

Address:	14-19 Tottenham Mews London W1T 4AA	
Application Number:	2012/4786/P	Officer: Jenna Litherland
Ward:	Bloomsbury	
Date Received:	17/09/2012	
Proposal: Erection of a 5 storey building, including basement level and roof level plant enclosure, to provide a Mental Health Resource Centre (MHRC) including recovery centre, consultation and activity rooms (Class D1) and 6 x 1 bed short-stay bedrooms (Class C2) (following demolition of existing two storey MHRC building (Class D1)).		
Drawing Numbers: (Prefix- 233/PD/) 001, 101, 102, 103, 104, 105, 105, 201A, 202, 203, 204, 205, 301B, 302B, 303A, 304A, 305B, 306A, 308B, 307B, 309A, 310B, 311A, 312B, 313A, 314B; Report for Planning by Studio Downie Architects rev B dated September 2012, Transport Statement by Steer Davies Gleave dated May 2012; Air Quality Assessment by Phlorum Ltd dated May 2012; Plant Noise Assessment by AAD dated 8 September 2010; Daylight and Sunlight Report by GVA dated 16 July 2012; BRE Report ref:TO39/11/BRE by GVA dated 13 December 2011; BIA by Penson Structures dated January 2012; Trial Hole Investigations by Penson Structures; Flood Risk Assessment by Penson Structures; BREEAM Healthcare Pre-assessment by Gleeds dated July 2012; BREEAM Compliant Report targeting Credit Reference Management 6 and 7 by Lodestar dated 14 September 2010; BREEAM Compliant Report targeting Credit Reference Management 6 Appendices by Lodestar dated 14 September 2010; BREEAM Healthcare (2008) Assessment by The Ecology Consultancy dated 26 October 2010; Energy Study Issues 4 by Chapman Bathurst dated August 2012.		
RECOMMENDATION SUMMARY: Grant conditional permission subject to S106 agreement		
Related Application?	17/09/2012	
Date of Application:		
Application Number:	2012/5306/C	
Proposal: Demolition of existing two storey Mental Health Resource Centre (MHRC) building (Class D1).		
Drawing Numbers: As above		
RECOMMENDATION SUMMARY: Gant conditional permission		
Applicant:	Agent:	
Camden & Islington NHS Foundation Trust Mr Robert Freake Executive Corridor, 2nd Floor - East Wing St Pancras Hospital 4 St Pancras Way London NW1 0PE	Studio Downie Architects LLP 29-31 Saffron Hill London EC1N 8SW	

ANALYSIS INFORMATION

Land Use Details:

	Use Class	Use Description	Floorspace
Existing	<i>D1 Non-Residential Institution</i>		<i>706 sqm</i>
Proposed	<i>D1 Non-Residential Institution</i> <i>C2 Residential Institution</i>		<i>1756 sqm</i> <i>338 sqm</i>

OFFICERS' REPORT

Reason for Referral to Committee: The development is a major development involving the construction of more than 1000 sqm of non-residential floorspace (i).

The development involves substantial demolition of a building in a conservation area (v).

The development involves the a planning obligation under Section 106 of the Town and Country Planning Act 1990 (vi)

1. SITE

- 1.1 Tottenham Mews is located to the rear of the western side of Charlotte Street and is located within Charlotte Street Conservation Area. The eastern side of the mews is occupied by a series of individual mews buildings of varied design which are predominantly 4 storeys in height. The north of the mews is closed off by No.13 Tottenham Mews. The mews is accessed from the south via Tottenham Street. The buildings at southern end of the mews increase in scale with an 8 storey building (Arthur Stanley House) on the south western side of the mews. Development Control Committee (DCC) also recently resolved to grant planning permission for a 4 storey building with a roof top pavilion at no. 4 Tottenham Mews (southern side of the mews). The mews is predominantly occupied by businesses with three residential buildings along the eastern side. The general character of the mews is brick faced buildings with panel infills and metal railings with several having tall, large timber windows at ground level.
- 1.2 The application site is occupied by an existing Community Mental Health Resource Centre (MHRC) which in accommodated in a temporary building dating from c.1974 which is located on the western side of Tottenham Mews. The building is dilapidated and is considered to detract from the overall character of the Mews. This is confirmed in the Charlotte Street Conservation Area Appraisal and Management Plan.

2. THE PROPOSAL

Original

- 2.1 Planning permission is sought for the erection of a 5 storey building (following demolition of the existing building), including basement level and roof level plant enclosure, to provide a new Community Mental Health Resource Centre (MHRC) to accommodate shared facilities including a recovery centre, consultation and activity rooms (Class D1) and 6 short-stay bedrooms (Class C2).
- 2.2 The development of Community Mental Health Resource Centres is vital to achieving Government targets on improving access to care, reducing inpatient admissions, reducing suicide and self-harm, and reducing inequalities in the experience of care amongst ethnic minority service users. The key driver for the proposal is the need to improve access to psychological therapies and improve the level of personal care provided by the Camden Islington NHS Foundation Trust and bring forward the S106 obligation of the UCLH Foundation Trust.
- 2.3 The services that will operate from the Tottenham Mews MHRC will serves a population of up to 44,000 Camden residents who are registered with primary care practices, plus a

significant number of people who are either registered with practices outside of Camden or are not registered. The latter group includes a high proportion of people in hard to reach sections of society such as ethnic minorities, homeless and individuals who are victims of alcohol or substance misuse.

