

Rear of 115-119 Finchley Road, Swiss Cottage

Planning Statement

LPA Ref: PP-08698249

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Section 1 Introduction

- 1.1 This Planning Statement has been prepared by Firstplan in support of a planning application by Roofoods Ltd (t/a Deliveroo Editions) in respect of the Unit to the rear of 115-119 Finchley Road, London (**the Site**).
- 1.2 The use of the Site as Commercial Kitchens and a Delivery Centre (Sui Generis) and the installation of external plant to facilitate that use currently benefits from temporary planning permission, which was granted by an Inspector on 17 September 2019 following a Public Inquiry to determine an appeal under Section 174 of the Town & Country Planning Act 1990 (as amended) (the Appeal Decision). The permission was granted for 14 months and is due to expire on 17 November 2020.
- 1.3 Paragraph 113 of the Appeal Decision confirms that a *“trial run is needed to assess the effect of the development on the area with all the controls that have been developed in the run up to and during the Inquiry”*. The “controls” referred to were introduced in July 2019 and comprise the restriction on delivery vehicles collecting orders from the Site to bicycles and electric two wheeled vehicles (**ETWs**) (as well as on foot) only and the implementation of a bespoke Operational Management Plan (**OMP**), which regulates the operation of the Site.
- 1.4 The Inspector goes on to state at paragraph 114 that *“monitoring would be essential for the trial period.”* The implementation of the OMP has been actively monitored by Deliveroo since planning permission has been granted and, as agreed with Camden Council (LBC), Firstplan were instructed to undertake a dedicated exercise from November 2019 to monitor how the OMP is being enforced on the Site.
- 1.5 The results and analysis of this exercise are set out in the separately submitted ‘Swiss Cottage Editions Site Monitoring Report’ (**the Monitoring Report**) prepared by Firstplan, which should be read in conjunction with this Planning Statement. Overall, it is our view that the Site is operating in accordance with the OMP as evidenced by our visits. The rules appear to have *“bedded in”* well and the same riders largely return during the monitoring period and are well versed in how to enter the Site, park their bike/EV and head inside to collect their order.
- 1.6 Accordingly, it is considered that planning permission should be granted on a permanent basis. This Planning Statement demonstrates that the permanent use of the Site by Editions and the retention of

the installed plant equipment continues to be acceptable in all regards and is therefore in accordance with adopted local and national planning policy as follows:-

- The Site is situated within a busy town centre where commercial development is encouraged in line with Policy 2.15 of the London Plan and Policy TC4 of the Camden Local Plan;
- The Site is an important economic use, which is providing an essential delivery service to local people, particularly during the current COVID-19 situation. Editions has occupied an underutilised unit within a defined town centre, has created 29 new jobs for local people (excluding riders), has benefited the local supply chain and facilitates the growth of new and existing restaurant businesses, including start-ups and SMEs. The continued support that the Site will provide to restaurant businesses, which have been severely affected by the current circumstances, will be vitally important post COVID-19. This important economic use is fully supported by policies 4.1 and 4.10 of the London Plan and Policy E1 of the Camden Local Plan;
- The use of bicycles and ETWS as the mode of operation for delivery vehicles supports Camden Council's commitment to make Camden net zero carbon by 2030. This is fully in accordance with policy 5.1 of the adopted London Plan and draft Policy GG3 of the Draft New London Plan;
- When taking into account of the context of the Site, the limited hours of operation and the conclusions of the monitoring exercise and the noise and odour reports, it is our view that the permanent use of the Site and retention of installed plant equipment does not have an unacceptable impact upon the amenity of neighbouring residential properties and complies with policies A1 and A4 of the Camden Local Plan; and
- Based on the conclusions of the supporting Transport Statement, the permanent use of the Site does not result in unacceptable harm to highway safety and complies with Policy A1 of the Camden Local Plan.

1.7 As such, it is respectfully requested that planning permission is granted without delay.

1.8 This Statement adopts the following structure:-

- Section 2 sets out the planning background to the Site;
- Section 3 describes the Deliveroo Editions concept and the operation on Site;
- Section 4 sets out the relevant planning policy framework;
- Section 5 provides an assessment of the pertinent planning issues associated with the permanent use of the Site; and
- Section 6 draws conclusions.

Section 2 Planning Background

a) Description of the Site and Surrounding Area

- 2.1 The Site comprises the lower ground floor of 115-119 Finchley Road, Swiss Cottage. The total floorspace extends to 460 sq m and the Site is served by a dedicated servicing area and three off-street car parking spaces. Access to the Site is from Finchley Road and is managed via a gate.
- 2.2 In terms of the immediate surrounding area, the upper ground floor of 115-119 Finchley Road is divided into a mix of retail and restaurant uses. Residential units are accommodated on the three upper floors. To the north east of the Site is Cresta House, a nine-storey mixed use building with commercial uses accommodated on the ground floor and residential uses above. The land to the rear of Cresta House is separated from the Site by a locked gate. This building is served by the dedicated surface car park immediately to the north of the Site. To the south and west of the Site are residential properties fronting onto Dobson Close.
- 2.3 The Site is located within the designated Finchley Road/Swiss Cottage Town Centre which is a busy location on the A41 Finchley Road.
- 2.4. The Site is not situated within a Conservation Area, the building is not listed and the Site is not within an area at risk of flooding.

b) Relevant planning history

- 2.5 The following is a description of the planning history in relation to the Site based on the documentary records provided by LBC:-
- The Site formed part of the construction of a wider development relating to 115 – 121 Finchley Road. Planning permission was granted on 11 September 1959 (ref: TP21868) for the erection of a building, part two-part and part five storeys, comprising shops and supermarket on lower-ground and ground, five self-contained flats at first floor and five self-contained maisonettes at second and third floors with ancillary garages at the rear. This permission was later renewed in 1960 (ref: TP21868/5675).

- Since the original construction, there have been numerous planning permissions granted relating to various parts of the wider site. Substantive planning permissions relating to the Site (117-119 Finchley Road) are considered to be as follows:-

- **8400217** - *Alterations to shopfront for Comet store (granted 24 April 1984)*

- **9005435** - *Sub-division of existing retail unit (A1) to form one hot food takeaway/restaurant (A3) and one retail unit (A1) and associated works (granted 18 January 1991)*

- **9200229** - *Change of use of ground floor unit from retail (A1) to mix of A1 and B1 (granted 8 May 1992).*

- **2017/4737/P** - *The installation of external plant, including 3 no. extract ducts, 4 no. flues, 3 no. air intake louvres, 1 rooftop extract and 3 no. air condenser units installation of external plant, including 3 no. extract ducts, 4 no. flues, 3 no. air intake louvres, 1 rooftop extract and 3 no. air condenser units (refused 11 May 2018)*

- **2018/0865/P** - *Certificate of Lawfulness of an Existing Use for use of the Site as a Class B1c Commercial Kitchen (refused 11 May 2018).*

2.6 Planning permission was granted for a 14 month period from 17 September 2019 for the use of the Site for commercial kitchens and delivery centre (sui generis) and the installation of external plant to facilitate that use including three (3) extract ducts, four (4) flues, three (3) air intake louvres and three (3) air condenser units following a Public Inquiry to determine an appeal under Section 174 of the Town & Country Planning Act 1990 (as amended).

2.7 The principle of the use of the Site and the installation of the plant equipment has therefore been considered acceptable by an independent Inspector. This application will demonstrate that the OMP continues to work effectively and that the application proposal remains acceptable against all relevant planning policies and therefore a permanent planning permission should be granted.

Section 3 The Application Proposal

3.1 The application seeks planning permission for the permanent use of the Site as commercial kitchens and delivery centre (Sui Generis) and retention of external plant to facilitate that use including three extract ducts, four flues, three air intake louvres and three air condenser units.

a) **Use of the Site**

i) The Deliveroo Editions Concept

3.2 A briefing note setting out details of the Deliveroo Editions (**Editions**) concept and how the Site operates is attached at **Appendix 1**. Further information on the benefits and support provided by Deliveroo to restaurant partners and riders is attached at **Appendix 2**. A summary of both notes is set out in the paragraphs below.

3.3 Editions provides bespoke, fully-equipped, state of the art commercial kitchen units which are licensed and occupied by new and established restaurant partners. The kitchens are staffed and operated by the restaurant partners. Food is prepared and cooked within these kitchens by the restaurant partners and delivered to customers using Deliveroo's fleet of riders.

3.4 The concept provides a platform to support the restaurant industry, enabling restaurant partners to open in a new market without the up-front costs or risks of setting up and managing their own physical premises. Deliveroo does not charge partners a rent to occupy a kitchen pod at the Site. Instead, Deliveroo will take a commission against all orders made via the Deliveroo app. There is therefore zero upfront cost for partners to move into the Site - all they are required to do is source chefs and ingredients. At a time when restaurant businesses have been particularly hard hit due to the ongoing COVID-19 restrictions, Editions is appealing to restaurants as it gives them the chance to launch, expand and test new innovations at minimal cost, creating in excess of 1,000 new restaurant jobs across the UK. In tandem, Editions is providing an essential delivery service for customers in light of new social distancing measures, which are likely to last for some time.

3.5 Furthermore, Editions uses insights to identify cuisine gaps in the local market and predicts which menu items will succeed in each area, thereby reducing the risk of business failure for restaurants. The Editions concept also allows food entrepreneurs to prototype new food products and/or brands with

the benefit of insights from Deliveroo. This in turn supports small businesses and start-ups to launch and trial their menus at low risk, both helping new chefs launch for the first time and more established restaurants to reach customers in new places.

