

London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London
WC1H 9JE

1 October 2018

Our Ref: 4106A

Dear Sir / Madam,

Former Waitrose, 131-133 Camden High Street, Camden Town, NW1 7JR

On behalf of my client, ALDI Stores Ltd. (ALDI hereafter), I am pleased to submit a planning application via the Planning Portal pursuant of the Town and Country Planning Act 1990 (as amended) in respect of proposals relating to the above site at 131-133 Camden High Street.

In summary, the proposals involve shopfront alterations and loading bay works to facilitate conversion of the Waitrose unit to provide a new ALDI foodstore. The proposals represent a considerable investment in Camden Town Centre and will allow swift re-occupation of a prominent high-street unit. The new ALDI store will bring added vibrancy to this high-street location, creating additional local supermarket choice and competition, in addition to up to 50 new local jobs.

In this context, the NPPF advises that, only where proposals result in significant impacts should permission be refused. In fact, this application, represents a significant investment that will secure considerable benefits to positively impact the immediate and surrounding area and it is respectfully requested that planning permission is granted.

This covering letter provides a general background and context to the proposals, including a description of the site and summary of the proposals. A brief background to ALDI and their unique and highly bespoke trading format is also included. This covering letter should also be read in accordance with the supplementary documents accompanying the application outlined in the submission package.

Application Submission

In summary, ALDI's occupation of the unit involves the following aspects:

- Conversion of the existing unit (Waitrose) (Use Class A1) to form a new ALDI foodstore (also Use Class A1). Proposals do not involve a change of use and the physical internal conversion of the unit falls outside the definition of development at S.55 of the Town and Country Planning Act and therefore **does not** require planning permission.
- However, the proposals rise to associated shopfront alterations and loading bay works, which are development for the purposes of S.55 and therefore **do** require planning permission and are included within this application.

Site Description

Directors
Helen Cuthbert | Stuart Slatter | Claire Temple | Alastair Close
Dan Templeton

Associate Directors
Katie Turvey | Heather Vickers

Consultant
Lorna Byrne

Associates
Sally Arnold | Rob Scadding | Alan Williams | David Williams

The site forms a prominent high-street location on the west side of the Primary Shopping Frontage of Camden Town Centre, as defined by the adopted policies map. The unit in question consists of the entire ground floor unit of the 5-storey building, recently vacated by Waitrose. The upper floors of the unit are currently occupied by offices (B1). In its immediate surroundings, the unit is bounded by Three. phone store to the north and Snappy Snaps to the south. Indeed, being located on the high-street within a busy town centre, the unit is surrounded by a mix of retail and commercial uses on ground floor including many well-known high-street chains, with residential or offices on upper floors. Finally, the unit falls within Flood Zone 1 and is located within the Camden Town Conservation Area.

Clarification on the ALDI Offer

Prior to setting out the material justification for the proposals, it is useful to briefly summarise ALDI's offer to understand this context and the wider benefits the store will deliver to Camden Town. The ALDI store format is an important distinction when comparing ALDI with other retailers and crucial to understanding how stores operate. In practice, this means that, unlike larger store formats, customers have to visit other shops and services to complete their shopping trip. Further, stores only have a limited amount of non-food space (15-20%), which mostly contains weekly specials. This performs a purely ancillary role. This is a further difference to larger supermarkets, which can have between 30-50% non-food floorspace.

Crucial to this is a tried and tested store format, which the company has developed to enable goods to be handled, displayed and sold efficiently, thus enabling stores to effectively compete and provide the award-winning offer. Store layouts are eminently practical and reflect the company philosophy of offering unrivalled value for money through effective cost management. There is no unnecessary expenditure on elaborate shop fittings with resultant savings reflected in low prices.

ALDI's function, is primarily a 'weekly' food shop destination, albeit also providing a degree of top-up / one off purchases, such as weekly 'specials'. The business model is recognised by the Competition Commission as a 'limited assortment discounter' (LAD), or 'deep discounter' and the introduction of an ALDI store also helps to contribute to the overall range of convenience facilities. The ALDI store format does not include a specialist butcher, fishmonger, delicatessen, a chemist or counters, which are commonplace with larger retailers. On this basis, ALDI complements, rather than competes with existing local traders. The resulting arrangement is such that an ALDI does not offer a 'one-stop-shop'.

