

# Coram Community Campus – New East Building

**On behalf of Coram**

**July 2010**

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## 1 Introduction

1.1 This planning statement is submitted in support of a planning and conservation area application for Coram, Coram Campus, London.

1.2 Planning permission is sought for

**“ demolition of mortuary, swimming pool and Gregory House, and redevelopment of the site by the erection of a new building comprising ground, first, and second floors for the provision of flexible B1/ D1 floorspace, and associated works”.**

1.3 In bringing forward this proposal, Coram’s consultants have had particular regard to the following;

- the extant planning permission for a similar proposal;
- the location of the site within the Bloomsbury Conservation Area, adjacent to a grade II listed wall, and the Grade II\* listed St George’s Gardens;
- the needs of the Coram foundation for a flexible sustainable building that will serve their long-term needs and will be accessible to all;
- the amenity of residential occupiers in the surrounding area;
- the considerations of local amenity groups;
- the presence of numerous mature trees on site;
- relevant development plan policies.

1.4 Thomas Coram Foundation for Children (Coram) is a children’s charity that was given Royal Charter in 1739. Captain Thomas Coram founded the charity to protect and care for abandoned children. This concept has been continued and developed over the last 300 years through the Foundling Hospital and today, through the Coram Foundation, the charity

**“promotes resilience and well-being in vulnerable children and young people in preparation for their adult life”**  
**(Coram)**

1.5 Coram works with vulnerable children, young people and their families, transforming their lives through practical help and support. The Foundation aims to build self-esteem and well-

being, preparing children and young people for a fulfilling adult life.

- 1.6 This planning statement has been prepared by Gerald Eve LLP as planning consultants and should be read in conjunction with the other planning application documentation submitted and in particular Meadowcroft Griffin Architects Design and Access Statement which describes the proposals and sets out the design philosophy for the scheme.

## **2 Site and Surrounding Area**

- 2.1 The site forms part of the Coram Community Campus located between Brunswick Square, Mecklenburgh Square, St Georges Gardens and Coram's Fields.
- 2.2 To the north of the site is St George's Gardens which is Grade II\* listed in the English Heritage Register of Historic Parks and Gardens. The north of the site the boundary comprises a Grade II listed wall.
- 2.3 The site is designated by the Camden Unitary Development Plan ("UDP") 2006 as being located within the Bloomsbury Conservation Area and an area of nature conservation.
- 2.4 The Coram Campus comprises a collection of buildings and adjacent to the site is the Foundling Museum which is Grade II listed.
- 2.5 The application site is located in the north eastern area of the campus. The application site comprises a single storey double height swimming pool, a disused single storey mortuary, some single storey storage buildings and a two storey late 1950s building (Gregory House).
- 2.6 The swimming pool building abuts the mortuary and parts of the north side of the building abuts the listed wall to St George's Gardens. The mortuary building is a smaller single storey 19<sup>th</sup> Century brick-built structure. Gregory House, built in 1958, is a modern two-storey structure with a flat roof. It includes a staff flat with a large south-facing balcony on the first floor. The north elevation of the building abuts part of the flank wall of William Goodenough House.
- 2.7 Conservation Area Consent to demolish these buildings was granted on 26 June 2006. A new application for conservation area consent is submitted with this application.

### 3 Planning History

3.1 On 28 August 2003 a planning application (Reference 2003/1960/P) was submitted by Coram for;

**“Redevelopment of the site by the erection of a new building comprising semi-basement, ground, first and second floors for the provision of child care facilities”**

3.2 A conservation area consent application was made in conjunction with this (Reference 2003/1961/C) for;

**“The demolition of the mortuary, swimming pool and Gregory House within the Coram Community Campus”.**

3.3 The application was subsequently refused on 9 March 2005 by the General Purposes (Development Control) Sub-Committee for the following reason;

**“ The proposed development by virtue of its size, scale, height, bulk, design and location would be harmful, in particular to the setting of the adjoining open space of St George’s Gardens and the character and appearance of this part of the Bloomsbury Conservation Area, contrary to the requirements of policies EN31 (character and appearance of conservation areas and EN52 (development bordering designated open space) of the London Borough of Camden Unitary Development Plan 2000”.**

3.4 Coram lodged an appeal against the decision of the Council which was then dismissed by the Inspector on 23 March 2006. The Inspector concluded that the overall concept and realisation of the design was acceptable describing it as ‘admirable’ but the eastern end of the building required revision. In Para 38 of his report the Inspector states that;

**“Bearing in mind the long history of the scheme, it is regrettable to have to dismiss the appeal because of a relatively small defect in the design”**

3.5 The defect was the concern the Inspector had over the impact of the development on sunlight/daylight to four windows at ground and first floor level in the flank wall of William Goodenough House.