- 2.4 The Government has consulted the service prior to the publication of a new strategy for mental health and it is anticipated that there will be an increase in demand for mental health services from people of working age. Contributory factors are thought to be the recession, higher unemployment and increases in personal debt. Camden and Islington NHS Foundation Trust have predicted that within the South Camden population demand for mental health services will grow significantly, which will have an impact on the requirements for community mental health services.
- 2.5 The proposed building would provide accommodation for the following services:
- 2.6 **Community Mental Health Team (CMHT)** - The Kings Cross and Regents Park CMHTs were previously located within the existing building on site. Following the closure of the existing building these services were moved to temporary accommodation on Kings Cross Road. It is proposed for these services to relocate back to the application site. This service would operate between the hours of 9am and 5pm. The service would be located on the lower ground and ground floor levels of the building. A Community Mental Health Team is a multidisciplinary team offering specialist assessment, treatment and care to adults with mental health problems in their own homes and the community.
- 2.7 **Recovery Centre** –The recovery centre will be relocated from St. Pancras Hospital to the 1st and 2nd floor of the proposed building. The recovery centre provides assessments, care co-ordination and management, and therapy for people with mental health difficulties. The recovery centre would be a day centre which only operates between the hours of 9am and 5pm.
- 2.8 **24-hour Crisis House** – Crisis House would be a new facility which provides additional services to the borough. It would be located on the 3rd floor of the building. The facility would provide a 6 bed unit that offers professional care and support in a safe environment. It has six bedrooms that all have their own bathrooms. The support given is one to one support and counselling, access to the Recovery Centre group timetable that includes Art Therapy, Music Therapy, Mindfulness, etc. The support given is for those who otherwise would be admitted to an inpatient unit. It is envisaged that patients would stay for a time period of a few days up to a few weeks. They would remain independent and would be permitted come and go as they please.
- 2.9 **Additional services** – The MHRC would also provide a 24-hour South Camden Crisis Response and Resolution Team who would offer short-term care and support for those experiencing psychiatric crisis; and a 24-hour Approved Mental Health Professional (AMHP) Duty Service which is for anyone who may require urgent assessment under the 1983 Mental Health Act. The applicant has also advised that it may be possible for the Centre to accommodate the Traumatic Stress Unit which currently operates at no. 73-75 Charlotte Street to allow for the redevelopment of no. 73-75 Charlotte Street in accordance with application ref: 2012/2045/P.
- 2.10 **S106 obligation of the UCLH Foundation Trust**
- 2.11 Whilst this planning application should be considered on its own merits it should be noted that there is a strong interrelationship with UCLH NHS Trust and its planning obligations

related to development of the main hospital and subsequently the Odeon site at Grafton Way/Tottenham Court Road.

- 2.12 Original proposals for redevelopment of the latter site envisaged inclusion of a mental health facility (664 sqm) for the south of the Borough. The facility has not been provided as proposals for the Odeon site have been reconsidered and UCLH is likely to bring forward this site as an alternative health care facility in the near future.
- 2.13 The Camden & Islington NHS Foundation Trust confirmed as far back as 2007 a preference for securing long-term provision of the mental health facility at its current location in Tottenham Mews. As a broader service based facility than that envisaged on the Odeon site. It was considered that a financial contribution (of c. £3m) towards the cost of this larger facility would be appropriate. This approach was endorsed in principle by the Development Control Committee in September 2007. It has taken a considerable period of time since then for these proposals to evolve.
- 2.14 The new facility on Tottenham Mews would provide the mental health resource originally to be created elsewhere. This is considered to be a satisfactory and logical alternative form of provision which would meet the planning purpose of the original obligation. Officers in Adult Social Care have said they welcome this initiative, they are keen to enhance the services available to mental health clients in the south of the Borough, and agree that this site is ideal. A variation to the s106 agreement will be needed to secure these funds, this will be reported to Committee in due course setting out the basis of a reasonable financial contribution based on equivalent pro rata construction costs.
- 2.15 The Council would also need to agree the mechanism for holding and paying the funds at the appropriate stages tied into likely timescales for implementation of the new facility.
- 2.16 The applicant has advised that the contribution from UCLH towards the development is currently under negotiation and funding from the S106 would assist in bring this development forward. However, should this funding not come forward, this would not necessarily result in the current scheme not being implemented.

Revisions

- 2.16 During the course of the application the proposed loading bay within the Mews has been omitted from the proposal following advise from the Transport Planner.

3. RELEVANT HISTORY

At the application site

- 3.1 **2011/6301/P and 2012/0295/C:** Erection of a 5 storey building, including basement level and 2 x roof level plant enclosures, to provide a new Community Mental Health Resource Centre (MHRC) to accommodate shared facilities, recovery centre, consultation and activity rooms (Class D1) and 6 short-stay bedrooms (Class C2) following demolition of the existing two storey MHRC building (Class D1). **Withdrawn following advice from officers that the proposal was unlikely to be acceptable on Transport, Sustainability and Design grounds.**
- 3.2 **17539:** Erection of a two storey prefabricated building to accommodate a Psychiatric Centre and Day Hospital. **Granted 07/02/1974**

At nos. 73 - 75 Charlotte Street, nos. 34-38 Tottenham Street and no. 4 Tottenham Mews

- 3.3 **2012/2045/P and 2012/2052/C:** Erection of a part 3/4/5 & 6 storey building plus basement level for a mixed use development comprising of 11 residential units (Class C3) and 253sqm of office (Class B1) floorspace at part basement and ground floor level, following demolition of existing buildings at 73-75 Charlotte Street & 34-38 Tottenham Street and 4 Tottenham Mews. – **DCC resolved to grant conditional planning permission subject to a S106 agreement on the 08/11/2012. The S106 agreement has not yet been signed.**

At no. 8 Tottenham Mews

- 3.4 **9000037:** Erection of rear extension at 1st floor and 3rd floor roof extension for B1 office purposes and 4th floor roof extension for studio flat and external alterations to front elevation. **Refused 17/07/1990 as the proposal would obstruct light to the adjoining properties to the detriment of amenity and as the 4th floor extension would be visually detrimental to the character and appearance of the Mews.**

4. **CONSULTATIONS**

Statutory Consultees

- 4.1 **Crossrail Safeguarding Team:** No objection
- 4.2 **English Heritage:** The application should be determined in accordance with national and local policy guidance, and on the basis of the Council's specialist conservation advice.
- 4.3 **Environment Agency:** No objection
- 4.4 **Metropolitan Police (Crime Prevention Advisor):** Concern raised about providing a alley way through the Mews.
- 4.5 **City of Westminster:** No objection

Conservation Area Advisory Committee

- 4.6 **Bloomsbury Conservation Area Committee:** The scheme does not seem to have changed since we commented in 06/06/2012, object to the height and overhang.
- 4.7 **Charlotte Street Conservation Area Committee:** No reply to date.

Local Groups

- 4.9 **Charlotte Street Resident's Association:** No reply to date.

Adjoining Occupiers

	Original
<i>Number of letters sent</i>	96
<i>Total number of responses received</i>	3
<i>Number of electronic responses</i>	0
<i>Number in support</i>	0
<i>Number of objections</i>	2

- 4.10 96 neighbours were notified by letter. A site notice was displayed from 27/09/2012 until 18/10/2012. A Press Notice was placed in the Ham and High on the 04/10/2012

4.11 2 letters of objection have been received from the occupiers of 8 and 13 a Tottenham Mews and a letter of comment was received from the occupiers of no. 13.