- 3.6 In addition, Editions goes one step further using customer feedback to help chefs refine their product offering. Deliveroo is also able to help restaurant owners tailor their menu items using information on the conversion rate (how many people consider vs. purchase from the menu), giving them insights around menu items that are proving popular for customers in their area.
- 3.7 The focus of the model is “*last mile*” delivery and Deliveroo utilises the latest technology to ensure that the food is delivered to the customer in the most efficient way. Deliveroo’s real-time dispatch algorithm, ‘Frank’, constantly looks at available riders and orders, and then every two seconds, evaluates the most efficient way to dispatch them. This decision process is based on (i) machine-learning predictive models of when the food will be ready; (ii) how long every part of the delivery process will take; and (iii) which rider is best placed to fulfil that specific order based on distance, type of location and other factors. The result is that the technology can predict when a rider should arrive on Site, minimising dwell time, and customers get an even more precise indication of when deliveries will arrive.
- 3.8 Each order that is serviced by Editions kitchens is processed in the following way:
- The customer creates an account on the Deliveroo app;
 - The customer logs into the Deliveroo app and places an order with the restaurant located at the Site;
 - The restaurant receives notification of an order being placed and, once it chooses to accept the order, prepares and cooks the food;
 - Deliveroo’s ‘Frank’ algorithm will assign a rider to the confirmed order. The rider must accept the delivery;
 - When the food is nearly ready, the Deliveroo app will notify the rider to go to the Site and pick it up;
 - When the food is cooked, it is packaged and marked with the order number, and then taken to the shared dispatch area, to be collected by the assigned rider;
 - The assigned rider collects the order from the Site and delivers the food to the customer;
 - In practice, orders are “*stacked*” where possible for efficiency so that the rider is often carrying more than one order; and

- The customer can monitor the progress of their order and track the location of the assigned rider (once the order has left the Site) on the Deliveroo app.

- 3.9 Sales do not take place at the Site and there is no ability for customers to collect an order at the Site themselves. The transaction occurs entirely online and is completed via the online app.
- 3.10 The Site is providing an important service to the residents of Camden. The attached briefing note at **Appendix 3** confirms that the Site serves an extensive radius of residents in Camden and analysis of the order data shows that the Site is popular with local residents in Swiss Cottage, many of which live within 500m of the Site.

ii) The operation at the Site

- 3.11 The Site accommodates nine micro kitchen pods (eight extending to 32 sqm each and one larger kitchen pod of 48 sq m). Each pod is independent and shares a dedicated dispatch area where food from all restaurants in occupation is collected by the riders. The Site also accommodates management offices, storage and welfare facilities for kitchen staff and riders.

Restaurant Partners

- 3.12 Since the Site began trading in November 2017, a variety of restaurant partners have operated from the Site including, Pinza, Zia Lucia, Waleema, Motu, Honest Burger, Ekachai, The Good Earth, Kalmaki Street Greek and Ahi Poke. These businesses are a mix of 'start-ups', small independent restaurants and more established brands.
- 3.13 **Waleema** are an example of a small 'start-up' businesses seeking to establish their product. The Site has allowed them to set up and trial their menus in this part of north west London without significant upfront costs.
- 3.14 **Ahi Poke** is an example of a small and independent restaurant business. The Site has enabled them to raise awareness of their brand and test out new areas before deciding to expand.
- 3.15 **Motu** is an Indian restaurant delivery brand created by JKS Restaurants. The Site has facilitated the development of the brand and its success means that JKS are now seeking to open physical premises.
- 3.16 The two most established restaurant partners to have operated from the Site are Honest Burger and Busaba both of which are London based brands. Honest Burger has 28 restaurants in London and

Busaba operates 13 restaurants in London. The Site enabled both brands to service a part of London where they have no representation.

Hours of operation

- 3.17 The Site can be accessed from 08:00 seven days a week by the restaurant partners for food preparation. However, customers are only able to place orders via the app from 12:00 each day. Last orders are placed at 22:45 and the kitchens close at 23:00.
- 3.18 The busiest period for orders is generally between 19:00 and 21:00, which mirrors the casual dining sector on the high street. Orders typically drop off after 21:00.

The collection of orders

- 3.19 Riders using motorised vehicles are prevented from collecting orders from the Site. Only those riders who deliver on foot, bicycles and electric two wheeled vehicles (**ETW**) are allocated an order to collect from the Site. Riders enter the Site, go down the ramp and park their bicycles/ETW in the dedicated parking spaces prior to entering the building to reach the order dispatch point.

iii) The OMP

- 3.20 The operation of the Site is controlled in accordance with a bespoke OMP. The document was prepared with agreement from Officers from Camden Borough Council and secured by a Section 106 agreement to the Appeal Decision.
- 3.21 The OMP covers the following elements:
- The operating hours of the Site;
 - How those who use the Site will be expected to conduct themselves;
 - How Deliveroo Rider deliveries will be managed;
 - The responsibilities of the on-Site marshals;
 - Servicing arrangements for the Site;
 - How refuse and recycling is stored and collected;
 - The noise mitigation measures employed on-Site;
 - Pest control;
 - Site security;
 - On-Site staff training;

- Communication with local residents; and
- Complaints handling procedure and logging process.

3.22 It was agreed following a meeting with officers at Camden Council on 29 October 2019 that on-going monitoring should be carried out to determine the effectiveness of the measures implemented on-Site in accordance with the above topics as the preferred means of providing an appropriate evidence base to make a robust case as to why a permanent planning permission should be granted.

3.23 Firstplan undertook this monitoring exercise over 15 visits between November 2019 and March 2020. A description of the methodology adopted for the exercise and an analysis of the results are set out in the separate Monitoring Report prepared by Firstplan, which is submitted as part of this planning application. A summary of the analysis will be set out in Section 5 of this planning statement.

b) Description of the installed plant

3.24 The extract and ventilation equipment that has been installed is as follows:-

- Three extract ducts on the rear elevation of the building facing west; the ducts are 900mm by 600mm. The ducts start at 3.7m above ground level and protrude upwards to 9.5m above ground level;
- Four extract flues (three on south facing elevation and one on north facing elevation). The three flues are small, 0.3m diameter circles which are flush with the external wall of the building. The north facing flue is a narrow 0.3m wide pipe that starts at 2.4m above ground level and is 5.5m high;
- Two air intake louvres positioned on the north facing elevation and one on the south facing elevation);
- Three air condenser units positioned on the southern elevation; and
- One condenser for refrigeration.

3.25 The extract was retrofitted in August 2018 with fine filtration and UV-Ozone treatment, which provides a very high level of odour control. This has been maintained regularly by appointed contractors Leech Mechanical Services.

3.26 The following frequency of maintenance actions is undertaken at the site:

- Duct cleaning quarterly (undertaken Sep 2019, Jan 2020 and April 2020);

- Pre filter changes monthly;
- Carbon filters changed annually (changed in Aug 2019); and
- Hepa bag filters changed every 6 months.

Section 4 Relevant Planning Policy

- 4.1 The statutory development plan for the Site comprises the Camden Local Plan (2017) and the London Plan (2016). The National Planning Policy Framework (**NPPF**) (2019) is also a material consideration.
- 4.2 The planning policy context remains the same as that assessed by the Inspector at the Public Inquiry. However, the emerging new London Plan that will replace the existing London Plan once adopted has reached a more advanced stage of preparation. This has been through examination and is expected to be adopted later in 2020.

a) The National Planning Policy Framework (2019)

- 4.3 The revised National Planning Policy Framework was published in July 2018 and updated in February 2019. It provides overarching planning policy guidance for development across England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 4.4 Paragraph 10 sets out that at the heart of the framework is a “*presumption in favour of sustainable development*” and Paragraph 11 notes that for decision-taking sustainable development means “*approving development proposals that accord with an up-to-date development plan without delay*”.
- 4.5 In terms of decision taking, Paragraph 38 sets out that Local Planning Authorities should approach decisions on proposed development in a positive and creative way. It states that decision-makers at every level should seek to approve applications for sustainable development where possible.
- 4.6 Paragraph 47 requires that applications be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 4.7 In terms of economic development, Paragraph 80 sets out that:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global

leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential” (our underlining)

4.8 Paragraph 82 goes on to say that:

“Planning policies and decisions should recognise and address the specific location requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations” (our underlining)

4.9 Section 11 of the NPPF is predicated on making the effective use of land, with Paragraph 118 stating that planning policies and decisions should encourage multiple benefits from urban land and give substantial weight to the use of suitable brownfield land.

4.10 Policies relating to the achievement of well-designed places are contained within Section 12. Paragraph 124 states that the fundamental objective of the planning and development process is to achieve high quality buildings and places and that good design is a key aspect of sustainable development.

4.11 Paragraph 127 requires planning policies and decisions to ensure that developments will function well and add to the overall quality of the area, are visually attractive and establish a strong sense of place and which create attractive and distinctive places to work.

b) The London Plan

i) Adopted London Plan (2016)

4.12 The following policies are considered relevant at the strategic level:-

- **Policy 2.15** – Town Centres;
- **Policy 4.1** – Developing London’s economy;
- **Policy 4.8** – Supporting a successful and drivers retail sector and related facilities and services;
- **Policy 4.10** - New and emerging sectors;
- **Policy 5.1** – Climate mitigation;
- **Policy 6.3** – Assessing the effects of a development on transport capacity; and

- **Policy 7.15** – Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.

