

CAMDEN GOODS YARD

Planning Statement

January 2020



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1.0 Introduction

- 1.1 This Planning Statement has been prepared on behalf of St George West London Limited (“the Applicant”) for the development site known as Camden Goods Yard. It supports a planning application submitted pursuant to s73 of the Town and Country Planning Act for “minor material amendments” to full planning permission reference 2017/3847/P (“the 2018 Permission”). The description of development associated with the 2018 Permission has recently been amended by a non-material amendment application with reference: 2019/6301 (see Section 3 for further details).
- 1.2 The 2018 Permission was granted on the 15th June 2018, subject to 66 conditions and a Section 106 agreement. This related to the comprehensive redevelopment of the Camden Goods Yard site for the following (inter alia):
 - 6 storey building on the PFS parcel (11,243 sqm) including petrol filling station, Class A1/A3, Class B1.
 - Temporary use of the PFS parcel for a foodstore (Class A1 use) for a period of 30 months.
 - Redevelopment of Main Site parcel to include 573 homes and 28,345 sqm (GEA) non-residential floorspace.
- 1.3 The principal purpose of this s73 application, and accompanying S106 Deed of Variation (submitted under separate cover), is to secure amendment to the wording of Condition 4 of the 2018 permission to add in plans relating to the approval of a single storey temporary food store within the PFS parcel with associated parking, servicing, access and landscaping. The duration of the temporary foodstore is to increase from 30 to 50 months and a condition is proposed to be added to the new permission to secure this.
- 1.4 The amendment to the s106 agreement will introduce ‘Phase 1a’ to the development to ensure that the temporary supermarket becomes its own phase. The changes are principally required to the s106 to:
 - Amend the phasing to enable the store to be delivered as the first phase (Phase 1a);
 - Reflect that the store will be a temporary structure and not part of the final permanent PFS building on the PFS parcel; and
 - Ensure that the new section 73 permission is bound by the existing s106 obligations.
- 1.5 The amendment will allow the ‘Main Site’ to be vacated much earlier in the construction sequence process, facilitating the delivery of much needed housing for the borough with reduced lead in time. More broadly, this will allow the wider regeneration benefits associated with the development to be realised earlier. These include (inter alia):
 - Significant public realm enhancements
 - 573 new homes and 184 new affordable homes
 - New foodstore and workspace, including 955 sqm affordable workspace.
- 1.6 Information is also provided to discharge conditions 24 (landscaping), 25 (cycle parking), and 26 (building details) for Phase 1a of the development.
- 1.7 A separate application for advertisement consent relating to the temporary store will be submitted once these details are finalised.
- 1.8 As detailed further within this Planning Statement, final details of the artwork to be included on the Chalk Farm Road elevation will be secured by way of the addition of a new planning condition requiring the submission of these details. Final details are not included as part of

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this application to allow for a more extended period of consultation to be undertaken with the local community as to the final design for this element.

- 1.9 This Statement should be read in conjunction with the original Planning Statement (dated July 2017) and key associated documents (Heritage, Transport, Energy and Sustainability, Design and Access Statement) that were approved as part of the 2018 Permission.

Contents and Structure of Planning Statement

- 1.10 This Statement is structured as follows:

Section 2.0 describes the site;

Section 3.0 describes the relevant planning history following the 2018 Permission;

Section 4.0 outlines the s73 application proposals;

Section 5.0 provides the Development Plan context;

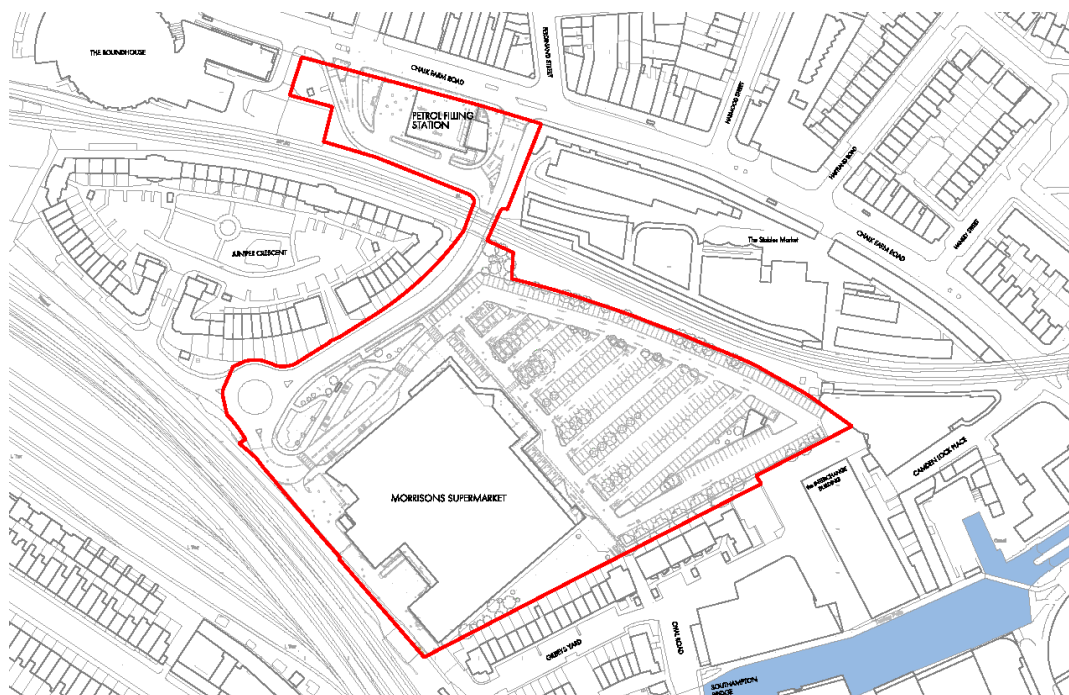
Section 6.0 assesses the key planning considerations relevant to the determination of this s73 application; and

Section 7.0 provides a summary of this Statement.

2.0 Site and Surroundings

THE SITE

- 2.1 The application site is identical to that which formed the basis of the 2018 Permission. A detailed description of the site is provided within the original Planning Statement.
- 2.2 The Camden Goods Yard site is comprised of two principal elements - the 'Main Site Parcel' and the 'Petrol Filling Station (PFS) Parcel.' The two sites are shown on the plan below and cover an area of approximately 3.2 hectares.



