National Grid

Proposed Headhouse

St Pancras Substation

57 Pratt Street NW1

Planning Statement

August 2009

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by EDAW|AECOM on behalf of National Grid for full planning permission for a permanent headhouse building within the existing EDF Energy St Pancras Substation site at the junction of Pratt Street and Royal College Street, within the London Borough of Camden.
- 1.2 The headhouse relates to the wider Electricity Tunnelling Project in North London stretching from Hackney to Willesden. The tunnel will house 400,000 Volt (400 kV) electricity supply cables linking National Grid's existing substations at Hackney and St John's Wood, and will also make provision for possible future connections. The project comprises of a 12.5 km long cable tunnel with associated shafts ventilation of, and access to the tunnel will be provided by a number of headhouses located above shafts linked to the main tunnel.
- 1.3 All aspects of the cable tunnel project are permitted development by virtue of the Town and Country Planning (General Permitted Development) Order 1995, SI 1995/418 (as amended) with the exception of the intermediate headhouses. Therefore planning permission is only required and is only being sought for the intermediate headhouses.
- 1.4 The purpose of this statement is to explain the requirement for and function of the proposed headhouse at St. Pancras, and set it in the context of the locality and relevant planning policy, thereby allowing the London Borough of Camden to assess the acceptability of the planning application. It is therefore an integral component of the planning submission.

The Statement will cover the following sections:

- Description of Site and Surroundings
- Planning History
- The Proposal
- Planning Policy Context
- Design and Access Statement

- Statement of Community/ Stakeholder Consultation
- Planning Case and Policy Compliance
- Conclusion

2.0 DESCRIPTION OF SITE AND SURROUNDING

- 2.1 The existing EDF Energy (EDFE) site occupies a rectangular area of land situated between and bounded by Georgina Street to the North, Royal College Street to the East and Pratt Street to the South with a grid reference of E529307, N183901. The site is occupied by a combination of electricity transmission plant, buildings and associated circulation space and service yard. It is proposed to locate the National Grid headhouse within this compound immediately adjacent to the existing 4-storey former training centre building that directly fronts Pratt Street
- 2.2 Royal College Street is a wide thoroughfare with segregated cycle path. Land uses are predominantly commercial including warehousing, depots and small industrial units. Immediately opposite the proposed headhouse site on the east side of Royal College Street, and extending between its junctions with Pratt Street and Georgina Street, the road is flanked by a solid red brick wall which forms the west elevation of the 'St Pancras Commercial Centre' this is visually dominant within this part of Royal College Street. The frontage of the EDFE substation site to this road is characterised by boundary walling, a range of electricity plant, the rear of the 4-strorey former training centre, and two large advertising hoardings. Overall the existing visual quality is considered ordinary.
- 2.3 At the south east corner of the Pratt Street & Royal College Street junction stands 'The Golden Lion' public house. This 4-storey Victorian Red Brick property punctuates the streetscape at this point and looks over the vacant corner site where it is proposed to accommodate the National Grid headhouse. The current absence of development here is considered to create an imbalance in the streetscape at this junction.
- 2.4 The western side of Royal College Street and the southern side of Pratt Street are residential, characterised by three-storey Georgian terraces of stone and London stock brick. However, views of the application site are largely limited to numbers 102, 104 & 106 Pratt Street, which are located immediately opposite the proposed

site at a distance of approximately 14m - these are the closest residential properties.

- 2.5 The northern side of Pratt Street comprises a different mix of building types that include the Lady's RC Primary School, the All Saints Greek Orthodox Church and the four-storey brick built training centre which has an art-deco aesthetic.
- 2.6 The application site is not located within any designated landscape areas, although the Regents Canal Conservation Area is located at a distance of approximately 100 m to the north in the vicinity of Lime Street and to the east adjacent to the Regents Canal. However, because of existing buildings the proposed site is generally not visible from within the conservation area. The closest listed building is the Grade I 'All Saints Greek Orthodox Church' located some 150m south west of the application site on Camden Street. However, because of the location of the proposed headhouse within the existing substation, neither the setting nor appearance of the church will be affected by this proposal.
- 2.7 Overall the visibility of the application site is very limited and is largely restricted to those buildings and streetscape areas in the immediate vicinity.