4.12 Comments are as follows:

- The proposed 5 storey building would have a detrimental impact on light to the neighbouring properties and will result in overshadowing;
- No. 8 Tottenham Mews is 2 storeys and receives light mainly from the windows in the front elevation. In the winter months no natural light would reach the Mews;
- It was understood that no building higher than 3 storeys would be granted in the Mews;
- Planning permission was refused in 1990 for the addition of a 4th floor at no. 8 Tottenham Mews on the ground of impact on the character and appearance of the mews and loss of light to neighbouring buildings;
- The building would harm the character of the mews and would appear dominant;
- Concerned about the increase in traffic to and from the site during construction and following completion;
- Concerned about the disruption the construction will cause to residents and businesses in the Mews;
- The existing building is full of asbestos. What are the plans for safe demolition and removal of the material?
- What plans are in place to minimise the potential disruption to businesses and how long will the development take; and
- Concerned about whether the patients housed in centre could impact on the safety of people working in the Mews.

See the main body of the report for the case officer's response.

5. POLICIES

5.1 National Planning Policy Framework 2012

5.2 LDF Core Strategy and Development Policies 2010

CS1 Distribution of growth

CS3 Other highly accessible areas

CS5 Managing the impact of growth and development

CS6 Providing quality homes

CS9 Achieving a successful Central London

CS10 Supporting community facilities and services

CS11 Promoting Sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental standards

CS14 Promoting high Quality Places and Conserving Our Heritage

CS15 Protecting and Improving our Parks and Open Spaces & encouraging Biodiversity

CS16 Improving Camden's health and well-being

CS17 Making Camden a safer place

CS18 Dealing with out waste and encouraging recycling

CS19 Delivering and monitoring the Core Strategy

DP1 Mixed use development

DP6 Lifetimes Homes and Wheelchair Housing

DP8 Accommodation for homeless people and vulnerable people

DP15 Community and Leisure Uses
 DP16 The Transport implications of development
 DP17 Walking, Cycling and public transport
 DP18 Parking standards and limiting the availability of car parking
 DP19 Managing the impact of parking
 DP20 Movement of Goods and Materials
 DP21 Development connecting to the highway
 DP22 Promoting Sustainable Design and Construction
 DP23 Water
 DP24 Securing High Quality Design
 DP25 Conserving Camden's Heritage
 DP26 Managing the impact of development on occupiers and neighbours
 DP27 Basement and lightwells
 DP28 Noise and Vibration
 DP29 Improving access
 DP32 Air quality and Camden's Clear Zone

5.3 **Supplementary Planning Policies**

Camden Planning Guidance 2011

- CPG1 – Design
- CPG2 – Housing
- CPG3- Sustainability
- CPG4 – Basement and lightwells
- CPG6 – Amenity
- CPG7 – Transport
- CPG8 – Planning obligations

Charlotte Street Conservation Area Appraisal and Management Plan, July 2008

6. **ASSESSMENT**

6.1 The principal considerations material to the determination of this application are summarised as follows:

- Land use
- Design
- Amenity
- Residential development standards (C2 accommodation)
- Basements Impact
- Transport
- Sustainability
- Other matter: Contaminated land; Employment and training; and CIL

6.2 **Land use**

6.2.1 The lawful use of the application site is as a Mental Health Recourse Centre within a temporary building which was constructed in 1974. The use of the centre ceased in April 2011. The current proposal is to re-provide a Community Mental Health Resource Centre which includes a mix of D1 and C2 uses classes. The centre will comprises of the following services which have been described in greater detail above:

- the Kings Cross and Regents Park Community Mental Health Teams at ground and lower ground floors (Use Class D1);

- the recovery centre at first and second floors (Use Class D1);
- Crisis House at third floor level (Use class C2)
- Additional services - 24-hour South Camden Crisis Response and Resolution Team and the 24-hour Approved Mental Health Professional (AMHP) Duty Service (Use class D1)

- 6.2.2 **Provision of additional health facilities** - Policy CS16 states that the Council will seek to improve health and well-being in Camden by (amongst other things) supporting provision of new or improved health facilities in line with NHS London's plans to consolidate and modernise its facilities. The Camden Plan also seeks to improve health and wellbeing for the local community. Policies CS16 and DP8 acknowledges that there is likely to be a 10% increase in the number of people with serious mental illness between 2010-2025. The Council seeks to provide care for people with serious mental illness in partnership with the Camden and Islington Foundation Trust.
- 6.2.3 Policy DP8 states that the Council will support development of accommodation for vulnerable people providing that the development is suitable for the intended occupiers in terms of the standard of facilities, the level of independence and the provision of support and care; will be accessible to public transport, workplaces, shops, services, community facilities and social networks; and contributes to creating a mixed and inclusive community. Policy DP8 acknowledges that additional intensive support places for people with mental illness would be developed at Kings Cross as part of the Kings Cross Central Development (15 mental health supporting housing have been provided within Building R4 which is now complete). However, it also states that some additional provision may be needed elsewhere. The Council will particularly support development of pathway accommodation that provides support tailored to an individual's needs and their progress towards independence.
- 6.2.4 The proposed uses within the building comprise certain facilities which will be relocated from other parts of the borough as well as new facilities. The new facilities have been designed specifically for these uses. Providing these facilities under one roof helps to integrate the different facilities and provides ease of access to support and care. It is considered that the proposed facility will improve health care provision in the borough. The proposal meets the requirements to consolidate and modernise the NHS's facilities to develop, fewer, larger health facilities, and help enable the NHS to meet the predicted increased demand for mental health facilities over the Core Strategy period.
- 6.2.5 The residential aspect of the proposal would provide additional temporary accommodation for people with serious mental illness which would go towards meeting additional demand in compliance with Policy DP8. The proposed accommodation is intended for temporary stays when a person requires additional support which cannot be provided by the day services however is not so severe that they would require hospitalisation, therefore the proposed accommodation would enable users to regain their independence in a safe environment. This also fulfils the requirements of DP8. The proposed accommodation would meet modern standards and is designed to meet the needs of the users. The site is located in a highly accessible location within Central London close to public transport, work places, shops, services and facilities.
- 6.2.6 The application site is located on a mews which contains a mix of uses including, office accommodation, residential and workshops. The proposed use is considered to be compatible with the surrounding uses within the Mews.

