

Address:	Central Somers Town Covering Land At Polygon Road Open Space, Edith Neville Primary School 174 Ossulston Street And Purchase Street Open Space London NW1		1 & 2
Application Number:	2015/2704/P 2015/7168/L	Officer: David Fowler	
Ward:	St Pancras and Somers Town		
Date Received:	17/12/2015		
Proposal (2015/2704/P):			
<p>Demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys in height comprising:</p> <ul style="list-style-type: none"> • Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to include a children’s nursery and community play facility with 10no. residential units above; • Plot 2: 35 residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m); • Plot 3: Extension of Grade II listed terrace to provide 3no. dwellings; • Plot 4: Replacement school (Use Class D1) ; • Plot 5: 20no. residential units over a replacement community hall (Use Class D1) (approximately 211sq.m); • Plot 6: 14no. residential units; and • Plot 7: 54no. residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 70sq.m). <p>Changes to existing public open spaces along with associated highways works and landscaping.</p>			
Background Papers, Supporting Documents and Drawing Numbers:			
<u>Whole site</u>			
Existing 246-100-P-01, TCP_CNSOMERSTWN_1.			
Proposed 246-110-P-50, 246-110-P-51, TCP_CNSOMERSTWN_2.			
<u>Plot 1</u>			
Existing 057/4002, 057/4010, 057/4050, 057/4051, 057/4052, 057/4053.			
Proposed 057/4102, 057/4110, 057/4111, 057/4112, 057/4113, 057/4114, 057/4115, 057/4150,			

057/4151, 057/4152, 057/4153, 057/4160, 057/4161, 057/4162, 057/4163, 057/4164, 057/4165, 057/4220, 057/4221, 057/4222, 057/4223, 057/4300, Z(--)-232/P2, V(21)006

Plot 2

Existing

(00) P100, (00) P101.

Proposed

(01) P100, (01) P102, (01) P103, (01) P104, (01) P105, (01) P106, (01) P107, (01) P108, (01) P109, (01) P110, (01) P111, (01) P201, (01) P202, (01) P203, (01) P204, (01) P210, (01) P211, (01) P301, (01) P302, (01) P303.

Plot 3

Existing

176 A001, 176b A010.

Proposed

176b A100, 176b A101, 176b A102 R1, 176b A103 R1, 176b A104, 176b A200, 176b A201, 176b A202, 176b A203, 176b A204, 176b A205, 176b A206, 176b A207, 176b A208, 176b A210, 176b A211.

Plot 4

Existing

176 A001, 176 A010, 176 A011.

Proposed

176 A101, 176 A102, 176 A103, 176 A104, 176 A201, 176 A202, 176 A203, 176 A204, 176 A221, 176 A222, 176 A223, 176 A224, 176 A225, 176 A226.

Plots 5 and 6

Existing

A228_A_(00)_P100, A228_A_(00)_P102, A228_A_(00)_P103.

Proposed

A228_A_Z5_(01)_P104, A228_A_Z5_(01)_P105, A228_A_Z5_(01)_P106, A228_A_Z5_(01)_P107, A228_A_Z5_(01)_P201, A228_A_Z5_(01)_P202, A228_A_Z5_(01)_P203, A228_A_Z5_(01)_P204, A228_A_Z5_(01)_P210, A228_A_Z5_(01)_P211, A228_A_Z5_(01)_P301, A228_A_Z5_(01)_P302, A228_A_Z5_(01)_P303, A228_A_Z6_(01)_P102, A228_A_Z6_(01)_P103, A228_A_Z6_(01)_P104, A228_A_Z6_(01)_P105, A228_A_Z6_(01)_P106, A228_A_Z6_(01)_P201, A228_A_Z6_(01)_P202, A228_A_Z6_(01)_P203, A228_A_Z6_(01)_P204, A228_A_Z6_(01)_P210, A228_A_Z6_(01)_P211, A228_A_Z6_(01)_P301, A228_A_Z6_(01)_P302, A228_A_Z6_(01)_P303.