Figure 1 View of application site looking south west along Pratt Street



Figure 2 View into application site from Pratt Street



Figure 3 View of application site looking south along Royal College Street

3.0 PLANNING HISTORY

3.1 The last planning application registered for this site with LB Camden related to the continued use for training purposes of a building fronting Georgina Street in 1973.

4.0 THE PROPOSAL – FUNCTION AND LOCATION

- 4.1 This proposal consists of the construction of a single headhouse building, the purpose of which is:
 - a. to provide secure operational access and egress to a cable tunnel;
 - b. to provide emergency access and egress from the cable tunnel;
 - c. to protect the plant and machinery associated with the operation of the cable tunnel;
 - d. to accommodate variable speed extraction fans which are integral to the forced air ventilation system used to cool the cables and maintain the temperature of the tunnel at the required level; and
 - e. through louvered panels fixed to the exterior of the headhouse, and by operating the fans, allow air to be drawn into the headhouse and subsequently the tunnel.
- 4.2 The proposed headhouse building sits directly over a shaft that leads to a short spur tunnel (approximately 280m long) connecting to the main 12.5 km cable tunnel to be constructed between Hackney and St Johns Wood substations.
- 4.3 The headhouse has a total height of 7.82m, a width of 18.38m and a depth of 13.28m. This represents the minimum size possible for the building to function, whilst providing a design, which as far as possible, follows the existing scale, form and appearance of the existing art deco styled training centre with which it will adjoin. Further design details are provided in Section 7.0.

Alternative Locations Considered

- 4.4 The location of the headhouse is directly related to the alignment of the tunnel, with each headhouse sited directly above this wherever possible and spaced no more than 5km apart. This allows the main tunnel to be evacuated within 30 minutes, which is the minimum requirement of National Grid. If this cannot be achieved a spur tunnel can be used (as in this case), but its distance must be kept to an absolute minimum commensurate with the availability of sites. Increasing the distance from the main tunnel can adversely impact upon the effectiveness of the forced air ventilation system and thus the efficient operation of the cable tunnel.
- 4.5 The route of the main cable tunnel has been fixed and represents the most viable option available between the Hackney and St John's Wood substations taking into account the following:
 - Minimises social, economic and environmental impacts;
 - Maximises the amount of tunnel length located beneath the highway, thereby limiting the need to tunnel beneath private property, allowing National Grid to develop its infrastructure in line with its statutory provisions; and
 - Ensures that no tunnel bend has a radius of less than 250m which is required to allow construction by a tunnel boring machine.
- 4.6 Importantly, the A503 (Seven Sisters Road) is a part of London's Strategic Road Network and as illustrated in the diagram below is ideally aligned between the City of Westminster and Hackney to provide a largely straight highway route under which much of the overall tunnel length can be constructed.
- 4.7 Consequently the tunnel passes through the London Borough of Camden and as noted above (because of the shaft spacing requirements) a headhouse is required within the area local to the proposed St. Pancras site. Like much of London, this area is densely developed and the availability of open and vacant space on which to build is very limited, and has resulted in the need for a spur or off-line tunnel.

Nevertheless the identification of the proposed site within the existing EDFE St Pancras Substation is considered to have a number of advantages. For example it represents an opportunity for two utility companies to collocate, thereby reducing the impact of infrastructure development on the local area, and in accordance with the Government's sustainable development objective outlined in paragraph 27 viii of PPS 1; it makes use of underused previously developed land. In addition and as discussed further in Section 7.0 below, it has good access and presents an opportunity to enhance the streetscape and townscape thus benefiting the local area. For these reasons it is National Grid's strongly preferred site.



Figure 5: Map illustrating the advantageous location of the A503 between St John's Wood & Hackney.

St Johns Wood Substation

5.0 PLANNING POLICY CONTEXT

5.1 National Level

The following National Planning Policy relates to the headhouse development:

5.1.1 White Paper – Planning for a Sustainable Future

This Paper identifies that the right infrastructure is essential at every level for the highest quality of life. Improving infrastructure provision is also vital for unlocking housing growth. It further adds that the planning system has to adapt to enable the infrastructure necessary to support sustainable communities and everyone's quality of life to be built.