- 3.6 Coram then amended the scheme taking into consideration the Inspector's comments and submitted an application on 26 June 2006 Reference 2006/2951/P for;

**“The redevelopment of the site by the erection of a new building comprising semi-basement, ground, first and second floors for the provision of child care facilities (Class D1), ancillary residential and office (Class B1) floorspace and associated landscaping”**

- 3.7 This application was approved on 9 November 2007 subject to a S106 agreement. The planning permission expires on 8 November 2010; this permission is therefore still extant.
- 3.8 An application for conservation area consent (Reference 2006/2952/C) was also submitted on 26 June 2006 for ;

**“Demolition of existing mortuary, swimming pool and Gregory house buildings”**

- 3.9 The application was approved on 26 October 2006 subject to the corresponding planning application being granted. As the S106 agreement on the planning application was not signed until 9 November 2007, the conservation area consent had effectively 1 year less time to implement. This consent has therefore lapsed on 25 October 2009.
- 3.10 On 15 June 2010 an application to discharge condition 8a and b (ground investigation) and condition 9a and b (listed wall survey) of the extant planning permission 2006/2951/P was submitted and subsequently approved on 22 July 2010.
- 3.11 On 26 May 2010 an application to discharge condition 4 (landscaping), 5 (trees) and 10 (green wall) of the extant planning permission 2006/2951/P was submitted and subsequently approved on 22 July 2010
- 3.12 All the pre-commencement conditions for extant permission 2006/2951/P have therefore been discharged.
- 3.13 The pre-commencement S106 obligations have been submitted also. The Travel Plan has been discharged, and the Crime Prevention Plan and Sustainability Plan are still under consideration by London Borough of Camden.
- 3.14 Once these have been discharged, it is Coram's intention to implement the permission in August 2010. Coram's preference is to erect the building that is the subject of this planning application submission, but due to timescales, they will implement the extant

planning permission so that after 9 November 2010, if planning permission has not been granted for this new application, they have the ability to build at the extant permission.



## 4 Proposals

- 4.1 Since the approval of the scheme 2006/2951/P, Coram have sought professional advice and through this process, they have identified that their future needs are changing and that a more flexible building would be better suited to their requirements.
- 4.2 As such, Meadowcroft Griffin Architects were instructed to design a new scheme that would provide them with this flexibility.
- 4.3 It is now proposed to redevelop the site for;

**“redevelopment of the site by the erection of a new building comprising ground, first, and second floors for the provision of flexible B1/ D1 floorspace, and associated works”**

- 4.4 The proposed building is lower in height than the extant planning permission. The top storey on the north side is set back more than the extant permission and is clad in timber so that it reads as an attic level. Slots/ setbacks have also been introduced to break up the length of the building. The proposed building is also set back at first and second floor level to create a gap of 13m between William Goodenough House and the proposed building. This allows better views to the tree canopy behind when viewed from St George’s Gardens.
- 4.5 Green/ living walls are also proposed within the slots, the ends, and the faced facing St George’s Gardens.
- 4.6 The proposed areas are as follows. (All areas in GEA sq m).

Land Use	Existing	Approved 2006/2951/P	Proposed
Ancillary Residential	110.25	419	85
Office B1	141.9	457	0
Training, Child and Adult Welfare D1	1032.75	2838	0
Flexible B1/D1 use for childcare related activities	0	0	3585
<b>Total</b>	<b>1284.9</b>	<b>3714</b>	<b>3670</b>

- 4.7 The intention is that the flexible B1/D1 floorspace will be occupied by Coram’s own offices and other complimentary uses.

- 4.8 An ancillary caretakers flat is proposed in the north east corner of the new east building. The flat is ancillary to the use of the Campus and is not therefore Use Class C3.
- 4.9 There is an area on the roof top designated to plant which will be screened by timber. The detailed specification of the plant is not yet known but this information can be secured through a planning condition.
- 4.10 A substation is proposed to serve the new building. This is located on the eastern boundary behind a timber screen adjacent to the proposed bin stores.
- 4.11 On the application site there are 6 car parking spaces proposed within the red line site including 2 disabled spaces. There are 20 car parking spaces elsewhere on the campus.
- 4.12 In terms of cycle parking, 20 spaces are proposed. The location of these will be detailed within the landscaping Masterplan strategy for the site, which can be secured by an appropriate planning condition.
- 4.13 Ground source heat pumping is proposed together with other sustainable measures.

## **5 Consultations**

- 5.1 The full details of consultation carried out for the revised proposals are detailed within section 1.2 of the Design and Access statement that forms part of this application submission.
- 5.2 Five rounds of pre-application consultation have been held with LB Camden planning and design officers who are supportive of the proposals.
- 5.3 The Friends of St George's Gardens were also consulted on three occasions. Positive feedback has been received from the Friends.
- 5.4 A meeting with the Bloomsbury Conservation Area Advisory Committee was held and a copy of the detailed proposals were then submitted to them. No objections to the proposals have been raised.
- 5.5 The architects have also met with Community Police to discuss Secure by Design and best practice for the security measures.
- 5.6 The King's Cross Ward Councillors have also been briefed and had no concerns over the proposals.
- 5.7 The scheme now proposed is the result of all these consultations where feed back from all groups has been taken on board and a solution found that best meets the interests of all those parties.

## 6 Relevant Planning Policy Context

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Order 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 6.2 The regional planning policy document is the Mayor's London Plan consolidated with Alterations since 2004 which was published in February 2008 ("the London Plan"). The Mayor has also drafted a Replacement London Plan October 2009 which is currently undergoing an Examination in Public. The Draft Replacement London Plan is expected to be published in late 2010. As such, less weight can be given to the policies contained within this draft.
- 6.3 The adopted local planning policy document is Camden's UDP 2006. This contains more detailed policies. Camden is also currently preparing its Local Development Framework (LDF) which will eventually replace the UDP. The Camden Core Strategy and Development Policies documents were submitted to the Secretary of State in January 2010 and the Examination in Public took place in May 2010. The Inspector's decision is expected in Autumn 2010 and if the documents are found sound, they will be adopted and used for the determination of planning applications.
- 6.4 The planning application has therefore had regard to both adopted and emerging local policy.
- 6.5 The most relevant planning policies for the proposals are summarised below.

