Edward Hodgson
Regeneration and Planning
London Borough of Camden
Camden Town Hall
London
WC1H 8ND

25th July 2024

Dear Sir/Madam,

PARTIAL DISCHARGE OF CONDITION 58 (BASEMENT AREA) FOR PLANNING PERMISSION REF: 2022/3646/P AT MORRISONS SUPERSTORE AND PETROL FILLING STATION, CAMDEN GOODS YARD, CHALK FARM ROAD NW1 8EH

Please find enclosed an application for the partial discharge of Condition 58 (Air Quality Monitoring) for basement only in respect of the Main Site for the 'Camden Goods Yard' project. Details for approval of remaining relevant blocks and the basement will be submitted separately to LBC for approval in due course.

Condition 58 for Blocks A & B was previously discharged with the application ref: 2023/0312/P on 1 February 2024. Information relating to the basement has been omitted from the original submission for clarity.

Please note, any references to 'Buildings' [A, B, - etc] on plans should read as Blocks.

This application has been submitted through the planning portal on 25th July 2024 reference **PP-13219292.**

1. Project Background

On 15 June 2018 full planning permission (ref: 2017/3847/P) was granted for the redevelopment of the 3.26-hectare site known as Camden Goods Yard, located off Chalk Farm Road.

Subsequently, a S96a non-material amendment was approved by Camden Council on 6th February 2019 (2019/0153/P). This altered the wording of Condition 49A to refer specifically to the PFS land parcel.

On 24 December 2019, the description of development of the Original Permission was amended pursuant to section 96A of the 1990 Act (decision reference 2019/6301/P).

On 5 May 2020 a Section 73 application (ref: 2020/0034/P) was granted approval for variation of Condition 4 (approved drawings) for redevelopment of the petrol filling station site and main supermarket site; namely for a single storey temporary food store on the Petrol Filling Station site with associated parking, servicing, access and landscaping.

On 3 December 2020, a Section 73 application (ref: 2020/3116/P) was granted for variation of Conditions 3 (approved drawings) and 73 (number and mix of residential units) of planning permission 2020/0034/P for 71 additional homes.

On 29 March 2023, a Section 73 application (ref: 2022/3646/P) was approved which included amendments to the PFS site only: Replacement of petrol filling station with electric vehicle charging station; increase in height and footprint to create additional Office floorspace (Class E) and remove access road; reconfiguration of plant and cycle parking.

On 1 February 2024, an application for submission of details for partial discharge for Blocks A and B was discharged pursuant to Conditions 56 and 58 (application ref: 2023/0312/P).

2. Condition 58 (Air Quality Monitoring)

Prior to commencement of the building envelope of each building and of the supermarket basement, details of the mechanical ventilation system for the structure shall be submitted to and approved in writing by the local planning authority. The building details shall include the include air inlet locations. The basement carpark details shall include locations of outlets and expected pollutant concentrations. The development shall thereafter be constructed and maintained in accordance with the approved details.

Development of the temporary store shall be constructed and maintained in accordance with the details approved on 30/09/2020 under reference 2020/2099/P unless otherwise agreed in writing by a further approval pursuant to this condition.

Reason: To protect the amenity of residents and occupiers and to safeguard the amenities of the adjoining premises and the area generally, in accordance with Policies A1, CC4 and A4 of the Camden Local Plan 2017.

3. Condition 58 History and Back Up Power Strategy for Life Safety Systems

An application for the partial discharge of Conditions 56 and 58 for Blocks A and B, as well as the basement containing the Morrisons car park, was submitted in January 2023 (ref: 2023/0312/P). Following this submission, queries about the application were received from LBC officers in May 2023, primarily concerning the air quality information, flue heights, and operating hours related to a diesel generator located within the basement area that provides backup power for life safety systems within the development. St George responded to these queries.

On July 4, 2023, the Council requested further information about alternative sources of backup power that had been considered, beyond the diesel generator located within the basement, the relevant legislation applicable to non-diesel options, and relevant electrical services functions related to life safety within the development. A query was also raised about the height of the outlets for the flues from the generator and basement, following consultation with the Environment Agency. These points were discussed at a meeting on July 12, 2023, with officers. No comments or concerns had been raised by officers regarding air quality or mechanical ventilation within Blocks A or B.

Following on from this meeting a revised flue proposal was shared by St George with the Council for agreement in principle 13 July 2024.

Post the meeting on 12 July 2023 and St George's follow up correspondence 13 July 2024, the Council queried the rational for the size of generator proposed and for St George to demonstrate what options had been explored and why the automatic fire suppression system (AFSS) needs the level of power stipulated. On 24 July 2023 St George response that a battery back-up pack for uninterruptable power supply (UPS) was discounted as an option. This is because it cannot be considered a back-up supply to commercial sprinkler pumps under British Standard (BS) 12845 and not meeting the size of power required.