5.1.2 White Paper – Meeting the Energy Challenge, Department of Trade and Industry

This White Paper, published in May 2007, sets out the Government's international and domestic energy strategy to respond to changing circumstances and addresses the long term energy challenges.

The Paper advises that security of supply requires sufficient infrastructure capacity to be available to avoid socially unacceptable levels of interruption to physical supply. It adds that security of energy supplies requires sufficient, diverse and reliable:

- Supplies of energy to meet customers' demand; and,
- Capacity on the import, transmission and distribution networks to deliver supplies to customers.

The Government identifies that the planning system plays an important role in delivering the necessary energy infrastructure to meet our national needs.

5.1.3 Planning Policy Statement 1 (PPS 1) Delivering Sustainable Development

This statement sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. It states that infrastructure, including energy infrastructure, underpins sustainable communities.

Within PPS 1 a number of key principles are identified that relate to the delivery of sustainable development. Of these the following relates to infrastructure projects:

• Ensure that infrastructure and services are provided to support new and existing economic development and housing.

Paragraph 27.8 emphasises the importance that all proposals must make efficient use of the site and all vacant and under-used land and properties should be brought into use as soon as possible.

5.1.4 Planning and Climate Change – Supplement to Planning Policy Statement

The climate change statement sets out how planning, in providing for the new homes, jobs and infrastructure needed by communities should take account of climate change. It supplements PPS1 by setting out how planning should contribute to reducing emissions and stabilising climate change and take into account the unacceptable consequences. It is intended to ensure that spatial planning makes a full contribution to delivering the Government's Climate Change Programme and energy policies. As with other types of development, infrastructure proposals should secure the highest viable resource and energy efficiency and reduction in emissions.

5.2 Regional Level Planning Policy

5.2.1 The Mayor's Energy Strategy (February 2004)

The Energy Strategy states within section 6.59 that London's growth and economy faces a key challenge to provide adequate energy infrastructure to continue to allow growth to happen.

5.2.2 London Plan - Spatial Development Strategy for Greater London (Consolidated with Alterations since 2004)

Both the Early and Further Alterations have now been incorporated into the London Plan (consolidated with alterations since 2004) and published February 2008.

Section 2.34 of the Plan states that housing stock should have capacity to meet the needs of people in order to achieve sustainable communities, and this must be supported by adequate social, physical, and environmental infrastructure.

Policy 2A.1 'Sustainability Criteria' emphasises the importance that all proposals should take account of the impact on natural recourses, optimising the use of vacant land, using a design led approach, taking account of infrastructure, incorporating green infrastructure and engaging the local community.

Policy 4A.11 'Living Roofs and Walls' sets out that major developments where feasible should incorporate living roofs and walls that incorporate sustainable urban drainage, enhance biodiversity, improve appearance and adapt to climate change.

Policy 4B.1 'Design principles for a compact city', indicates that development proposals need to ensure that they maximise the potential of sites, are sustainable, and respect local context, character and the natural environment.

Policy 4B.8 'Respect local context and communities' sets out the importance of proposals preserving or enhancing the local social, physical, cultural, historical, environmental and economic characteristics of an area.

5.3 Local Planning Policy

This section identifies the relevant local planning policy for Camden related to this headhouse proposal on Pratt Street.

5.3.1 Core strategy Camden Preferred Approach November 2008

One of the key objectives of the Core Strategy set out on page 10 of this document is to ensure development is supported by necessary infrastructure and maximises the benefits for the local community and the borough as a whole.

Another objective is to promote high quality, sustainable design and physical works to improve places and streets and preserve the unique character of Camden and the distinctiveness of our valued places and historic environment. Section 1.17 indicates the importance of the provision of utilities and social infrastructure to make development work and support local communities, particularly in the parts of the borough that will experience most growth in future years.

Camden's Preferred Approach CS2 promotes the efficient use of land and buildings in Camden. Development should make full use of its site, taking into account quality of design, its surroundings, amenity and transport accessibility;

Preferred Approach CS8 identifies the importance of promoting high quality places, where developments use the highest standard of design and landscaping to respect the local context.

