

Peck, Amanda

From: Wilkes, Simon [REDACTED]
Sent: 12 February 2013 14:21
To: Peck, Amanda
Cc: Watson, Ed; francis.wheat@camden.gov.uk; St Josephs Head; Siobhan Horisk; Vincent, Sue (Councillor)
Subject: RE: Parker Street Planning Application
Attachments: L-NClough-Camden-ParkerStHostel-4.12.120001.pdf; L-APeck-Camden-ParkerSt-4.12.120001.pdf

Dear Amanda,

Thank you for your email concerning the above, I have now downloaded the additional information from the website and will start to review the content.

Due to the late inclusion of such extensive, technical and vital material I would like to formally request that the application is deferred to the March 2013 Committee to allow a reasonable period of time for the school to fully consider the content and if appropriate make further comment. I would also like to request that the school be allowed to address the Planning Committee if it transpires that the School's concerns have not been adequately dealt with.

The school is disappointed with the way in which the applicant has engaged with the school, we have been open with the applicant at all stages and are disappointed that this has not been reciprocated:

- 1) They have failed to even respond to the above letter we wrote to them on 4/12/12 and were sent a copy of our initial objection letter dated 4/12/12.
- 2) They have failed to take up the offer of further meetings.
- 3) We copied the applicant in on our objection (which we did not need to do) in an effort to resolve items.
- 4) They did not have the courtesy to send us a copy of their further submissions or even tell us they had been submitted.
- 5) Their Daylight and Sunlight consultant has failed to return calls to the school's consultant and the daylight and sunlight model has still not been sent through as requested so we can verify the work and make an assessment of the Rights to Light impact.
- 6) I can see no revised information on the website concerning the access route to the school playground.

The school are surprised at the lack of engagement from the applicant particularly as this is Camden Council, I would appreciate it if you could confirm that the application will be deferred by 1 month to allow the school to fully consider information which should have been included in the original application.

SIMON WILKES
Associate Governor
Premises Committee
St Joseph's School

Contact Details:

[REDACTED]



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From: Peck, Amanda [mailto:Amanda.Peck@camden.gov.uk]
Sent: 08 February 2013 14:04
To: Wilkes, Simon
Subject: RE: Parker Street Planning Application

Simon,

An acknowledgement letter was sent on 10 December following receipt of your first letter. I have received your second letter and am in the process of assessing the objections sent on behalf of St Joseph's school along with the comments and objections sent by other residents.

I am also assessing additional information submitted by the applicant with regard to construction noise, demolition method statement, daylight/sunlight, refuse collection, affordable housing and amended floorplans (which is saved on our website at the following link
<http://planningrecords.camden.gov.uk/Northgate/PlanningExplorer17/GeneralSearch.aspx> - documents dated 11 Jan, 24 Jan, 5 feb, 8 feb)

The application is likely to go to our DC committee meeting on 28 February and if you have any further comments to make on the additional information you can make these up until the date of committee. You will receive notification of the confirmed date of committee closer to the time.

Regards

Amanda Peck
Principal Planning Officer

Telephone: 020 7974 5885

From: [REDACTED] On Behalf Of Wilkes, Simon
Sent: 31 January 2013 17:50
To: Peck, Amanda
Subject: Parker Street Planning Application

SENT ON BEHALF OF SIMON WILKES

Dear Amanda

13/02/2013

I would be grateful if you could give me a brief update as to where the current thinking is on when the planning application might go to Committee?

I would appreciate it if I could come in and discuss the school's concerns with yourself and Ed Watson. Since submitting our objection, I have not heard anything from yourselves or the applicants.

Yours sincerely

Simon Wilkes

Head of Business Space Development



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13/02/2013

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St Joseph's RC Primary School

Macklin Street
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Telephone: 020 7242 7712

Facsimile: 020 7430 1834

Email: admin@stjosephs.camden.sch.uk

Web site: www.stjosephs.camden.sch.uk



Headteacher: Miss Helen Tyler

26 February 2013

Amanda Peck
Regeneration and Planning
Development Management
London Borough of Camden
Town Hall
Judd Street
London WC1H 8ND

Dear Ms Peck

PLANNING OBJECTION TO PARKER HOUSE, PARKER STREET – PLANNING APPLICATION NO. 2012/6132/P

Following the St Joseph's RC Primary School's letter of objection dated 15th January 2013 the School has been in intensive dialogue with the Applicant to try and resolve the issues that we raised in response to their planning application.

Having read the additional material submitted by the Applicant, we wish to make the following comments.

Lack of Consultation

Whilst we were disappointed by the consultation process prior to the application, following our letter dated the 9th January detailed negotiations appear to have found a way forward that is satisfactory to both parties.

Incomplete Planning Application

In our letter dated 15th January 2013 we pointed out that the original application documents which were submitted on 12th November 2012 were inadequate in that they did not recognise that the School was a sensitive receptor and that:

1. The School should have been included in the acoustic study to ascertain the impact of the demolition and construction upon the School.

2. The impact on daylight and sunlight of the proposals should have been fully assessed, the School was omitted from the analysis undertaken in the original Application.

The Applicant has now undertaken these studies which have been reviewed by the School and are commented in more detail later in this letter.

Access to the School playground and other Safety Measures

At meetings in June 2011 and June 2012 the School raised with the Applicant the enormous benefit to the School of achieving an access way direct from Parker Street to the School playground in terms of the safeguarding of the children (safer pick ups and drop offs) as well as offering an additional means of escape from the School. Proposals were not contained in the planning application.

In the School's letter dated 15th January 2013 architects on behalf of the School showed how an access route could be achieved at the eastern end of the Parker Street site to the School playground with the loss of only one bedroom from the Applicant's scheme.

The Applicant has now proposed an alternative solution which involves the reconfiguration of the Eastern stair core of the school to allow a direct level access route from the pedestrian area of Macklin Street in to the play ground. Whilst more disruptive to the school it achieves the aims of improving the safety of drop off and pick up in the same way. The Applicant has agreed to fund these works along with other safety measures (as detailed in their addendum report dated 26th February 2013) as the cost will be significantly cheaper than incorporating a route through their development and is a more efficient use of resources. As such the School is supportive of this alternative proposal.

Other measures agreed to be funded and undertaken by the Applicant either through allocated S106 monies or direct contribution include:

- A raised table to Macklin Street to calm traffic in front of the school. - *new plan*
- Additional fire exits through Powis House and Wimbledon House. - *ed s106*
- A secure lobby to the western entrance of the school which will be part financed by other funding already secured by the school. - *previous s106*
- Secondary glazing to classrooms overlooking the playground. - *ed s106*

As an overall package the School is now happy that the opportunity to fundamentally improve the safety of the school through the Parker Street development is not being lost.

Daylight and Sunlight

The Applicant failed to assess the impact of their development on the School in terms of daylight and sunlight, this omission from their Application has now been rectified through a report by GVA dated 23rd January 2013. The Applicant now states that there will be no "material" impact upon the School in terms of daylight and sunlight.