Plot 7

Existing

372-SITE-100_P04, 372-SITE-101_P04

Proposed

372-LB-200_P05, 372-LB-20_P04, 372-LB-202_P04, 372-L01-203_P05, 372-L02-

204_P05, 372-L04-205_P05, 372-L05-206_P05, 372-LB-207_P05, 372-LB-208_P05, 372-LB-209_P05, 372-LB-210_P05, 372-LB-211_P05, 372-LB-212_P05, 372-LB-213_P05, 372-LB-214_P05, 372-LB-215_P05, 372-RCP-220_P04, 372-SEC-300_P05, 372-SEC-301_P04, 372-ELE-400_P09, 372-ELE-401_P09, 372-ELE-402_P10, 372-ELE-403_P10, 372-ELE-450_P06, 372-ELE-451_P05, 372-ELE-452_P07, 372-ELE-453_P06, 372-ELE-454_P04, 372-ELE-455_P04, 372-ELE-456_P03, 372-ELE-457_P04, 372-ELE-458_P04, 372-ELE-459_P04, 372-ELE-460_P03, 372-ELE-461_P03, 372-ELE-46_P032, 372-ELE-463_P03, 372-ELE-464_P02, 372-ELE-46_P02.

Documents (all plots)

Design and Access Statements

- Design and Access Statement – Masterplan and Landscape (prepared by DSDHA) December 2015
- Design and Access Statement Rev A – Plot 1 - Community Hub and Housing (prepared by Adam Khan Architects) December 2015
- Plot 1 Community Facilities - Landscape Design & Access Statement Rev C (prepared by LUC) December 2015
- Design and Access Statement – Plot 2 - Charrington Street Housing (prepared by Duggan Morris Architects) December 2015
- Design and Access Statement – Plot 3 - Charrington Street Terraced Housing (prepared by Hayhurst and Co)
- Design and Access Statement – Plot 4 - Edith Neville School and Children's Centre (prepared by Hayhurst and Co) December 2015
- Design and Access Statement – Plots 5 and 6 - Purchase Street Housing and Community Centre (prepared by Duggan Morris Architects) December 2015
- Design and Access Statement – Plot 7 - Brill Place Tower (prepared by DrMM Architects) December 2015

Other documents

- Planning Statement (prepared by Turley) December 2015
- Affordable Housing Statement (prepared by Turley) December 2015
- Contamination Land Assessment (prepared by Buro Happold Engineering) 18 September 2015
- Transport Assessment Revision P01 (prepared by Civic Engineers) December 2015
- Framework Delivery and Servicing Plan (prepared by Civic Engineers) December 2015
- Framework Travel Plan (prepared by Civic Engineers) December 2015
- Draft Construction Management Plan (produced by BAM Construction) December 2015
- Heritage, Townscape and Visual Impact Assessment (produced by Turley) December 2015
- Heritage, Townscape and Visual Impact Assessment: Addendum (produced by Turley) March 2016
- Flood Risk Assessment (produced by AKT) January 2016
- Arboricultural Report (prepared by Arboricultural Solutions) December 2015
- Ecological Site Assessment – Extended Phase 1 Habitat Survey (produced by Penny Anderson Associates Ltd.) December 2015