- 2.3 The focus of this s73 application is the PFS Parcel which covers an area of approximately 0.4 hectares. It is occupied by an operational petrol filling station, associated forecourt and retail facilities. The parcel also accommodates bus layovers.
- 2.4 The PFS parcel fronts Chalk Farm Road to the north and is located at the junction to the Main Site Parcel. The junction operates as a one way only, allowing entry to the Morrisons store, Juniper Crescent and filling station. An exit route runs across the rear of the petrol filling station site, providing access to the filling station and exit from the site.
- 2.5 The site is approximately 780m from Camden Underground Station and 460m from Chalk Farm Underground Station.
- 2.6 The PFS parcel is in the Camden Town Centre and is defined as a Major Town Centre in the Camden Local Plan and London Plan. The PFS parcel is designated in CPG 5 (Town Centres, Retail and Employment) as a 'Secondary Frontage'.
- 2.7 The PFS parcel lies within the Regents Canal Conservation Area. It does not contain any features of particular architectural or historical merit. It falls within the Protected Viewing Corridor from Parliament Hill. Four mature street trees to the north of the PFS Parcel are located on public highways land and outside the redline boundary of the application.

3.0 Planning History

- 3.1 Full planning permission for the comprehensive redevelopment of the site known as Camden Goods Yard was granted planning permission (REF: 2017/3847/P) on 15th June 2018 ‘the 2018 Permission’.
- 3.2 The description of development has subsequently been amended by way of a NMA (Ref. 2019/6301), approved on 24th December 2019, so the revised description of development states:

‘Redevelopment of petrol filling station site to include the erection of a new building of up to six storeys and up to 11,243 sq m GEA floorspace to accommodate a petrol filling station (Sui Generis use), flexible retail/food & drink floorspace (Class A1, A3 uses), Class B1 floorspace and a winter garden; with cycle parking, public green space, public toilets and other associated works and highways works; all following demolition of existing building petrol filling station. Use for a foodstore (Class A1 use) with associated car parking for a temporary period.

Redevelopment of the main supermarket site to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) of up to 14 storeys accommodating up to 573 homes (389 market and 184 affordable in up to 60,568 sq m GEA of residential floorspace) together with up to 28,345 sq m GEA non-residential floorspace comprising foodstore (class A1), flexible retail/food & drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, cafe and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore.’

- 3.3 The 2018 Permission will be brought forward as a series of development phases. Further details of the planning history of the site prior to the 2018 Permission are set out within the Planning Statement (July 2017).

Application Submissions Post Planning Approval

- 3.4 The 2018 Permission was granted subject to 66 conditions. Subsequently, S96a non-material amendments were approved by Camden Council on 6th February 2019 (2019/0153/P), 4th July 2019 (2019/2962/P) and 24th December 2019 (2019/6301/P). These NMAs altered the wording of conditions 29, 47, 48, 49, 50 and 60 to refer specifically to the PFS land parcel.
- 3.5 Table 1 below provides details of these NMAs and the conditions that have been discharged to date. It includes three current pending application submissions.

Table 1 - Summary of Applications Post 2018

APPLICATION REFERENCE	TYPE	DESCRIPTION	DECISION
2019/0153/P	NMA	Changes to timing of triggers for submission of details for conditions 47 (Drainage strategy), 48 (Water supply infrastructure) and 49 (HS2) approved under planning permission 2017/3847/P dated 15/06/2018 for redevelopment of the petrol filling station site and main supermarket site.	Granted 06.02.2019

Planning History

2019/2368/P	Approval of Details	Details of a Written Scheme of Investigation as required by condition 50 of planning permission 2017/3847/P dated 15th June 2018 (as amended by 2019/0153/P dated 06/02/19 and 2019/2962/P dated 04/07/2019).	Granted 18.07.2019
2019/2962/P	NMA	Amendments to planning conditions 29 (tree protection), 50 (archaeology) and 60 (lighting) approved under planning permission 2017/3847/P dated 15/06/2018 (as amended by 2019/0153/P dated 06/02/19) for redevelopment of the petrol filling station site and main supermarket site.	Granted 04.07.2019
2019/3105/P	Approval of Details	Condition 61 (A + B) Written detailed scheme of assessment of land contamination as required by condition 61 (parts a and b) of planning permission ref 2017/3847/P (dated 15/06/2018) for redevelopment of Petrol Filling Station and Supermarket sites.	Granted 03.07.2019
2019/5988/P	Approval of Details	Details for Condition 54: If more than 12 months elapse between the date of the approved bat survey (June 2017) and commencement of development, an updated bat survey shall be submitted to and approved in writing by the local planning authority. Such survey to be carried out by a suitably qualified ecologist and accompanied by a report confirming the results and implications of the assessment, including any revised mitigation measures. All mitigation measures as approved shall be implemented in full in accordance with the agreed time scales.	Granted 22.12.19
2019/6111/P	Approval of Details	Details for Condition 29: Prior to the commencement of any works on site, details demonstrating how on-site trees to be retained shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction" and should include details of appropriate working processes in the vicinity of trees, and details of an auditable system of site monitoring. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the approved drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details.	Pending
2019/6175/P	Approval of Details	Details for Condition 49a: Prior to the commencement of development on the PFS land parcel, detailed design and method statements (in consultation with HS2 Ltd) for that parcel of land shall be submitted to and approved in writing by the local planning authority.	Pending
2019/6301/P	NMA	Amendment to the description of development associated with the 2018 Permission.	Granted 24.12.19

Planning History

Awaiting Validation	Approval of Details	Details for Condition 62a Contaminated Land : Site Investigation and Remediation Scheme.	Pending
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- 3.6 The most recent NMA submission (REF: 2019/6301/P) was submitted to address the relevant considerations emerging from the recent *Finney v Welsh Ministers* [2019]. The NMA amends the description of development to remove reference to the temporary period and location of the temporary store and thus enable this s73 application to be made.

4.0 Format and Scope of the Application

THE PROPOSALS

- 4.1 The 2018 Permission included provision of a temporary foodstore on the PFS parcel (as part of the ground and first floor of a six-storey building) to enable Morrisons to relocate from its current site, freeing up the Main Site for construction access and redevelopment. The temporary foodstore within the extant permission formed part of a six-storey building that comprised a gross floor area of circa 1,450sqm with 61 car parking spaces.
- 4.2 The amendments being requested within this s73 application will introduce an additional phase into the development sequence (Phase 1a), thereby ensuring that the temporary foodstore can be constructed as a standalone building and can be operational earlier in the construction process. The principal amendments are as follows:
1. To increase the duration of the temporary foodstore from 30 to 50 months and;
 2. Provide a new, 1,403 sqm (GEA) temporary, single storey standalone building within which the foodstore will operate. 25 car parking spaces and 48 cycle spaces are proposed.
- 4.3 This revised approach will not require the six-storey building to be constructed within the first phase, avoiding the time-lag associated with the current approach in the extant permission will allow the redevelopment benefits of the 2018 Permission to be realised earlier. More broadly, this will allow the wider regeneration benefits associated with the development to be realised earlier.
- 4.4 The 50-month period will allow development of the Main Store to be completed.
- 4.5 The amendment to the s106 agreement will introduce Phase 1a to the development to ensure that the temporary supermarket becomes its own phase. The changes are principally required to the s106 to:
- Amend the phasing to enable the store to be delivered as the first phase (Phase 1a);
 - Reflect that the store will be a temporary structure and not part of the final permanent PFS building on the PFS parcel;
 - Update the relevant affordable housing triggers to relate to the temporary structure; and
 - Ensure that the new section 73 permission is bound by the existing s106 obligations.