- 4.13 **Policy 2.15** refers to town centres. Part A(a) confirms that London’s town centres “*are the main foci beyond the Central Activities Zone for commercial development.*” This is important context for assessing the appropriateness of the use at the Site and is discussed further in Section 7 of this Proof.
- 4.14 **Policy 4.1** is focused on London’s economy and confirms that the Mayor will “*promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient workspaces in terms of type, size and cost...*”. The policy also emphasises the need for greater recognition of the importance of enterprise and innovation.
- 4.15 **Policy 4.8** confirms the Mayor’s support for a successful, competitive and diverse retail sector which promotes sustainable access to goods and services that Londoners’ need. Part B(f) requires planning decisions to support the development of e-tailing and more efficient delivery systems.
- 4.16 **Policy 4.10** refers to new and emerging sectors. Whilst “*last mile*” delivery is not specifically referred to in the policy wording, it is clear that the policy supports innovation and seeks to ensure that there is availability of a range of workspaces, including start-up space.
- 4.17 **Policy 5.1** confirms that the Mayor seeks to achieve an overall reduction in London’s carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. It is expected that the GLA Group, London boroughs and other organisations will contribute to meeting this strategic reduction target, and the GLA will monitor progress towards its achievement annually.
- 4.18 **Policy 6.3** confirms that planning decisions should ensure that development does not adversely affect safety on the transport network.
- 4.19 **Policy 7.15** confirms that development proposals should seek to manage noise and (amongst other measures) should mitigate and minimise the existing and potential adverse impacts of noise without placing unreasonable restrictions on development.

ii) ‘Intend to Publish’ Draft London Plan (DNLP) (December 2019)

- 4.20 The DNLP is at an advanced stage, having been through examination in public. However, the adoption of this document has been delayed following comments from the Housing Minister regarding the

proposed housing needs in March 2020. Whilst the existing London Plan (2016) remains the current policy document for the GLA area, the DNLP is still a material consideration.

- 4.21 **Draft Policy GG1** identifies the need to help deliver strong and inclusive communities within which a wide range of economic and other opportunities continue to be supported. **Draft Policy GG2** goes on to emphasise the need to make the best use of land, in particular through enabling the development of brownfield land on surplus public sector land, and sites within and on the edge of town centres, whilst also maximising the development potential of sites. **Draft Policy GG3** sets out a focus on creating a healthy city by promoting active and healthy lifestyles and improving London's air quality.
- 4.22 **Draft Policy GG5** relates to growing a good economy and identifies the need to plan for sufficient employment and industrial space in the right locations to support economic development whilst at the same time making full use of the existing network of town centres to support economic activity.
- 4.23 Design principles are provided at **Draft Policy D4**, with **Draft Policy D5** requiring development to achieve the highest standards of accessible and inclusive design.
- 4.24 **Draft Policy D13** relates to the Agent of Change principle, ensuring that new noise and other nuisance-generating development proposed close to residential and noise-sensitive uses should mitigate this impact, with **Draft Policy D14** relating specifically to Noise and requiring development to manage noise in accordance with **Draft Policy D13**. It too identifies the need to avoiding significant adverse noise impacts and mitigate against them where required.
- 4.25 The DNLP recognises the importance of emerging types of logistics to London's economy. Draft Policy E4 places 'last mile' distribution on equal footing with other industrial uses. The supporting paragraph to the policy (6.4.1) supports this by recognising that London depends on a wide range of industrial, logistics and related uses (including food and drink preparation) that are essential to the functioning of the economy, for servicing the needs of its growing population as well as contributing towards employment opportunities for London;
- 4.26 The provision of low cost business space should be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to 'start up' or expand (draft Policy E2). The supporting paragraph 6.2.1 sets out that a sufficient supply of business space of different types, uses and sizes will ensure that workspace is available at an appropriate range of rents for SMEs and businesses wishing the start-up or expand and paragraph 6.2.4 confirms that low cost business space is often found in locations such as back of town centre and high street locations.

4.27 The role of town centres is changing as retailing is undergoing a period of continued restructuring. Draft policy SD6 recognises the need for town centres to diversify to support a wider range of uses to support their vitality and viability and to meet the needs of Londoners. Part B of the policy confirms that the adaptation and diversification of town centres should be supported in response to challenges and opportunities provided by multi-channel shopping, changes in technology and consumer behaviour, including the management of servicing and deliveries. The supporting paragraphs to the policy recognise that retailing has evolved to include direct delivery to homes and workplaces (2.6.5) and that town centres should accommodate new space where there is demand (2.6.6).

c) **Camden Local Plan (2017)**

4.28 The adopted policies map of the Local Plan shows that the Site is situated within the defined boundary of **Finchley Road/Swiss Cottage Town Centre**. It is not subject to any other site specific or Borough wide designations.

Town Centre policies

4.29 The following policies are considered to be relevant to the town centre designation:-

- Policy TC2; and
- Policy TC4.

4.30 **Policy TC2** confirms that the Council will seek to promote successful and vibrant centres throughout the Borough to serve the needs of residents, workers and visitors.

4.31 **Policy TC4** seeks to ensure that the development of town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours. Whilst the Appellant's particular use is not listed as a 'town centre use' in supporting **paragraph 9.32**, the list is not a closed list. It is my view that the Appellant's use should be considered as a 'town centre' use given it is a commercial use requiring a central location in order to provide an efficient service to local residents.

4.32 Criteria a) – f) of Policy TC4 are principally concerned with changes to the mix and balance of uses within identified shopping frontages and a result are not considered relevant to the assessment of this application. Criteria g) – k) of the policy seek to assess the impact of any proposed town centre use by reference to the following considerations:-

- g) on nearby residential uses and amenity and any prejudice to future residential development;
- h) parking, stopping and servicing and the effect of development on the ease of movement on the footpath;
- i) noise and vibration generated either inside or outside the site;
- j) fumes likely to be generated and the potential for effective and unobtrusive ventilation; and
- k) the potential for crime and anti-social behaviour, including littering.

4.33 The policy goes on to state that to manage potential harm to amenity or the local area, in appropriate cases, planning conditions and obligations will be used to address issues raised by the particular use. A number of potential issues are listed in the policy text, but the issues I consider to be relevant to the assessment of the application proposal are:-

- hours of operation;
- noise/vibration, fumes and the siting of plant and machinery; and
- the use of local management agreements to ensure that the vicinity of premises are managed responsibly to minimise impact on the surrounding area.

Other relevant policies

4.34 The other Local Plan policies considered to be relevant to the assessment of the appeal by the main parties. For the avoidance of doubt these policies are set out below:-

- **Policy G1** – Delivery and the location of growth;
- **Policy E1** – Economic development;
- **Policy A1** – Managing the impact of development;
- **Policy A4** – Noise and vibration;
- **Policy D1** – Design

4.35 **Policy G1** states that the Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden’s identified needs. This includes supporting development that makes the most efficient use of land.

4.36 **Policy E1** confirms that the Council will secure a successful and inclusive economy in Camden by creating conditions for economic growth and harnessing the benefits for local residents and businesses. The policy sets out a number of objectives and those considered relevant to the assessment of the appeal are set out below:-

- a. support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;
- b. maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions for firms with differing resources;
- c. support local enterprise development, employment and training schemes for Camden residents;
- d. encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough; and
- i. recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.

4.37 The supporting paragraph 5.9 confirms that the Council *“will seek the provision of innovative new employment floorspace in developments that will provide a range of facilities including flexible occupancy terms, flexible layouts, studios, workshops and networking, socialising and meeting space that will meet the needs of a range of business types and sizes.”* (our emphasis)

4.38 **Policy A1** refers to managing the impact of development. The policy states that the Council will seek to protect the quality of life of occupiers and neighbours and confirms that planning permission will not be granted for development that causes unacceptable harm (our emphasis) to amenity. The policy sets out how the Council will seek to achieve this and the relevant actions the Council will undertake are:-

- a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- c. resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- d. require mitigation measures where necessary.

The factors we will consider include:

- h. transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
- j. noise and vibration levels; and
- k. odour, fumes and dust.

4.39 Paragraph 6.3 sets out the Council’s approach in terms of expecting development to avoid harmful effects, but also requires developers *“where this is not possible, to take appropriate measures to minimise potential negative impacts.”*

4.40 **Policy A4** refers specifically to noise and vibration. The policy seeks to ensure noise and vibration is controlled and managed. It confirms that planning permission will not be granted for development likely to generate unacceptable noise and vibration impacts. The policy states that planning permission will only be granted for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity. Reference within the policy is made to Appendix 3 (Noise Thresholds) of the Local Plan, which sets the parameters for the assessment of proposed sources of noise in areas sensitive to sounds. This requires plant and machinery to achieve a noise rating level of 10 dB below background noise levels.

4.41 **Policy D1** refers to design and in the context of the appeal is only a relevant consideration in terms of the plant equipment. The policy seeks to secure high quality design in development that (amongst other considerations) respects local context and character.

d) Camden Supplementary Planning Guidance

4.42 The Council has adopted a series of documents in 2018 and 2019, which provide further guidance on the implementation of the Local Plan policies. The following are considered relevant to the assessment of the application proposal:-

- CPG: Employment Sites and Business Premises (March 2018);
- CPG: Town Centres (March 2018)
- CPG: Amenity (March 2018)
- CPG: Transport (March 2019)

CPG: Employment Sites and Business Premises

4.43 **Paragraph 37** refers to “*industrial kitchens for deliveries*”. The paragraph states as follows:-

“In response to the popularity of takeaway delivery apps there has been a growth in industrial scale kitchens to cook food off site on behalf of restaurants. The food is then delivered locally, usually by scooter. The Council considers that existing industrial areas are the most appropriate location for such uses. However, their impact in terms of noise, odour, fumes and dust generation needs to be carefully considered and managed and they should not have a detrimental impact on nearby uses and / or residents.”

CPG: Town Centres

- 4.44 This document provides specific guidance for each of Camden’s designated town centres. Whilst the focus of the guidance is controlling the mix of uses within identified shopping frontages, it contains a useful description of Finchley Road/Swiss Cottage Town Centre, describing its role and key features of its character. It references the presence of “*the busy A41 Finchley Road*” and notes that the town centre “*generally serves the local population, a role which is expected to continue*”.