- Air Quality Assessment (produced by Ramboll Environ) December 2015
- Statement of Community Involvement (produced by Camden Council) December 2015
- Masterplan Energy and Sustainability Statement (produced by Atelier Ten) December 2015
- Energy and Sustainability Statement – Community Hub (Plot 1) (prepared by Max Fordham) December 2015
- Plot 1 Community Facilities – Sustainability and Energy Statement REV C (prepared by Max Fordham) December 2015
- Energy and Sustainability Statement – Plots 2, 5 and 6 Rev D Issue (prepared by Max Fordham) December 2015
- Energy and Sustainability Statement – Plot 3 Charrington Street Terraced Housing (prepared by Max Fordham)
- Energy and Sustainability Statement – Plot 4 Edith Neville School and Children’s Centre (prepared by Max Fordham) December 2015
- Energy and Sustainability Statement – Plot 7 Brill Place Housing (Skelly and Couch) December 2015
- Polygon Residential, Plot 2 – SUDS Drainage Statement version 1 (prepared by Price & Myers) 20.11.15
- Polygon Residential, Plot 5 – SUDS Drainage Statement version 1 (prepared by Price & Myers) 20.11.15
- Polygon Residential, Plot 6 – SUDS Drainage Statement version 1 (prepared by Price & Myers) 20.11.15
- Daylight and Sunlight Assessment (prepared by Point 2 Surveyors) December 2015
- Noise Assessment (prepared by Ramboll Environ) December 2015
- Plot 1 Community Facilities - Noise Impact Assessment Revision E (prepared by Max Fordham) December 2015
- Plot 2 – Charrington Street Housing, Central Somers Town - Noise Impact Assessment Rev B (prepared by Max Fordham) December 2015
- Plot 5 – Purchase Street Housing North and Community Hall and Plot 6 – Purchase Street Housing South, Central Somers Town - Noise Impact Assessment Rev B (prepared by Max Fordham) December 2015
- Wind Microclimate Study (prepared by BMT Fluid Mechanics) December 2015
- Basement Impact Assessment (prepared by Buro Happold) December 2015
- Phase 1 Geo-environmental Desk Study (prepared by Pell Frischmann) May 2013

RECOMMENDATION SUMMARY:

Grant conditional planning permission subject to Section 106 Legal Agreement

Applicant:

London Borough of Camden (CIP and Major Projects)

Agent:

Ms Claire Newbury
Turley
The Charlotte Building
17 Gresse Street
London
W1T 1QL

Proposal (2015/7168/L):	
Extension of Grade II listed terrace to provide 3no. dwellings.	
Background Papers, Supporting Documents and Drawing Numbers:	
<u>Plot 3</u> Existing 176 A001, 176b A010. Proposed 176b A100, 176b A101, 176b A102, 176b A103, 176b A104, 176b A200, 176b A201, 176b A202, 176b A203, 176b A204, 176b A205, 176b A206, 176b A207, 176b A208, 176b A210, 176b A211.	
RECOMMENDATION SUMMARY:	
Grant conditional listed building consent	
Applicant:	Agent:
London Borough of Camden	Ms Claire Newbury Turley The Charlotte Building 17 Gresse Street London W1T 1QL

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (GIA sqm)
Existing	School		1,770
	Children's nursery		133
	Community facility		133
	Tenant's Hall		150
	TOTAL		2,186
Proposed	School		1,770
	Children's nursery/community play facility		1,554
	Community hall		211
	Residential (Class C3)		14,673
	Flexible A1/A2/ A3/D1 use		207
	TOTAL		18,415

Residential Use Details:						
	Residential Type	No. of Bedrooms per Unit				
		1	2	3	4	Total
Market	Flat	42	44	3	-	89
	House	-	-	3	-	3
	TOTAL	42	44	6	-	92
Affordable (rented)	Flat	13	23	8	-	44
TOTAL - All	Flats & Houses	55	67	14		136

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	0	0
Proposed	0	0

OFFICERS' REPORT

Reason for Referral to Committee: Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace [clause 3(i)]; and which is subject to the completion of a Section 106 legal agreement for matters which the Director of Culture and Environment does not have delegated authority [clause 3(vi)].

The application includes a building which is over 30m in height and is therefore considered a 'strategic' application under the Mayor of London Order 2008. The application is thereby referable for his direction, whereby he has power to direct the local authority to refuse the application or call the application in for his own determination.

Environmental Impact Assessment (EIA)

A screening opinion for the proposal was provided by the Council in 2015 whereby that development did not constitute an EIA development under the EIA Regulations 2011/2015 Regulations.). An EIA is therefore not applicable to the development.