Five rooms will experience a loss of internal daylight distribution that breach BRE recommendations. The school is satisfied that whilst there is a technical breach of the BRE Guidelines the impact is not material and is offset by the package of measures put forward by the Applicant detailed above.

Noise and Vibration

In the application documents submitted on 12th November 2012 the Applicant failed to include the School in the acoustic study when assessing the impact of the demolition and construction on surrounding buildings.

This omission was corrected by the submission of a further report dated 8th February 2013 by the Applicant's acoustic consultants, PBA. Acoustics consultants have been helping the School understand this technical report which now confirms the School's fears expressed in their letter dated 15th January 2013 that the demolition and construction noise would significantly impact the School's ability to function and continue lessons. A detailed acoustic study within the School has now been undertaken and shows that the original construction methodology would have been inadequate to protect the School from excessive noise. This has resulted in revised proposals to shroud the site in envirowrap polythene sheeting to attenuate the sound from the construction site.

The Applicant's revised acoustic report states that an increase in noise level of less than 3db is considered not significant or perceptible. The report further states that when the children are playing in the playground, the 3db increase will not be exceeded, however when the children are not using the playground, significant increase in the internal noise levels of up to 6db is predicted at certain points during the demolition works.

Acoustic consultants have advised that the method of analysis is misleading and masks the true impact upon teaching in the school during the works:

- The PBA assessment follows standard methods, however their averaging approach over an hour means that impulsive, short term peak noise levels are hidden.
- Using a dB(A) approach to noise, which is a weighted average of noise levels across all frequencies, disguises the effect over speech frequencies that are so important to teaching. In the unmitigated state 20db excesses are predicted in these frequencies.
- It is unclear as to why ambient noise levels were measured in occupied classrooms with windows open and the playground in use.
- There is no spectral data for Envirowrap, so it is unknown as to whether it will really perform in the assumed fashion.
- The potential for 70dB(A) unmitigated noise level in the playground would prevent teachers from communicating with children. Arup advise that construction noise at these levels will be stressful to both teachers and children contrary to the purposes of playtime. To give some sort of context 70dB(A) is

similar to the noise levels standing on the kerb of a very busy main road or being 1 metre away from a washing machine on full spin, as the schools consultant puts it, it is loud.

The School is extremely concerned that the incorporation of the conclusions of the PBA report dated 7th February 2013 in Condition 17 will not protect the School from excessive noise as is intended. The Committee papers state that as 3db is not perceptible to the "average" person and that the Applicants proposals are therefore acceptable. An average 3dB(A) increase will be far louder than made out, the confusion between dB and dB(A) needs to be corrected.

It is now agreed by the Applicant and the School that the best way of moving forward on this matter is to undertake further acoustic tests when demolition commences at the end of the summer term 2013, this is because we can not fully predict how the School will be impacted by construction noise in advance. These technical acoustic tests and subjective tests by the teaching staff will be used to determine a reasonable level of noise increase that will allow lessons to continue. In a similar way noise levels in the playground will need to be assessed and agreed at levels where the children can enjoy and safely use the playground These agreed levels will then adhered to by the contractor so that lessons can continue and the playground can be used.

These discussions have resulted in the agreement that the current Condition 17 does not fully protect the School and has led to the agreed alternative wording put forward by the Applicant in their addendum document dated 26th February 2013.

The School's consultants are of the opinion that temporary secondary glazing during the construction process will be essential for lessons to continue and is now included in the Applicant's mitigation measures. The design of this secondary glazing would need to allow for ventilation of the classrooms for part of the day.

In summary the School believes that the averaging of both noise and frequency levels over an extended period mask the true impact upon lessons and that the revised Condition 17 is required to protect the School.

Dust

Whilst the Development Management plan details how dust is intended to be managed on site the School wishes to reiterate that it has a large number of asthmatic children who's health will be severely impacted if dust in the playground and school building is not controlled correctly. We wish to see incorporated in Conditions the obligation to actively monitor dust and to take immediate action if agreed trigger levels are exceeded.

Summary

Following detailed negotiations between the parties since the Application the School is now able to withdraw it's objection letter dated 15th January 2013 and support the Planning Application subject to the agreements and points detailed in this letter and the Applicants addendum being formally incorporated in the terms of the planning consent should it be granted.

Yours sincerely



SIMON WILKES
Associate Governor
Premises Committee
St Joseph's School

DRAFT

Peck, Amanda

From: Wilkes, Simon [S [REDACTED]]
Sent: 23 February 2013 01:34
To: Clough, Nick; Kemp, Mark; Young, Jed; jennifer.ross@tibbalds.co.uk; Dominic.Feming@echarris.com
Cc: St Josephs Head; Siobhan Horisk; Fulbrook, Julian (Councillor); Olad, Awale (Councillor); Peck, Amanda; Vincent, Sue (Councillor); Depala, Bhakti; h.mulcahey@concerto.uk.com; Adam Crozier
Subject: Parker House Redevelopment - Impact on St Joseph's
Attachments: 1195 SK01A Plan.pdf; 1195 SK02A Elevations.pdf; 1195 SK03A Sections.pdf; St Joseph's Entrance 14 Jan 13.pdf
 <<1195 SK01A Plan.pdf>> <<1195 SK02A Elevations.pdf>> <<1195 SK03A Sections.pdf>> <<St Joseph's Entrance 14 Jan 13.pdf>>

Nick,

Thankyou for meeting this afternoon which was productive and hopefully we have found a way forward although there will be quite a lot to sort / agree before the committee on Thursday. Hopefully we have all learned a bit from the process and had we had this level of discussion last summer we might have been supporting the application. I had a post meeting review with Helen and Siobhan to clarify a few points which I will deal with below. They feel genuinely let down by the process and feel Camden should have struck a much better balance between the CIP Programme and the school much earlier.

Physical Improvements


As promised please find attached the Sutton CA drawings for the reconfiguration of west entrance to the school which are proposed to be financed out of the £104,000 Central Saint Giles S106 Education Fund. As part of the overall agreement the school is happy for Camden to carry out this project using the CSG money as part of a wider package of works arising out of the Parker House development. This has the advantage of minimising irrecoverable VAT, the costings were prepared by Mark Lacey at ECH who has been authorised to release the full workings behind the cost summary attached. It would be helpful if you could clarify the process to transfer the funds internally and formally secure them for the school. Bhakti Depala at Camden is currently dealing with the CSG Education fund.

The proposals you presented today to reconfigure the eastern stair core to create a "level" access to the playground is innovative and delivers the same benefits to the school as the access from Parker Street and the school is happy support these proposals as an equivalent solution we put forward from Parker Street.

The school would like to retain the the main entrance at the western end in the configuration proposed by Sutton CA so there will be a saving in your budget by not creating a secure corridor to the playground at the west entrance as it is felt to compromise the main entrance too much.