Procedural Matters

- 4.6 This planning application is made under Section 73 of the Town and Country Planning Act 1990 (as amended).
- 4.7 An application can be made under Section 73 to vary or remove conditions associated with a planning permission. One of the uses of a Section 73 application is to seek Minor Material Amendments to the approved development, where there is a relevant condition that can be varied to facilitate such changes.
- 4.8 Government Guidance does not explicitly set out what may be treated as a 'minor material amendment' but does, however, support the definition that such proposals "*whose scale and nature results in a development which is not substantially different from the one which has been approved*" (CLG, 2009).
- 4.9 Established case law also confirms that s73 applications cannot be used to bring about 'fundamental alteration' to the original planning permission.

Format and Scope of the Application

- 4.10 Consideration has been given as to the effect of the amendments to the approved development, confirming that it would:
 - Result in a change that is minor in terms of its scale;
 - Result in a change that is minor in terms of its impact on amenity and visual impact;
 - Would comply with material planning considerations.
- 4.11 Pre-application meetings have been held with LB Camden Officers who have concluded that the proposed alterations are minor in nature and do not represent a fundamental alteration to the approved development, and are able to be dealt with as part of an application for a Minor Material Amendment under Section 73 of the Town and Country Planning Act (1990) (as amended). Officers have welcomed the principle of the proposals.

The Application Specification

- 4.12 Following an audit of the conditions attached to the 2018 permission, this section identifies the changes to condition wording that are proposed by this s73 application.
- 4.13 The application principally seeks approval to amend Condition 4 to incorporate the additional documents relating to Phase 1a of the development. In addition, it is proposed that a condition is added to secure the amended timescales that the store will be in operation for.
- 4.14 In addition to amending Condition 4, Table 2 below summarises where additional information for the temporary store has been provided as part of this s73 application to discharge the relevant conditions in respect of Phase 1a of the development.

Table 2 – Additional Condition Submission Details Provided

PLANNING CONDITION DELIVERABLE	WHERE INFORMATION IS PROVIDED
Condition 24 – Landscaping	Drawing Schedule Provided by Allies and Morrisons
Condition 25 – Cycle Parking	Drawing Schedule Provided by Allies and Morrisons
Condition 26 – Building Details	Drawing Schedule Provided by Allies and Morrisons

- 4.15 Final details of the artwork to be included on the Chalk Farm Road elevation will be secured by way of the addition of a new planning condition requiring the submission of these details. Final details are not included as part of this application to allow for a more extended period of consultation to be undertaken with the local community as to the final design of this.
- 4.16 The amendment to the s106 agreement introduces ‘Phase 1a’ to the development to ensure that the temporary supermarket becomes its own phase. The changes are principally required to the s106 to:
 - Amend the phasing to enable the store to be delivered as the first phase (Phase 1a);
 - Reflect that the store will be a temporary structure and not part of the final permanent PFS building on the PFS parcel; and
 - Ensure that the new section 73 permission is bound by the existing s106 obligations
- 4.17 The affordable housing triggers within the s106 are unaffected by the proposed introduction of the temporary store. The first trigger requires revision to reflect to the updated construction sequence as the ground floor slab of the permanent PFS office building will not be built until much later in the programme. Instead, the first trigger will be linked to the completion of the shell and core of the temporary store. This has been discussed and agreed with Officers during pre-application discussions.

Format and Scope of the Application

- 4.18 As the s106 limits the temporary store permission for a period of 50 months only it is exempt from CIL by virtue of Reg 5 (2) in the 2019 Amendment Regs. A separate covering note has been produced by Quod in respect of this. The timing of the affordable housing trigger is unaffected by this.
- 4.19 As part of this s73 application an informative is suggested for inclusion on the Decision Notice to make explicit reference to the planning permission being phased for the purposes of CIL. The wording proposed is as follows:

“A CIL phase may consist of : demolition, enabling and site preparation works, non-chargeable landscape and access works, construction of a block or blocks, construction of a plot or plots, construction of a basement or below ground works (which shall be separate to those above them) or construction of a specified part of any of the above. A plan showing the extent of phase will be submitted alongside the CIL Additional Information Form and Assumption of Liability for each phase.”

The Planning Application Package

- 4.20 Table 3 below sets out the plans and documents that form part of this minor material amendment application.

Table 3 – S73 Application Package

S73 PLANNING DELIVERABLE	AUTHOR
Application Form and Ownership Certificate	CBRE
Covering Letter	CBRE
Planning Statement	CBRE
CIL Form and CIL Covering Note	Quod
MMA Design Statement	Allies and Morrison
Façade Proposal	HATO
Site Location Plan	Allies and Morrison
Proposed Drawings, Plans and Elevations <ul style="list-style-type: none"> - Existing Site Location Plan (1095_03_07_001_P01) - Proposed Site Plan (1095_03_07_010_P01) - Proposed Site Sections (1095_03_07_030_P01) - Proposed Site Elevations (1095_03_07_040_P01) - Ground Floor Plan (1095_03_07_100_P01) - Roof Plan (1095_03_07_101_P01) - Proposed Elevations (1095_03_07_200_P01) - Proposed Sections (1095_03_07_300_P01) - Proposed Landscape Plan (1095_03_07_600_P01) 	Allies and Morrison
Drawing Schedule	Allies and Morrison
EIA Letter of Conformity	Ramboll
Addendum to the Transport Assessment (Servicing, Loading, Deliveries and Parking)	Ardent
Addendum to the Sustainable Design and Construction Statement Addendum	Hodkinson
Deed of Variation to s106 (submitted under a separate cover)	Winkworth Sherwood

- 4.21 The above is to be read in conjunction with the plans and documents that formed part of the 2018 Permission that are to be carried forward to this application.

Format and Scope of the Application

Town and Country Planning (Environmental Impact Assessment) Regulations (2017)

- 4.22 The original application was supported by an Environmental Statement (ES) because it was categorised as a “Schedule 2 Development” under the Town and Country Planning (EIA) Regulations 2011 (as amended).
- 4.23 Ramboll submitted an informal EIA Scoping Opinion Request letter to the LBC on 17 October 2019 which outlined the proposed scope of and approach to the updated EIA of the proposed amendments and the amended proposed development as a whole, as well as the reporting format. The approach was agreed by the LBC on 4th October 2019.
- 4.24 Ramboll and relevant environmental specialists have reviewed the changes brought forward by the s73 application, whilst considering the potential implications for the likely environmental effects reported within the 2017 ES. Consideration has been given to:
- any changes to legislation, policy and assessment methodologies since the 2017 EIA;
 - any changes in baseline conditions since the 2017 EIA;
 - the conclusions of 2017 EIA for June 2018 consented scheme; and
 - any changes to the 2017 EIA conclusions as a result of the Spring 2020 proposed amended proposed development, as well as cumulative effects.
- 4.25 The application is supported by a “Statement of Conformity” which confirms that the conclusions of the original ES remain relevant to this application and that the new temporary foodstore will not result in impacts that have not previously been assessed.