### National Planning Policy Guidance

- 6.6 **Planning Policy Guidance/ Statements-** With regard to national planning policy guidance, regard should be had to Planning Policy Guidance Notes and Planning Policy statements. Those relevant to this application are listed below;
- PPS1: Delivering Sustainable Development 2005;
  - PPS3: Housing 2006
  - PPS5 Planning for the Historic Environment 2010;
  - PPS22 Renewable Energy 2004;

- 6.7 **Planning Policy Statement 5**, Planning for the Historic Environment (PPS5) was published in March 2010. An accompanying practice guide has also been jointly prepared by Communities and Local Government, English Heritage and Department of Culture Media and Sport, being the “PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide”.
- 6.8 Proposals for consent relating to heritage assets are subject to policies which require such proposals to be justified and an explanation of their effect on the heritage asset’s significance to be provided.
- 6.9 PPS5 sets out three broad objectives in paragraph 7:-
- to deliver sustainable development;
  - to conserve heritage assets in a manner appropriate to their significance;
  - to contribute to knowledge and understanding of the past.
- 6.10 Significance is defined as:-
- “the value of a heritage asset for this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic”** (PPS5, Annex 2, page 14)
- 6.11 Significance “is a key term”, to sum up the qualities that make, an otherwise ordinary asset, a heritage asset. The Practice Guide explains that the significance of a heritage asset is the sum of its interests (Practice Guide, paragraph 12) and justifies a degree of protection in planning decisions.
- 6.12 PPS5 introduces Heritage Assets and Designated Heritage Assets which are separately defined. A conservation area (as a whole) is one type of designated heritage asset, a listed building is another.
- 6.13 It states that there should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting

any designated heritage asset should require clear and convincing justification.

- 6.14 Other Relevant Government or National Guidance- Relevant guidance to this application includes;
- Safer Places: The Planning System & Crime Prevention 2004;
  - Planning and Access for Disabled People: A Good Practice Guide 2004:
  - CABE/ DETR “By Design” 2000

## **Regional Planning Policy**

### **The Consolidated London Plan (February 2008)**

#### **Social, community uses**

- 6.15 **Policy 3A.18** refers to the protection and enhancement of social infrastructure and communities facilities. It states that development plan documents (“DPDs”) should assess the need for community facilities in their area, and ensure that they are capable of being met wherever possible. These needs include primary health care facilities, children’s play and recreational facilities, services for young people, schools, nursery, and other child care provision, amongst others.
- 6.16 Policy should seek to ensure the net loss of such facilities be resisted and increased provision be sought, both to deal with the increased population and to meet existing deficiencies.
- 6.17 **Policy 3A.24** refers to education facilities and states that DPDs should reflect demand for pre-school, school and community learning facilities. Boroughs should provide criteria based approach to the provision of different types of educational facilities and the expansion of existing facilities, taking into account the need for new facilities and the potential for expansion of existing provision.

#### **Heritage**

- 6.18 **Policy 4B.11** states that the Mayor will work with strategic partners to protect and enhance London’s historic environment. DPD policies should seek to maintain and increase the contribution of the built heritage to London’s environmental

quality and to the economy, through the beneficial use of historic assets while allowing for London to accommodate growth in a sustainable manner.

- 6.19 **Policy 4B.12** states that Boroughs should ensure that the protection and enhancement of historic assets in London are based on an understanding of their special character and form part of the wider design and urban improvement agenda including their relationship to adjoining areas.

### Design

- 6.20 **Policy 4B.1** of the London Plan sets out design principles for a compact city identifying 12 specific principles which development should address. These include respecting local context, history, built heritage and also, where appropriate, to inspire, excite and delight.

### Sustainability

- 6.21 The London Plan sets out policy to tackle climate change at **Policy 4A.1**. It states that the following hierarchy will be used to assess applications:-
- Using less energy (in particular by adopting sustainable design and construction methods):
    - **Policy 4A.3**, sustainable construction and design, seeks to ensure that future developments meet the highest standards of sustainable design and construction. This includes measures to make effective use of land, existing buildings and other resources; reduce emissions that contribute to climate change; avoid internal heating and excessive heat generation; minimise energy use; reduce light, air and water pollution; and promote sustainable waste behaviour.
  - Supplying energy efficiently (in particular by prioritising decentralised energy generation):
    - **Under Policy 4A.6**, all developments are required to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions. The need for active cooling systems should be reduced as far as possible through passive design including ventilation, thermal mass,

external summer shading and vegetation on and adjacent to buildings. Heating and cooling infrastructure should be designed to allow the use of decentralised energy (including renewable generation) and for it to be maximised for the future.

- Using renewable energy:
  - In **Policy 4A.7**, renewable energy, the Mayor will adopt an assumption that developments will achieve a reduction in carbon dioxide emission of 20% from on site renewable energy unless it can be demonstrated that such provision is not feasible.

6.22 In addition to the Consolidated London Plan the Mayor has produced more detailed strategic guidance on issues, which cannot be addressed in sufficient detail in the Plan through SPG documents. The SPG documents provide guidance on polices within the London Plan.

6.23 The relevant SPGs for this application are listed here;

- Sustainable Design and Construction SPG 2006;
- Accessible London: Achieving an Inclusive Environment SPG 2004;

6.24 Other Mayoral Strategies and Documents include;

- Energy Strategy 2004

## **Draft Replacement London Plan 2009**

### **Education Facilities**

6.25 Draft **Policy 3.19** states that in terms of planning decisions, development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to education purposes.