1 BACKGROUND

- 1.1 The proposed development is a self-funding CIP (Community Investment Programme) scheme, led by the objective of re-providing dilapidated school, nursery, community hall and play facilities. There would be public realm improvements as part of the application.
- 1.2 This CIP scheme was agreed by Cabinet in December 2013 and in December 2015. The CIP brings together a wide range of work considering how best to use the Council's assets to improve, shape and transform key places and services within Camden. The CIP was launched in response to a reduction in funding, including a cut of £200m of capital funding, and responding to this financial climate remains a key challenge for CIP, including, in particular, ensuring continued investment in schools. The CIP schools budget of £117million was agreed in response to the funding challenges and was approved by Cabinet in the December 2012 Director of Finance Report to Cabinet 2011/12 Revenue Estimates and Council Tax (FIN/2011/07).
- 1.3 The vision of the CIP is to apply a strategic approach to enable the use of the Council's assets to support community investment. It aims to use development and disposals and rationalisation to create value which can then contribute to the funding of the Council's capital investment priorities, focused having regard to the age and condition of the Council's portfolio and the capital programme commitments. The CIP is about taking a long-term and co-ordinated approach to the wide variety of Council-owned assets to ensure best use is made of them in order to deliver on the needs and priorities for local communities across the Borough.
- 1.4 The applicant for the proposal is the Council department of CIP and Major Projects. The proposal is for the re-provision of the existing school and community facilities with the provision of private residential to fund those elements of the proposal. The proposal also includes affordable housing.
- 1.5 A planning application and listed building consent application have been submitted. The listed building consent application has been submitted as there is 1 listed building (grade II) on the site – the end of the Georgian terrace on Charrington Street.

2 SITE

- 2.1 The application site covers an area of approximately 2.2 hectares (22,000sqm) and can be broken down into 3 parts;
 - Polygon Open Space to the west and the hub community facilities (including private open space)
 - Edith Neville Primary School (ENPS) in the centre and the southernmost property of the terrace on Charrington Street (listed)
 - Purchase Street Open Space to the east, with a tenant's hall at the northern end of this space.



Figure 1 – The existing site

- 2.2 The site also includes a pathway running along the northern periphery of Polygon Open Space, which is designated Public Open Space. Purchase Street and a pedestrian route between Ossulston Street and Charrington Street run through the site. The property at the end of the terrace on Charrington Street which is included in the site is grade II listed. The site itself is not within any conservation areas and does not include any locally listed buildings.
- 2.3 The site is bounded to the south-west by Chalton Street with residential blocks beyond (4-5 storeys). The site is bounded to the north-west and north-east (moving in a clockwise direction) by the vacant pub building fronting Chalton Street (4 storeys including mansard storey), the southern boundary of Regent Park High School (sports pitches), the southern end of a grade II listed terrace of Georgian houses (3 storeys plus basement level) on the north-eastern side of Charrington Street, the rear gardens of properties fronting Somers Close, Purchase Street with 3 residential blocks beyond, Hampden Close and the Coopers Lane Estate. The listed end-of-terrace property is the Caretaker's House for ENPS. The site is bounded to the south-east by Brill Place with the Frances Crick Institute, being constructed beyond (to a height equating to approximately eighteen residential storeys along the southern boundary and thirteen residential storeys along the Brill Place frontage). The site is bounded to the south (moving in a clockwise direction) by Purchase Street and Polygon Road, with housing beyond (4-6 storeys) including Phoenix Court and Walker House (6 storeys including roof storey). The site slopes gradually from west to east, with more noticeable topography on Purchase Street, where the site slopes down to the boundary with the Cooper's Lane Estate.
- 2.4 The King's Cross St Pancras Conservation Area adjoins the central part of the site to the north-west, and is also located close to the eastern part of the site, to the east. The terrace on Charrington Street to the north-west of the site (within the King's Cross St Pancras Conservation Area) is grade II listed, as are the

other terraces along this street to the north and the Great Northern Hotel beside King's Cross. There are a number of grade I listed buildings in the area; St Pancras Station, King's Cross Station and the British Library (recently listed in July 2015). St Pancras Old Church, to the north-east, is grade II* listed. The site is not covered by any viewing corridors, but there is a viewing corridor (Blackheath Point to St Paul's Cathedral) to the south-west. Walker House to the south of Polygon Open Space is locally listed. The flats to the north-west of the site; St Michael's flats, St Anthony's flats, St Francis' House, St George's House, St Christopher's House, St Nicholas's Flats, north of Aldenham Street, are also locally listed. The site lies just outside the Central Activities Zone, the northern boundary of which runs along Brill Place.