On 26 July 2023 the Council responded that whilst it accepts uninterruptable power supply (UPS) is not possible for the commercial areas of the development it would like to see further evidence that alternative UPS options had been explored for supplying the residential uses. The purpose being to explore an alternative to a diesel generator or to achieve a smaller generator. The Council stated that if these two options were not possible then a flue system as proposed may be acceptable subject to satisfying air quality requirements.

On 20 November 2023 in agreement with LBC officers St George submitted an updated covering letter removing the basement as a building area for the purpose of Condition 58, so that the applicable areas were Blocks A and B only. Application 2023/0312/P was discharged 1 February 2024.

4. Back Up Power Supply and Alternative Options

Further correspondence with the Council was exchanged on back up power options contained within the basement ahead of submission of a specific application for a partial discharge of Condition 58 for the basement.

On 26 January 2024, St George wrote to LBC officers with a recap on discussions with respect to the generator within the basement and further work undertaken exploring options for alternate sources of back-up power as well as scope to reduce the size of a diesel generator. Following consultation with M&E and fire engineers and power utility provider, St George's response was summarised as follows:

- Due to fire and building safety regulations it is not possible to replace the proposed generator with a secondary alternative electrical substation within the site as a 'secondary source'. This was captured in a Secondary Sources note by M&E engineers MTT. This note demonstrated that a second substation supply would:
    - Not meet the requirements of the following relevant documents for secondary and life safety sources:
        - BS7671:2108 +A2:2022, Requirements for Electrical Installations
        - BS9999 2017, Fire safety in the design, management and use of buildings – Code of practice
        - BS9991 2015, Fire safety in the design, management and use of residential buildings – Code of practice (Note a draft consultative version was issued in 2021 for comment with view of update of the current issue)
        - BS8519 2020, Selection and installation of fire-resistant power and control cable systems for life safety, fire-fighting and other critical applications — Code of Practice.
    - Whilst physically separate, the substations for the site are not electrically separate due to being part of the same high voltage (HV) cable ring. In the event of an HV fault or extensive low voltage (LV) fault, both substations as primary and secondary supply, could lose supply simultaneously meaning life safety systems would not function. Regulation 560.6.5 cannot be met.
    - In short St George has demonstrated that to comply with life safety regulations there are no other alternative choices to the proposed diesel generator.

5. Application for Partial Discharge of Condition 58 (Basement)

This application includes information in full compliance with submission requirements for Condition 58.

Details of the Mechanical Ventilation System

The sitewide life safety backup generator is located in the basement below Block E2, as this is the only feasible location in the development which can accommodate an equipment of this size. The generator is intended for use only in the case of a primary HV/LV supply failure.

The proposed generator system as assessed in this report meets the LBC Clean Air Quality Strategy policy requirements, and contribute to meeting planning Condition 58.

- The schematics of the mechanical ventilation system for the basement is shown on drg: CGY0B-MTT-ZZZ-ZZ-DR-M-1000 rev C1.
- The locations of the car park inlets and outlets are highlighted on the sitewide plan drg: CGY-MAK-XX-00-DR-A-00-050
- The detail location of the back-up power system for the basement can be found on drg: CGY0B-WAT-0B-B1-DR-M-02010

Generator Flue Location

DustScan has proposed extending the flue to terminate 3 meters above the west side of Building E2, with the nearest residential windows being over 25 meters away from the flue, as per LBC's original request (see page 14, DustScan report).

The flue make up is a twin wall, stainless steel, 350mm I/D Generator Exhaust System (constructed from 0.5mm 316L fully seam welded stainless steel inner, 0.5mm 304 stainless steel outer with 75 mm annulus of Rockwool insulation) with manufacturing requirements to conform to BS EN 1856-1.

The enclosed air quality assessment report demonstrates an improvement in emissions, particularly at ground level.

6. Supporting Information

In support of this application we enclose the following information on behalf of St George by DustScan Air Quality Consultants, Mtt ltd M&E consultants and Watkins M&E & Plumbing services:

1. ZECGYC_AQAAir - Quality Assessment: Camden Goods Yard Emergency Generator. (*This report provides a revised assessment of the impacts associated with the operation of a proposed emergency generator at the Camden Goods Yard development, Chalk Farm Road, Camden, London.*
2. CGY0B-MTT-ZZZ-ZZ-DR-M-1000 - Mechanical ventilation system
3. CGY-MAK-XX-00-DR-A-00-050 - Sitewide plan
4. CGY0B-WAT-0B-B1-DR-M-02010 - Back-up power system location plan

We trust the enclosed provides sufficient information to register, validate and discharge this application. If you have any queries or require further detail to determine this application please contact Emmanouil Magkaris via:

emmanouil.magkaris@stgeorgeplc.com

Yours sincerely,

Emmanouil Magkaris

Design Manager
St George City Limited