

**267 Eversholt Street, London NW1 1BA (LB of Camden)**

**APP/X5210/X/23/3325618 and APP/X5210/X/23/3325801**

**(LPA ref: 2022/5295/P and 2023/2017/P)**

**Appellant's Statement of Case**

1. These Appeals were lodged against non-determination, after efforts to obtain a decision from the LPA on the Certificate applications proved fruitless (as related in the Appeal submissions).
2. The LPA was contacted subsequently and a copy of its Delegated Report(s) requested, it having been presumed by the Appellant's advisers that the LPA would - following submission of the Appeals - have made a Delegated Decision as to how it would have determined the Certificate applications if the Appeals had not been submitted. However, the LPA advised such documents were not in existence.
3. The Appellant is therefore presently hindered in preparation of its case for these Appeals.
4. The Appellant's case will develop and supplement the evidence which was submitted in support of the Certificate applications
5. The Appellant reserves the right to supplement and revise its case as appropriate, in order to address points raised by the LPA or which emerge during the Appeals.

**Documents the Appellant will rely upon: -**

- Application files 2022/5295/P and 2023/2017/P
- Statutory declarations
- Records relating to occupation and use of the Appeal premises.
- Planning records and contemporaneous documents.
- Other relevant decisions by the LPA as appropriate.
- Relevant Case Law.
- Supporting documentation in association with the planning history of the property'

The Appellant reserves the right to add and amend this list, as appropriate, in order to address points raised by the LPA or which emerge during the Appeals.

The Appellant intends to call the following witnesses:

- A planning witness.
- Third party witnesses