- 2.5 The surrounding area is predominantly residential, with some commercial uses at ground floor level. The area was originally laid out as Georgian terraces but has residential development from the Victorian era and from throughout the twentieth century. There are major commercial buildings in the area also, at the Francis Crick Institute and St Pancras Station. There are a number of schools in Somers Town, including Edith Neville Primary School on the site and Regent Park High School adjoining the site to the north.
- 2.6 The eastern parts of the site (Brill Place and Purchase Street) have a PTAL rating of 6b (Excellent), which falls to a PTAL of 5 (Very Good) moving west across the site to Chalton Street. The site is located close to St Pancras and King's Cross Stations, as well as numerous bus services.

3 THE PROPOSAL

- 3.1 The proposal is for the erection of buildings on and around Purchase Street and Polygon Open Spaces and the provision of additional public open space on the southern part of the Edith Neville Primary School site. The application involves the demolition of the existing primary school, the existing buildings at Plot 10 Community Play Facilities and the Tenant's Hall north of Purchase Street Open Space. The proposal centres around the 2 open spaces. The application site is divided into 7 plots which would comprise the following:
- Plot 1: Community hub including nursery and MUGA and 10 flats, over 6 storeys
 - Plot 2: 35 flats over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m) over part 9/part 6 storeys
 - Plot 3: Extension of Grade II listed terrace to provide 3 no. dwellings;
 - Plot 4: Replacement school building
 - Plot 5: 20 flats over a replacement community hall beside Purchase Street Open Space (northern block)
 - Plot 6: 14 flats beside Purchase Street Open Space (southern block)
 - Plot 7: Brill Place Tower - 54 flats over flexible A1/A2/A3/D1 floorspace at ground level over 25 storeys