Preferred Approach CS14 emphasises the importance that developments need to consider the impact on neighbouring occupiers and neighbours.

5.3.2 Replacement Unitary Development Plan 2006

The headhouse site does not have a designation within the UDP. However the following policies are relevant to the headhouse proposal.

Policy SD1 - Quality of life identifies that development fosters sustainable communities, and therefore in determining applications for planning permission the local planning authority will take into consideration the special needs and characteristics of individual areas and communities. It also promotes the regeneration of areas in need of environmental, physical, social or economic renewal, together with stating the importance of designing out crime and the fear of crime.

Policy SD 4 - Density of Development indicates that development needs to make full use of the potential of a site. The character, amenity, nature of site, type of development and potential impact on local transport network all need to be carefully considered.

SD6 - Amenity for Occupiers and Neighbours emphasises the importance of development to consider and not cause harm to the amenity of local occupiers and neighbours. Visual effects and the impacts of noise levels, odour and sunlight & day light levels all need to be considered.

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Policy SD7 B – Noise/Vibration Pollution states that planning permission will not be granted for development that is likely to generate noise and vibration pollution

Policy SD8 *A* **- Disturbance from Plant and Machinery** identifies that permission will only be granted for plant or machinery that can be operated without causing a loss to local amenity and does not exceed the thresholds of 5dB(A) <LA90.

Policy B1 - General Design Principles requires that development should respect its site and setting, be safe, improve spaces around and between buildings, promote sustainability measures and provide high quality landscaping.

Policy B5 – Biodiversity requires all development to consider the conservation and enhancement of biodiversity.

Policy B7 A – Conservation Areas – character & appearance advises that planning permission will not be granted for development outside of a conservation area where it is considered harmful to the conservation area's character, appearance or setting.

T3 – Pedestrian and Cycling

Policy T3 outlines the importance that new development shall not create severance to existing cycle and pedestrian links, to ensure previously severed links are reinstated and conditions for convenience and safety are improved where possible.

6.0 STATEMENT OF COMMUNITY/ STAKEHOLDER CONSULTATION

6.1 Pre-application Consultation

6.1.1 National Grid engaged in pre-application discussions with the Development Control Officers of the London Borough of Camden. Correspondence was first exchanged in August 2007 regarding National Grid's requirements. Between then and the submission of this application further written correspondence and meetings have been had, resulting in changes to the design of the headhouse. As a result National Grid is not proposing the use of its standard headhouse and instead architects were commissioned to design a bespoke building, for which planning permission is now sought. National Grid believes this responds to the comments made by the LB Camden Planning Officers.

6.2 Public Consultation

- 6.2.1 National Grid held a staffed public exhibition relating to this proposal and the wider project cable tunnel project on the 10th December 2008 at the Prince Albert Public House. National Grid advertised the event in advance with the delivery of notification letters to 600 addresses in the local area, together with locally elected councillors and the MP. A total of 27 individuals attended the exhibition.
- 6.2.2 From the feedback received from attendees no concerns/comments were received in relation to the proposed headhouse design. General comments were received relating to general construction traffic and noise, but these will be managed by National Grid by agreeing noise levels with the LB Camden and through the implementation of a Traffic Management Plan.
- 6.2.3 In addition to the staffed exhibition National Grid wrote separately to the St Pancras and Somers Town Residents Association and the following ward councillors. Information presented at the exhibition about the project was included within the correspondence.

Cantelowes WardCllr Paul BraithwaiteCllr Frederic CarverCllr Ben RawlingsCamden Town and Primrose Hill WardCllr Pat CallaghanCllr Libby CampbellCllr Chris NaylorSt Pancras and Somers TownCllr Roger RobinsonCllr Anna StewartCllr Nurul Islam

At the time of writing this planning statement National Grid had not received any response to the information sent.