- 6.2.7 It is considered that the proposed D1 and C2 accommodation meet the requirements of policies CS6, CS16 and DP8 of the LDF and would improve health care and mental illness care within the borough. As such, the proposal is considered acceptable in land use terms.
- 6.2.8 **Mixed Use development** - Policy DP1 requires a mix of uses in developments in the Central London Area and expects 50% of the net increase of floorspace (above a threshold of 200sqm) to be new housing, the expectation is that this should be provided on site, particularly where 1000 sqm of additional floorspace is proposed. However, where the inclusion of residential cannot practically be achieved on site, the Council may accept off site provision on a donor site in the area, or exceptionally a payment in lieu.
- 6.2.9 The scheme would result in a net increase in newly constructed floorspace of 1,388sqm therefore in accordance with this policy 694sqm of floorspace would normally be sought as residential use on site.
- 6.2.10 Policy DP1 identifies a number of factors which the Council may take into consideration in deciding whether a mix of uses should be sought, one such factor is whether the development is publically funded and is required to accommodate a public facility, service or administration. It also states that where the proposal relates to a healthcare facility and a secondary use would preclude the operational requirements of that use it may not be appropriate to seek a mix of uses.
- 6.2.11 In this case, the proposed development is funded by the NHS and is for the creation of an expanded healthcare facility which will meet the needs of residents of the borough. As such, it is considered acceptable that housing as an alternative secondary use is not provided on site. Furthermore, it should be noted that the proposal would include the provision of 338 sqm of short stay residential accommodation in Crisis House for patients who are semi-independent but who still require a level of support or care.

6.3 Design

- 6.3.1 **Context of the development site** - Tottenham Mews is located within Charlotte Street Conservation Area. There are no listed buildings within the immediate setting, although the BT tower is visible in background views of the site. Listed buildings in the wider area include Middlesex Hospital Annex. The majority of the terrace houses in Goodge Place and No. 72 Charlotte St (on the east side), Nos. 6-12 Tottenham Mews, opposite the site, as well as Middlesex House to the rear are recognised as positive contributors to the character and appearance of the Conservation Area. The current prefabricated building located on the site is considered to detract from the conservation area.
- 6.3.2 The Tottenham Mews layout forms part of the original plan form of Fitzrovia. A hierarchy of primary streets and secondary mews is characteristic of the area with buildings on each reflecting a mostly consistent and recognisable London Georgian scale and language.
- 6.3.3 In Tottenham Mews the original scale and grain is substantially preserved on the east side. Here the aforementioned positive contributors are generally of four storeys. They have a legible mews character leaning towards a light industrial or warehouse style, in stock brick, and with a strong plot derived rhythm of vertical facades and horizontal openings.
- 6.3.4 On the west side the buildings beyond the mews are of a greater 20th Century scale. The proposal site is currently occupied by a two storey prefabricated building of poor townscape and architectural quality. Behind it sits Middlesex House, a workplace building of six

storeys. At the mouth of the mews on the west side sits Arthur Stanley house which is eight storeys high.

- 6.3.5 **Demolition of existing building** – As stated above, the existing 2 storey building located at the site detracts from the character and appearance of the Conservation Area. Its removal is therefore welcomed.
- 6.3.6 **Proposed building** – Bloomsbury CAAC have raised objection in relation to the height of the proposed building. The proposed facade reflects the parapet height of the end mews property, Number 13, to which it is contiguous. Above this is a set back attic storey which would not be readily visible within the mews. The mews character has been expressed in the design with the façade broken down into mews plot width bays, each a pair of windows wide separated by a shadow gap on the notional 'party wall' lines. The lower one and a half storeys have an open nature characteristic of the full width openings in mews properties. The two lower floors would be segregated by a section of timber panelling. Above this are two storeys of brick above with punched windows. The windows would be set in deep reveals with a central coloured fin which would add to the visual interest of the building. The recessed attic storey is clad in zinc. The fenestration pattern on the front elevation provides a hierarchy of window scale typical to the mews, ensuring that the proposed building respects the local character.
- 6.3.7 The proposal ties in with the wider opportunity of providing permeability through the Howland Street, Charlotte Street, Tottenham Street, Cleveland Street urban block. With any future proposal on Middlesex Annex Site the Council would seek a pedestrianised east-west route joining Foley Street with Chitty Street. This proposal provides a route which will connect Tottenham Mews to the future east-west route. This would allow access to the health care facility from the north. To achieve this the ground floor of the building is splayed back (about 4.5m high). Although the route is narrow as it passes no.13 (about 2m at its narrowest point, widening to 4m) the route has been designed with good viewing angles and is activated by glazing and a communal lobby as it passes by no 13. Here the plan form curves back to provide visibility. The splayed ground floor allows views of the route to be achieved from the southern end of the mews. The Crime Prevention Officer at the Metropolitan Police has raised concern in relation to the creation of this route. However, it is considered that the building has been designed to allow long views of the access route and the large glazed windows at ground floor level and window at upper floor level would ensure the route is overlooked.
- 6.3.8 Bloomsbury CAAC has also raised concern in relation to the overhang created above ground floor level where the upper floors cantilever over the lower floors. It is considered necessary for the façade to be set back at ground floor level to maintain an area of public footway which is both sufficiently wide to be safe and allow long views, the curve of the building also aids this. In design terms the cantilever is considered to create visual interest and integrates the building with the public realm area.
- 6.3.9 Although the proposed building is taller than the buildings on the east side of the mews, the west side does already have a context of taller buildings into which the proposal fits comfortably. Due to the typically narrow nature of the mews the set back attic storey will not have significant presence from street level in front of the building. It will be present in views from the south over the boiler facilities of Arthur Stanley House, however it would be expected that this building be redeveloped at some time in the future, with a foreground building placed on the boiler site.

- 6.3.10 The proposal includes provision of a roof level garden at the northern end of the building. The balcony would be bounded by an etched glazed screen with a height of 3 metres. The applicant has confirmed that it is necessary to have a screen of this height given the nature of the use, for use by patients potentially at risk of suicide. The roof garden is located in a prominent position as it is set forward of the set back attic storey, however careful design and use of lightweight material would ensure that the proposal would not appear prominent or detract from the appearance of the mews. The detailed design of this aspect of the proposal would be secured by condition.
- 6.3.11 The materials of the proposed building as described above would include two colours of bricks with a slight varnished quality, a wood soffit, metal framed windows, wood panels at ground floor level, bronze and silver coloured panels for the attic level, and light silver coloured metal railings. Full details of materials including samples would be secured by condition.
- 6.3.12 It is considered that the proposed building would respect the character of the Mews and would preserve and enhance the character and appearance of the wider conservation area.