### **Heritage**

6.26 Draft **Policy 7.8** seeks to protect London's historic environment, including natural landscapes, conservation areas, heritage assets, World Heritage Sites, scheduled ancient monuments and memorials should be identified, preserved and restored.



- 6.27 It goes on to explain that new development in the setting of heritage assets, and conservation areas should be sympathetic to their form, scale, materials and architectural detail.

### **Design**

- 6.28 Draft **Policy 7.6** states that buildings and structures should be of the highest architectural quality and be of a proportion, composition, scale and orientation that enhances activates and appropriately encloses the public realm.

### **Transport**

- 6.29 Draft **Policy 6.3** states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Transport assessments will be required for major planning applications.

### **Sustainability**

- 6.30 Draft **Policy 5.1** seeks to achieve an overall reduction in London carbon dioxide emissions of 60% (below 1990 levels) by 2025. It is expected that regional agencies, London Boroughs and other organisations will contribute to meeting this strategic reduction target, and the GLA will monitor progress towards its achievement annually.
- 6.31 Draft **Policy 5.2** states that proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor's energy hierarchy.
- 6.32 Major development proposals should include a detailed energy assessment to demonstrate how the minimum target for carbon dioxide emissions reduction outlined above are to be meet within the framework of the energy hierarchy.
- 6.33 Draft **Policy 5.3** states that development proposals should ensure that sustainable design standards are integral to the proposal, including it's construction and operation, and ensure they are considered at the beginning of the design process.
- 6.34 Draft **Policy 5.7** seeks to increase the proportion of energy generated from renewable sources, and that the minimum targets for installed renewable energy capacity will be achieved

in London. Development proposals should provide a reduction in carbon dioxide emissions through the use of onsite renewable energy generation, where feasible.

- 6.35 All renewable energy systems should be located and designed to minimise any potential adverse impact on biodiversity, the natural environment and historical assets.
- 6.36 Draft **Policy 5.10** states that the Mayor will promote and support urban greening such as new planting in the public realm which includes tree planting, green roofs and walls and soft landscaping.
- 6.37 Draft **Policy 5.11** encourages the use of roof, wall and site planting, especially green roofs and walls where feasible, to deliver as many objectives of draft Policy 5.11 as possible.

## **Local Planning Policy**

### **Camden UDP 2006**

#### **Land Use / Community Uses**

- 6.38 **Policy SD3** seeks a mix of uses in development, including a contribution to the supply of housing, and will not grant planning permission for development that reduces the amount of floorspace in secondary uses, unless it considers that particular characteristics of the proposal, site or area would make development of housing or a mix of uses inappropriate.
- 6.39 **Policy C1** states that the Council will grant planning permission for the development of community uses in suitable locations. Facilities with a local catchment should be located close to, and/or be easily accessible to, the community that they serve. Facilities likely to attract large numbers of people should be located where they are easily reached by public transport and should be fully accessible to people with disabilities.
- 6.40 **Policy C1d** advises that the Council will grant planning permission for child care facilities provided that there is safe and secure external play space on-site. The Council will seek the provision of child care facilities in workplace and educational developments of 1,000 square metres or more.

## Heritage

- 6.41 **Policy B6** seeks to preserve or enhance the character and setting of listed buildings as buildings of special architectural or historic interest.
- 6.42 **Policy B7a** advises that the Council will only grant consent for development in a conservation area that preserves or enhances the special character or appearance of the area.
- 6.43 **Policy B7 b** states that the Council will not grant conservation area consent for the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area, unless exceptional circumstances are shown that outweigh the case for retention.
- 6.44 **Policy N2b** explains that the Council will not grant planning permission for development bordering public and private open space that it considers would cause harm to its wholeness, appearance and setting, or is likely to intrude on the public enjoyment of the open space.
- 6.45 **Policy N3a** states that the Council will not grant planning permission for development that it considers would cause harm to the historic features and setting of Parks and Gardens of Special Historic Interest and London Squares shown on the Proposals Map.

## Design

- 6.46 **Policy B1** explains that the Council will grant planning permission for development that is designed to a high standard. It goes on to a list of criteria used for assessing this. The key considerations section of this planning statement discusses this in more detail.
- 6.47 **Policy SD1 c** states that the Council expects all new development to meet the highest standards of access and inclusion. The Council will require development of buildings and spaces that the public may use, including changes of use and alterations where practicable and reasonable, to be designed to improve access and use for all.
- 6.48 **Policy SD1 d** states that the Council will require development to incorporate design, layout and access measures which address personal safety, including fear of crime, security, and crime prevention.

- 6.49 **Policy SD9 c** seeks developments that conserve energy and resources through:
- a) designs for energy efficiency;
  - b) renewable energy use;
  - c) optimising energy supply; and
  - d) the use of recycled and renewable building materials.
- 6.50 It goes on to require major developments to demonstrate the energy demand of their proposals and how they would generate a proportion of the site's electricity and heating needs from renewables wherever feasible.

### **Amenity**

- 6.51 **Policy SD6** states that the Council will not grant planning permission for development that it considers causes harm to the amenity of occupiers and neighbours.

### **Trees**

- 6.52 **Policy N8 c** states that the Council will seek to protect trees within the Borough.

### **Transport**

- 6.53 **Policy T1** seeks to have developments encourage travel by walking, cycling and public transport. The Council will not grant planning permission that would be dependent on travel by private motor vehicles.
- 6.54 **Policy T1 b** of this policy requires applicants to provide a Transport Assessment in support of any development that significantly increases travel demand or would otherwise have a significant impact on travel or the transport system.
- 6.55 **Policy T1c** requires applicants to provide a Travel Plan to manage travel arising from any development that significantly increases travel demand or would otherwise have a significant impact on travel or the transport system.