7.0 DESIGN AND ACCESS STATEMENT

7.1 Introduction

- 7.1.1 This section sets out and explains the design principles, rationale and development of the headhouse on Pratt Street and specifically addresses the following:
 - Use
 - Amount of Development
 - Layout
 - Scale
 - Landscaping
 - Appearance
 - Access

7.2 Use

- 7.2.1 The headhouse represents essential energy infrastructure and is critical to the delivery of National Grid's wider cable tunnel project (constructed under permitted development rights) which will connect the Hackney and St John's Wood substations and reinforce the capacity of London's electricity grid.
- 7.2.2 Importantly this project relates to the physical transmission of power across National Grid's transmission network infrastructure, which by virtue of its spatial nature requires elements of it to be located throughout the existing built environment, and regardless of whether such areas might otherwise be predominantly residential, commercial or a mix of the two.
- 7.2.3 The proposed application site is immediately located within a predominantly residential area, though a public house and a small commercial estate is located close by. However, as an existing EDFE substation the overall site has an established electricity infrastructure use which has coexisted with the neighbouring land uses for over 40 years. As such, the principle of the proposed headhouse at this location is considered wholly consistent and appropriate. Importantly, whilst intensifying the quantum of built development within the EDFE compound, once operational the headhouse will largely be an unmanned secure facility with only limited attendance throughout the year by National Grid's operational staff in

vehicles generally no larger than a transit van. Therefore, National Grid's presence will not add notable additional vehicle movements.

7.2.4 In all other respects the headhouse is designed to perform its function, particularly with respect to ventilation without impacting, on the amenity of neighbouring land uses. For example whilst the headhouse will contain fans to supply air to the tunnel, these will be designed and installed to ensure that they will not adversely impact upon the amenity of the closet residential property.

7.3 Amount of Development

7.3.1 National Grid only requires the construction of a single storey headhouse to be located on this site, and the minimum building volume possible is proposed. National Grid will share the existing EDFE compound area.

7.4 Layout

- 7.4.1 Options for siting the proposed headhouse were restricted by the operational requirements of EDFE and the need for National Grid's own operations, and importantly the construction of the off-line tunnel shaft, not to impede upon these. It is only in the location proposed that this can be achieved. Aside from this the building layout is derived from its functional needs, which principally relate to:
 - the requirement to be centrally located above the offline tunnel shaft;
 - the accommodation of ventilation fans;
 - the accommodation of the electrical control equipment;
 - the inclusion of a store room; and
 - the accommodation of stair well and access to the shaft
- 7.4.2 Whilst it is necessary to have louvers located in the north, east and south elevations to ensure effective ventilation, care has nevertheless been taken to site the ventilation fans themselves against the northern elevation of the building which faces into the existing substation compound and which is the greatest distance from residential property. This will further help to ensure that operation of the ventilation fans does not impact on residential amenity, consistent with the requirements of planning policy.

7.4.3 The St Pancras headhouse site is located in Flood Zone 1 which is assessed as having a low probability of flooding and is assessed as having less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1 %). As such, this proposal will have negligible effect on the fluvial water environment and is consistent with the requirements of PPS 25 – 'Development and Flood Risk' to steer development to areas within Flood Zone 1.</p>

The site is also not considered to be at risk of surface water flooding.

7.5 Scale

- 7.5.1 Similar to the building layout, the scale of the headhouse has largely been dictated by its functional requirements, albeit slightly increased in length to allow the building to wrap around the corner of Pratt Street and Royal College Street. This will provide a frontage to both streets and importantly give greater balance to the Pratt Street and Royal College Street junction, thereby improving the overall appearance of the streetscape.
- 7.5.2 As an extension to the former Camden Training Centre building, the proposed headhouse is lower in height than this, and so importantly is subservient to it. Despite this, the scale still allows the vertical order of the existing building to be repeated in the new, which will assist with the effective assimilation of the headhouse within Pratt Street.

7.6 Landscaping

- 7.6.1 Because of the nature of the site it is not possible to propose any planting within this scheme. However, because of the location of the proposed building in relation to both Pratt Street and Royal College Street, the existing, inconsistent and relatively poor boundary treatments will be removed. This, together with the use of good building materials will enhance the overall streetscape quality.
- 7.6.2 It is also proposed to enhance the ecological value of the current substation site by incorporating a 'Brown Roof' or 'Living Roof' atop the proposed headhouse building. Details of this are provided on drawing: NGCASPZZZDWGAR00004RevE The roof covering will consist of rubble and crushed local substrate various sizes

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which will provide an ideal habitat for bird species such as the Black Redstart and will in time become colonised by various insects, especially when vegetation becomes established through the process of natural seeding.