CPG: Amenity

- 4.45 This document sets out further guidance as to the assessment of amenity considerations. Section 6 refers to noise and vibration and confirms that acoustic reports should be submitted in support of applications for noise generating commercial uses and plant, ventilation, air extraction and/or air conditioning equipment and flues.
- 4.46 **Paragraph 6.8** confirms that the Council will consider reported measurements against noise thresholds (No Observed Effect Level – NOEL), (Lowest Observed Adverse Effect Level – LOAEL) and (Significant Observed Adverse Effect Level – SOAEL). **Paragraph 6.9** notes that the cumulative impact of numerous individual noise sources should be considered, for example in town centre locations, where known to have a proliferation of air conditioning machinery and contain numerous food, drink, leisure and entertainment uses.
- 4.47 **Paragraph 6.11** confirms that (where necessary), proposals will be expected to mitigate the impact of noise to an acceptable level and that the Council will consider the use of planning conditions or a legal agreement to ensure that these are provided and regulated.

CPG: Transport

- 4.48 Section 4 refers to delivery and servicing plans and explains how they can be used to manage and mitigate the potential impacts of deliveries and servicing on the amenity and safety of the general public. **Paragraph 4.5** confirms that they should be provided for major developments and those schemes identified through a Transport Assessment as likely to impact on the safe and efficient operation of the transport network. **Paragraph 4.9** notes that delivery and service plans are secured as a planning obligation via a Section 106 Agreement.
- 4.49 In terms of timing for deliveries, **paragraph 4.20** requires deliveries outside 7:00 to 20:30 to be subject to an out of hours delivery agreement and the delivery and servicing management plan should state

the commitment from the operator to minimise noise, setting out the proposed measures which will be used. The paragraph makes reference to an example measure where an operator had agreed to operate a quiet approach to deliveries through the use of quiet vehicles and practices.

d) Conclusions

4.50 The principal conclusions that can be drawn from a review of the planning policy framework are as follows:-

- The Site is situated within Finchley Road/Swiss Cottage Town Centre. Both the adopted and emerging DNLP confirm that London's town centres are the main foci beyond the CAZ for commercial development;
- A wide range of uses should be supported in town centres not only to ensure their vitality and viability and that they continue to meet the needs of the local population, but also in response to the restructuring of the retail sector and changes in consumer behaviour;
- There is planning policy support at all levels for economic development supporting businesses of all sizes, particularly start-ups and small and medium business enterprises;
- There is increasing recognition of the important contribution of newer sectors such as last mile logistics to London's economy and meeting the needs of its residents and the need to address specific locational requirements'. This is reflected by the reference to delivery only kitchens within Camden's Planning Guidance; and
- Development proposals are required to demonstrate that they will not cause an unacceptable harm to the amenity of communities, occupiers and neighbours through noise and vibration, transport impacts and odour, fumes and dust. Where harm is identified, appropriate mitigation measures should be considered to minimise impact and these could be secured by conditions and/or legal agreements.

Section 5 Planning Assessment

5.1 This section provides an assessment of the main planning issues arising from the proposed permanent use of the Site for commercial kitchens and a delivery centre and the retention of the installed plant equipment and the relevant planning policy framework as follows:-

- The principle of the permanent use of the Site;
- Whether the permanent use of the Site results in an unacceptable impact upon residential amenity;
- The effectiveness of the OMP in managing the operation on Site;
- Whether there is a harmful impact upon highway safety;
- The design of the plant equipment;
- How the permanent use of the Site complies with relevant policies relating to economic growth; and
- How the permanent use of the Site supports Camden's objectives to make the Borough net carbon zero by 2030.

a) **The principle of the permanent use of the Site**

i) **The principle of the location of the Site**

5.2 The Site is situated within the defined boundary of the busy Finchley Road/Swiss Cottage Town Centre. Policy 2.15 A(a) of the adopted London Plan (2016) confirms that town centres are *"the main foci beyond the Central Activities Zone for commercial development"*.

5.3 From the description of the concept set out in Section 3, it is clear that Editions is a commercial use, which provides an important consumer service to local residents and businesses and is therefore an appropriate permanent use for a town centre location in accordance with Policy 2.15 C(c) of the London Plan (2016) and Policy TC4 of the Local Plan (2017).

5.4 As recognised in Policy 4.8 of the London Plan and emerging guidance set out in draft Policy SD6 of the DNLP, town centres need to diversify and continually adapt in response to the challenges and opportunities provided by multi-channel shopping, changes in technology and consumer behaviour to ensure that they continue to meet the needs of the local population. The Site is a typical 'back of high street' site with no direct street frontage and a dedicated servicing area that is suitable to accommodate

the Editions business model, which is a prime example of a new service for which there is considerable demand. In tandem, the permanent Editions use will ensure that the Site is in productive economic use, which provides an essential service to local residents, particularly in the current COVID-19 situation, and through its workforce can only assist in bringing footfall to other shops and services within the centre, improving its vitality and viability in line with Policy TC2 of the Local Plan and Policy 2.15 of the London Plan.

5.5 Paragraph 82 of the NPPF (2019) confirms that planning decisions “*should recognise and address the specific locational requirements of different sectors*”. The Site principally serves the local residents of Swiss Cottage, Hampstead, Kilburn and St John’s Wood. The concept of ‘last mile’ delivery is focused on delivering the product to the end user as fast as possible. As such, the use is only viable in reasonable proximity to residential areas. For this catchment, this means that a central town centre location (where the use does not conflict with other relevant policies) with good radial accessibility.

5.6 Paragraph 37 of the Council’s adopted CPG on Employment Sites and Business Premises considers that existing industrial areas “*are the most appropriate locations*” for commercial kitchens with deliveries. The implication of the Council’s guidance (by referring to the need to ensure that the impact of ‘industrial scale kitchens’ is managed so as not to impact on neighbouring uses) is that alternative non-industrial locations may be appropriate where such impacts are appropriately managed. Importantly, the guidance is predicated on deliveries from such kitchens being undertaken “*usually by scooter*”. Clearly, the Site’s mode of operation justifies a different approach and the town centre location is appropriate for a permanent use of the Site for commercial kitchens and a delivery centre.

ii) The principle of the mode of operation for delivery vehicles

5.7 The mode of operation of the delivery vehicles is also acceptable in principle on a permanent basis as bicycles and ETWs supports Camden Council’s commitment to make Camden net zero carbon by 2030.

5.8 ETWs run on batteries and therefore do not produce any toxic fumes or residues. Accordingly, the use of such vehicles protects the environment and reduces the carbon emissions from deliveries. This is fully in accordance with policy 5.1 of the adopted London Plan and draft Policy GG3 of the DNLP

iii) The principle of retaining the plant equipment

5.9 In relation to the external plant equipment, this is a common feature in town centre locations given that they are the focus for commercial developments, including retail, restaurant, leisure and

entertainment uses, all of which require ventilation and (to varying levels) extraction. Indeed, before taking into account the proposed plant, the building already accommodates various plant equipment associated with the operation of the ground floor retail/restaurant units fronting onto Finchley Road, including roof top plant and an extract flue.

b) Whether the permanent use of the Site results in an unacceptable impact upon residential amenity

5.10 As set out above, town centres are the focus for commercial activity beyond the CAZ. It is therefore axiomatic that there will be a degree of impact from such uses as activities such as deliveries, servicing, comings and goings and operation of plant as these are all essential to the successful operation of businesses. The advantages for residential occupiers of a town centre location in terms of accessibility to services and facilities depends on such activities. The following are also relevant context:

- The Site was built with a commercial use in mind and this is evident in terms of the form and layout of the Site;
- The Site has not historically been subject to operating restrictions despite the proximity of the neighbouring residential properties; and
- The Site only trades for 11 hours a day (12:00 -23:00), during day-time hours, on Mondays to Sundays. This is a total of just 77 hours per week, which equates to just 46% of the hours in a week.

5.11 The test set out in Policy A1 of the Local Plan is whether impact on amenity is “*unacceptable*”. The term indicates a clear acceptance that any new development will have some impact on the amenities of existing properties which their occupants are likely to regard as “*adverse*”. It is only where the adverse effects significantly impair the reasonable use and enjoyment of affected properties that it can be properly be described as “*unacceptable*”. It is also important to ensure that the potential effects of the operation are transparently assessed, with appropriate recourse to objective measures of impact, so that the decision taker can bring a balanced, proportionate judgement to bear when making the planning decision.

i) Noise

Site operation and delivery vehicles

5.12 Sharps Redmore (SR) has undertaken an updated Noise Assessment to review the noise impacts of the operations in the Appeal Decision was granted in September 2019.

5.13 The Assessment draws the following conclusions:-

- The switch, in early July 2019, for riders serving the Deliveroo Editions site at Swiss Cottage to only use E-bikes, E-scooter and bicycles/foot has resulted in a significant drop in levels of noise associated with the operation of the site.
- All aspects of the delivery process was observed to be well managed, and noise from riders waiting to collect orders was negligible at all times. The site marshals demonstrated strong organisation skills and maintained control of operations at all times; and
- The noise impact from the operation of the Site is considered to be low at all times. Noise from the site complies with the requirements of the both national and local planning policy.

Plant Noise

5.14 SR has also undertaken an updated assessment of noise associated with the fixed plant equipment at the Site.

5.15 This assessment confirms that there have been no changes to the plant equipment in terms of the unit type, location or operational settings since the Appeal Decision and demonstrates that the predicted rating noise levels from the operation of the current installed fixed plant equipment continue to comply with Camden's requirement for plant rating noise levels to be 10 dB below the existing background noise climate.

ii) Odour

5.16 An updated Odour Assessment has been undertaken by Arup. The report confirms that the actions required by the Plant Management Plan, which formed part of the Appeal Decision have been undertaken at the Site.

5.17 The report concludes that sniff testing in the environs of the Site has not identified any cooking odours that could be clearly identified with the operation of the Site. Indeed, cooking odours are a common feature of the local environment from domestic kitchens and existing restaurant operations within the town centre.