- 6.56 **Policy T3** advises that the Council will only grant planning permission for development that it considers to make satisfactory provision for pedestrians and cyclists.

## **Emerging Policy**

### **Camden Draft Core Strategy**

#### **Land Use**

- 6.57 **Draft Policy CS10** states the Council will work with its partners to ensure that community facilities and services are provided for Camden community and people who work in and visit the borough.
- 6.58 The explanatory text in Para 10.8 states that that the Council aims to make sure that children and young people receive the services and support they need by working with our partners, including schools, the voluntary and community sector, parents and carers and the children and young people themselves. It goes on to say that the Council will implement their children and young people's plan which aims to improve the experience of children and young people in Camden and details the areas that they are working on to improve, in particular:
- Keeping children safe;
  - Raising school standards, and
  - Helping children achieve their full potential

#### **Design and Heritage**

- 6.59 **Draft Policy CS14** seeks to ensure that Camden's places and buildings are attractive, safe and easy to use by requiring;
- development of the highest standard of design that respects local context and character;
  - preserving and enhancing Camden's rich and diverse heritage, including conservation areas, listed buildings and historic parks and gardens;
  - Promoting high quality landscaping and works to streets and public spaces;

- Seeking the highest standards of access in all buildings and places and requiring buildings and spaces that the public may use to be as accessible as possible.

- 6.60 **Draft Policy CS15** seeks to protect and improve the parks, open spaces and trees.
- 6.61 The Council will protect and improve sites of nature conservation and biodiversity, in particular habitats and biodiversity identified in the Camden and London biodiversity plans in the Borough by protecting other green areas of value including gardens. It goes on to say that where possible the provision of new or enhanced habitats will be encouraged which can include biodiverse green or brown roofs and green walls.

### **Sustainability**

- 6.62 **Draft Policy CS13** aims to tackle climate change through promoting environmental standards. These include;
- Reducing the effects of and adapting to climate change by requiring all development to take measures to minimise the effects of, and adapt to, climate change and expects all developments to meet the highest feasible environmental standards during construction and occupation by ensuring patterns of land use that minimise the need to travel by car and help support local energy networks;
- 6.63 Promoting the efficient use of random buildings by minimising carbon emissions from the redevelopment, construction and occupation of buildings by implementing, all of the elements of the energy hierarchy.

### **Transport**

- 6.64 **Draft Policy CS11** states that the Council will promote the delivery of transport infrastructure and the availability of sustainable transport choices in order to support Camden's growth, reduce the environmental impact of travel, and relieve pressure on the borough's transport network.

## **Camden Draft Development Policies**

### **Land Use**

- 6.65 **Draft Policy DP15** seeks to help to meet increased demand for facilities, the Council will protect existing community facilities by

resisting their loss. It goes on to state that new community facilities must be provided in buildings which are flexible and sited to maximise the shared use of premises.

### **Heritage – Conservation Areas**

- 6.66 **Draft Policy DP25** states that In order to maintain the character of Camden’s conservation areas, the Council will only permit development within conservation areas that preserves or enhances the character and appearance of the area and prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown.
- 6.67 In addition the Council will preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden’s architectural heritage.  
Conservation areas

### **Heritage - Listed buildings and Historic Parks**

- 6.68 **Draft Policy DP26** aims to preserve or enhance the borough’s listed buildings. In order to do this the Council will prevent the total or substantial demolition of a listed building unless exceptional circumstances are shown that outweigh the case for retention, only grant consent for a change of use or alterations and extensions to a listed building where it considers this would not cause harm to the special interest of the building; and not permit development that it considers would cause harm to the setting of a listed building.
- 6.69 The Council will also seek to protect other heritage assets including Parks and Gardens of Special Historic Interest and London Squares.

### **Design**

- 6.70 **Draft Policy DP24** requires all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider character, setting, context and the form and scale of neighbouring buildings.

## Sustainability

- 6.71 **Draft Policy DP22** states that the Council will require development to incorporate sustainable design and construction measures. Schemes must demonstrate how sustainable development principles have been incorporated into the design and incorporate green or brown roofs and green walls wherever suitable.
- 6.72 Non-domestic developments of 500sqm of floorspace will be expected to achieve 'very good' in BREEAM assessments, with the aim of increasing the target to a rating of at least 'excellent' in 2016, if feasible, and zero carbon from 2019, in line with the government's ambitions.
- 6.73 **Draft Policy DP23** requires developments to reduce their water consumption, the pressure on the combined sewer network and the risk of surface water flooding by incorporating water efficient features and equipment and capturing, retaining and re-using surface water and grey water on-site amongst other suggested measures.

## Amenity

- 6.74 **Draft Policy DP26** states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity.
- 6.75 **Draft Policy DP28** seeks to ensure that noise and vibration is controlled and managed.

## Access

- 6.76 **Draft Policy DP29** seeks to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities.

## Transport

- 6.77 **Draft Policy DP16** seeks to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links.
- 6.78 **Draft Policy DP18** seeks to ensure that developments provide the minimum necessary car parking provision. Appendix 2 states



that where the Council accepts the need for car parking provision, development should not exceed the maximum standard for the area in which it is located (excluding spaces designated for disabled people).