6.4. **Amenity**

- 6.4.1 Core Strategy policy CS5 and Development Policy DP26 seek to ensure that the existing sensitive residential amenities of neighbouring properties are protected, particularly with regard to privacy, outlook, daylight and sunlight.
- 6.4.2 The proposed building would have a smaller footprint than the existing building at ground and lower ground floor level and at upper floor would have a footprint similar to that of the existing building as the upper floors extend over the covered passage-way at ground floor level. However, the height of the building would be substantially greater than the existing building. The existing building has a height of 7.5 metres whereas the proposed building would have a height of 16.3 metres (excluding the roof top plant enclosure). Considering this extra height, the applicant has modelled the impact of the development on neighbouring flats across Tottenham Mews in order to demonstrate that they would not be adversely impacted upon such that would justify refusal of the scheme.
- 6.4.3 **Daylight and Sunlight** – The application is accompanied by two independent Daylight and Sunlight Reports by GVA which were undertaken to assess the impact on no. 10 Tottenham Mews (currently in residential use) and nos. 6 and 11-12 Tottenham Mews which currently have planning permission to convert to residential (references for the application are: 2010/4069/P – no. 6 and 2011/5279/P – no. 11-12).
- 6.4.4 No. 10 Tottenham Mews - In relation to no. 10 Tottenham Mews the report demonstrates that the proposal would result in a loss of daylight and sunlight to the habitable room windows of this property. BRE guidelines state that a Vertical Sky Component greater than 27% indicates that an adequate level of daylight is reaching the windows. Where this value is not achieved a reduction of up to 20% of the former would not be noticeable. The proposed development would result in the vertical sky component to the habitable windows at first and second floor level being reduced to a (VSC) of less than 27% and the reduction would be more than 20% of the former VSC. The Average Daylight Factor (ADF) which assesses the internal illumination of the room has also been calculated for all the windows at no. 10. This establishes that that all windows would receive an ADF of 2.32 and above which complies with the BRE guidelines. The reduction in VSC raises concern as it would not meet the guidelines set out in the BRE guidelines, however these guidelines also

advise that a more flexible approach needs to be taken to the target values particularly in city centres (para 1.6, BRE Guidelines 2011). Considering this, the constraints of the mews and that all windows would have adequate ADF, on balance, although there would be a reduction in daylight levels this would not be to such a significant extent as to warrant refusal of the application.

- 6.4.5 No. 6 Tottenham Mews – The assessment result for no. 6 Tottenham Mews shows only small breaches in VSC daylight reduction tests to ground floor level living room windows (reductions of 25.49% and 29.20% where a reduction of 20% would be considered adequate). The No Skyline and ADF test demonstrate that the occupants will continue to enjoy high levels of daylight. Good sunlight levels would be achieved at all levels.
- 6.4.6 No. 11-12 Tottenham Mews – In relation to 11-12 Tottenham Mews the report demonstrates that there would be a reduction in VSC that would not comply with the BRE guidelines. The rooms at lower ground and ground floor level would have access to daylight from the rear light well. The windows on the Mews elevation at ground floor level do not serve habitable rooms, therefore there is no daylight requirement for these rooms. The report demonstrates a reduction in VSC of around 45% at first floor level, 35% second floor level, and 21% at third floor level. However, the ADF demonstrates a high level of compliance to the majority of the living rooms and bedrooms with all bedrooms exceeding the suggested 1%. 3 of the open plan kitchen/living area fall below the suggested 2% (for kitchens) at 1.42%, 1.66% and 1.88%, however if the balcony was removed, as suggest in the BRE guidelines, the room which is shown as receiving 1.42% would receive a minimum of 1.5% meeting the standard for a living rooms. Good sunlight levels are achieved at first, second and third floor level. At 11-12 Tottenham Mews there would be a noticeable reduction in daylight when reviewing the VSC, however the ADF result show that the proposed condition maintains reasonable levels of daylight in most instances.
- 6.4.7 The daylight study shows that there would be a noticeable reduction to daylight levels at both No. 6 and 11-12. However, at present these units are not currently in residential use and therefore they do not have occupiers which have enjoyed a certain level of daylight. In view of this it is considered that as long as the units would maintain adequate ADF the units would still provide a good level of amenity for new residential accommodation. The daylight assessment shows that the residential units at Nos. 6 and 11-12 would maintain adequate ADF values, therefore it is considered that it would not be reasonable to refuse the proposal on loss of daylight to neighbouring properties.
- 6.4.8 Objections have been made to the proposal on the grounds that it would result in loss of daylight and overshadowing to the commercial units at no. 8 and 13. Commercial units are not protected in terms of access of daylight in the same way that residential properties are therefore this does not form part of the consideration of the proposal.
- 6.4.9 **Privacy and Overlooking** – The closest residential windows are located approximately 10 metres from the application site on the opposite side of the mews at No. 10. Nos. 11-12 have planning permission to convert to residential so shall also be taken into consideration. It is generally expected that 18 metres is sufficient distance between windows to prevent overlooking, however this is not always possible to achieve in urban environments. The mews already has building is residential use on either side of the highway with windows facing each other and this is accepted as providing an appropriate level of privacy. In view of this the current proposal is considered to be acceptable.
- 6.4.10 **Noise and vibration** – The proposal includes provision of plant. This would be located at roof level to the rear of the building within a plant enclosure. The application is

accompanied by an acoustic report which details the plant that will be installed. The report provides the background noise levels and sets the noise limits the plant must comply with to meet Camden's Noise standards. The report demonstrates that the proposed plant will comply with the noise standards. The report has been assessed by the Council's Environmental Health Team who consider that the plant would operate within the required noise standards. No details have been provided in relation to vibration and this will be required by condition. A condition will also be imposed to ensure that the plant continues to operation with the Council's noise standards.

6.5 Residential Development Standards

- 6.5.1 The proposed temporary residential accommodation would comprise 6 bedrooms with en-suite facilities and a communal kitchen/living room, a separate lounge, utility room and roof terrace. The proposed bedrooms meet the size standards for single bedrooms and are of adequate layout. Two of the bedrooms have en-suite facilities that are fully accessible to all. All rooms would have good levels of daylight, outlook and ventilation. The proposed accommodation can be accessed from the stair cores or lifts. It is considered that the overnight rooms would provide good quality accommodation.
- 6.5.2 Owing to the nature of the use the roof terraces would only be accessible to patients that are accompanied by a member of staff. The inclusion of an outdoor amenity space is welcomed.