5.18 Overall our view is that based on the above conclusions, the use of the Site and operation of the external plant on a permanent basis will have a negligible effect on amenity by way of noise or odour and therefore complies with policies A1 and A4 of the Local Plan.

c) The effectiveness of the OMP in managing the operation on Site

i) The Monitoring Report

5.19 The Monitoring Report prepared by Firstplan concludes that the Site is operating in accordance with the OMP as evidenced by our visits between November 2019 and March 2020. The key points in summary are as follows:-

- Whilst the Site was not being strictly operated in accordance with the OMP on the first visit in November 2019 (only two months after the Appeal Decision), the subsequent visits demonstrate that the OMP is being enforced effectively and this is evidence that the measures have ‘bedded-in’ well and all users of the Site understand the rules;
- In terms of the safety of the access/egress for riders and pedestrians, very few incidents have been recorded, and in each of these cases no collisions have occurred. Furthermore, although a number of Highway Code breaches were observed in the first survey, the number dropped considerably during the latter dates, which again is a clear indication that the measures being used at the Site are effective at controlling this once the rules are understood;
- It is observed that the use of marshals at the Site to ensure that the measures on-Site are adhered to has been successful. It has allowed regulation and control of the users of the Site and has helped to make sure that there are no detrimental impacts on the local area, particularly in terms of noise and highway safety. Where incidents do occur, the results of the monitoring set out in section 4 of the Monitoring Report have shown that they are able to take effective positive action in accordance with the rules set out in the OMP.

ii) The Community Working Group

5.20 The Section 106 Agreement attached to the Appeal Decision required the establishment of a Community Working Group (**the CWG**) to facilitate consultation with the local community in respect of matters relating to the operation of the Site and the OMP. A summary of the engagement with the CWG undertaken to date is attached at **Appendix 4**.

5.21 Following receipt of the list of residents groups and nominated persons to form the CWG from the Council, the first meeting of the CWG took place on 5 February 2020 at Swiss Cottage Library. The meeting was attended by Edie Raff - Chair, Cresta House Residents Association, Chris Coggins - Hilgrove Estate TRA and Vicky Stacey - Local Residents Group. The minutes of the meeting are attached at **Appendix 5**.

- 5.22 The meeting was considered useful to discuss matters of concern for residents and to ensure that aspects of the OMP were clarified.
- 5.23 In agreement with Camden Council, Deliveroo offered to facilitate the second CWG meeting on **9th April 2020** via video call - given the Government's social distancing guidelines. However, this was rejected by two participants of the CWG and they asked for the meeting to be deferred. This meeting has now been confirmed for **27 May 2020** via video call.
- 5.24 Whilst all matters raised by local residents continue to be taken seriously by Deliveroo, based on the discussions to date and the fact that the CWG has not specifically requested additional meetings as they are entitled to as set out in paragraph 4.1.5 of the s106 Agreement, it is considered that the Site is operating in accordance with the OMP.
- 5.25 As such, it is concluded that the measures set out within the OMP have been effective at ensuring that the Site operates safely and without having an unacceptable impact upon the neighbouring residential properties. The granting of a permanent planning permission is therefore in accordance with policies A1 and A4 of the Camden Local Plan (2017) and paragraph 4.20 of the CPG on Transport.

c) Whether there is a harmful impact upon highway safety

- 5.26 Transport Planning Associates (TPA) has prepared an updated Transport Statement to assess the impact upon highway safety arising from the proposed permanent use of the Site.
- 5.27 TPA conclude that the application proposal does not propose to change the operation of the site beyond that previously deemed acceptable. The operation of the Site is in accordance with the relevant planning policies and has not resulted in an increase in personal injury collisions and will continue to operate with no material detriment to the local highway network or to highway safety.
- 5.28 Accordingly, it is considered that the permanent use of the Site complies with Policy A1 of the Camden Local Plan and the CPG relating to Transport.

d) The design of the plant equipment

- 5.29 Seen in context, the Site accommodates a large rectangular shaped commercial warehouse building extending to 460 sq m. The built form is not listed or situated within a Conservation Area. It was developed for commercial use and has previously accommodated a mix of commercial uses over time. Before the occupation of the Site by Editions, the building already accommodated various plant

equipment associated with the operation ground floor retail/restaurant units fronting onto Finchley Road, including roof top plant and an extract flue. The building is therefore a large functional commercial unit.

- 5.30 In terms of the character of the local area, the Site is located within Finchley Road/Swiss Cottage Town Centre. Plant equipment is a common feature on the rear of buildings within the town centre and is essential to the operation of the commercial uses, which are actively encouraged in such locations by policies TC2 and TC4 of the Local Plan and Policy 2.15 of the London Plan. The design is appropriate both to the building and the location.
- 5.31 In terms of siting, the extract ducts and associated equipment are positioned at the rear of the building. This is appropriate as the ducts are not visible from Finchley Road. Whilst the ducts are visible from the gated entrance to Cresta House car park to the north and the south east corner of Dobson Close to the south, they are not unduly prominent and reflect the commercial character of the building and the backdrop of other large scale buildings facing Finchley Road such as Cresta House.
- 5.32 Whilst the residential properties to the rear of the Site (facing Dobson Close) are in close proximity to the rear of the building, these properties are situated at a lower level to the Site and the extract flues are largely screened from view. It is noteworthy that no objections were raised either by local residents or the Council at the Public Inquiry in relation to design or on grounds of visual amenity.
- 5.33 Accordingly, overall the plant and extract equipment is functional and is considered appropriate for this commercial Site in the defined boundary of the town centre. It is sited at the rear and its visual impact is negligible. Therefore the permanent retention of the plant equipment does not cause harm to the character and appearance of the Site or to the context of the local area and is not contrary to policy D1 of the Camden Local Plan.

e) **How the permanent use of the Site complies with relevant policies relating to economic growth**

- 5.34 Editions is an innovative concept for which there is significant consumer demand, as recognised within Policy 4.10 of the London Plan, draft Policy E4 of the DNLP and within Camden Planning Guidance on Business and Employment uses. The Site is an important economic use, which has occupied an underutilised unit within a defined town centre, has created a significant number of jobs and facilitates the growth of new and existing restaurant businesses, including start-ups and SMEs. The support that the Site brings to restaurant businesses will be even more important once COVID restrictions are

eventually lifted when the hospitality sector will be trying to recover in what is sure to be a prolonged period of economic uncertainty. It will be vital during this time for restaurant businesses to be able to trade at a low cost whilst they attempt to rebuild their business, particularly if they have had to close physical premises.

- 5.35 In the Appeal Decision, the Inspector recognised the economic benefits of the Editions use and concluded the following in paragraph 73:-

“The development has brought back into use part of a vacant building, which involved an initial significant capital investment and resulted in a short term positive economic effect in terms of employment, provision of building services and supplies. In the order of 29 people are employed at the site, including 6 employees of Deliveroo. In 2018, a total of 1,340 riders made deliveries from the site, 780 of whom are registered as residing in Camden. Additional economic benefits for the area are derived from the spending by employees on goods and services and stimulation of spending in the supply chain. The estimation of revenue generated and the delivery figures indicate that the service has been successful and fulfils a consumer demand.”

- 5.36 The Site continues to provide these benefits and has provided a particularly important local service for the community in the current lockdown period due to COVID-19.

- 5.37 The below table demonstrates that the permanent use of the Site for commercial kitchens and a delivery centre complies with the relevant requirements of Policy E1 (and London Plan Policy 4.1) in creating condition for economic growth, which harnesses benefits for both local residents and businesses:-

Relevant Policy E1 criteria	How the Site complies
a) support businesses of all sizes, in particular start-ups, small and medium-sized enterprises;	The Site has supported restaurant businesses of all sizes, particularly start-ups (eg Waleema), small (eg) and medium sized enterprises (eg Honest Burger).
b) maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on	The Site accommodates 9 kitchen pods. This ensures a stock of premises that are suitable for a variety of restaurant partners of different sizes. Deliveroo offers different terms and conditions for partners who do not

a range of terms and conditions for firms with differing resources;	undertake cooking at the Site (such as dessert brands who may only utilise freezer space) to those that occupy a whole kitchen.
c) support local enterprise development, employment and training schemes for Camden residents;	All entry level jobs are currently advertised in the local Job Centre Plus.
d) encourage the concentrations of professional and technical services, creative and cultural businesses and science growth sectors in the borough;	The Site encourages local chefs to be a part of the community of fellow professionals, sharing ideas, experiences, techniques and encourages a concentration of professionals.
i) recognise the importance of other employment generating uses, including retail, education, health, markets, leisure and tourism.	The Site employs 29 people (6 directly by Deliveroo and 23 by restaurant partners)

5.38 The Site is already bringing with it a range of economic and other benefits. In the event planning permission is granted on a permanent basis, these benefits can only develop further as relationships with the Council and local businesses continue to evolve. This is particularly important in supporting the restaurant industry to recover post the effects of the COVID-19 pandemic, when the sector is sure to face a prolonged period of economic uncertainty, and to help ensure that restaurant businesses are sustainable going forward.

5.39 Furthermore, if a permanent planning permission is granted, the Site has potential to continue to support local high streets at a time where they face many threats and challenges by supporting small restaurant businesses until they are able to invest in physical premises.

f) How the permanent use of the Site supports Camden's objectives to make the Borough net carbon zero by 2030.

5.40 At a full Council meeting in October 2019, Camden Council committed to take all the action it can to make Camden net zero carbon by 2030. Four main themes emerged:-

- People taking action to reduce their environmental impact;
- public spaces being green, car free and healthier;
- buildings using less energy and harnessing power from the sun; and
- organisations leading the climate emergency response.