5.0 The Proposals

The Proposals

- 5.1 Table 4 below provides a summary of the key components of the temporary foodstore. A full description of the scheme is included in the Allies and Morrisons Design Statement submitted as part of this application.



Table 4 Temporary Foodstore Summary – Phase 1a

COMPONENT	DETAIL
Duration	50 Months
Size	<ul style="list-style-type: none"> GEA - 1,403sqm GIA - 1,320sqm
Height	34.037 m AOD
Cycle Spaces	48
Parking Spaces	25 (2 of which are accessible)

- 5.2 The store will be served by a priority-controlled T junction at the eastern edge of the site. The existing two-lane egress to the northwest of the site is to be closed off and consolidated to a single lane egress point, to be utilised solely by delivery vehicles associated with the Morrisons store.
- 5.3 As shown in the plans, the footway along the southern edge of the access will be closed off. Hence, a crossing is proposed in the vicinity of the access that will accommodate any pedestrian desire line to Chalk Farm Road. The existing footways along the northern and eastern elevations are to be retained.

The Proposals

Community and Stakeholder Engagement

- 5.4 St George is committed to liaising proactively with the local community throughout the project. A dedicated website and contact number have already been set up, with the details as follows:
- Website: <http://www.camdengoodsyardconsultation.com/>
 - Number: 0800 298 7040
 - Email: feedback@camdengoodsyard.com
- 5.5 Further, a newsletter was distributed to over 7,000 local residents, businesses and stakeholders w/c 16 December 2019, introducing St George and informing the community of this forthcoming planning application. Details of this are included in **Appendix 1**.
- 5.6 The newsletter included information about the impending application for a temporary store located at the Petrol Filling Station site; people were asked to get in touch via email or phone, should they have any queries or require further information about this.
- 5.7 Additionally, stakeholders (including ward councillors) were sent copies of the newsletters through email. A meeting is set to take place with ward councillors in January 2020, and St George have offered surrounding community stakeholders an opportunity to meet with us, should they wish to discuss the scheme.
- 5.8 St George has also agreed a joined-up approach to wider consultation with One Housing Group to liaise with their residents and a meeting took place on 4th November 2019.
- 5.9 A copy of the Newsletter and Distribution Area is included in **Appendix 1**.
- 5.10 A key aspect of the temporary foodstore will be the installation of artwork along the frontage with Chalk Farm Road. St George has commissioned HATO to work alongside the community to deliver the vision for this space. This application is submitted alongside a Façade Proposal which details the approach to community engagement to be taken through the project to ensure that local stories and history is a key influence for the emerging design.
- 5.11 It is proposed that the final façade design and artwork will be submitted by way of a planning condition post a decision on this s73 application to ensure that the process for engagement with the local community is not artificially constrained by the timeframes associated with this submission.

6.0 Development Plan and Material Considerations

INTRODUCTION

- 6.1 As per 'regular' planning applications, applications submitted under s.73 should be determined against the Development Plan and material considerations, in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Adopted Development Plan

- 6.2 The Development Plan for the London Borough of Camden comprises the following:
- The London Plan (2016);
 - Camden Local Plan (2017)

Material Considerations

- 6.3 Other material considerations carry less 'weight' in planning terms than the Development Plan. Policy documents forming material considerations include (inter alia):
- National Planning Policy Framework (February 2019)
 - Planning Practice Guidance
 - Camden Planning Guidance (Various)
 - Camden Goods Yard Planning Framework (July 2017)
 - National Design Guide (October 2019)

Changes to the Policy Framework Since the 2018 Permission

- 6.4 Since the 2018 Permission, there have been no changes to the adopted London Plan or the Camden Local Plan.
- 6.5 The Development Plan is unchanged since the granting of the 2018 Permission. The principal policy changes following the grant of the 2018 Permission are those relevant policies within the Draft London Plan (July 2019) and relevant Camden Planning Guidance documents published since June 2018.
- 6.6 In addition, revisions have been made to the National Planning Policy Framework (NPPF) which are consolidated in the February 2019 publication. A National Design Guide (October 2019) has also been published.
- 6.7 The principal policy document published since the 2018 extant permission include:
- NPPF - February 2019
 - Governments National Design Guide - October 2019
 - Access for All CPG - March 2019
 - Air Quality CPG - March 2019
 - Design CPG - March 2019
 - Transport CPG - March 2019
 - Trees CPG - March 2019
- 6.8 Where relevant, reference have been included to policies of the Draft London Plan where there have been no conflict/modifications suggested following the publication of the Panel Inspector's report.

Development Plan and Material Considerations

- 6.9 The Draft London Plan has been submitted to the Secretary of State following the recommendation of the Panel Report. It is anticipated that the New Local Plan could form part of the Development Plan at the point that this application is determined. Consideration has been given to policies of the New London Plan (2019) where relevant.

7.0 Planning Assessment/Analysis

- 7.1 The Development that this application seeks to amend has already been determined to be acceptable by Camden Council in June 2018. With this in mind, and in accordance with National Planning Practice Guidance, the key considerations in the determination of this s73 application are:
- Whether planning policies and other material considerations have changed since the 2018 Permission was granted; and
 - Whether the proposed amendments are acceptable having regard to the Development Plan and other material considerations.

Changes to Planning Policy and Other Material Considerations

- 7.2 As explained in the previous section, the Development Plan affecting the site remains unchanged to that in place in June 2018 (when the original application was determined).
- 7.3 There have been no material changes to any other relevant material considerations in the period since the 2018 Permission was granted. The additional Camden Planning Guidance documents build on the policies that are contained within the adopted Local Plan but themselves do not introduce any change to the Development Plan.
- 7.4 The Draft London Plan has recently been submitted to the Secretary of State and could form part of the Development Plan at the point that the application is determined. As such, relevant consideration has been given to policies of the Draft London Plan.
- 7.5 Accordingly, the proposed development remains acceptable in principle in planning terms. It follows that the only relevant considerations for the determination of this application are the proposed amendments themselves and whether these are acceptable when assessed against the Development Plan and other material considerations, as considered below.
- 7.6 As detailed throughout, the principal amendments are (1) the duration of the temporary store and (2) the design and layout of the temporary store.
- 7.7 This section of the Planning Statement provides an assessment of each relevant element of the application proposals, including justification in terms of relevant planning policies and material considerations, as set out below:
- Operation of the Temporary Foodstore for 50 Months
 - Urban Design
 - Design and Shopfront Design
 - Heritage and Townscape
 - Transport, Servicing and Sustainable Transport
 - Highways
 - Parking
 - Servicing
 - Sustainability and Energy
 - Cumulative Effect of Amendments

Principle of the Proposed Foodstore Operating for 50 Months

- 7.8 The principle of the demolition of the existing PFS, principle of a temporary foodstore and temporary loss of the PFS has already been approved by the 2018 Permission.