7.7 Appearance

- 7.7.1 The appearance of the proposed headhouse building has been taken from the existing Camden Training Centre, which whilst currently vacant has a distinctive art deco styled façade to Pratt Street, which together with the scale and massing of the building gives it a strong and individual visual presence. The architectural objective for the proposed building, which immediately adjoins the existing, was therefore to preserve this and in doing so both protect and enhance the local area townscape. We believe this is best achieved by repeating - as far as possible - the original artdeco design detail, dimension, order and proportion in the east and south elevations of the new building. The obvious exception being the use of windows, which for matters of security can not be used in the headhouse, but to compensate; inlaid brick panels of the same dimensions as the existing windows will be used to retain the pattern, order and form. These will be separated by protruding brick pillars providing the important vertical emphasis whilst the horizontal, as in the existing, will be provided by the art deco pattern panels at each floor level. This detail will be extended onto the south and east elevations of the headhouse, thereby improving the appearance of the Pratt Street and Royal College Street junction, which is currently dominated by two large advertising hoardings and the feeling of absent or missing built form. The removal of the advertising hoardings is considered to be an indirect benefit of the proposed development and will make a positive contribution to enhancing the visual amenity of the area. This is especially true as National Grid has invested time and resource in developing a non-standard head house design, which has been informed by the site and surrounding buildings.
- 7.7.2 The north elevation of the proposed headhouse faces into the existing EDFE substation compound, which because of the height of the existing boundary walling to Royal College Street is largely obscured from view. As such and in much the same way as the treatment of the existing northwest elevation of the training centre building, it is proposed to treat this elevation much more simply and practically. For this reason the art deco detailing will not be repeated and instead this elevation will consist of brick, albeit the horizontal emphasis will be carried through.

7.7.3 A schedule of the overall materials and their specific use within the building is provided on drawings: NGCASPZZZDWGAR00003RevH and NGCASPZZZDWGAR00004RevE. A number of 3D images provided for illustration only are also included.

7.8 Access and Transport

- 7.8.1 A Construction Traffic Management Plan is submitted with this application as a supporting document. This document details the level of vehicle movements and routes associated with both the construction of the headhouse building and the shaft and lateral spur tunnel. Because the shaft and tunnel are being constructed using National Grids permitted development rights and therefore do not form part of this planning application, the following relates to the access and transport requirements for the headhouse only both construction and operation and is repeated in the Construction Traffic Management Plan, where additional information can also be found.
- 7.8.2 The headhouse can only be accessed by National Grid authorised users. National Grid will comply with the appropriate legislation relating to equality and disability as applicable, but in addition the design will satisfy all relevant statutory requirements for operational and access needs, in so far as it applies to the operation of this facility. The north elevation of the building will accommodate the principal means of access and egress.
- 7.8.3 For purposes of construction it is proposed that the following routing will be implemented:
 - HGVs will access the site from the A503 Seven Sisters Road. Traffic will head southwest on the A503 until the A503 Camden Road. Traffic will turn left into A400 Camden Street. At the junction with Crowndale Road vehicles turn left and left again at Royal College Street. The site entrance will be via the existing EDF access at the substation.
 - To exit the site vehicles will circulate around existing buildings and exit via the existing access off Georgiana Street. Vehicles will turn right into Georgiana Street and then pass straight across Royal College Street to Saint Pancras

Managing the necessary construction traffic in this way will:

- Maximise construction site safety;
- Maximise safety with respect to the existing EDFE live electricity distribution plant; and
- Negate the need for construction vehicles to travel from Camden Street (A400) along the full length of Georgiana Street which is predominantly a residential street. As such construction vehicles will only use a very short length of Georgiana Street, near its junction with Royal College Street. This is considered to be the most effective construction traffic routing option available with respect to minimising impact on residential amenity and marinating highway safety.
- 7.8.5 The existing vehicular access onto Pratt Street will be permanently closed.