- 5.41 Deliveroo are committed to working with Camden to ensure that the permanent use of the Site supports these objectives. Deliveries from the Site only take place via bicycles, ETWs or on foot. No motorised scooters are permitted to operate from the Site. ETWs run on batteries and therefore do not produce any toxic fumes or residues. Accordingly, the use of such vehicles protects the environment and ensures that there are no carbon emissions from deliveries. This is fully in accordance with policy 5.1 of the adopted London Plan and draft Policy GG3 of the DNLP.
- 5.42 Furthermore, the Editions model, whereby more than one restaurant business operates under a single roof, such as at the Site, lowers a business's environmental impact. The Site is fitted with state-of-the-art cooking equipment and the latest energy efficiency appliances (such as refrigerators), maximising shared efficiencies and minimising wasted energy.
- 5.43 Editions has also partnered with Olleco, the UK's leading circular economy company, to convert the waste oil from the Site into high value renewable fuels, such as biodiesel. The waste oil from the Site is sealed in containers and transported off by Olleco, on a weekly basis. This innovative process can help to reduce the carbon impact of the oil supply chain by 50%.
- 5.44 All of the above initiatives confirm that the permanent use of the Site fully supports Camden's objectives to make the Borough net carbon zero by 2030.

Section 6 Conclusions

- 6.1 This Planning Statement has been prepared in support of a planning application for the permanent use of the Site for commercial kitchens and a delivery centre and retention of the installed plant equipment.
- 6.2 It has been demonstrated through the monitoring exercise undertaken by Firstplan and through the conclusions of the noise, transport and odour reports that the ‘trial run’ approved by the Inspector has been successful and a permanent planning permission should be granted.
- 6.3 The application proposal complies with all relevant policies within the Development Plan. In summary:-
- The Site is situated within a busy town centre where commercial development is encouraged in line with Policy 2.15 of the London Plan and Policy TC4 of the Local Plan. The Site was originally built with a commercial use in mind, which is capable of accommodating deliveries, and no operating restrictions were imposed by the Council;
 - When taking into account of the context of the Site, the limited hours of operation and the conclusions of the monitoring exercise and the noise and odour reports, it is our view that the permanent use of the Site and retention of installed plant equipment does not have an unacceptable impact upon the amenity of neighbouring residential properties and complies with policies A1 and A4 of the Local Plan;
 - Based on the conclusions of the transport statement, the permanent use of the Site does not result in unacceptable harm to highway safety and complies with Policy A1 of the Local Plan; and
 - The Site is an important economic use, which has occupied an underutilised unit within a defined town centre, has created a significant number of jobs, benefited the local supply chain and facilitates the growth of new and existing restaurant businesses, including start-ups and SMEs. This is supported by all tiers of planning policy, particularly policies 4.1 and 4.10 of the London Plan and Policy E1 of the Local Plan and therefore should be allowed to continue on a permanent basis.
- 6.4 The use of the Site has been particularly important during the COVID-19 crisis, with many local people relying on food delivery due to the Government’s lockdown measures. Post COVID-19 it will be even more important for restaurant businesses to trade at low cost, particularly if they have had to close physical premises. If a permanent planning permission is granted, the Site will be able to continue to support restaurant businesses and enable them to retain jobs until they are able to invest again in physical premises.

6.5 Accordingly, it is respectfully requested that a permanent planning permission is granted for the use of the Site for commercial kitchens and a delivery centre and the retention of installed plant equipment.

Appendix 1

Deliveroo Editions

What is Deliveroo Editions?

Deliveroo Editions provides bespoke, fully-equipped, state of the art kitchens to restaurant partners allowing them to launch delivery-only menus catered for local taste. Using Deliveroo's insights, we can help those within Editions kitchens to fulfil local consumer needs and grow their business.

Deliveroo Editions has partnered with a range of restaurants across the UK, from established brands who are not able to cater for delivery demand in their existing bricks and mortar sites, such as Chipotle and Wagamama, to people just starting out in the food industry who want to trial their product and establish their business without the huge upfront costs of a brick and mortar restaurant.

Experience of Editions restaurants has been overwhelmingly positive. By leveraging Deliveroo's analytical insights to support Editions kitchens, partner restaurants have seen sales increase by up to 400% in some cases. More generally there have been numerous examples of restaurants using their place in an Editions site to grow their brand and achieve key business goals without the capital cost constraints typically associated with starting a restaurant.

How does Deliveroo Editions work?

The Editions kitchens are staffed and operated by restaurant partners. Each partner is allocated a kitchen 'pod' and has access to shared dry and cold storage areas, as well as the shared dispatch area. Food is prepared and cooked within the kitchen pods by the restaurant partners and delivered to customers using Deliveroo's fleet of riders.

The on-site Deliveroo Editions team provides a dispatch service and is responsible for managing the interaction between restaurants and riders. In addition, the on-site team is responsible for managing the shared areas and ensuring that everyone on site complies with the site rules and regulations.

Each order that is serviced by Editions kitchens is processed in the following way:

- The customer creates an account on the Deliveroo app;
- The customer logs on to the Deliveroo app and places an order with the restaurant located at the Editions site. Sales do not take place at the Site and there is no ability for customers to collect an order at the Site themselves. The transaction occurs entirely online and is completed via the online app;
- The restaurant receives notification of an order being placed and, once it chooses to accept the order, prepares and cooks the food;
- Deliveroo's 'Frank' algorithm will assign a rider to the confirmed order. The rider must accept the delivery;
- When the food is nearly ready, the Deliveroo app will notify the rider to go to the Editions site and pick it up;
- When the food is cooked, it is packaged and marked with the order number, and then taken to the shared dispatch area, to be collected by the assigned rider;

- The assigned rider collects the order from the Editions site and delivers the food to the customer. In practice, orders are “stacked” where possible for efficiency so that the rider is often carrying more than one order;
- The customer can monitor progress of their order using the Deliveroo app.

Each restaurant partner is separately registered as a food business with the local authority, in addition to the Deliveroo Editions central operation. Partners will not be allowed to trade if they score a food hygiene rating of 3 stars or less (unless they are awaiting inspection).

Deliveroo is responsible for all site maintenance, including equipment and building repairs.

Why do restaurants want to join Deliveroo Editions?

Deliveroo does not charge partners a rent to occupy an Editions kitchen. Instead, Deliveroo will take a commission against all orders made via the Deliveroo app. There is therefore zero upfront cost for partners to move into an Editions site - all they are required to do is source chefs and ingredients. At a time when soaring costs are forcing many independent restaurants off the high street, Deliveroo Editions is appealing to restaurants as it gives them the chance to launch, expand and test new innovations at minimal cost, creating in excess of 1,000 new restaurant jobs across the UK.

Further, Deliveroo uses insights to identify cuisine gaps in the local market and predicts which menu items will succeed in each area, thereby reducing the risk of business failure for restaurants. The Editions concept also allows food entrepreneurs to prototype new food products and/or brands with the benefit of insights from Deliveroo. This in turn supports small businesses and start-ups to launch, trial their products at low risk, both helping new chefs launch for the first time and more established restaurants to reach customers in new places.

In addition, Editions goes one step further using customer feedback to help chefs refine their product offering. Deliveroo is also able to help restaurant owners tailor their menu items using information on the conversion rate (how many people consider vs. purchase from the menu), giving them insights around menu items that are proving popular for customers in their area.

How does a restaurant join Deliveroo Editions?

Space at Editions sites is often in high demand. Deliveroo therefore works closely with restaurants looking to enter Editions to make sure that they have everything they require to succeed. The process of joining an Editions site typically takes between 8 - 12 weeks.

- **Step 1:** The Editions team will identify restaurant partners interested in an Editions kitchen, and/or target specific partners based on cuisine type. Restaurants must meet certain criteria to be able to take space in an Editions kitchen, including things like food safety ratings and ability to service customer demand. This is a flexible process designed to ensure that those entering Editions kitchens are supported to succeed.
- **Step 2:** Depending on the type of restaurant, and their existing level of experience, Deliveroo will work with them to help shape their offering at the Editions site. This can include things like working through their business plan, or their existing P&L.
- **Step 3:** Deliveroo will work with the restaurants to identify their kitchen needs. This includes discussions about the kind of cookers they need, whether they require bespoke equipment such as pizza ovens, and how they would like the kitchen to be set up.

- **Step 4:** The restaurant partner will undertake a site induction, where the site rules and regulations are explained to them. This will also include an equipment demonstration . Deliveroo provides the restaurant partner with all that they need to take orders, including a tablet set up with our restaurant app.
- **Step 5:** Partners move into the Editions site and are launched on the Deliveroo app to start serving customers. Each partner in occupation has its own restaurant page on the Deliveroo app, separate to any bricks and mortar site they may have.

What support does Deliveroo provide a Deliveroo Editions partner?

Throughout their time in Editions, restaurants have access to advice and support aimed at helping them refine and grow their offer. This includes Deliveroo analytics on what is selling well and what customers are looking for, to help restaurants ensure they are maximising value to consumers.

Deliveroo also offers partners access to a range of other benefits designed to support them and reduce their costs. This includes access to worldpay, which can reduce processing fees on payments; free trials of tools to create a website and build an online presence; and access to a free employee benefits package that includes discounts and wellbeing packages.

In addition, we are working hard to help restaurants using Editions sites reduce their food costs through our food procurement service, where we look to source the ingredients they need at lower prices. At a time when costs of raw ingredients are increasing, this is an important way in which we can enable restaurants using Editions to focus investment on staff or reducing prices to consumers. Deliveroo is also helping these restaurants reduce their environmental impacts through schemes such as our partnership with Olleco, who recycle cooking oil. Since the Islington Editions site opened in October 2017, the amount of oil recycled has been equivalent to taking 40 cars off the road. These types of schemes would not be available to restaurants of this size without Deliveroo's support.

On top of this, the dedicated on-site team works closely with the restaurant partners day-to-day to ensure they have everything they need to be able to trade safely - including access to food safety training and support.

Appendix 2

Deliveroo, Riders and Restaurants

About Deliveroo

Deliveroo is a UK tech success story. Founded in 2013 with a handful of riders and partner restaurants, we now work with 80,000 restaurants and 60,000 riders across 500 cities in 13 markets to deliver amazing meals straight to customers' front doors. The company's founder, Will Shu, was our first rider and still makes deliveries to this day.