Planning Assessment/Analysis

- 7.9 The s73 will allow for the acceleration of the delivery of the overall redevelopment scheme. A key benefit will be to increase the rate of delivery of homes on the site when compared with the provisions in the 2018 Permission.
- 7.10 The NPPF seeks to ‘significantly boost the supply of housing.’ Paragraph 59 of the NPPF (2019) further states that ‘land with permission is developed without unnecessary delay.’
- 7.11 The London Plan (2016) establishes the pressing need for more homes in London and the need to boost significantly the supply of housing. Local Plan policy H1 is clear that LBC seeks to exceed its housing target of 16,800 additional homes from 2015/16 - 2030/31 (circa 1,120 homes per year), including 11,130 additional self-contained homes. The 2017/2018 Camden AMR reports that 758 homes were delivered against a target of 1,120.
- 7.12 Neither the Draft London Plan (July 2019) or Camden Planning Guidance documents published since June 2018 alter considerations in respect of this principle.
- 7.13 In summary, there are clear local, regional and national policy objectives that seek to incentivise the rate of housing delivery. On this basis the proposed extension in duration for 30 to 50 months is acceptable in planning terms.

Design Considerations

- 7.14 As detailed within the Officer Report for the 2018 Permission, the existing PFS site does not positively contribute to the existing street scene.
- 7.15 The 2018 Permission includes the provision of a new building on the PFS site which has broadly the same ground floor footprint as that proposed for the new temporary store.
- 7.16 A summary of policy relating to urban design is set out within Sections 6.22-6.25 of the original Planning Statement (July 2017). Since then Camden has published the following relevant Camden Planning Guidance Documents:
 - Access for All CPG - March 2019
 - Design CPG - March 2019
- 7.17 In addition, the Government has published “The National Design Guide” (October 2019). This section assesses the proposals for Phase 1a of the PFS parcel in this context.
- 7.18 The proposals have been the subject of design discussions during the pre-application process. They respond to the requirement of Policies D1 and D3 the Design CPG (March 2019) in being designed to a high standard to integrate well with the surrounding area and contribute positively to the public realm.
- 7.19 An assessment of the proposals considered against the requirements of Policy D1 is included below.
- 7.20 Whilst temporary in nature, the proposals have been developed to reflect the quality of the overall development and to ensure that the proposals respond to the street frontage location. The design proposals that have been developed are a pragmatic response to the competing requirements of (1) ensuring a temporary store design that design that expedites the site wide construction timeline whilst (2) respecting and being sensitive to the wider townscape and Conservation Area.

Policy Response D1

REQUIREMENT OF POLICY D1	ASSESSMENT OF NEW TEMPORARY STORE
a. respects local context and character	The PFS site is located within the Regents Canal Conservation Area.

Planning Assessment/Analysis

	<p>The 2017 Framework notes that <i>'development should also seek to deepen and spread appreciation of the area's historic significance.'</i></p> <p>This part of the Regents Canal Conservation Area is noted in the Conservation Area appraisal as being dominated by industrial uses. It further states that buildings were often functional in design. This context has informed the emerging proposals for the temporary store in terms of its relationship to the wider townscape.</p> <p>As detailed in the Design Statement, the building is treated in an industrial and robust manner with a singular primary material used across all elevations and roofscape to respond to the Conservation Area character. The primary material is a dark grey corrugated metalwork which is arranged in wide panels. Around the perimeter of the building a dark grey brick plinth established at the base to provide a robust interface with the changing ground levels.</p> <p>Through pre-application discussions an opportunity has been identified for public art to be incorporated along the frontage with Chalk Farm Road. A scoping document has been prepared by HATO which identifies how the brief for the artwork will be developed with input from the community to ensure that the building has an identity and sense of character within the local street scene.</p> <p>Whilst it is inevitable that, in responding to the wider brief, the temporary store needs to be functional and simple in terms of its design and installation, St George have been keen to ensure that the building (whilst temporary and reflecting the principles of the circular economy) does relate and draw reference to the wider community in which it is situated.</p>
<p>b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage</p>	<p>See full response at Paragraph 7.25.</p>
<p>c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation</p>	<p>See full response at Paragraph 7.47.</p>
<p>d. is of sustainable and durable construction and adaptable to different activities and land uses</p>	<p>The proposals are temporary in nature and have been designed for (1) a known end user and (2) for a fixed duration. The temporary store will be designed with circular economy principles in mind as encouraged by the draft London Plan. This will include encouraging contractors to segregate waste for recycling; consider elements that can be manufactured offsite to minimise waste; where possible reuse and receive the temporary structure, including internal fittings, once it is dismantled.</p>
<p>e. comprises details and materials that are of high quality and complement the local character</p>	<p>As noted in the response to D1(a) and 7.21 the design approach taken for the temporary store has responded to the objectives of ensuring a sensitive design in the context of the townscape and Conservation Area, while developing a design that would result in a clear material benefit to the overall construction timeline.</p> <p>Given the temporary nature of the proposals, significant brickwork would be inappropriate for use in this context, albeit this is a dominant material in the Conservation Area. The use of corrugated metal works picks up the industrial theme to the materiality which is present in the Conservation Area whilst ensuring that the material can be easily installed and removed.</p>
<p>f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;</p>	<p>In responding to the CPG requirement for <i>'vibrant and well-designed shopfronts animate and activate the street scene and contribute to creating healthy places'</i> the proposals will include an artwork commission along the main frontage with Chalk Farm Road. In addition to providing vibrancy and animation to the street scene, this will also act in itself as an element of public art in being curated with the input and influence of the local community.</p>