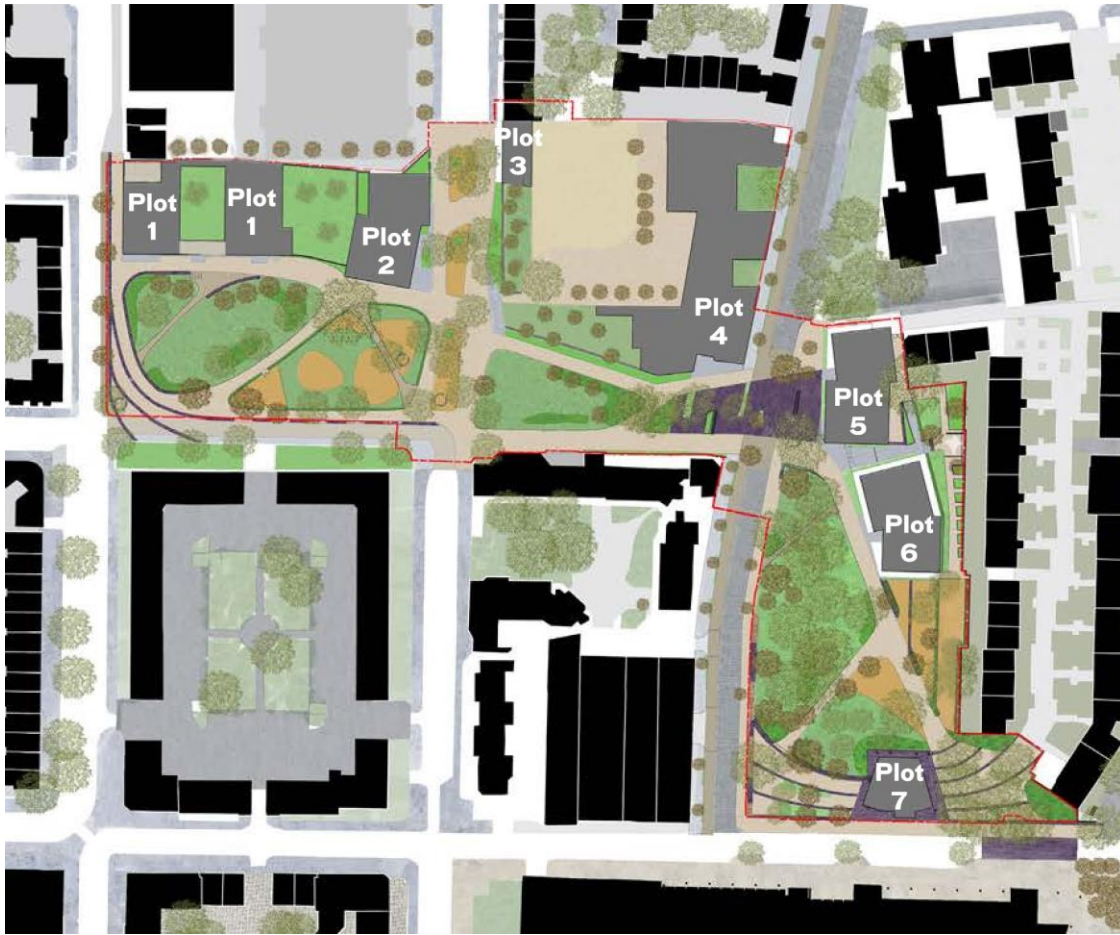


Figure 2 – The proposed site

- 3.2 The proposal also involves landscaping on the Public Open Spaces.
- 3.3 St Aloysius Nursery currently exists in a temporary building in the grounds of Regent High School to the north of the site. Under the proposals this would be provided on Plot 1.
- 3.4 In terms of residential use, overall the proposal would provide 136 units (across plots 2, 3, 5, 6 and 7).
- 3.5 Different architects have produced the proposals for the different plots, but have worked together as a team for the overall design concepts.
- 3.6 All of the proposed works are limited to within the site boundary. The applicant has drawn up some changes to the highways works which are shown for indicative purposes only and should not be considered as part of this application. A pedestrian, cyclist and environmental contribution (pce) would be secured to pay for environmental improvements in the area, though it should be noted that the Council would design and implement these. These amendments would be carried out under highways legislation with consultation where necessary.

4 SECTION 106 AGREEMENT

- 4.1 The recommendations are based on certain planning requirements (“Heads of Terms”) being secured in the event of approval. These Heads of Terms would usually be incorporated in a Section 106 Agreement. However in this case the applicant is the Council and as a matter of law the Council cannot enter into a Section 106 Agreement with itself.
- 4.2 Nevertheless it is still imperative that this application is dealt with in a way that is consistent with the way the Council would deal with non-Council applications. Therefore the Heads of Term will be embodied in a “Shadow Section 106 Agreement”. This will be in the same form as a “standard” Section 106 agreement, incorporating the “usual” legal clauses and negotiated by separate lawyers within the Borough Solicitors Department representing the interests of the Council as landowner/ applicant and the Council as regulatory planning authority.
- 4.3 The Shadow Section 106 will include inter alia a provision requiring (i) that in the event of any disposal of the relevant land the Shadow Section 106 Terms will be included in the terms of the sale transfer and (ii) the purchaser will be formally required to enter into a Section 106 agreement as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site). The different plots in the application are likely to be developed at different phases. Some of the conditions and obligations are plot-specific to allow for this.
- 4.4 Once the Shadow Section 106 Agreement has been finalised the Director of CIP and Major Projects (the applicant department) will sign a letter formally undertaking on behalf of the department that its provisions will be complied with in the build out of the development and its subsequent operation.
- 4.5 The Shadow Section 106 Agreement and the Executive Director/Director’s Undertaking of Compliance will be noted on the Planning Register (so the agreement is put on the record in the same way as a “standard” Section 106 Agreement) and compliance with the Shadow Section 106 will be tracked and monitored by the Planning Obligations Monitoring Officers in Development Management in the same way as a “standard” Section 106.