We are proud to be a British company headquartered in London, with 2,500 employees around the globe and 1,500 in the UK.

At a time when the high street is facing challenges, Deliveroo is helping restaurants grow and take on new staff by increasing sales and revenue. Independent analysis by Capital Economics has found that Deliveroo has helped create 25,000 jobs in the UK restaurant industry since its launch six years ago, with the potential to support 70,000 restaurant jobs by 2020. The study also found that Deliveroo helped its UK partner restaurants and their supply chains generate additional revenue of £1 billion in 2018, including £320 million for independent restaurants.

How does Deliveroo work?

Deliveroo provides a platform allowing customers to identify and order from their favorite restaurants, and for the food to be delivered to them.

Customers are able to order through two routes: the Deliveroo app and the Deliveroo website. Customers provide their delivery address in the app or website, which determines which restaurants they can order from. We are constantly looking to increase selection and give customers the best possible choices of great food in their local area. The number of restaurants that a customer can order from is determined by the density of restaurants partnering with Deliveroo in that specific neighbourhood - put simply this means that customers in large cities will typically see a larger selection of restaurants than customers in smaller towns where there are fewer restaurants.

When customers order through Deliveroo, the price they pay for each menu item is set by the restaurant. Once the customer has selected all the items they wish to order, the customer will then pay for their items through our secure payment system. The customer will also pay a small 'customer delivery fee' and 'service fee'. The customer delivery fee is variable and is primarily determined by the distance between the customer and the restaurant. Alternatively, customers can choose to purchase 'Deliveroo Plus', which means that they pay a monthly subscription in return for no delivery fees.

A self-employed Deliveroo rider then delivers the meal to the customer. The focus of the Deliveroo model is "last mile" delivery, and Deliveroo utilises the latest technology to ensure that the food is delivered to the customer in the most efficient way. Deliveroo's real-time dispatch algorithm, 'Frank', constantly looks at available riders and orders, and then every two seconds, evaluates the most efficient way to dispatch them. This decision process is based on (i) machine-learning predictive models of when the food will be ready; (ii) how long every part of the delivery process will take; and (iii) which rider is best placed to fulfil that specific order based on distance, type of location and other factors. The result is that customers get an even more precise indication of when deliveries will arrive.

About Riders

Central to our popularity with riders and our success as a business is the flexible nature of the work that we offer - allowing riders to be their own bosses. Our fully flexible fee per delivery payment model means that riders choose when they ride, can work with other companies - including competitors - at the same time as they are riding with Deliveroo, and can decide how often they work with us. They can fit their work around their life, rather than their life around their work.

Riders value the flexibility that self-employment provides. In a recent survey, 80% of riders in the UK said that flexibility is what they value most about working with Deliveroo. A majority of riders work for fewer than 15 hours a week. There is no other type of work that allows you to work whenever or wherever you want; no other work that allows you to both plan where to work but also cancel right up to the last minute if you wish; and no other type of work that allows you to work for a competitor at the same time.

Riders on average across the UK make over £10.00 per hour working with Deliveroo, well above the National Living Wage. 84% of Deliveroo riders are happy or very happy working with us. People want the ability to fit work around their lives and many of our riders have other commitments. Around half of Deliveroo riders (47%) are students and 28% have caring responsibilities.

Deliveroo Rider Requirements

As riders are self employed we do not control their hours or where they work. However, to ride with Deliveroo, potential riders must meet certain criteria, like:

- Riders must have the right to work in the UK, and must be able to demonstrate proof of address.
- Riders must have no criminal record and must be over 18 years of age.
- All scooter riders must be properly insured.

Riders must also complete an on-boarding session where they meet with a Deliveroo operations representative in their area, who checks their documentation in person.

The Deliveroo rider contract is clear that, when working for Deliveroo, riders must not breach the Highway Code. Deliveroo's Rider Support teams are in regular contact with riders to remind them of these responsibilities.

Rider Deliveries

When riders are logged on to the Deliveroo app they will be offered the opportunity to accept deliveries. It is up to them whether they accept each delivery or not. They are paid a fee per delivery that is calculated using various metrics including things like distance of the delivery and the level of demand. Additional payments can be added for things like delays at the restaurant in the unlikely event that food isn't quite ready when the rider arrives.

Our 'Frank' dispatch algorithm is used to match riders with orders. The algorithm also constantly updates riders on the optimal route to deliver the order. The combination of this mapping, and including the distance of the delivery in calculating the fee for each delivery means that there no incentive for riders to speed or drive dangerously.

Because riders are paid for each delivery they undertake, there is also no incentive for them to delay time between deliveries, or for groups of riders to cluster at an Editions site.

Deliveroo's Commitment to Riders

We care about the wellbeing of the riders who partner with us. We were the first company of our kind to offer riders free insurance against accidents and third party damage. But we also want to go further and have have called for changes to the law to ensure that we can offer riders additional benefits, such as sick pay, without jeopardising the flexibility that self-employed status brings and which riders value highly.

We also care about the safety of our riders. We run regular safety workshops across the country and provide a range of safety kit, free of charge to riders, including reflective jackets and thermal bags. We also offer riders access to Portify, an online service where they can receive discounts on necessities like bike repair shops, breakdown cover and life insurance.

We closely monitor what riders tell us about the safety of the areas they work in. We are clear that if a rider does not feel safe delivering to an area they should not do so, and have a contact line where we encourage riders to let us know about any concerns. We work closely with the police to highlight areas where riders feel unsafe or traffic danger zones.

Finally, we support riders in other ways. In August 2018 we announced a scheme which gives riders who partner with us access to hundreds of online courses free of charge in conjunction with education and vocational training provider Open Classrooms. Deliveroo also created a scholarship scheme to give away a hundred bachelor's degrees from leading universities that only riders can apply for.

Deliveroo's Commitment to Restaurants

Deliveroo is passionate about supporting restaurants. We work closely with all our restaurant partners to make sure they are as successful as possible. When we partner with restaurants and they join our app, they have access to our system to help them see and fulfil orders and use our rider network to deliver them. We then charge a commission on orders.

In addition to providing restaurants a place on our app, helping them reach new customers, Deliveroo also works to provide a range of other support for restaurants. This includes access to services like Worldpay, which helps reduce the cost of processing payments, and marketing support, enabling restaurants to run offers to help promote their business.

We are in regular contact with our restaurant partners about how we can help them improve and grow. This includes access to insights about what menu items are popular, of what customers have searched for in their area. This can help restaurants target and personalise their menus in a way not previously available to smaller local businesses. We also work nationally to champion issues facing the restaurant industry through events such as our Restaurant Conference, and campaigns on issues such as business rates.

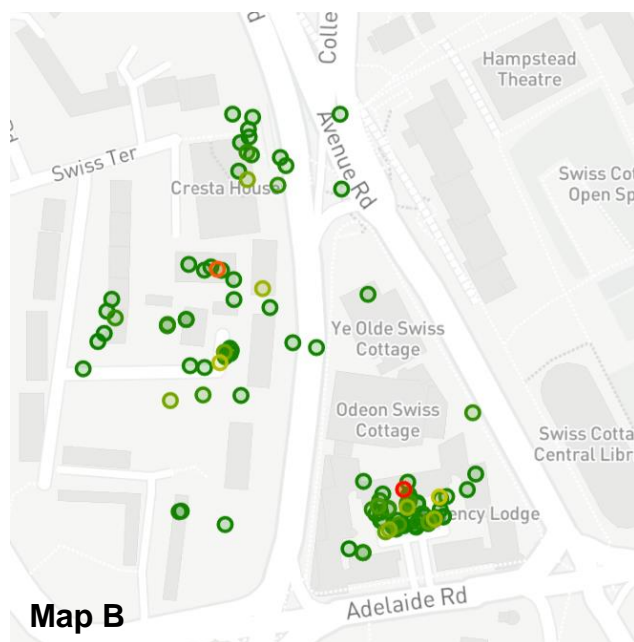
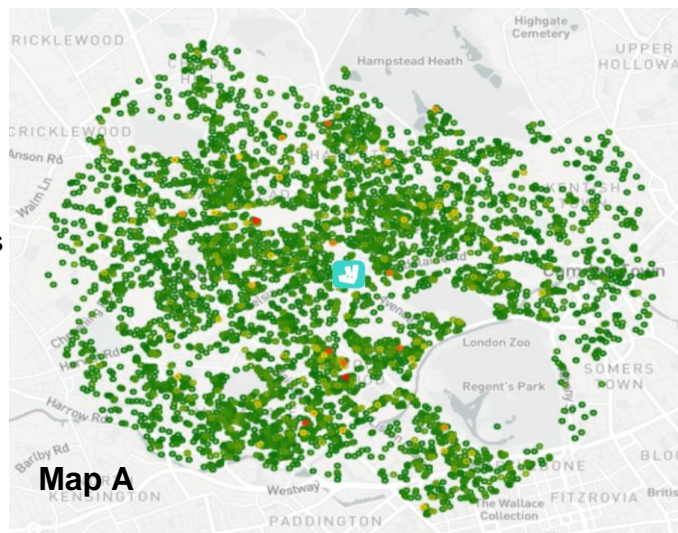
Appendix 3

Deliveroo and Swiss Cottage Editions: Use and benefits to the local community

Deliveroo is proud of the work we are doing serving the local community. It is clear to us that there is a high demand for our services, and specifically the services provided for by the Editions site, among residents in the local community.

While recognising the ongoing work Deliveroo is doing to engage with the community and address the Inspectors concerns about the site, it is also worth highlighting that many local residents are benefiting directly from Deliveroo's work in Camden, and specifically the range of food choice available from the Editions site.