### **Conservation Area Audits**

- 6.79 The **Bloomsbury Conservation Area Statement** February 1998 sets out the characteristics of important buildings within the Conservation Area. There is no specific reference made to the buildings within Coram Campus. In addition the document is dated February 1998 and as such more recent relevant policy supercedes this.
- 6.80 The **draft Bloomsbury Conservation Area Statement** dated May 2008 places Coram's Fields within sub area 13 and describes the surrounding area and materials . No specific reference is made to the unlisted buildings on the Coram Campus. It does note that St George's Gardens are a positive contributor to the Conservation Area.

### **Planning Brief**

- 6.81 A draft brief was prepared in 1991 which went to consultation in late 1991. A further report was the presented to Committee on 14 January 1992 with the recommendation that the draft site brief be used as the basis of all discussions prior to the presentation of a full site brief to committee. Members agreed and noted that the Coram Foundation's revised programme proposed meant that a brief would not be required before mid 1992. The draft was too general as it was decided that it would be used for discussion only.
- 6.82 The brief was never finalised and due to this and the time lapsed since its drafting, no weight should be given to this document.

## 7 Key Planning Considerations

7.1 The key planning considerations relevant to this application are;

- Assessment of the affect of the proposals on the significance of the heritage assets;
- Design and appearance
- Land use
- Sustainability
- Amenity
- Transport – servicing, deliveries, parking cycle
- Landscaping

### **Assessment of the Proposals on the Significance of the Heritage Assets**

7.2 The heritage assets are considered to be the Grade II\* listed St George's Gardens, the Grade II listed wall and the Bloomsbury Conservation Area as a whole.

### **The Conservation Area**

7.3 Permission was granted for the demolition of the buildings within the conservation area on 9 November 2007. These proposals do not propose to demolish any additional buildings to those previously granted permission. The principle of the loss of these buildings within the conservation area has therefore been accepted in principle at appeal and then subsequently by LB Camden.

7.4 In the appeal (Reference APP/X5210/A/05/1187904) the Inspector noted that Gregory House detracted significantly from the character and appearance of the conservation area and that architecturally it has little in common with the massive institution buildings at both ends of the Gardens, with the intimate detail of the rear of Georgian Houses fronting Regent's Square or with palatial Georgian frontages all of which are typical of the character.

7.5 It was noted that the swimming pool has an interesting elevation but this can not be seen from the wider area and the building mostly presents a long monolithic elevation to the public. The mortuary and swimming pool building were noted to not detract

from the area but have little in common again with the more imposing architecture of the area. The Inspector noted their contribution was neutral to the character and appearance of the Conservation Area at best.

7.6 The Inspector noted that:

**“ Gregory House detracts significantly from the character and appearance of the area, the swimming pool and mortuary present a dull elevation that detracts from the overall appearance of the area, particularly the Gardens. In terms of the character and history, there is ample evidence locally of the history of William Coram and the Foundling Hospital in the form of the imposing museum, the William Coram statue and Coram’s Fields itself. Although some people cherish the swimming pool and mortuary they make a limited contribution to the area, and so the demolition of the existing buildings is accepted provided the new building makes an equal or greater contribution”.**

7.7 In addition to the Inspector’s comments, the buildings have been considered in the past for listing status and have been rejected.

7.8 It is therefore considered that the buildings to be demolished do not contribute to the character of the conservation area and have a neutral effect at best. Their loss would therefore not harm the significance of the conservation area provided they are replaced with a better quality building.

7.9 The proposed building is considered to be a much more high quality design that is more sympathetic to its surroundings when viewed from the wider conservation area and is therefore considered to enhance the appearance of the conservation in accordance with PPS 5, London Plan Policy and in particular UDP Policy B7, and draft policy CS14 and DP 25 of the emerging LDF.

### **Grade II Listed Wall**

7.10 PPS5, London Plan Policy and in particular UDP Policy B6 and draft Policy CS14 and DP25 seek to protect the significance of the Grade II listed wall and its setting.

7.11 The development is sited a substantial distance away from the wall to protect it. The listed wall survey and protection measures

are described within the supporting application documentation which will ensure that the setting of, and the wall itself will be safeguarded for the future.

- 7.12 The proposed design and appearance of the building is considered to enhance the setting of the listed wall and materials will be chosen that do not detract from the wall. These can be secured by an appropriately worded planning condition.
- 7.13 The significance of the heritage asset is therefore not harmed by the development proposals and its setting could be argued to be enhanced due to the more attractive replacement building and proposed materials in accordance with the relevant development plan policy detailed in Para7.10.

### **Grade II\* St George's Gardens**

- 7.14 PPS 5, London Plan Policy, UDP Policy B6 and N2, and draft policy CS14, and DP25 state that the permission will not be granted for development bordering public or private open spaces that would cause harm to its significance, appearance and setting, or is likely to intrude on the public enjoyment of the open space.
- 7.15 The proposed design and appearance of the replacement building is considered to enhance the views from St George's Gardens and the use of timber and the insertion of green walls results in the building having a less oppressive and imposing presence on the Gardens as it blends better with the foliage than the existing buildings and extant permission.
- 7.16 The Friends of St George's Gardens agree that the proposed building is much more sympathetic than the extant permission and will therefore enhance the views and the thus the enjoyment of the Gardens in accordance with development plan policy.
- 7.17 In terms of PPS 5 the significance of the heritage asset will not be harmed as the proposed building will improve the setting and backdrop to the Gardens and enhance the views out of the Gardens.