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	<p>The proposals safeguard the existing pedestrian route along the north-eastern boundary of the site, maintaining easily recognisable routes.</p> <p>The store itself will include glazing on one of the key junctions of the site to provide interest that wraps the corner of the site, providing animation to this space and integration with the wider junction and street scene.</p> <p>The PFS side of the Chalk Farm Road is dominated by the historic wall which provides a long continuous frontage. The line is respected as part of the temporary proposals.</p>
g. is inclusive and accessible for all	The temporary store is provided on one level (the 2018 Permission includes access over the ground and first floor). Two accessible car parking spaces are provided as part of the development as per the adopted and emerging London Plan.
h. promotes health	As per the 2018 Permission, the proposals will ensure the re-provision of a key local foodstore during the redevelopment of the Main Site.
i. is secure and designed to minimise crime and antisocial behaviour	Consistent with CPG – Design security features have been sensitively designed to consider visual appearance alongside safety and security. Cycle facilities are provided in a clear, accessible location close to the store entrance to provide natural surveillance.
j. responds to natural features and preserves gardens and other open space;	Not relevant to the s73 application.
k. incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,	The proposals include the opportunity for public art to be provided along a key frontage with Chalk Farm Road, this will provide animation to this side of Chalk Farm Road. It is intended that the artwork commission will be developed in collaboration with the local community. The animation of frontages with artwork is a common feature of the Camden Town Area and will be a positive feature in ensuring that the proposals are developed to include an individual identity that helps in reaffirming a sense of place.
l. incorporates outdoor amenity space	Not relevant to the s73 application.
m. preserves strategic and local views	<p>The s73 application is at a height significantly lower than that approved on the site for the 2018 Permission and does not introduce new matters in respect of the consideration of strategic views.</p> <p>In respect of local views, the building has been sensitively designed to preserve key local view, notably The Roundhouse and the Stables. All back-of-house and warehousing/storage requirements have been designed to be off of the main elevation with Chalk Farm Road.</p>
n. for housing, provides a high standard of accommodation	Not relevant to the s73 application.
o. carefully integrates building services equipment	Plant will be incorporated internally wherever possible.

Heritage and Townscape

- 7.25 Since the approval of the extant planning permission there has been no material change in the planning policy framework for the site in respect of the consideration of heritage.
- 7.26 The 2018 Permission establishes the principle of the existing PFS being demolished. Within the 2018 Permission it is confirmed that the existing PFS does not positively contribute to the Conservation Area.
- 7.27 The Heritage Assessment that was approved as part of the 2018 Permission¹ noted:

¹ Appendix 4 – Built Heritage Assessment (Page 281) of 2018 Permission

Planning Assessment/Analysis

'The application site, part of which falls within the Conservation Area, is inconsistent with its character and appearance and, for the most part, detracts from its particular heritage significance, both in terms of direct impact and as an element of setting. It is therefore only the site levels, consistent with the historic Goods Yard and the townscape to the south/southeast, which contribute positively to the significance of the conservation area.'

- 7.28 The lack of contribution made by the existing site to the townscape character of the area is also confirmed in paragraph 5.7 of the Planning Officer report in which it states:
- 'In approaching the main site from Chalk Farm Road, the petrol filling station (PFS) is the first visual indication of Morrison's presence in the area. However, the building does not contribute positively to the local townscape. The PFS comprises a retail unit that turns its back on the supermarket access road and Stables Markets and has no direct access for customers from the street. A large forecourt canopy with open sides sits along the length of Chalk Farm Road and is separated from the narrow pavement along the street by a low wall with railings.'*
- 7.29 The lack of contribution that the site make to the Conservation Area and wider setting of heritage assets in this part of Camden was confirmed in Historic England's consultation response to the extant planning approval.
- 7.30 Policy D2 (Heritage) in building upon Policy D1(b) states that proposals should preserve or enhance the historic environment and heritage assets.
- 7.31 As discussed above, the form of the temporary building also reflects a functionality that is common in the industrial heritage buildings of the wider Conservation Area.
- 7.32 The proposals have been sensitively designed to respect the historic environment and heritage assets. Through the proposed inclusion of public art as part of the scheme there is an opportunity to enhance the understanding of the wider heritage associated with the area consistent with Policy D2. St George is working alongside HATO and the local community in respect of the proposed design.
- 7.33 The 2018 Permission has previously established the acceptability of a much taller building on the site. The provision of a smaller building, for a temporary period of time is not considered to result in a material change to the previous assessment. This position is confirmed in the EIA Statement of Conformity in which it states *'the introduction of a temporary store would not alter the conclusions of the built heritage assessment for the demolition and construction stage as presented in the 2017 ES as the overall height and footprint is smaller than that of the proposed office building and would be temporary in nature.'*

Highways, Parking and Servicing

Policy Context

- 7.34 The Development Plan context remains unaltered from that considered under the 2018 Permission. The exception to this is the Draft London Plan which, following the publication of the Panel Report, has weight in the decision-making process (with the exception of those policies in which are the subject of suggested main modifications).
- 7.35 A Transport Assessment Addendum (TAA) has been prepared by Ardent and the summary below should be read alongside their overarching report and supporting documents. This includes a relevant assessment of Draft London Plan Policies published since the granting of the extant planning permission.

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- 7.36 The previous scheme from the 2018 Permission had a gross floor area of circa 1,450sqm with 61 car parking spaces, the proposed scheme thus has a lower floor area and number of car parking spaces. It was determined at that stage that the impact on the local highway network was acceptable, and therefore it is considered that traffic generation outlined above will continue to be satisfactorily accommodated.
- 7.37 In respect of highways capacity and operation, the proposed revision does not result in additional transport impacts that are not considered by the 2018 Permission and is thus acceptable.

Car Parking

- 7.38 The 2018 Permission included 61 parking spaces served from the new Juniper Crescent access, including 4 disabled spaces, however this was for a larger scheme (circa 1,450sqm GFA).
- 7.39 The revised scheme includes a temporary store which includes 25 car parking spaces and is slightly smaller in gross floor area (1,320sqm GIA).
- 7.40 The reduction in car parking proposed as associated with the temporary store is consistent with the London Plan and Camden Local Plan which both include policies that seek to reduce the amount of car parking provided.
- 7.41 Consistent with the CPG Transport March (2019) Part 3, Schedule 24 of the s106 Agreement includes a Car Parking Management Plan to be submitted with the application. The document has been prepared to set out the management measures that will be in place at the car park to ensure that no overspill / illegal parking takes place.
- 7.42 In line with draft New London Plan policy, developments should typically provide provision of rapid electric charging points for retail developments. Noting that the store is temporary, and car parking for long periods of time is not encouraged, as agreed with Officers during pre-application discussions, no electric charging points will be provided with the temporary store.
- 7.43 The amendments will result in a reduction of carparking associated with the temporary foodstore which is consistent with relevant development plan policies.

Cycle Parking

- 7.44 Cycle parking for the new temporary foodstore is acceptable as it exceeds current policy and is in accordance with draft New London Plan standards. A total of 48 spaces are to be provided.

Delivery and Servicing

- 7.45 Consistent with the requirement of CPG – Transport (March 2019) a dedicated loading bay will be provided as part of the temporary proposals on the western edge of the development, this will avoid the need for servicing on the public highway. The proposed servicing route has been the subject of tracking analysis to ensure the safe manoeuvring within the network.
- 7.46 As per the extant s106, the details of the timing and operation of the loading bay will be secured through the Servicing and Delivery Plan submitted pursuant to the s106.

Sustainability and Energy

- 7.47 A Sustainability and Energy Statement has been submitted by Hodkinson Consultancy to support the application.