This can be seen in the overall success of Swiss Cottage for the businesses operating from the Editions site. As can be seen in Map A, the site covers an extensive radius of residents in Camden and the immediate surrounding area. It is worth noting that the location of the site makes it uniquely capable of serving this radius of customers, and that each order represents earnings generated for a self employed person riding with Deliveroo, many of whom live locally.



In addition to the wider geographical reach of the Editions site, Deliveroo is popular in the area immediately surrounding the site itself. Analysis of orders shows that over the last 12 months residents living within 100m of the Swiss Cottage Editions Site have ordered from the site itself over 500 times. When expanded to the immediate neighbourhood (a 500m radius from the site) order numbers over the previous 12 months total over 9,300.

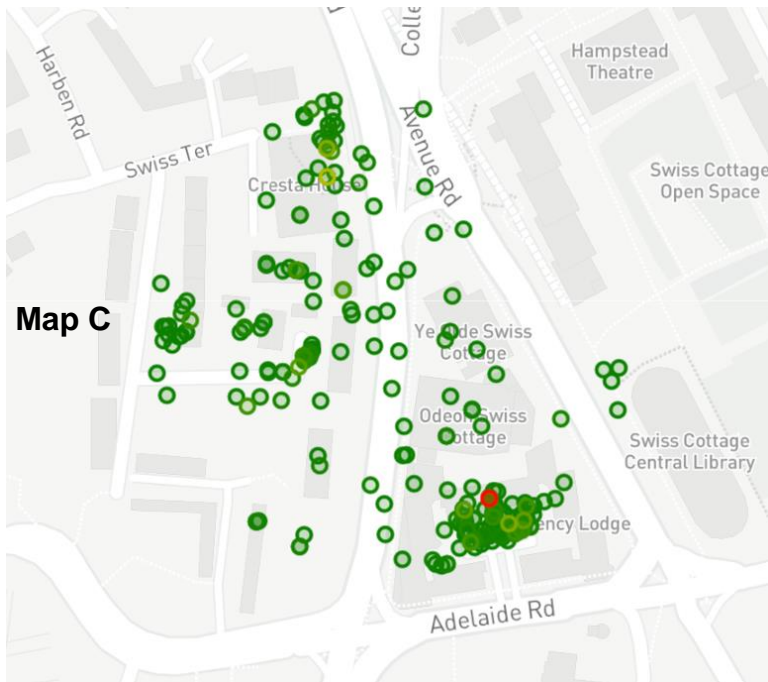
This figure includes numerous orders from residential properties located immediate to the property, as can be seen in Map B

(relating to orders over 12 months within 100m of the site). As orders from Editions sites are clearly labelled on the Deliveroo app, it's clear that residents will have been aware of the close proximity of the site from which they were ordering.

While the Editions site is popular as a food choice for local residents, Deliveroo more widely is also very popular, with food from other restaurants within Camden being delivered by riders on a regular basis. In the past 12 months 3,400 orders have been delivered to

customers with 100m of the Editions site (meaning 2,900 orders from locations other than the Editions Kitchens). This data can be seen in Map C. It is worth noting that riders delivering these orders are therefore likely to be seen regularly in areas near the Editions

site without being related to the Editions kitchen itself. When expanded to the immediate local neighbourhood (500m) we see over 92,000 orders by local residents through Deliveroo.



Restaurants who use Deliveroo see revenue increase by up to 30% and so the importance of these deliveries to local restaurant businesses in Camden should not be underestimated. Given the current impact of COVID-19 on the sector, local restaurants are likely to be even more reliant on delivery services than previously as a key (if not the whole) of their income. Even after restaurants begin to reopen, social distancing measures will mean restaurants cannot fully utilise dine-in space. Recent polling of small and

independent restaurants in the UK by Deliveroo suggests that 78% believe that takeaway and delivery will be more important to their business than ever before, even after lockdown measures are reduced.

Appendix 4

Summary of Engagement with the Community Working Group (CWG)

Date	Actions
29 October 2019	Meeting held with officers at Camden. In line with the requirements of the S106 Agreement, Deliveroo requested that the Council provide a list of residents groups to contact in order for them to nominate representatives to attend the CWG.
28 November 2019 - 13 December	The Council provides an initial longlist, and subsequent shortlist of residents groups for potential membership of the group.
18 December - 15 January	Contact made with suggested CWG members. However, no response from groups proposed was received.
15 January - 21 January	Deliveroo and Council work together to identify further groups to invite. Invitations then sent to additional groups. Four of nine groups contacted respond. Three confirmed willingness to be part of CWG, one (Fairfax Place) declined on basis of being supportive of the site.
5 February 2020	First meeting of CWG held at Swiss Cottage Library (minutes of meeting attached)
13 February 2020	Response provided to CWG members on issues discussed at meeting on 5 February including traffic marshal rotas and providing a copy of the OMP.
31 March 2020	Invitation sent to CWG Members proposing a second meeting on 9 April via video call in light of COVID-19 restrictions. This invitation was turned down by two members of the CWG
15 May 2020	Invitation sent to CWG Members proposing a meeting on 27 May via video call. This has been accepted.

Appendix 5

Community Working Group

Location: Swiss Cottage Library

Date: 05/02/2020 at 18:30 - 19:30

Attendees

Will Tricker, Deliveroo (WT) [Liaison Officer]

Rebecca Stevenson, Deliveroo (RS)

Edie Raff - Chair, Cresta House Residents Association (ER)

Chris Coggins - Hilgrove Estate TRA (CC)

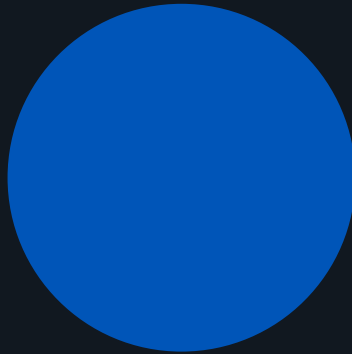
Vicky Stacey - Local Residents Group (VS)

Minutes

1. The meeting commenced at 18:30
2. Each participant introduced themselves and the organisation they were representing.
3. **WT** asked the participants whether the meeting could be digitally recorded to keep accurate minutes. **ER** objected and therefore no recording took place.
4. **ER** asked why the first meeting of the Community Working Group (**CWG**) had not taken place sooner. **WT** explained that Camden Council had only confirmed all the suggested invitees and their corresponding contact details in December 2019. **WT** told the group that owing to the Christmas period and a poor response rate it was necessary to allow for additional time to ensure all participants were able to consider the invitation. **WT** also explained that Deliveroo went beyond the Council's suggested list and contacted a few local schools.
5. **CC** told the group that he would like to extend an invitation to other representatives he considered would have a genuine interest in the operations of the site. **WT** agreed to follow up with **CC**.
6. **WT** clarified that the working group will convene every three months within the first calendar year, and thereafter the group will meet every six months.
7. **WT** gave a presentation about:
 - Deliveroo and the Swiss Cottage Editions site,
 - the background of the planning issue,
 - the purpose of the CWG,
 - the site's Operational Management Plan (**OMP**) and Performance Management Plan (**PMP**),
 - the complaints procedure, and the role of the traffic marshalls.

8. **WT** indicated that the PMP and OMP were working documents and that the purpose of the CWG was to facilitate consultation between Deliveroo and the local community to improve the site's operations.
9. During the OMP slide, **VS** and **ER** produced a detailed list of incidents which they said conflicted with the OMP. **WT** and **RS** asked whether the participants could share the documents so that they could be investigated.
10. The nature of the incidents included:
 - Smoking on the ramp.
 - No visible traffic marshal on-site at specific times.
 - Riders crossing the A41 to head southbound when exiting the site.
 - Lack of visible signage of the site's code of conduct.
 - Littering on Dobson Close.
 - Two riders talking at the top of the ramp with the traffic marshal.
 - Supplier deliveries breaching the OMP. **VS** gave specific incidents and times.
 - Use of additional cones at the top of the ramp.
11. **RS** and **WT** noted the incidents and told the CWG that they will speak to staff at the site to investigate specific incidents which run counter to the OMP.
12. **WT** also said that they will try to identify riders and send notifications as this would help to create best practice amongst the rider community.
13. **RS** told the group that Deliveroo will amend signage and will also enquire about having a bin placed at the top of the ramp.
14. **WT** clarified that only riders with confirmed deliveries at the site were able to access the site and that Deliveroo will not permit any more than 30 riders on the site.
15. **RS** noticed that the incidents regarding no visible traffic marshal at the top of the ramp corresponded to periods when the site is not trading when 1 traffic marshal is on duty for supplier deliveries only, which is in accordance with the OMP. At those times the marshal might have been helping a delivery at the bottom of the ramp or taking a break. **WT** will circulate the traffic marshalls rota to the CWG, to clarify when the traffic marshalls are on duty as well as their list of duties.
16. In response to the PMP slide, **ER** commented that she believed the issue of odour would resurface in the summer when residents opened their windows.
17. The group then discussed the switch to e-vehicles. **WT** told the group that Deliveroo had made a considerable effort to switch riders to e-mopeds. **WT** also pointed out there were considerable challenges, including a lack of viable market and charging infrastructure.

18. **ER** asked **WT** whether he knew how many riders were carrying out deliveries from the site in any given hour. **WT** told the group that the purpose of the CWG was to work with all the participants to improve the operations of the site and ensure that noise and any issue of anti-social behaviour is reported.
19. **RS** told the group the importance of working with participants to create best practice, a model of how Editions can operate in a way benefits the local community. **ER** and **VS** said that this was not possible and the site should not have been originally built.
20. **WT** asked the group whether there was anything in particular the group wanted to discuss at the next meeting. **CC** said that he would like to hear more about the site's community budget. The CWG agreed to this proposal.
21. **WT** also agreed to share the following documents:
 - Operational Management Plan
 - Performance Management Plan
 - The Planning Inspectorate's decision
 - Section 106 agreement
22. Participants agreed that the Swiss Cottage library was a suitable venue.
23. The meeting adjourned just after 19:30



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