6.6 Basement Impacts

- 6.6.1 **Structural stability and hydrology** - Policy DP27 states that developers will be required to demonstrate with methodologies appropriate to the site that schemes maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and run-off or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area.
- 6.6.2 The proposal includes a basement with a length of 41 metres, a maximum width of 12 metres and a maximum depth of 2.5 metres. A Basement Impact Assessment has been provided in accordance with the provisions of Policy DP27 and Camden Planning Guidance (CPG No.4). The BIA has been prepared by suitability qualified engineers.
- 6.6.3 Desk based investigations and ground investigations confirm that the ground comprises of a layer of made ground underlain by River Terrace Deposits to a depth of 6.7 metres, then London Clay to a depth of 10.5 metres. The report goes through the screening exercise recommended in CPG4 in respect of groundwater flow, land stability and surface flooding. This established that it was not necessary to take the BIA forward to the Scoping stage in relation to surface water flow and flooding. The site is not identified in CPG4- Basements and lightwells as a street at risk of surface water flooding. In relation to Groundwater flow it was necessary to take the BIA forward to the scoping stage as it was unknown whether the site was above an aquifer, if the basement would extend beneath the water table surface or whether the site was within 100m of a watercourse. In relation to slope stability it established that it was necessary to take the BIA forward to the scoping stage as it is unknown whether the site is within 110m of a watercourse, whether the site is within an aquifer and as the site is within 5m of a highway and would significantly increase the differential depth of the foundations of the property in relation to the neighbouring properties.
- 6.6.4 Groundwater flow – The site is underlain by Lynch Hill Gravel (part of the River Terrace Deposits) which is classified as a minor aquifer. Further investigations have found that the

site is not within 100m of a water feature. The nearest water feature being the boating lake at Regent's Park which is approximately 1km northwest of the site. The proposed basement would have a depth of 2.5 metres below ground level from Tottenham Mews and 0.5 metres from ground level at the rear of the site. Site investigations have concluded that the basement would not sit below the water table. No water was found in the trial holes undertaken at the site. As such, it is considered that the proposed basement would not impact on ground water flow.

6.6.5 Land stability – In order to ensure the proposal would not impact on the neighbouring properties continuous flight auger piles will be used. Piles will be kept 1 metre away from the boundaries and where required cantilever foundations will be used. It is envisaged that the flank wall of no. 13 would require underpinning. On the southern boundary no retaining wall would be required owing to the presence of an existing retaining wall. On the eastern boundary a retaining wall would be required as well as temporary supports during construction. On the western boundary no retaining is required as the level of the ground is similar to the basement level. On the northern boundary a retaining wall would be required as well as a temporary support owing to the differential foundation depths. Providing the measures set out in the BIA are followed, it is considered that the proposed basement would maintain the ground stability of the site and would not impact on other nearby neighbouring structures.

6.6.6 Summary - Based on the information provided and providing the recommendations of BIA are complied with the proposal will maintain the land stability of the site and the structural stability neighbouring properties; avoid adversely affecting drainage and run-off or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area. Any permission would be subject to a condition ensuring the works are overseen and monitored by a suitability qualified engineer.

6.7 Transport

6.7.1 Tottenham Mews is a cul-de-sac accessed from Tottenham Street in the Clear Zone Region. There is limited vehicular access to the site and it has a Public Transport Accessibility Level (PTAL) of 6b (excellent).

6.7.2 **Cycle Parking** - The proposed development comprises 6 Class C2 residential units (338sqm) and 1,756 sqm of D1 space. As the residential rooms are for short stay patients the floor area has been included in the overall floor area of 2,094sqm rather than providing a separate provision. The cycle parking requirements for the use is one space per 250sqm (above the criteria 500sqm).

6.7.3 A total of 9 cycle parking spaces for staff and 9 cycle spaces for visitors would be required for the development in connection with the proposed use. The applicant has stated they have allowed for 16 cycle spaces on site in the basement area. To support cycling, the applicant has provided lockers and showers in connection with the cycle storage within the basement area. Lift access has been provided to the basement area and is generally acceptable in connection with staff cycle storage. It would be preferable to have the cycle parking at ground floor level, however, it is considered that as the cycle parking can be accessed by lift it would still be easily accessible. As the cycle storage is being provided within the building making it less accessible to visitors and as fewer spaces are proposed than required by policy it is considered that as part of the public realm contribution and Tottenham Mews improvements a level of visitor cycle storage, could be included on-street as part of the highway works.

- 6.7.4 **Car-free and Car-capped Development** - The London Plan 2011 and Camden's LDF Development Policies (policy DP18) identify that car-free and car-capped should not only be sought for housing but also for developments in general and should be secured in areas of high public transport accessibility. Therefore, this development should be made car-free through a Section 106 planning obligation.
- 6.7.5 **Servicing Management** - DP20 and DP21 seek to protect the safety and operation of the highway network. For some developments the way a site is serviced can be a concern and a level of control over how the development is to be serviced through a Servicing Management Plan can be (SMP) secured via S106.
- 6.7.6 The Council's Transport Officer has advised that a separate service yard within the footprint of the building should be provided given the amount of service vehicle deliveries, and the constrained nature of Tottenham Mews and the narrow highway. The applicant has advised that this would not be possible as it would significantly reduce the amount of useable floorspace within the building. To overcome this issue, it is considered appropriate to secure provision of a 'shared' surface within the Mews. This would allow for sufficient space for servicing vehicles to turn around in the Mews. The original submission included provision of an on street service bay, however this has since been removed from the proposal as it is considered that the existing single yellow line arrangements are considered sufficient to manage servicing needs.
- 6.7.7 Although servicing has been covered in the submitted Transport Statement, this does highlight the increased level of movements to the site therefore it is considered that a Servicing Management Plan should be secured via the S106 to ensure servicing does not harm safety and operation of the highway.
- 6.7.8 **Construction Management** - DP20 and DP21 seek to protect the safety and operation of the highway network. For some development this may require control over how the development is implemented (including demolition and construction) through a Construction Management Plan (CMP) secured via S106. Although a section on construction has been included in the Transport Statement this does not provide any detailed information and does not address how the cumulative impacts relating to construction movements in the area will be mitigated. The constrained nature of the site and other developments in the area a CMP is considered necessary and would be secured by a S106 agreement.
- 6.7.9 The proposal includes the complete demolition of the building and construction of a completely new building. This will result in a large number of construction vehicle movements to and from the site, which would have a significant impact on the local transport network. This is of concern as the site is located within the Clear Zone Region which is a highly constrained area in regard to transport. Further, as stated previously Tottenham Mews is a highly constrained mews with a width of 4 metres at it narrowest point. The configuration of Tottenham Mews is such that large construction vehicles would not be able to access the site for either the demolition and construction phases without significant disruption to the highway network and potentially damaging some of the properties along Tottenham Mews.
- 6.7.10 Details submitted in relation to the demolition and construction phase are in a draft format and provide limited information. The information requires the removal of the footway along Tottenham Mews to enable a large vehicle to access. It also makes reference to a crane being required on site. The Transport Planner has reviewed the CMP and considers that whilst it does not provide the level of details required, it does demonstrate that it will be