### **Design and Appearance**

- 7.18 The proposed building is considered to improve upon the extant scheme. It is lower in height and the top storey on the north side

is set back more than the extant permission and is clad in timber so that it reads as an attic level. This responds to previous concerns raised by the consultees and the Inspector that the façade was too imposing and monolithic. The Inspector's report advised that by reducing the height of the building in the centre, views to the tree canopy beyond could be increased.

- 7.19 The proposed slots/ setbacks have been introduced to break up the length of the building. The proposed building is also set back at first and second floor level to create a gap of 13m between William Goodenough House and the proposed building. This allows better views to the tree canopy behind when viewed from St George's Gardens.
- 7.20 The detailed design aspires to improve access to the building.
- 7.21 The proposed development comprises a high quality design which respects its site and setting. The building is accessible to all and will improve the spaces around and between buildings (this will be further progressed as part of the landscaping strategy which will be the subject of a planning condition).

### **Land Use**

- 7.22 London Plan Policy, UDP Policy SD3, draft Policy CS1 and Draft Policy DP1 seek a mix of uses in development, including a contribution to the supply of housing. In considering policy SD3, the Council will have regard to the need and potential for the continuation of an existing use.
- 7.23 It was considered by Camden Council on the previous scheme that the introduction of a mix of uses to Coram Campus could have compromised the viability of the development and the increase in community facilities within the Borough was welcomed.
- 7.24 The Council therefore considered it appropriate to waive the need for a mixed-use scheme to achieve the community benefit that the proposals would bring.
- 7.25 This scheme proposes the same uses as previously and will improve the provision of activities and services currently provided on the site which are considered by the Council to form a valuable local and regional resource.
- 7.26 London Plan Policy, UDP Policy C1, and draft Policy CS10 and draft Development Policy DP15 seeks to ensure that a range of

premises for community facilities, including childcare, and education, are retained to meet the needs of the community.

- 7.27 These proposals for improved facilities will facilitate the continuation of the use that will benefit of the local and wider community.
- 7.28 The proposed development is also strongly supported by Policy SD1A as it will provide the Central London Area with enhanced facilities.

### **Sustainability**

- 7.29 A Sustainability Plan, BREEAM report and Energy Report have all been submitted as part of the application supporting information.
- 7.30 The BREEAM pre-assessment targets the overall score at 65.68%, this is well above the 55% threshold for a 'Very Good Rating' and is therefore in line with Council policy.
- 7.31 The Energy Report that accompanies the application recommends that a ground source heat pump be installed to meet the 20% carbon emissions reduction as set out in the London Plan.
- 7.32 Appendix A of the energy report sets out the geothermal feasibility study, and Appendix B shows the proposed borehole locations for the proposals.
- 7.33 Sustainable measures for the building are set out in the accompanying Sustainability Plan which includes measures for; reducing heat loss; energy efficient light fittings; high performance glazing; a thermal buffer; water saving measures; materials; waste and site management; and sustainable transport measures amongst other things.
- 7.34 Policy SD9c of the UDP requires development of more than 1,000 sq m to incorporate renewable technologies to provide at least 10% of the predicted requirements.
- 7.35 London Plan Policy, Draft Policy CS13 and DP 22 and DP23 aims to tackle climate change through promoting environmental standards. These include reducing the effects of and adapting to climate change; promoting the efficient use of buildings by minimising carbon emissions from the redevelopment, and ensuring developments use less energy. The proposals are considered to accord with policies.

## **Transport**

- 7.36 A Transport Assessment and Draft Travel Plan have been prepared by Steer Davies Gleave and are submitted as part of this application.
- 7.37 The main findings of the TA include:
- The site has a very good level of accessibility being well connected by pedestrian, cycle and public transport routes. The site is close to 3 national rail station, 7 underground lines and 19 bus routes all within walking distance.
  - 20 cycle spaces are proposed
  - 26 car parking spaces on site including spaces for disabled users.
  - Overall the redevelopment of the site will generate less trips compared to the existing site the transport impact of the completed development is considered to be negligible;
  - The car free development and enhanced cycling facilities will encourage the use of more sustainable forms of transport and therefore the net impact on pedestrians and cyclists is considered to be beneficial
  - The proposal will therefore comply with the aspirations and direction of current transport policy at all levels.

## **Servicing**

- 7.38 The servicing/ delivery bay is provided as part of the development.
- 7.39 A bin store is located to the east of the site and will be collected as per existing arrangements on site i.e. three times a week for the non-recyclable bins and weekly collection for the recyclable bins.
- 7.40 A construction management plan setting out the measures to minimise the impact of the construction traffic on the surrounding road network will be devised at a later stage. This can be secured through an appropriately worded planning condition.

## **Travel Plan**

- 7.41 As existing, Coram actively promotes the use of public transport, cycling and walking through the provision of season ticket loans and through its pilot Healthy Activator programme which encourages healthy activities and lifestyle.
- 7.42 The Travel Plan measures to be implemented are;
- A Travel Plan Coordinator will be responsible for managing the ongoing development and delivery promotion of the plan.
  - The steering group will be formed of suitable representatives and will meet on a regular basis
  - Travel surveys will be carried out and monitored
  - Site specific information will be provided to staff and visitors
  - Site specific travel information will be provided to staff and visitors
  - Travel Plan information will be provided to staff and visitors.
- 7.43 The proposals therefore comply with the London Plan Policy and local policy by reducing the need to travel and promoting more sustainable methods of transport.