The new eastern route to the playground would be a two way access that is simply opened up for half an hour at drop off and pick up rather than trying to create a "grand" entrance at this end of the site.

The other S106 benefits to the school are welcome:

- raised table to Macklin Street 
- fire exits to Powis House and Wimbledon House.

The items from your proposals which the school don't feel need to be progressed are:

- enlarged eastern extension (the existing CPA room works well and will become part of the main school under your proposals)
- mechanical ventilation of the classrooms (it is felt that long term the existing natural ventilation strategy

can work and the installation disruption and running costs outweigh the benefits, the school is also now used to balancing noise from the playground with teaching)

The installation of secondary glazing as proposed by Arup to the rear of the school during the construction phase is felt to be a good idea, it gives Helen and Siobhan greater comfort that construction noise can be successfully mitigated. This could be funded from the deflected items above. It may be retained long term if the ventilation can be managed or removed after construction depending on how it works. It would be helpful if your M&E consultants could consider a ventilation strategy with secondary glazing as it will impact the design of the secondary glazing.

In terms of funding this package of works we would like to see a revised schedule of works with sketch plans submitted as part the planning addendums submitted next week along with a summary of the funding mechanisms which is essentially the S106 money from CSG and Parker Street along with £250,000 allocated by the Housing Committee? There would then be a formal note on record as to the agreement notwithstanding some of the issues are not technically Parker St planning issues.

Daylight and Sunlight

I think the only issue here is for GVA to confirm the change in the number of hours rather than stating that after the works the BRE code is still met.

Noise / Vibration and Dust

It will have been apparent from today's meeting that this is probably the biggest issue for the school's management team and I will try to summarise where we have got to.

Whilst the PBA report was welcome (in that it was a detailed acoustic study of the school) we dispute its findings and do not accept that its recommendations (which are subsumed into Condition 17) will protect the teaching environment in the school:

The report measures the impact on the school in terms of dB(A) - this is a weighted average over an hour of noise levels across all frequencies, impulsive short term peaks would be hidden and it would disguise the effect over speech frequencies that are so important to teaching. In the unmitigated state 20db excesses are predicted in these key frequencies.

The PBA report and the Committee report are both misleading when they mean dB(A) but use dB which is a peak measurement. It took Arup Acoustics to highlight this to the school as the difference is beyond most non acousticians.

Condition 17 as currently drafted essentially states that a 3dB impact is acceptable because 3dB is not perceptible to the average person, the actual impact is forecast to be 3dB(A) which is a totally different level of noise and is likely to significantly impact teaching.

Rather than having a detailed technical debate now which will never really tell us what the noise will actually be like Arup have advised the school that the best way forward is to carry out trials at the start of demolition (hopefully right at the start of the summer holidays) whereby the actual sound levels from demolition are measured and subjectively (and reasonably) assessed by the teaching staff to set a threshold which allows lessons can continue, and Keltray must adhere to.

This real world test is required in part because there is no spectral data for environment so we cannot predict now which frequencies it will attenuate most successfully. Carrying the bulk of the demolition during the school holidays as now proposed is a very welcome change to your programme of works.

This will require new drafting of Condition 17 which will in effect be a clear process by which the acceptable noise level is determined at a later date. Jennifer Ross will produce some new wording which will need to be agreed by the Amanda Peck as well. The new Condition 17 will also need to deal with noise in the playground, Arup believe the 70dB(A) unmitigated forecast level in the playground is unacceptably loud and it is probably best if PBA can put forward a reasonable level or the reasonable level that will protect the children and make playtime tolerable is calculated at the same time the classroom level is set.

The Construction Management Plan needs to deal with dust levels in the playground and school and must be

tightly controlled due to a large number of asthmatic children, this may need a new condition on the control of dust.

We need to see robust conditions that force changes in the method of work on site if either noise or dust impact the school beyond an acceptable point.

We believe that secondary glazing will be required to achieve an acceptable teaching environment.

If all this can be agreed prior to Thursday in a binding package then the schools next written submission and representations on the night will adopt a very different tone than currently planned.

Regards Simon Wilkes

On behalf of St Joseph's School

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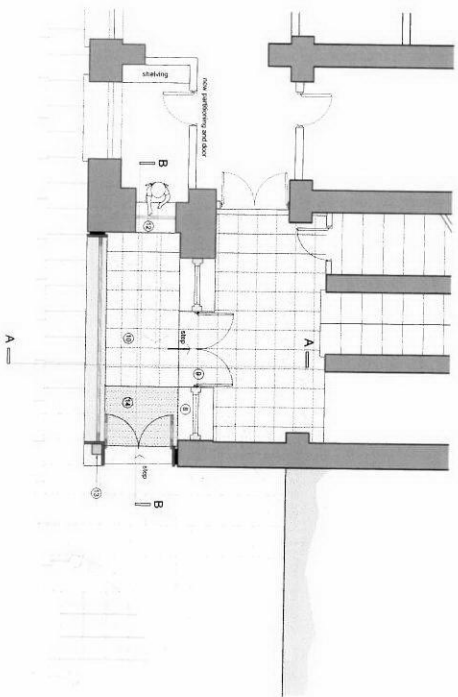
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- 1) reconstituted granite stone
 - 2) PVC fluted profiled flooring
 - 3) slope 4% membrane roof
 - 4) PVC profiled slab formwork with reinforced glazing
 - 5) solid finished steel sheet
 - 6) lock-in mesh ceiling
 - 7) brickwork, glazed
 - 8) existing frame, inspected and repaired
 - 9) new timber doors
 - 10) reconstituted stone slab
 - 11) white painted masonry
 - 12) new opening with reinforced glazing window
 - 13) reinforced masonry system
 - 14) masonry
 - 15) framed 20% slabs with 60% recessed lights

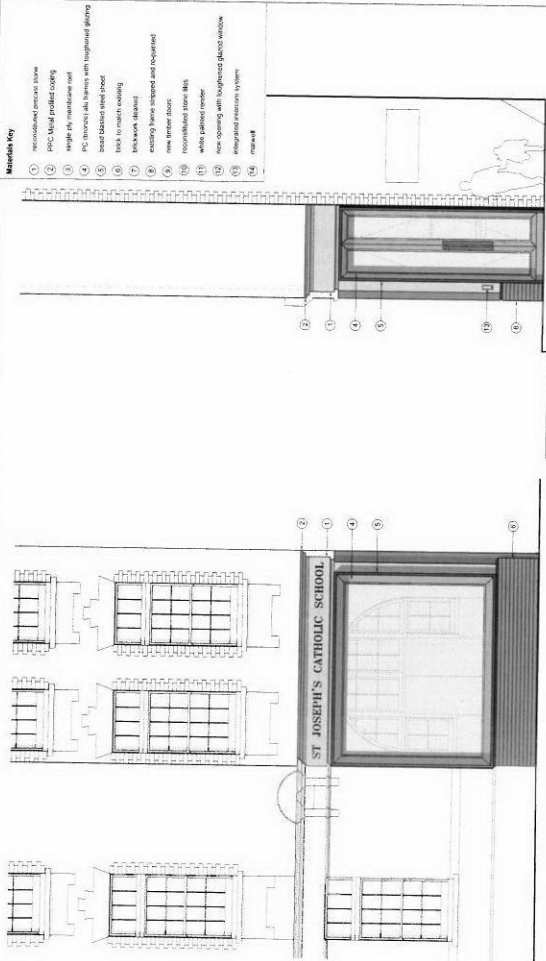


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Drawn: [Name] **Checked:** [Name] **Date:** [Date]
Scale: 1:200 **Project:** [Project Name]
Client: [Client Name] **Address:** [Address]
Site: [Site Name] **Location:** [Location]