Planning Assessment/Analysis

- 7.48 The planning framework has remained largely unaltered with respect to Energy and Sustainability since the granting of the 2018 Permission with the exception of the Draft London Plan.
- 7.49 Of note in the context of this planning application is Policy SI 7 of the New Draft London Plan which reflects the principles for reducing waste and supporting the circular economy.
- 7.50 In promoting the principles of the circular economy of the Draft London Plan, the Energy and Sustainability Strategy highlights that the development proposes to achieve good standards in terms of sustainable design and construction.
- 7.51 As detailed in the report prepared by Hodkinson's Consultancy, good practice energy and sustainability targets have been reviewed for the site as set out below, bearing in mind the temporary status of the development and the requirements already in place as part of the sitewide S106 for the development.
- 7.52 Full details of the approach to Energy and Sustainability are included in the note prepared by Hodkinson's Consultancy and include inter alia:
- Benchmarking BREEAM performance of the temporary store against the BREEAM Shell only requirements (without certification);
 - Embracing circular economy principles wherever possible;
 - Achieving the equivalent of BREEAM Fit-out and Refurbishment mandatory 'Excellent' Wat 01 requirements in terms of on-site water usage flow rates for the fit-out specification of sanitaryware;
 - Allowing for metering of any low and zero carbon technology;
 - Providing temporary cycle provision above the standards required in the New London Plan to encourage sustainable travel. The site more broadly is located in a highly accessible location for public transport.
- 7.53 Policy CC2 of the Camden Local Plan (2017) states that the response to adapting to climate change should be 'appropriate.' In this context the temporary duration of the store is important to ensure that proposed energy and sustainability solutions are proportionate to the relatively short lifecycle of the building when compared with permanent buildings that can utilise longer 'payback' durations.
- 7.54 The proposed interventions accord with requirements of Policy CC1 to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.
- 7.55 The temporary nature of the proposals positive respond to Policy SI 7 of the Draft London Plan which promotes the circular economy.

Summary and Cumulative Effect of Amendments

- 7.56 When considered as a whole, the cumulative effects of the proposed changes to the approved development are minor in scale and nature.
- 7.57 Further assessment of this is included in the EIA Statement of Conformity. With the revised temporary store being (1) smaller and (2) including fewer car parking spaces, the environmental effects of the temporary foodstore in respect to matters such as air quality, noise and vibration are less than that previously assessed. The proposals will bring an additional construction phase into the overall construction process but, it is proposed that with

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the nature of the building much of the structure will be developed offsite with on-site work being more confined primarily to assembly.

- 7.58 The amendments will not result in a development that is substantively different to that already approved, particularly as the required amendments are all temporary in nature. Furthermore, the proposed minor amendments comply with the current policy framework. The addition of this temporary phase enables the significant benefits of the development to be bought forward earlier.
- 7.59 As detailed above, changes in policy and material considerations since the existing permission was granted on 15 June 2018 have been considered and do not materially alter the conclusions previously reached.

8.0 Conclusion

- 8.1 This Statement has been prepared to support a Section 73 application submitted pursuant to the 2018 permission which was granted on 15th June 2018.
- 8.2 The 2018 Permission allows the comprehensive redevelopment of the Camden Goods Yard site, including provision of a temporary store within the PFS parcel. It was granted subject to 66 conditions and a Section 106 agreement. The development approved under the 2018 Permission will be delivered as a number of phases and expected to commence in March 2020.
- 8.3 This S73 application is seeking approval for amendments to the wording to condition 4 as the mechanism for approval of plans for a single storey temporary food store to operate for 50 months within the PFS parcel. A Deed of Variation is submitted (under a separate cover) to include the relevant definition for Phase 1a and amend the timescales associated with the temporary store.
- 8.4 In addition, permission is sought for the discharge of conditions 24, 25, and 26 (insofar as it relates to the temporary store). A new planning condition is to be added in respect of the proposed final design of the artwork to the Chalk Farm Road elevation.
- 8.5 The 2018 Permission included provision of a temporary foodstore on the PFS parcel to enable Morrisons to relocate from its current site, freeing up the main site for construction access and redevelopment. The temporary foodstore within the extant permission formed part of a six-storey building that comprised a gross floor area of circa 1,450sqm with 61 car parking spaces.
- 8.6 The amendments being requested within this s73 application will introduce an additional phase into the development sequence (Phase 1a), thereby ensuring that the temporary foodstore can be operational earlier in the construction process. The principal amendments are as follows:
 - To increase the duration of the temporary foodstore from 30 to 50 months and;
 - Provide a new, 1,403 sqm (GEA) temporary, single storey standalone building within which the foodstore will operate. 25 car parking spaces and 48 cycle spaces are proposed.
- 8.7 This revised approach will not require the six-storey building to be constructed within the first phase. Avoiding the time-lag associated with the current approach in the extant permission will allow the redevelopment benefits of the 2018 Permission to be realised earlier.
- 8.8 The amendments are minor and will have no impact on amenity, neighbouring properties or the surrounding road network or parking. In addition, all of the amendments are temporary in nature.
- 8.9 The proposals imbed the principles of the circular economy by minimising waste, whilst ensuring that the proposals positively respond to the wider Conservation Area and townscape context.
- 8.10 Therefore, the amendments are acceptable in terms of policy and material considerations, and should be supported.

Appendix 1

Newsletter issued in December 2019:

THE CAMDEN GOODS YARD

Community Newsletter: December 2019




INTRODUCING ST GEORGE AND MORRISONS

St George and Morrisons have entered into a new partnership to deliver the regeneration of the Camden Goods Yard site.

St George is proud to be a member of the Berkeley Group, London's leading mixed-use developer and a FTSE 250 company. We regenerate brownfield land to create thriving new communities in attractive landscaped environments.

The site already benefits from planning permission (formally granted in June 2018) to provide the following key benefits:

 573 new homes, including 184 affordable homes	 Affordable workspace
 New state-of-the-art Morrisons stores	 1,159 jobs on-site once completed
 Retail and office space	 £17.2 million in Community Infrastructure Levy (CIL) payments
 Community spaces	 43 apprenticeships and 784 jobs during construction

GET IN TOUCH

Sign up for news and regular updates at www.camdengoodsyardconsultation.com

Email direct to feedback@camdengoodsyard.com or call  0800 298 7040




Appendix 1

ABOUT CAMDEN GOODS YARD

Formally granted by Camden Council in June 2018, Camden Goods Yard is located on the site of the current Morrisons Supermarket and Petrol Filling Station. The site bounds the neighbouring Gibbys Yard and Juniper Crescent estates, where separate proposals are currently being brought forward by One Housing Group and Countrywide.



A COMMITMENT TO ENGAGING WITH THE LOCAL COMMUNITY

During the delivery of our project, we will have a dedicated Community Engagement Facilitator to work alongside the local community.