## **Amenity**

### **Daylight and Sunlight**

- 7.44 A daylight and sunlight assessment is submitted as part of the application documentation.
- 7.45 The ground, first and second floor levels were assessed these were most likely to experience lower daylight and sunlight levels.
- 7.46 In terms of daylight, it was found that all windows passed the BRE Guidelines and in fact, 9 windows will receive daylight gains as the proposals are sited further away than the existing building.
- 7.47 In terms of sunlight, all windows pass the BRE guidelines for total sunlight. Again 9 of the windows will have sunlight gains. For window No. 3 there will be a winter sunlight reduction below BRE guidelines. The guidelines have a target of 5%, and the



level will be 4%. As existing there are windows which receive even less than this and all other windows achieve or exceed this target. The slight reduction in one window is therefore considered to be a de minimus impact as the level will not be noticeable.

- 7.48 The proposals therefore do not affect the amenity of the neighbouring properties to a detrimental extent in accordance with UDP Policy SD6 of the Council's UDP and policies DP26.

### **Noise**

- 7.49 An acoustic survey of background noise levels at the nearest residential building (William Goodenough House) was carried out. The survey location was the third floor of the West building overlooking the Coram Campus. The survey was carried out on 5 and 6 May 2010. Weather conditions and wind speed were noted.
- 7.50 The report concludes that a background noise level limit of minus 10dB from the proposed plant at the closest residential property will be considered at all times. The West Building is located 15 m away from the proposed plant.
- 7.51 Plant will be screened to limit the noise breakout and plant inlet and outlets will be appropriately attenuated to meet the above noise limit.
- 7.52 Once the actual plant has been selected, details of the specification and acoustic attenuation measures can be submitted to the Council for consideration. This can be secured by an appropriately worded condition.
- 7.53 Due to the distance of 15m between the proposed screened plant and the residential properties, it is considered that there will be no noise and disturbance caused to the residents and therefore the proposals are in accordance with Policy SD6 of the Council's UDP.
- 7.54 The proposals will enhance the amenity of the local residents as the new building will be more attractive and further away from surrounding residential occupiers thereby improving outlook and views to those residents in accordance with UDP Policies SD6 and draft Policy DP26.

## Landscaping

- 7.55 Previously the Inspector commented in relation to trees and landscaping that:
- “One large plane tree would be lost in the redevelopment. In the context of the numerous trees in the area it would not be significant and it would be replaced. On the evidence there is a significant possibility that the tree is unstable. The scheme conforms to Policy EN35”.**
- 7.56 An Arboricultural Assessment is submitted with the application documentation. Most of the trees within and immediately adjacent to the Coram Community Campus are unaffected by the proposed development.
- 7.57 It is proposed to remove 4 trees that have already been considered and permission granted under the extant permission (2006/2951/P). Site investigations will be carried out on the roots when the development commences to see if the large tree (010) can be retained and every effort will be made to do so.
- 7.58 Replanting of trees can be secured through an appropriately worded condition to secure the landscaping strategy for the site and to include additional planting.
- 7.59 A detailed landscaping masterplan is currently being designed for the site and it has been agreed with officers that this will be secured by a condition or S106 agreement.
- 7.60 The proposals will therefore not result in the loss of a significant amount of trees and as such the leafy character of the site and thus the character and appearance of the conservation area will not be affected in accordance with UDP Policy N8c and draft Policy CS15 and draft Policy DP25.

## 8 Conclusions

- 8.1 The Coram Family have instructed Meadowcroft Griffin Architects to deliver an exemplary replacement building that will serve enable the long term further use of the campus by the charity.
- 8.2 The proposals will deliver an increase in and improved social and community facilities to the benefit of children, young adults and adults alike. The complimentary uses will further enhance the work of the charity to the benefit of the community.
- 8.3 The design process has been the subject of extensive consultation from the beginning to achieve a building that the local community and officers support.
- 8.4 The building has been designed to respect the heritage of Camden, and due to its high quality design and appearance, it is considered to enhance the character and appearance of the conservation area, the setting of the Grade II listed wall, the views from and the enjoyment of St George's Grade II\* listed Gardens to the benefit of the wider community.
- 8.5 The wider landscaping strategy that will come forward as a result of this development will secure environmental enhancements and improved secured by design measures around the site.
- 8.6 The proposals have been demonstrated to comply with adopted and emerging planning policy and guidance at national, regional and local levels by delivering:
- increased provision of facilities for the welfare and education of children;
  - a comprehensive masterplan of landscaping for the wider area;
  - a highly sustainable building;
  - a design led solution of the high quality which compliments the local area whilst respecting its local and wider context;
  - a building that will enhance the character and appearance of the Bloomsbury Conservation Area;
  - a building that does not detrimentally affect the amenity of surrounding residents.

- 8.7 The proposals are a significant improvement on the extant scheme as the building;
- has less of an impact on the amenity of surrounding residents;
  - will be of a higher quality and more aesthetically pleasing;
  - will enhance the character and appearance of the conservation area, the setting of the listed wall and the setting of the listed gardens due to its more sympathetic appearance;
  - will be more sustainable than the extant scheme; and
  - will have a longer life time in terms of its use due to its flexibility that can be adapted to meet the charity's future needs.
- 8.8 In accordance with Section 38 of the Planning and Compulsory Purchase Act, the proposals comply with the Development Plan including relevant London Plan and LB Camden adopted UDP policies, emerging LDF policies and the statutory duties in respect of the conservation area and listed building assets.
- 8.9 As highlighted within this statement the proposals also provide a comprehensive range of other planning, design and environmental benefits.

**Appendix 1 – Committee report and decision notices for  
2006/2951/P**

**Appendix 2 – Inspector’s Report for Appeal Reference  
APP/X5210/A/05/1187904**