a *degree of flexibility may also be applied to reflect different trip-generating characteristics*.

7.65 The proposed parking provision will therefore be as follows:

	Number of Vehicle Spaces
Standard	23
Blue Badge	3
LGV	1
Total	27

7.66 The above provisions align with the standards set out within the London Plan in that they are below the maximum standards. The provision also reflects established need at other facilities and TRICS data from similar facilities and is therefore considered appropriate.

Energy and Sustainability

7.67 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7).

7.68 The London Plan therefore sets out a number of policies to ensure the delivery of sustainable development. London Plan Policy SI2 requires all major developments to be net zero-carbon and London Plan Policy SI4 requires proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

7.69 Adopted Local Plan Policy DM04 requires that all major development comply with the mayor's targets for reductions in carbon dioxide emissions. Emerging Local Plan Policy

ECC01 expands on this, stating that the council will seek to minimise Barnet’s impact on climate change. Policy ECC01 states that this will be achieved through a number of initiatives, including the promotion of the highest environmental standards for development and the incorporation of renewable energy initiatives in development proposals.

7.70 In developing the energy strategy for the proposal, the highest standards of fabric thermal performance and passive design have been applied to minimise the building's primary energy demands.

7.71 Further, the self-storage facility will achieve a reduction of the buildings’ energy consumption from non-renewable sources through the provision of on-site renewable energy sources such as PV panels on the roof. The table below therefore shows the % reduction of carbon emissions over Part L of the Building Regulations:

PV Annual Generation	58,900 kWh
% reduction through renewables	347%

7.72 In line with policy requirements the Applicant will look to achieve BREEAM excellent across the entirety of the Proposed Development. The BREEAM pre-assessment submitted in support of this application shows that currently **BREEAM Excellent** rating is achievable, with minimum 70% required for Excellent the Proposed Development is currently achieving 78.74%, a margin of 8.74% over the required 70% for Excellent.

7.73 In support of this planning application an Energy Strategy, Sustainability Statement, Circular Economy Statement and Whole Life Carbon Assessment have been submitted. These documents provide additional information on how the Proposed Development will look to achieve sustainable development in line with local and national planning policy.

Amenity

7.74 The NPPF states that developments should maintain a high standard of amenity for existing and future users (Paragraph 130f). The London Plan Policy D3 similarly states that development proposals should deliver appropriate outlook, privacy and amenity.

7.75 Paragraph 6.10.1 of the emerging Local Plan reflects the above, stating that proposals that cause significant harm to the amenity of neighbouring occupiers will not be accepted.

7.76 The Applicant and design team have therefore ensured that they have considered both future residents and neighbouring residents in the evolution of the proposal. Several factors have been considered, including the following key elements.

- Noise Emissions
- Daylight and Sunlight
- Air Quality

Noise Emissions

- 7.77 Both adopted Local Plan Policy DM04 and emerging Local Plan Policy CDH01 state that proposals should mitigate any noise impacts through their design, layout and insulation.
- 7.78 A Noise Assessment has therefore been carried out by Ardent and submitted in support of this application. Overall, the assessment concludes that the proposed operations will not result in an adverse impact at the nearest sensitive receptors and that the site is suitable for development, subject to the recommendations included in this report.

Daylight and Sunlight

- 7.79 Both adopted Local Plan Policy DM01 and emerging Local Plan Policy CDH01 state that developments should be designed to allow for adequate daylight and sunlight to adjoining occupiers and users.
- 7.80 Emerging Local Plan Policy CDH05 specifies that this also applies to extension applications, stating that extensions should avoid adverse impact on the sunlight/daylight to neighbouring properties.
- 7.81 The proposed extension has therefore been reviewed by Right of Light Consulting to assess the daylight and sunlight impact of the proposal on neighbouring developments. A document setting out the findings of this assessment has been submitted in support of this application. The assessment concludes that the proposal will have a low impact on the light received by neighbouring residential properties, with the development design satisfying requirements set out in BRE guidance.

Air Quality

- 7.82 Both Adopted Local Plan Policy DM04 and Emerging Local Plan Policy ECC02 state that the council expects development to improve air quality and ensure that it does not contribute to poor air quality. Both policies go on to state that developments should provide an Air Quality Assessment.
- 7.83 An Air Quality Assessment has therefore been prepared by Ardent and submitted in support of this application. The report assesses the impacts associated with both the construction and operational phases of the Proposed Development. The assessment concludes that there are no air quality constraints to the Proposed Development.

7.84 Although there is potential for dust during the construction phase, with the proposed mitigation measures the overall effect has been deemed to be not significant. Similarly, the anticipated volumes of both construction traffic and operational traffic has been judged to have an overall non-significant impact.

8. CONCLUSION

- 8.1 This Planning Statement has been prepared by ROK Planning on behalf of Cricklewood PropCo Ltd to support the redevelopment of the Site at 400 Edgware Road.
- 8.2 The proposals have been developed through consultation with the London Borough of Barnet and, as has been demonstrated within this Planning Statement, the Proposed Development will provide the following benefits:
- A development of high architectural and sustainable design;
 - Retention and re-use of an existing building;
 - Continued use of the site for an employment generating;
 - Delivery of new employment opportunities for the local community both directly and indirectly;
 - Redevelopment of a currently underutilised portion of land to the rear of the existing building;
 - Enhanced landscaping and an in turn an improvement to the existing public realm;
 - A net gain in biodiversity on the Site.
- 8.2 It is therefore considered that the proposed development is in accordance with adopted and emerging national, regional and local planning policy and guidance, and therefore should be supported.