Headhouse Construction Phase – vehicle generation

- 7.8.6 The total number of all vehicle type deliveries expected over the 4-month headhouse construction period is expected to be 46 vehicles inbound to the site which equates to an average of 1 vehicle per day. Assuming that each vehicle then leaves the site this equates to an average of two vehicle trip movements per day.
- 7.8.7 However, the construction programme is unlikely to be uniform in traffic generation terms, but given the relatively low volumes anticipated is unlikely to exceed 4-6 vehicle deliveries on any one day.
- 7.8.8 This estimate excludes workforce related traffic movements as the Contractor will be operating a travel to work programme designed to minimise vehicular traffic to and from the site, especially given the good accessibility of the location.
- 7.8.9 Overall the volume of traffic associated with the headhouse construction is small and will not have a significant impact on the surrounding road network. Table 1

below provides a breakdown of the anticipated trips by vehicle type over the 4month construction period.

Material	Quantities	No. of Vehicle loads	Vehicle Type			
Steel frame						
construction (steel						
stanchions,						
beams @ 3m ctrs)	80 tonnes	4	Articulated Vehicle			
Foundations:		•				
Concrete Strip						
(0.6m x 1.5m						
deep)	60 m³	-				
Concrete Pads	oo ³					
(2.0m x 8 NO.)	32 m ⁻	-				
Sub Total:						
Foundations	92 m ³	18 (@5m3/load)	Concrete mixer vehicle			
	00 m ³					
Executed material	92 m° x					
to tip	factor)= $1.66m^3$	12 (@ 14m3/load)	Large Tipper			
Brickwork /		4 (@ 16 pallets per				
stonework	54 pallets	vehicle)	Rigid HGV			
Floor and roof						
structure		4	Rigid HGV			
Plant		4	Rigid HGV			
Total No. of HGV		46				
Sundry Materials	Sundry Materials 8 Transit Van					

Table 1:	Estimated	vehicle type	and trip	number

Operation Phase - vehicle generation

7.8.10 The headhouse is essentially unmanned with occasional visits for the purpose of maintenance and inspection. Once normal operational activity commences, it is anticipated that there will be no more than an average of 24 vehicular movements or less in a year. This is notwithstanding the rare occurrence of major operational failure which will require a localised increase in vehicular activity for a short period.

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8.0 PLANNING CASE AND POLICY COMPLIANCE

- 8.1 At the heart of the Government's planning policy is the achievement of sustainable development. Central to this and as recognised at all levels of planning policy, is the provision of utility infrastructure. This proposal is required to ensure that London's electricity capacity and security of supply continues to remain robust and responsive to continued economic and housing growth. In this respect we believe the principal acceptance of this proposal to be without question. National Grid recognises however, that in responding to climate change it has a responsibility to ensure that its own development is as sustainable as possible. For this reason the cable tunnel uses a forced natural air ventilation system, which the headhouse, as discussed above, is an integral part.
- 8.2 With respect to the site itself, the narrowly defined search area together with the density of the built development within this, has restricted the availability of alternative sites, and the EDFE St. Pancras Sub-station site represents the only viable option. Its use however is considered consistent with planning policy that requires the use of previously developed land over Greenfield, and of particular relevance to this site, seeks to bring underused land into new uses. Furthermore, it has the added advantage of collocating two electricity utility companies on the one site, thus reducing the impact of utility infrastructure within Camden.
- 8.3 National Grid also believes that its proposal will enhance the appearance and quality of the local townscape. As described in section 7 this will be achieved by delivering a building designed specifically for this site, which takes account of the character and appearance of the local environment and the amenity of the existing population once operational the building will have very little discernable activity. For this reason the proposal is considered fully compliant with all design and amenity related policy.

9.0 CONCLUSION

- 9.1 We believe that the case for granting planning permission for the proposed headhouse and compound is a compelling one. The key factors are:
 - The headhouse constitutes essential infrastructure;
 - The development will enhance the physical appearance of the site and the immediate surrounding area;
 - The operation of the headhouse is considered appropriate and compatible with the existing landuse and character of the area;
 - The incorporation of a 'brown' or 'living' roof will provide ecological benefits
 - National Grid has engaged in meaningful pre-application consultation with both the local planning authority and local community and developed its proposals accordingly.

We therefore respectfully request that this application is approved.