REVISIONS
 No. Description Date
 01 Initial Issue 15/10/2023
 02 Revise Section A-A 20/10/2023
 03 Revise Section B-B 25/10/2023
 04 Final Issue 30/10/2023

Date: RIBA STAGE B



Materials Key

- ① reconstructed precast stone
- ② PPC Mylex product coating
- ③ single ply membrane roof
- ④ PC brackets all leaves with heightened glazing
- ⑤ bead banded sheet stone
- ⑥ brick to match existing
- ⑦ brickwork repairs
- ⑧ existing leaves stripped and re-pointed
- ⑨ new timber doors
- ⑩ reconstituted stone tiles
- ⑪ white painted render
- ⑫ new opening with heightened glass window
- ⑬ integrated entrance system
- ⑭ masonry

Date: 11/20/14
 Drawn by: [unclear]
 Scale: 1/8" = 1'-0"
 Project: St. Joseph's Catholic School Canvas
 Parish: [unclear]

SUBFOCUS
 [unclear]
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Revision Table:
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 Scale: 1/8" = 1'-0"
 Date: 11/20/14
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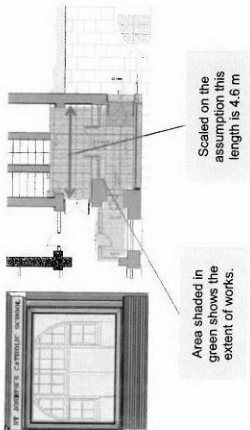
Project: ST. JOSEPH'S CATHOLIC SCHOOL CANVAS
 Parish: [unclear]

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 14 | [unclear] | 11/20/14

St Joseph's Catholic School - Indicative Cost Model Summary (Entrance Works), 14th January 2013

1.0 Terms of Reference

This report contains our indicative Cost Model prepared for LGIM for the Entrance Works at St Joseph's Catholic School, which comprises the refurbishment and extension to the existing entrance. The Cost Model has been prepared on the basis of the preliminary design information produced by Sutton CA and the assumptions stated below.



3.0 Indicative Construction Cost Model

	Item	£	Total
Asbestos			
Demolition Demolition and enabling works including removal of ironmongery, existing floor, doors, CCTV and breaking out of opening for new window. Assumed existing arched windows will remain in situ.		8,500	
Hard Refurbishment Including new raft foundation to front (9 m2 only), new roof, new external walls, new security counter, cornice and external	Item	£	29,000
Soft Refurbishment Including an allowance for connections to existing services, new door, new partitioning, shelving units, finishes to floors, ceilings, minor services (lighting and heating only) and reinstatement of existing CCTV.	Item	£	30,000
External Works Allowance for minor adjustments disturbed by works/ interfaces	Item	£	2,500
Sub Total =			£70,000
Prelims	14%		£9,800
OH + P	5%		£3,990
Contingency	7%		£5,865
Total Cost (Rounded)			£89,700
Architects Fees (Sutton CA)			£ 6,000
Project Management Fees (TBC)			£ 9,300
Total			£ 105,000

2.0 Exclusions/Key Assumptions/Notes for Consideration

- 1. No allowance for Inflation, Professional Fees, Statutory Fees, Developers Costs, VAT, Financing Costs, Marketing Costs, Removal of Tenants FF+E, Compensation to Existing Tenants, Utilities Diversions, Site Acquisition, Phased Construction, Asbestos
- 2. External Works based on minor making good works only.
- 3. The scale that has been used is as shown on the drawing above.
- 4. No allowance has been made for potential of listed features of the building.
- 5. Planning is excluded.
- 6. Temporary access is excluded.
- 7. Signage is assumed not to be carved into the Stone.

St Joseph's RC Primary School

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Headteacher: Miss Helen Tyler

4 December 2012

Amanda Peck
Regeneration and Planning
Development Management
London Borough of Camden
Town Hall
Judd Street
London WC1H 8ND

Dear Ms Peck

PLANNING APPLICATION 2012/6132/P – 43 RESIDENTIAL UNITS AT PARKER HOUSE, 25 PARKER STREET, LONDON WC2B 5PA

I refer to your letter dated 19th November 2012 addressed to the owner/occupier of the St Joseph's Primary School, Macklin Street, London WC2B 5NA. The St Joseph's Primary School immediately abuts the Parker House development site and will be significantly impacted by the proposals.

I am a Governor of the St Joseph's Primary School and sit on the Premises Committee and am taking the lead on behalf of the School in respect of the School's response to the planning application at Parker Street.

The Headmistress of St Joseph's School, Helen Tyler, and myself met with representatives of the site owners (Camden Council) approximately 2 years ago, however until the 19th November 2012 we have had no meaningful discussions with the applicants over this proposal. Some of the initial comments we made to the Applicants at the outset in respect of their scheme appear to have been ignored on commercial grounds and they have not to date taken on board the issues surrounding the proximity of a primary school to their development site.

Given the lack of adequate consultation in advance of the planning application, 21 days is an inadequate period in which to expect the School to respond fully. Please would you accept this letter as reserving a right to submit further more detailed representations when we have had the chance to fully review the application

documents. We expect to make detailed representations on the following issues but may include further points following a detailed review of the application.

1. The planning application fails to secure an alternative means of access to the School from Parker Street to the School's playground. The principle of securing routes through buildings for public benefit is well established at Central Saint Giles and Centrepoint.
2. The proposals are likely to impact upon daylight levels to the School classrooms and will cause overshadowing to the School's playground.
3. The noise from the initial demolition and construction works is likely to make teaching impossible.
4. The dust from the construction site is likely to cause harm to the children's play environment.
5. The applicant has failed to demonstrate satisfactorily to the School how the demolition and construction can be carried out in a safe way that respects the operation at the School and is safe.
6. The sub-structure design is the most efficient for the applicant, and alternative sub-structure designs which would cause far less disruption to the School are precluded by the current design.
7. The applicant's proposal ignores opportunities to undertake noisy works during school holidays.

We are currently preparing more detailed representations in respect of the application and once these have been submitted, I would appreciate it if we could meet with yourself and Ed Watson/Francis Wheat to discuss the proposals in greater detail.