5 RELEVANT HISTORY

- 5.1 The area is predominantly residential with housing of different eras, styles and heights. The parts of Somers Town close to St Pancras Station were formerly used as goods and coal yards connected to the station. The area was badly bombed during WWII and some of the open spaces in the area are as a result of this.

The site

- 5.2 05/10/2015 – request for a screening opinion for an Environmental Impact Assessment. Decision – not required (2015/5504/P).
- 5.3 Edith Neville Primary School is the primary school on the site with buildings dating back to the 1970s. Since it was built, there have been a number of extensions.

5.4 Plot 10 has existed on site since at least 1984.

12/05/2011 - Planning permission (2010/5814/P) granted for: "*Erection of a two storey community building (Class D1) following demolition of existing community building (Class D1). On Plot 10 site*" This permission was not implemented as funding was never secured.

The area

5.5 14/02/2005 – Permission granted for "The erection of a single storey nursery school building including external playspace and storage facilities" at South Camden Community School – now Regent High School (2004/5410/P).

5.6 The only major development to take place recently in the vicinity is the erection of the Francis Crick Institute (2010/4721/P) which was granted permission on 10/03/2011:

"Development to provide a biomedical research centre including laboratory and research space, lecturing and teaching space, exhibition space and a community facility; landscaped public open spaces; a new pedestrian route between Midland Road and Ossulston Street; a service entrance off Brill Place and a relocated vehicular access from Midland Road to serve the British Library."

6 CONSULTATION SUMMARY

STATUTORY

6.1 Greater London Authority Stage 1 response

- Social infrastructure; strongly support re-provision of educational and community space of improved quality.
- Open space; re-provision of same area of public open space and improvement strongly supported.
- Housing; choice of units, density and play space provision supported.
- Historic environment; no harm will be caused to designated heritage assets, harm to non-designated heritage assets outweighed by public benefits.
- Urban design and tall buildings; considered very high quality.
- Inclusive design; acceptable apart from need to provide blue badge parking
- Trees and biodiversity; loss of trees regrettable, however application demonstrates that the loss is unavoidable and mitigates through planting. Enhanced biodiversity welcomed.
- Transport; issues regarding deliveries, cycle parking, blue badge parking and pedestrian/cycle movement should be resolved.
- Climate change; CO2 savings exceed London Plan policy, further passive measures should be considered

Officer's response: See Transport section

6.2 Historic England

Proposed tower would cause 'less than substantial harm' and application should be withdrawn and alternatives considered.

- The proposed tower would harm the ability to appreciate and enjoy the significance of Regent's Park and some of the buildings associated with it, specifically Grade I listed Chester Terrace, which is of the highest architectural significance – significant in a European and world context.
- The proposed tower would appear above the roof of the Grade I listed Chester Terrace, in an axial route as viewed from the Inner Circle. Would be significantly taller than the listed terrace and would be visible day and night. The axial route was consciously designed to provide framed landscape views. The tall building would be clearly seen above the terrace in these views during the day and at night. There are no other buildings in this view.
- No other tall buildings in this key view from the heart of a registered landscape.
- Visual intrusion into carefully designed piece of architectural theatre strikes a discordant note, erodes original intention of architects.
- Proposed tower does not and could not respond to listed terrace.
- Support redevelopment of the Somers Town site in principle and accept public benefit of new school.
- Do not see convincing justification that this harm to designated heritage assets of the highest significance is necessary and proposals should be amended. Do not believe it has been demonstrated that the proposal is the only way to deliver public benefits.
- Whilst harm is less than substantial it is nevertheless significant and serious and affects heritage assets of the highest designation.
- Additional information provided by applicant demonstrates that the building will clearly be seen and will have an impact.
- The proposed building does not and could not respond to the terrace. The tower erodes the enjoyment of this key view.

No comment on application for listed building consent.