possible to undertake construction without adversely impacting on public safety or resulting in detrimental impact to other properties along the mews. A full CMP would be required by S106.

- 6.7.11 **Highways Works Immediately Surrounding the Site** - In order to tie the development into the surrounding urban environment, and to mitigate the impact of increased trips, a financial contribution should be required to improve the public realm along Tottenham Mews, these works include creating a shared space adjacent to the front of the building in granite setts (potentially including new drainage), an entry feature part way down the Mews to slow vehicle traffic (such as a speed bump or a change in paving material) and implement uniform street furniture (such as benches) to prevent on-street parking. The removal of the footway and the creation of a shared surface would also ensure that sufficient space is provided for service vehicles to turn around and exit the mews in a forward gear. Some of the existing properties on the eastern side of the mews have access directly onto the road already. A scheme can be delivered that would reduce the costs relating to drainage and enable a new 'shared' space designed to enhance the new MHRC. This could be secured through a S106 legal agreement.
- 6.7.12 An added benefit of the highways works is that damage caused to the highway during construction can be repaired. This work would be secured through a S106 legal agreement. The Council will undertake all works within the highway reservation, at the cost to the developer. An estimate for the cost of highway works has been calculated at £85,000.
- 6.7.13 It is also advised that to de-clutter the Mews area the lighting columns along the Mews are requested to be mounted on the new building so the street columns can be removed, this should be progressed through a Way Leave agreement which would be undertaken separately to the planning process.
- 6.7.14 **Public realm improvements** - As the proposals would intensify the use of the building it is considered that a Walking, Cycling and Environmental financial contribution of £60,000 would be required towards Public Realm and Environmental improvements in the vicinity of the site (e.g. Legible London, Tottenham Court Road and other highways improvement schemes). This would be secured through a S106 Agreement.
- 6.7.15 **Summary** – It is considered that the proposal is acceptable in transport terms providing the following are secured by a S106 legal agreement: that the development is car-free, a SMP, a CMP, level plans, and financial contributions toward highway and public realm improvements.

6.8 Sustainability

- 6.8.1 Policy DP22 requires all non-domestic developments of 500sqm of floorspace or above to achieve 'very good' in a BREEAM Assessment. The application is accompanied by a BREEAM Healthcare Pre-Assessment which indicates that the proposal would achieve 'excellent'. This is welcomed. In accordance with CPG3 60% of the un-weighted credits should be achieved in the categories of Energy and Water and 40% of un-weighted credits should be achieved in Materials. The proposal exceeds each of these requirements achieving 61.5% in the Energy category, 75% in the Water category and 73% in the Materials category. This is welcomed.
- 6.8.2 Policy DP22 encourages the incorporation of Brown and Green roofs and Rainwater and Grey Water harvesting. The proposal incorporates area of brown roof on the main roof of

the building. This would increase the biodiversity value of the site. The proposal also includes a water butt for the reuse of rainwater for watering plants in the roof garden. This is considered acceptable.

- 6.8.3 An Energy Study has been submitted which addressed the Energy Hierarchy – be lean, be clean, be green. The London Plan and CPG3- Sustainability states that carbon dioxide emissions should be minimised and that for new development to make a 25% improvement on the current 2010 Building Regulations.
- 6.8.4 **Be lean** - Calculations show a reduction in CO₂ emissions from the baseline figure of 8.15% from be lean measures. This includes thermal insulation, minimising thermal bridging, designing for an air tightness of 3m³ /hr/m², optimising U-values for windows, roofs and walls, making maximum use of daylight and minimising the need for mechanical ventilation. Some rooms within the centre are required to have non-opening windows for safety reasons (i.e. patient confidentiality) therefore mechanical ventilation is required for some area.
- 6.8.5 **Be clean** – The be clean measures (along with be lean measures) result in a improvement of 21.2% from the baseline figure. Be clean measures include variable refrigerant flow air cooling systems, high efficiency fans which allow for heat recovery, controls and detectors on lighting, and high efficiency condensing gas boilers.
- 6.8.6 CHP/ decentralised energy network – In order to ensure that energy from an efficient source is used CPG3 – Sustainability requires developers to where possible: investigate the potential for connecting into an existing or planned decentralised energy scheme and using heat; install a Combined (Cooling) Heat and Power Plant (CHP or CCHP), including exporting heat, where appropriate; provide a contribution for the expansion of decentralised energy networks; strategic sites are to allow sufficient accessible space for plant equipment to support a decentralised energy network and design the development to enable its connection to a decentralised energy network in the future.
- 6.8.7 The inclusion of a CHP has been considered however, as very limited heat load exists in the building equating to less that 2000 run hours a year the provision of a CHP is not viable for a scheme of this size. The nearest proposed district heating network is the Euston Road District Heating network. This is approximately 450m from the application site. For the size of this building an extension of the network for the heat load of this building is not feasible. The nearest existing district heating system is at Westminster, approximately 1,800m from the site. At present the provision of heat from a district heating system is not currently deemed feasible for a building of this size, however it is proposed to provide a connection point for any future opportunities that may arise. This is proposed to be sited in the ground floor plant room and shall allow space provision for a heat exchanger and metering / controls. This would be secured through at S106 agreement.
- 6.8.8 **Be green** – The be green measures (coupled with both be lean and be clean measures) result in an overall improvement of 30.43%. Be green measures include provision of solar thermal heating, photovoltaic panels, and space heating via air source heat pumps.
- 6.8.9 The proposal would exceed the target of the London Plan and CPG3 – Sustainability by creating an overall reduction in carbon dioxide levels of 30.43 %. The building is considered to perform well in terms of sustainability and this is welcomed.
- 6.8.10 **Air quality** – The application is accompanied by an air quality assessment which has been considered acceptable by the Council's Air Quality Officer.