I would appreciate it if you could confirm that it is in order for the School to submit further representations after the 21 day time limit specified in your letter.

Yours sincerely



SIMON WILKES

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Headteacher: Miss Helen Tyler

15 January 2013

Aranda Peck
Regeneration and Planning
Development Management
London Borough of Camden
Town Hall
Judith Street
London WC1H 8ND



Dear Ms Peck

PLANNING OBJECTION TO PARKER HOUSE, PARKER STREET – PLANNING APPLICATION NO. 2012/6132/P

I refer to my previous letter dated 4th December concerning the Planning Application at Parker House, 25-37 Parker Street, London on behalf of the St Joseph's Primary School in Macklin Street which immediately adjoins the Applicant's site. The School has now had the opportunity to consider the application in greater detail and is able to more fully respond to serious concerns it has on certain aspects of the Planning Application.

1. Statement of Community Involvement

We find the Statement of Community Engagement extremely misleading as to the extent and quality of engagement with the St Joseph's School. Meetings with the School were held on the following dates:

14 th June 2011	2pm – 3pm
13 th June 2012	2pm – 3.30pm
4 th September 2012	6.15 – 8.30pm (Public Development Management Forum)
18 th October 2012	4pm – 5.30pm
19 th November 2012	3.30pm – 5.30pm

At the meetings on 14th June 2011 and 13th June 2012 discussions with the Applicant were at a very outline stage and no details of the proposed scheme were tabled. The School expressed concerns over the impact of the development on the School and it was made clear to the Applicant that a key benefit of the redevelopment of Parker House would be the possibility of creating an additional access point to the School which would allow the youngest children to be picked up from the playground via Parker Street rather than from the very narrow pavement at the existing main entrance on Macklin Street. At this stage the Applicant agreed that this would be a desirable output from the redevelopment and they would consider it when working up their design (this is a key issue and is discussed in greater detail later on in this letter).

The next meeting held was the public Development Management Forum which was held on 4th September 2012 at the St Joseph's School and was attended by a wide variety of the local community. This meeting was dominated by local residents groups to the point that the Headmistress, Helen Tyler, found the meeting of little use and was unable to raise any of the School's concerns. It was agreed with the Applicant that a separate meeting would be held on 18th October 2012 to understand the School's issues in greater detail.

At the meeting on 18th October the design of the Parker Street development was tabled for the first time outside of the Development Management Forum. The School was disappointed to see that no access to the School's playground had been created from Parker Street and the Applicant stated that this was down to design and viability grounds and was simply not possible. The rest of that meeting focused upon the following issues:

- Loss of light to the School's classrooms and playground
- Construction noise
- Construction dust
- Lack of community benefits accruing to the School
- Adoption of more sensitive demolition methods
- Alternative foundation solutions such as a raft foundation to minimise impact upon the School
- Programming of the works.

It was clear from this meeting that these issues had not been considered fully and, at the suggestion of the School's representatives, the Applicant agreed to engage the services of a demolition and construction consultant to consider these aspects in further detail. The Applicant also agreed it would be helpful to undertake an acoustic survey and that they would supply a daylight and sunlight study. Neither of these have been undertaken although a more detailed acoustic study has now been commissioned. This led to a further meeting on 19th November 2012 where Keltbray Demolition presented their proposals for the demolition of Parker House. The presentation from Keltbray gave further detail on the demolition strategy and except for acoustic matting



ing was essentially a presentation of standard demolition sites in Central London.
to
Timeline above the construction management plan was prepared and
ed with the application prior to any real consideration of the impacts on
seph's School.

It is now clear from the timing of the Development Management Forum and the application date of 12th November 2012, there has been no meaningful consultation with St Joseph's School prior to the application being made as the first meaningful meeting was on 18th October 2012. This is a breach of the Localism Act 2011 which states that local people must be given a chance to comment where there is still genuine scope to make changes to the proposals. Given the timing of the meetings on 4th September, 18th October and 19th November in relation to the application date, this has clearly not occurred.

The consultation process with the St Joseph's School also failed to live up to the GLA Good Practice Guidance and the London Borough of Camden's Statement of Community Involvement (July 2011) which advises developers of major or sensitive development proposals to involve and consult with local communities early and in a meaningful way before applying for planning permission.

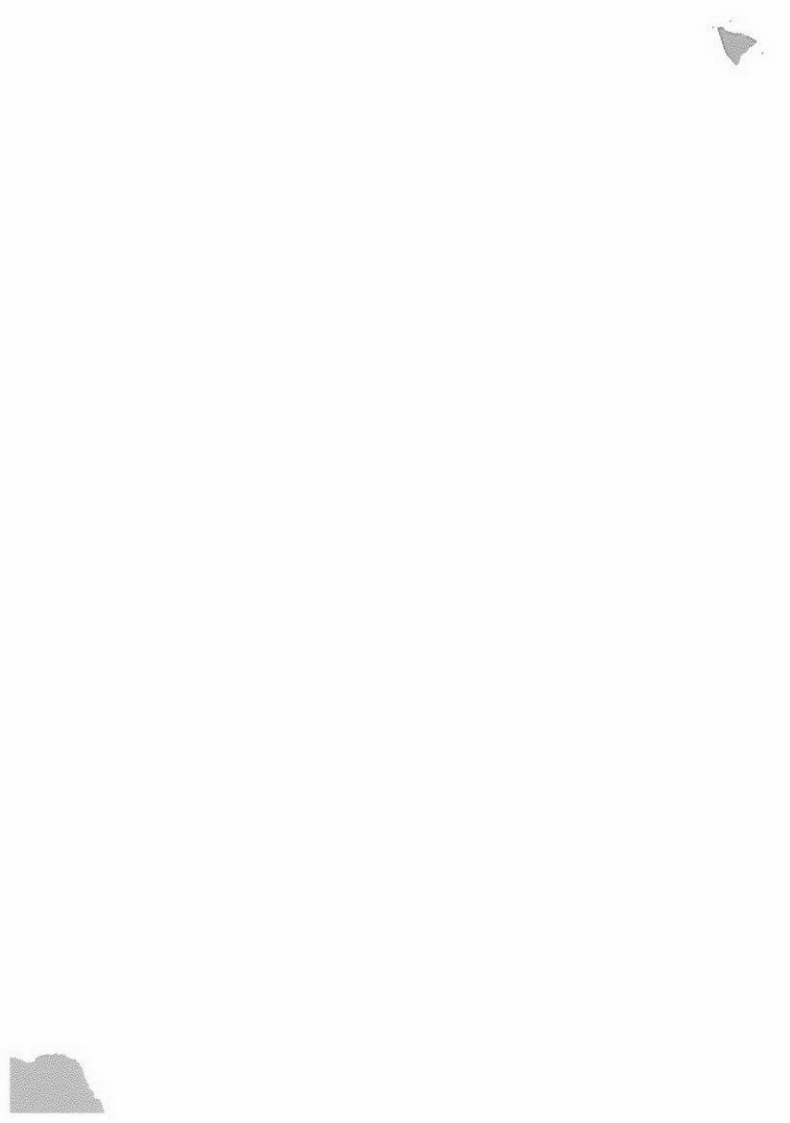
2. Design and Access Statement (DAS)

2.1 Quality of plans and diagrams

It has generally been quite difficult to understand the change in relationship of the existing and the proposed Parker House building in relation to the School as the plans do not clearly show the changes. As an example Figure 1 on page 9 (Design & Access Statement) indicates that the School is some distance from Parker House, however the photograph has clearly been taken from the wing furthest away from the School, giving the impression that Parker House does not immediately overlook the School and playground. This is not the case. Clearer plans and cross sections would have helped better understand the change in relationship such as the increase in the width of the wing overlooking the School.