Camden Goods Yard will deliver a variety of benefits for the community, and we want to engage you as we formulate our community initiatives. There are multiple ways that you can get involved and stay informed, through our website, newsletter and a newly established Community Working Group, where we'll be providing construction updates and discussing community activities.

If you would like to get involved or stay informed, then please sign up to the latest updates at www.camdengoodsyardconsultation.com or email feedback@camdengoodsyard.com

NEW TEMPORARY MORRISONS STORE APPLICATION

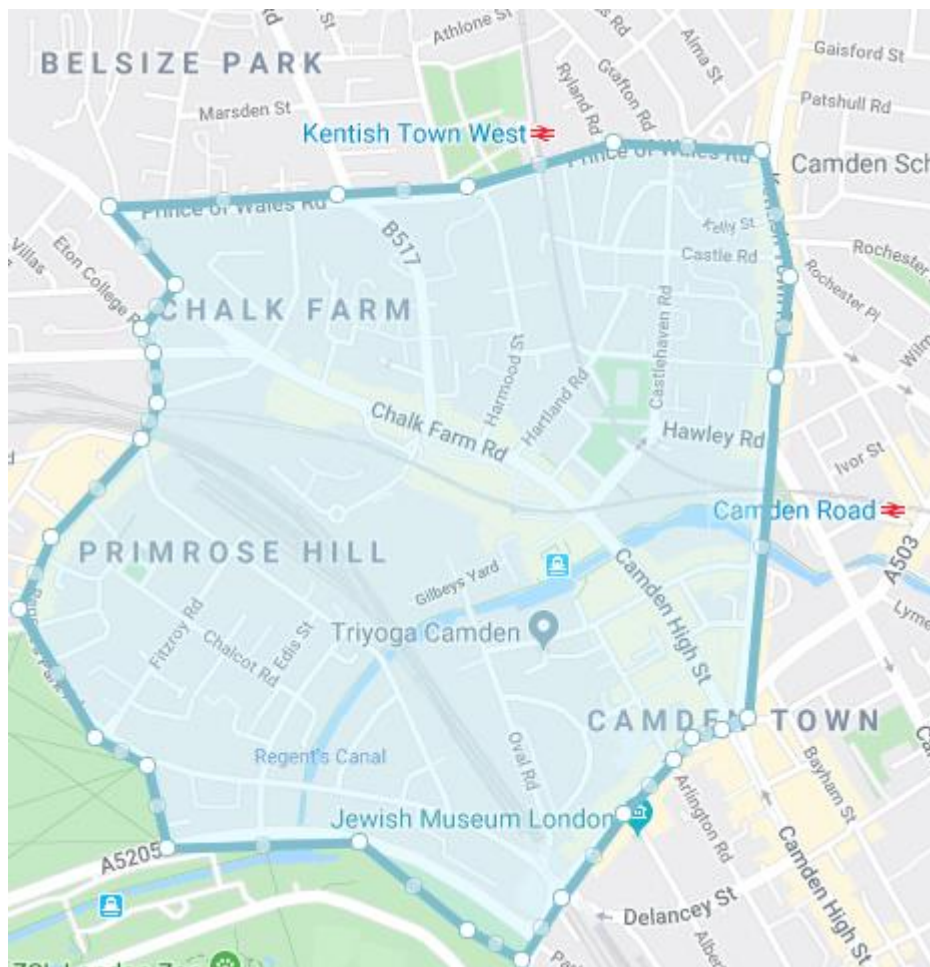
We are proposing a new temporary Morrisons store on the site of the petrol station, which will allow us to deliver the new homes and overall development much quicker.

Previously, the temporary store would have been within the new office building proposed for the petrol station site. Building a temporary structure for the store will enable us to commence work on the main site around a year earlier, which means all of the benefits can be brought forward.

An application for this proposal is currently being prepared for submission to Camden Council. If you have any questions, please do not hesitate to get in touch with us by emailing feedback@camdengoodsyard.com or by calling 0800 298 7040. Also, further information can be found on our website.

During the redevelopment process, Morrisons will enjoy continuity of trade. Under proposals, in Spring 2021, Morrisons will open a temporary store on the site of the current petrol station. We will then build their new permanent store, which will be open in Spring 2025.

Appendix 1



Map Showing Area of Newsletter Distribution

Appendix 2

New Camden Journal Advert 2nd January 2020 Publication

Public & Legal Notice



LONDON BOROUGH OF CAMDEN

Town and Country Planning (Development Management Procedure) (England) Order 2015
NOTICE UNDER ARTICLE 13 OF APPLICATION FOR PLANNING PERMISSION

Notice is hereby given that application has been made to the London Borough of Camden in respect of the following developments

Date of Notice 02/01/2020

Of Public Interest

2017/3847/P, as amended - Morrisons Superstore and Petrol Filling Station, Camden Goods Yard, Chalk Farm Road, London, NW1 8EH

I give notice that St George West London Limited is applying to the London Borough of Camden in respect of a minor-material amendment application to the planning permission granted 15th June 2018, as amended for:

Redevelopment of petrol filling station site to include the erection of a new building of up to six storeys and up to 11,243 sq m GEA floorspace to accommodate a petrol filling station (Sui Generis use), flexible retail/food & drink floorspace (Class A1, A3 uses), Class B1 floorspace and a winter garden; with cycle parking, public green space, public toilets and other associated works and highways works; all following demolition of existing building petrol filling station. Use for a foodstore (Class A1 use) with associated car parking for a temporary period.

Redevelopment of the main supermarket site to include the erection of seven buildings (Blocks A, B, C, D, E1, E2, F) of up to 14 storeys accommodating up to 573 homes (389 market and 184 affordable in up to 60,568 sq m GEA of residential floorspace) together with up to 28,345 sq m GEA non-residential floorspace comprising foodstore (class A1), flexible retail/food & drink (Class A1/A3), office and workshop (Class B1a and B1c), community centre (Class D2), roof level of 'Block B' for food and plant growing/production facility including small scale brewing and distilling (Sui Generis use); with associated ancillary office, storage, education, training, cafe and restaurant activities; together with new streets and squares; hard and soft landscaping and play space; lifts; public cycle parking and cycle hire facility and other associated works, including removal of existing surface level car parking and retaining walls, road junction alterations; all following demolition of foodstore.

Members of the public may inspect copies of the application during the period of 30 days from the date of this notice online at <https://www.camden.gov.uk/search-for-planning-applications> or at London Borough of Camden 2nd Floor, 5 Pancras Square c/o Town Hall, Judd Street, London, WC1H 9JE during all reasonable hours until Mon-Fri 9am to 5pm.

Anyone who wishes to make representations about this application should write to the Council at <https://www.camden.gov.uk/search-for-planning-applications> or at London Borough of Camden 2nd Floor, 5 Pancras Square c/o Town Hall, Judd Street, London, WC1H 9JE during all reasonable hours until Mon-Fri 9am to 5 by **2nd of February 2020**.

2nd January 2020