In this respect, Camden currently lacks an ALDI and therefore presents a need for a store locally. At present, while Lidl already has a presence on Camden High Street, the nearest ALDI is currently in Kilburn; 3 miles from the proposal site, resulting in a round trip of more than 6 miles. This illustrates a clear qualitative need for the proposals and a more localised store would meet this need and readdress the local shopping environment, as well as reduce the need to travel for anyone who is currently travelling to an ALDI to undertake a discount foodstore shop.

Shopfront Proposals

The proposals will involve internal works to convert the existing unit as well as external shopfront alterations to create a high-quality and contemporary uplift to this prominent location on Camden High Street.

The proposals have emerged following ALDI's thorough search of potential opportunity sites. The proposed site meets ALDI's key locational and operational requirements in town centre locations and will deliver improved retail choice and competition locally as well as physical enhancements to this prominent high-street site.

As set out above, ALDI could simply re-occupy the unit given its existing A1 use; however, this is considered to be a missed opportunity to provide visual improvements to both the existing building, the street scene and conservation area.

The site is within the Camden Town Conservation Area; however, the proposed shopfront alterations remain in keeping with the wider building and surrounding uses. On this basis, there will be no impact on the character or setting of the conservation area, therefore the proposals can be supported under Policy D2 'Heritage' of the Camden Local Plan (2017) as well as having regard for objectives set out within the Camden Town Conservation Area Appraisal and Management Strategy (2007).

The design will generally reflect that of the current shopfront, given the existing and longstanding use of the unit as a foodstore. The proposals will provide an open frontage with a new store entrance brought forward to the High Street, utilising a contemporary glazing solution which will create a more consistent building line and further enhance the shopfront to maintain the unit's prominence on the high street. This approach is in accordance with objectives of Local Plan Policies D1 'Design', D3 'Shopfronts' and TC2 'Camden's Centres and Other Shopping Areas'.

Further, the proposed alterations to the shopfront also remain in line with guidance set out in the Camden Planning Guidance document on design, demonstrating careful consideration of Camden's design aspirations, considering the immediate and surrounding context to ensure alterations are in accordance with the existing uses while focusing on providing a high-quality, contemporary design that is safe and accessible for all.

Submission Package

The application is accompanied by this covering letter providing the background and justification for the proposals as well as a comprehensive suite of documents and plans in accordance with Camden's validation requirements; including:

- Completed application forms and certificates;
- Design and Access Statement (ref: 2423-CHE-DA01) prepared by The Harris Partnership
- Architectural Drawings prepared by The Harris Partnership:
 - Site Location Plan (Drawing ref: 2423-CHE-100)
 - Existing Site Plan (Drawing ref: 2423-CHE-101)
 - Existing Ground Floor Plan (Drawing ref: 2423-CHE-102)
 - Existing First Floor Plan (Drawing ref: 2423-CHE-103)
 - Existing Elevations (1 of 2) (Drawing ref: 2423-CHE-104)
 - Existing Elevations (2 of 2) (Drawing ref: 2423-CHE-105)
 - Proposed Site Plan (Drawing ref: 2423-CHE-106)
 - Proposed Ground Floor Plan (Drawing ref: 2423-CHE-107)
 - Proposed First Floor Plan (Drawing ref: 2423-CHE-108)
 - Proposed Elevations (1 of 2) (Drawing ref: 2423-CHE-109)
 - Proposed Elevations (2 of 2) (Drawing ref: 2423-CHE-110)

A payment of £234 has also been made via the Planning Portal to cover the cost of the application.

Conclusion

In summary, the proposals will secure:

- A new ALDI foodstore;
- Improved retail choice and competition locally;
- An accessible high street store, facilitating significant potential for 'linked' trips;
- Creation of up to 50 new local jobs.

I trust the above and attached are self-explanatory and look forward to validation of the application in due course. We look forward to working with officers to realise these exciting proposals for Camden High Street. In the meantime, please do not hesitate to contact me directly should you have any questions in respect of this matter.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'K Clarke', enclosed within a light grey rectangular border.

Katia Clarke

Assistant Planner

Planning Potential

London