2.2 Access to the School Playground from Parker Street through the Parker House Site

It was suggested at the earliest meeting with the Applicant that it would be desirable to facilitate an additional access to the School through the proposed development. This is because the main school entrance on Macklin Street is straight on to an extremely narrow footpath making the pavement extremely crowded at drop off and pick up times which is unsafe and necessitates large numbers of parents coming in to the School. A route through the Parker House site directly in to the playground would allow the younger children to be picked up from the School playground and to exit into a much safer environment in Parker Street. It was stressed to the Applicant that this was a



once in a lifetime opportunity to fundamentally improve the safeguarding of children by creation of an additional access point to the School. The Applicant undertook to consider this idea. The School were informed on 18th October 2012 that such a route was not possible due to the significant impact it would have on viability and that the planners would not accept a new doorway in the Parker Street façade. It is clear to the School that this access route has not been considered in any great detail, if at all, no plans have ever been tabled to demonstrate that it is not feasible and the implication is that it has been ruled out on purely commercial grounds.

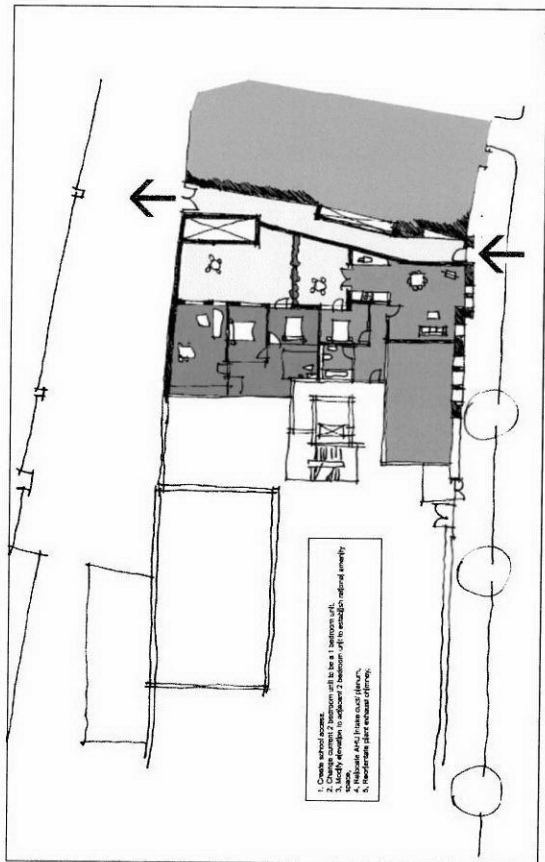
Our own discussions with Officers have indicated that a sensitive intervention to the façade on Parker Street to create an additional door would be considered if it was to create an access way for the School.

The St Joseph's School has commissioned its own architect to assess whether an access route is possible from Parker Street directly into the School's playground. The conclusion is that this is eminently feasible and a copy of the School's proposals is attached for information. This shows that a route can be taken through the eastern end of the Applicant's site along the boundary wall directly into the playground and requires only the creation of a sensitively designed door in the existing façade. Moreover with careful replanning of the units at this end of the site, the attached plan shows that the route can be achieved with the loss of only one bedroom to the applicant's scheme which will have minimal impact upon the viability of their proposals.

There are clear precedents for the creation of "public routes" through new developments for the public benefit. Camden Council have recently insisted on two such routes underneath and through the Central Saint Giles development and more recently the recent proposals for the refurbishment of Centre Point.

It is the School's contention that this route is extremely important in terms of the improved safety of the children at St Joseph's that the Planning Authority should insist on its inclusion within the Applicant's scheme.







2.3 Impact on Surrounding Buildings

There is no real analysis of any change in the impact of the proposed Parker House on the School playground and classrooms. The two cross sections at 5.3 (Design & Access Statement) do not clearly show the change in massing of the eastern wing of the new building. Although it steps back at 4th floor level and adds an additional 5th floor, what the cross sections do not show is that this wing is substantially widened.

In section 5.3 (Design & Access Statement) the Applicant states that the new C shaped plan should improve the existing situation to the buildings at the rear. We are talking about potential changes to the light to classrooms and the School's playground, the School's view is that the proposals will adversely impact the daylight and sunlight enjoyed and the school restates it's view that a detailed analysis should be undertaken to assess the impact of the change in bulk and massing and the assertions made by the applicant. This is discussed in greater detail in the daylight and sunlight report comments.

3. Daylight and Sunlight Report

The Building Research Establishment (BRE) Guidelines 2011 'Site Layout Planning for Daylight and Sunlight' (the leading authority on daylight/sunlight) identify the importance of residential buildings and, in particular, habitable rooms such as living rooms, bedrooms and kitchens to receive adequate levels of daylight and sunlight. It is therefore normal practice (as applied by GVA) to consider the impacts to those neighbouring buildings which are identified as residential by reference to external observation and a Valuation Office Agency search.

The BRE guidelines, however, also list a number of other sensitive building uses which may have a reasonable expectation of daylight such as schools, hospitals and hotels. In addition, policy SD6 (Amenity For Occupiers and Neighbours) of the London Borough of Camden UDP (adopted in June 2006) states that the '*Council will not grant planning permission for development that it considers causes harm to the amenity of occupiers and neighbours*'. A variety of factors to be considered are listed including daylight and sunlight levels. Given the proximity and extent of the proposed development at Parker House it is likely that the scheme will impact upon the daylight amenity, and consideration should be made to the resultant levels of daylight within the St Joseph's School.

The GVA report omits a number of key aspects and, in particular, the potential for the development to result in adverse overshadowing impacts on the school playground. The BRE guidelines provide that the availability of sunlight should be checked for all open spaces including parks and playing fields, children's playgrounds and gardens. Given the orientation of the school playground (to the north of Parker House) and the existing high marginalised conditions, it is likely the proposed development would result in an alteration

to the availability of direct sunlight to the playground and thus adversely affect the amenity.