6.9 Other matters

- 6.9.1 **Contamination** – The applicant has indicated in the submitted documents that there is asbestos within the existing building. This would be removed and disposed of by a contractor in accordance with the HSE guidelines.
- 6.9.2 There is also potential for the contamination to existing in the land of the development site. No details have been submitted in relation to ground contamination, however the proposal has been reviewed by the Contamination Land Officer who has advised it would be appropriate to request details on land contamination by condition.
- 6.9.3 **Employment and training** – Policy CS8 states that the Council will secure a strong economy by supporting employment and training schemes for Camden residents. CGP8 – Planning Obligations states that developments over £3 million will be required to recruit one construction apprentice through Camden Council, or its nominated partner, for every £3million of build where the length of the project allows (generally, where the contract is 52 weeks or more) A support fee of £1,500 per apprentice placement will also be payable in order to cover: pre-employment; recruitment process; training provider brokerage; and post-employment mentoring and support.
- 6.9.4 Developers will also be required through a legal agreement to sign up to the Camden Local Procurement Code where the value of the scheme exceeds £1,000,000. This will involve the developer/point of contact meeting with Camden Council and their nominated partner prior to the implementation of their scheme to discuss potential for local businesses becoming part of the supply chain and to draw up a Local Procurement plan in line with the Local Procurement Code.
- 6.9.5 The application has confirmed that the latest cost plan for the development is c.£6.6 million. As such, the applicant is required to sign up to Camden Local Procurement Code and to recruit 2 construction apprentices and provide a support fee of £3,000. This would be secured through a S106 legal agreement.
- 6.9.6 **CIL** – The proposed development is exempt from CIL as the applicant is the NHS.

7. CONCLUSION

- 7.1 The proposed development would work towards fulfilling the targets of the NHS and Camden to improve mental illness care within the borough within an area which is highly accessible to Camden residents. The building is designed to be highly sustainable and would respect the character of the Mews, would preserve the character and appearance of the wider conservation area and would not impact on neighbour amenity. Crisis House, would provide a good level of amenity for the short term occupiers. The proposal would not result in undue pressure on the surrounding road network and would promote the use of sustainable methods of transport and improve the public realm in the vicinity of the site.
- 7.2 Planning Permission and Conservation Area Consent are recommended subject to a S106 Legal Agreement covering the following Heads of Terms:-
- Car free
 - Sustainability Plan (BRREAM design and post construction review)

- Energy Efficiency Plan (to secure the measures sent out the Energy Study including future proofing for a connection to a CHP)
- Construction Management Plan
- Servicing Management Plan
- A Workplace Travel Plan (along with a £5,561 monitoring charge)
- Highway/public realm contribution (£85, 000)
- Level Plans
- Environmental Improvement contribution (£60,000)
- Employment and training (signing up to Camden Local Procurement Code, employment of 2 apprentices and £3,000 support fee)

7.3 In the event that the S106 Legal Agreement referred to above has not been completed within 13 weeks of the date of the registration of the application, the Development Control Service Manager be given authority to refuse planning permission on the following grounds:

- The proposed development, in the absence of a legal agreement to secure residential units as 'car-free' housing, would be likely to contribute unacceptably to parking congestion in the surrounding area and promote the use of non-sustainable modes of transport, contrary to policy CS11 of the London Borough of Camden Core Strategy (2010) and DP18 of the London Borough of Camden LDF Development Policies (2010).
- The proposed development, in the absence of a legal agreement securing a design and post-construction sustainability review achieving Excellent in a BRREAM (Healthcare) Assessment and the submission and compliance with an Energy Efficiency Plan securing the measure set out in the Energy Study, would fail to be sustainable in its use of resources, contrary to policy CS13 (Tackling climate change through promoting higher environmental standards) of the London Borough of Camden Local Development Framework Core Strategy and policies DP22 (Promoting sustainable design and construction) and DP23 (Water) of the London Borough of Camden Local Development Framework Development Policies.
- The proposed development, in the absence of a legal agreement to secure the submission and implementation of a Construction Management Plan, would be likely to give rise to conflicts with other road users, and be detrimental to the amenities of the area generally, contrary to policies CS5 (Managing the impact of growth and development) and CS11 (Promoting sustainable and efficient travel) of the London Borough of Camden Local Development Framework Core Strategy and policies DP20 (Movement of goods and materials), DP21 (Development connecting to the highway network) and DP26 (Managing the impact of development on occupiers and neighbours) of the London Borough of Camden Local Development Framework Development Policies.
- The proposed development, in the absence of a legal agreement to secure a Service Management Plan, would be likely to contribute unacceptably to traffic disruption and dangerous situations for pedestrians and other road users, and be detrimental to the amenities of the area generally, contrary to policies CS16 of the London Borough of Camden Core Strategy (2010) and DP20, DP26, DP28 and DP32 of the London Borough of Camden LDF Development Policies (2010).
- The proposed development, in the absence of a legal agreement to secure a travel plan, would be likely to contribute unacceptably to use of non-sustainable modes of

transport contrary to policy CS11 of the London Borough of Camden Core Strategy (2010), DP16 and DP17 of the London Borough of Camden LDF Development Policies (2010).

- The proposed development, in the absence of a legal agreement to secure contributions towards public highway works, level plans, public realm and environmental improvements would be likely to harm the Borough's transport infrastructure, contrary to policies CS11 and CS19 of the London Borough of Camden Core Strategy (2010), DP16, DP17 and DP21 of the London Borough of Camden LDF Development Policies (2010).
- The proposed development, in the absence of a legal agreement to secure the employment of an apprentice from the Kings Cross Construction Skills Centre or local labour and procurement would fail to contribute towards the creation of local employment and business opportunities which reinforce neighbourhood renewal objectives and improve sustainability of the local economy, contrary to policies CS8 and CS19 of the London Borough of Camden Core Strategy (2010).

8. LEGAL COMMENTS

- 8.1 Members are referred to the note from the Legal Division at the start of the Agenda.