In the School's view this report is inadequate in respect of the School. The Applicant appears to be taking the stance that they need only assess the impact of their scheme on residential accommodation as this is a category of use which has a special requirement for the light under the BRE Guidelines. The BRE guidelines clearly state that schools and playgrounds have a special requirement for light in a similar way to residential and therefore the Daylight and Sunlight Report should have undertaken a detailed study on any changes to the daylight and sunlight that the School and playground would receive after the development. This study has been requested from the Applicant but has not been forthcoming.

It is the School's contention that its application should not be considered until a full analysis of the impact of the scheme on the daylight and sunlight to the playground, classrooms has been fully assessed and taken into account through the scheme design. The report's conclusion that there is no unreasonable impact as a result of the development cannot be made until the Applicant has carried out a detailed analysis on the School.

This would be contrary to Development Management Policy DP26 "Managing the impact of development on occupiers and neighbours" which states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors to be considered include:

- a) visual privacy and overlooking;
- b) overshadowing and outlook;
- c) sunlight, daylight and artificial light levels.

4. Noise Assessment Study

The St Joseph's School is extremely concerned as to the impact of demolition and construction noise upon the School to the extent that it is feared, unless significant measures are taken, the noise will be such that it will be impossible to teach during the day.

4.1 Noise and Vibration

The School have been pressing the Applicant to undertake a proper acoustic survey to assess the likely level of construction noise within the classrooms and playground. This should have been done as part of the Applicant's noise assessment study and it is not acceptable for this aspect of the scheme to be conditioned and agreed between the Applicant, Camden Council, and the Camden Planners at a subsequent date.

The reason given for not carrying out an analytical assessment was "no information is available on the proposed construction methods". This is not

the case and it is straightforward to assess the demolition and construction methods based on the current design. It is also at odds given the inclusion of a programme of works and details of the demolition equipment to be used. Reference to an environmental management plan is made on page 22 however this has not been seen.

The acoustics of the School are particularly poor given the Victorian construction of the school buildings and the enclosed nature of the playground which is surrounded by an enclosed, hard urban environment. The School is naturally ventilated and relies on windows to the playground being opened.

The Applicant's Noise Assessment Study made great play of British Standard 5228. What they have failed to do is to use the tables set out in BS5228 to predict the level of construction noise that will be generated from their demolition and construction processes. Mace Construction, on behalf of the School, have used this information to estimate that at a distance of 10m from the demolition activity a pneumatic concrete breaker (the proposed method for the top two levels) emits a noise of 92db(A). The pulveriser mounted on the excavator (proposed for the lower levels) emits a sound level of 80db(A). Most other demolition activities, including crushing/dumping etc., range between 70 and 90db(A).

The Mace pre construction team have advised that noise levels (measured 1m from the School) should not exceed 65db(A) and that noise levels in playgrounds should typically be below 60db(A).

Arup Acoustics have reviewed the PBA report on behalf of the School and have made the following comments:

BS5228 suggests acceptable noise levels in open spaces as detailed by Mace, the limits relate to prevailing conditions for which survey results are needed. Arups view is that the PBA report is inadequate and they suspect a limit of 60db(A) or lower might be appropriate following more detailed surveys. PBA appear to have taken a 10 minute measurement facing towards the School which was "affected by noisy children in the playground to the rear of the site", which is unrepresentative of the noise climate when classes are taking place.

Building Bulletin 93 requires 35db(A) in classrooms. If natural ventilation is involved then 10 – 15 db(A) loss through partially opened windows i.e. 45 – 50 db(A) directly outside. With closed windows these limits could be 10db(A) higher depending on the type and quality of the windows.

Similarly there has been no assessment of the impact of vibration upon the teaching environment within the classrooms. Under the survey methodology section on page 13 of the report, no background measurements were taken in the school playground and a statement was made that there were access constraints. Access to the playground and school buildings would have been permitted had it been asked for.

4.2 Construction Works

As a community facility, schools are a protected use in Policy CS10 of the Core Strategy. The supporting text to this policy refers to Camden's Children and Young People's Plan which aims to improve the experiences of children and young people in Camden and details the areas the Council is working to improve, in particular:

- keeping children safe;
- raising school standards; and
- helping children achieve their full potential.

As stated above, Development Management Policy DP26 "Managing the impact of development on occupiers and neighbours" states that the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. The factors to be considered include:

- d) noise and vibration levels;
- e) odour, fumes and dust.

Development Management Policy DP28 "Noise and Vibration" states that the Council will seek to minimise the impact on local amenity from the demolition and construction phases of development. Schools are specifically referred to in the supporting text to Policy DP28 "Noise and Vibration" as a noise sensitive development.

Camden Planning Guidance 6 relates to amenity and sets out ways to mitigate noise by development.

In Section 5 of the report it is stated that no information is available on the proposed construction method so a detailed assessment is not possible at this stage. This statement is not correct. From the design of the building, it is relatively easy to assess the potential demolition and construction methods and the noise that would result. The Applicant is simply hoping to obtain a planning consent and try to sort the issue out later via condition.

The potential impact upon the School could be so severe that it would not be possible to continue teaching during the works and it is the School's contention that the noise generated by the demolition and construction should be more accurately predicted and a proper acoustic survey of the School undertaken so that appropriate noise attenuation measures can be taken both on the Applicant's site and in all probability within the School buildings in order to allow continued teaching. (This more detailed survey has only just been commissioned – January 2013.)

The Applicant suggests that normal construction works will take place between 8.00am and 6.00pm. These working hours for noisy activities are set

to protect residential occupiers and totally ignore the fact that there is a school operating within 10m of their site between the hours of 9.00am and 6.00pm Monday – Friday.

5.1.5 states that it may be appropriate to adopt a lower limit to protect the teaching environment. The School's consultants are fairly certain that it will be necessary to adopt a lower limit and that this lower limit should be calculated now prior to determination and be binding upon the applicant as part of any consent.

It is the School's contention that until a fuller noise assessment is undertaken which accurately predicts the level of the noise from the demolition and construction activities and the resultant noise levels in the playground and classrooms is predicted and acceptable noise levels agreed, that the application should not be determined.

If the noise and vibration from mechanical demolition and piling/construction activities cannot be brought down to an acceptable level following acoustic tests taken within the School environment, then it may be appropriate to impose much tougher conditions upon the Applicant such as quieter manual methods of demolition, and it may be necessary to adopt an alternative substructure construction methodology such as a raft foundation which would require less piling activities on the School boundary and would result in changes to the application design to allow the development to be constructed in a less intrusive manner.

It is the School's view that the current application does not comply with Policy CS10 Core Strategy, Policy DP26, Policy DP28 and Camden's Planning Guidance 6 and should be refused.

5. Draft Construction Management Plan

The opening statement that "the report provides a detailed approach for managing proposed demolition and construction works" is not the case as the applicant has to date so far failed to undertake a detailed study on how the building can be demolished and constructed within acceptable noise and vibration levels.

The Applicant has now undertaken further work with Keltbray demolition subsequent to the application being submitted.

As previously stated, Mace Construction estimate that the methods proposed by the Applicant for demolishing the building will cause sound levels of 92db(A) during the school day for a demolition period of 7 months commencing on 7th September 2013.

The precise method of demolition should be established with the building contractor prior to determination, not conditioned and dealt with between the Applicant and Officers at a later date. The Applicant needs to acknowledge that there will be divergence of what are acceptable hours between the School

and the local residential accommodation which may require completely different demolition and construction methodology.

On page 6 in the section on demolition of existing buildings, the Applicant fails to mention the DB rating of the various equipment they are proposing which is detailed in BS5228 and will range between 70 and 92db for pneumatic breakers which is the proposed methodology for the top two floors. The degree of analysis of the demolition process is totally inadequate given that the 7 month demolition period is due to commence on 7th September 2013 and may make the School environment unteachable. The Applicant has not considered alternative quieter equipment such as hydraulic and electric tools as the demolition would be slower.

The School is a sensitive neighbour and needs to benefit from the full time resident liaison officer.

The management of airborne hazards should be considered explicitly due to the proximity of the School playground including dust monitoring in the School.

An assessment of the local roads needs to be undertaken in respect of their suitability for 15 – 30 lorries daily, and school drop off and pick up times need to be avoided due to the route children take from/towards Kingsway which would conflict with construction traffic on routes with narrow footpaths.

The Applicant has subsequently suggested to the School that an acoustic screen will be erected on the scaffold to the site which they admit will attenuate the noise by 5db(A). The School's consultants advise that acoustic matting on its own will not reduce the demolition construction noise to a level at which classes can continue in the School. Therefore until the Applicant has carried out detailed acoustic surveys within the School and proposed further attenuation strategies that may include works within the School environment. This further analysis and additional attenuation measures should be detailed in the construction management plan which is currently inadequate for the application to be considered.

Live monitoring data needs to be made available to the School with immediate site response if the agreed levels are exceeded

5.1 Substructure Construction

The substructure construction can be equally intrusive in terms of noise and vibration as the demolition works. Again the construction management plan is inadequate in terms of estimating the likely noise from their construction method and the Applicant has failed to consider alternative methods of construction that would reduce the noise impact upon the School. The documents raise the potential of a secant pile wall which is a significant element of noisy works. If the intention is to use this method to create the perimeter basement wall, these works could last a number of months as only 2 – 3 piles will be installed a day depending upon the length, pile and scope of

the works. The Applicant has put forward the quickest and most economic construction method and has not considered noise impact upon the School. The Applicant has failed to consider less noisy alternatives such as a raft foundation or a kingpost basement retaining structure which would create less noise than secant piles as they can be bored (not hammered) and only one pile is required every 6 – 8m.

Again it is the School's contention that this application should not be considered until further work has been undertaken on the construction methodology and that it has been proven that the least intrusive method of demolition and construction has been adopted rather than the quickest and most economic method which also creates the most noise and vibration to adjoining properties.

The Applicant has simply failed to take account of the extremely sensitive environment within which they will be working, which is approximately 10m from an operational school.

5.2 Section 106

There is no indication from the application information as to whether a Section 106 Agreement is being entered into and what the terms of that agreement may be. St Joseph's School would be interested in the terms of the Section 106 Agreement which is meant to mitigate the impact of development.

6.0 Impact of the Parker Street Hostel Redevelopment on St Joseph's School

At the start of the academic year 2007/2008, the school had been through a very unsettled period and was placed in LA category 4 (inadequate). The headteacher implemented the Intensifying Support Programme (ISP) to embed systems and make secure assessments about children's learning as part of the drive to develop leadership & management capacity and accelerated progress and raise standards in reading, writing and maths.

By September 2012, outcomes for children were significantly above national averages for the third year running; 100% of children achieved a L4+ in English and maths combined. Last year, the school achieved the Camden Award for Inclusion and the national Achievement for All (Afa) Award. There has been significant development of a broad, enriched, engaging and exceptional curriculum involving all stakeholders and a range of cultural and corporate partnerships. Ofsted & Section 48 inspections are due between the beginning of the Summer Term 2013 and the end the Summer Term 2014. The school currently judges the overall 'best fit' to be outstanding (1) and is working towards that judgement in its next Ofsted inspection.

At St Joseph's we achieve these exceptional outcomes for children despite the many challenges the children face in life and the challenges of our school building. In recent years we have taken tremendous strides forward particularly in the development of children's early reading. This is centered on daily, thorough and targeted work on letters and sounds, and work with

children to build their confidence reading aloud in their early years. **We cannot imagine how children will be able to acquire these skills if they cannot be heard when they attempt sounds, or cannot hear the teacher pronouncing phonemes; that is assuming they can concentrate on the teacher in the first instance.**

As has been widely stated by the current government and in the national press, the ability to read is critical to a child's success in their wider education and in the future. **Given the length of the development of Parker Street, this could put our children years behind in their education.**

It would be unacceptable for our children to fall behind –they are among the most deprived nationally, and in order for them to achieve well in life they need to make more progress than their peers nationally, and teaching needs to be more effective, not less, than in another school.

Camden have recognised the importance of Nursery Education and have shown this by committing to funding full time places. However, we run the risk of jeopardising this crucial Early Years development because of the serious disruption so close by.

St Joseph's is an inclusive school and as such we have a number of children with statements of Special Educational Needs. Our duty to these children is to deliver a provision that is calm, predictable and allows them to feel secure. **Persistent noise at the level anticipated would be distressing for all children but we believe it would cause very high stress levels for the children with needs and jeopardise not just their education, but more significantly their emotional wellbeing.**

A key aspect of a child's primary schooling is learning how to concentrate. In 'normal' teaching conditions, this is challenging. Outstanding whole class teaching seeks to continuously engage the thirty children who span all ability ranges and learning styles for an optimum time of about fifteen to twenty minutes. **If the teacher is forced to spend this time managing the distraction and disruption caused by demolition/build activity, the job of actual teaching will be unfeasible. We are seriously concerned that this will impact our retention of the outstanding teachers we have invested in and developed in recent time.**

Every child brings additional funding to the school. If this demolition and construction goes ahead as planned, it will be demonstrable to prospective parents during school tours that the conditions for learning in our school are not good. We have built our standards and reputation to the point where we are the school of choice for many locally. However, there are other strong schools in the area which could be chosen over us based on the conditions for learning. **The long term impact of this on our funding and reputation is serious.**

Summary

The Applicant has failed to acknowledge in their planning submission that the St Joseph's School is a sensitive neighbour/receptor and the analysis undertaken reflects this. They have only treated residential neighbours as sensitive, and their design and construction methodology as a result fails to protect the School. It is St Joseph's view that far more analysis of the School needs is required before this application should proceed.

The School has also shown how a second means of access can be created improving safeguarding and would like this to be included in a revised proposal for the development.

Yours sincerely



SIMON WILKES
Associate Governor
Premises Committee
St Joseph's School

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