6.3 Victorian Society

- insufficient views of the proposed 25 storey tower block have been included to allow the impact of the tall building to be assessed.
- the proposals have the potential to affect the setting of numerous listed buildings and conservation areas, most notably St Pancras Station (grade I)

Officer's response: See Conservation section

6.4 Georgian Group

Object on the following grounds:

- Harm to the setting of Grade I listed Chester terrace when viewed from the Inner Circle of Regent's Park (itself a Grade I Registered Landscape), proposed tower would be visible above central section of terrace, impact on one of the most important views of the park.

Officer's response: See Conservation section

6.5 **Twentieth Century Society**

Object on the following grounds:

- Impact on significant architectural interest grade I listed British Library from proposed tower by virtue of its considerable height, design and massing
- Not possible to assess impact of tower from submitted information, no views from courtyard or landscaped roof terraces
- Impact on views from the British Library, particularly from the landscaped roof terraces

Officer's response: See Conservation section

6.6 **Transport for London**

- Walking and cycling; the proposal will result in enhancements to pedestrian and cycle routes through the upgrading of public open space, in principle support for the public realm improvements
- Concerns regarding achievability of cycle parking, given floorspace allocated
- No specific information provided on cycle parking for open space
- Car-free development strongly supported
- 14 blue badge spaces should be provided
- Concerns re servicing for Plot 6

Officer's response: See Transport section

6.7 **London Underground Lines (LUL)**

No comment.

6.8 **Network Rail**

No objection.

6.9 **Thames Water**

No objection.

6.10 **London Borough of Islington**

No comment.

6.11 **London Borough of Westminster**

Object on the following grounds:

- The tower element of the proposals, clearly visible in the 'CGI from Regents Park' above the roofline of Chester Terrace in the view east on Chester Road could only have a particularly harmful impact upon the setting of the Regent's Park Conservation Area, upon the remainder of

Regents Park included within the London Borough of Camden, and upon the setting of the terrace of Grade 1 listed buildings to Chester Terrace.

- The principal focus of Chester Terrace is on axis with Chester Road and thus the harm caused by the creation of a tower element rising markedly above the height of the terrace would be readily appreciable from inside the section of Regent's Park contained within Westminster. The uniformity of roofline of the buildings and the impression of them against the sky rather than with large built structures visible behind is a crucial feature of their character, and this aspect contributes significantly to their character and appearance and contribution to the setting of Regent's Park.
- It is clear that the tower proposed, by projecting above markedly above the height of Chester Terrace, would harm the setting of those listed buildings to Chester Terrace and the setting of the Regent's Park Conservation Area and Regent's Park generally. In line with the City Council's position as set out above, Camden Council are urged to refuse this application proposal.

6.12 Royal Parks

No response to date.

Local groups/stakeholders

6.13 King's Cross CAAC

No response to date.

6.14 Regent's Park CAAC

No response to date.

6.15 Camden Civic Society

Strongly object on the following grounds:

- Tower; Height of tower, not in keeping with area (maximum of 6 storeys), impact on green space
- Impact on St Pancras – particularly train shed, loss of light
- Impact on British Library
- Tower is not within Central Activities Zone
- Tower will not necessarily lead to higher density, population should be spread out
- Open space; Loss of open space, loss of trees, health implications, design of open space, landscaping does not justify loss of open space, design of open space will not be functional
- Justification of rebuilding primary school, should use section 106 and CIL money from other local projects
- 9 storey block; out of keeping with three-storey terraces, impact on terraces
- Impact on community garden

- Loss of amenity to residents, loss of light, overshadowing
- No disabled parking proposed

Officer's response: See sections on Principle of large-scale development, Conservation, Design, Impact on Public Open Space, Impact on Private Open Space

6.16 Somers Town Neighbourhood Forum

Objection on the following grounds:

- Viability and funding; viability assessment should be public
- A cheaper, better more deliverable solution to the local needs (rebuilding school and Plot 10) should be found, partnership working with locals has not happened, locals' suggestions for alternatives have been ignored, planning application ignores representations made at pre-application stage, proposals are unnecessary, delivery should be phased
- Proposal undermines neighbourhood planning process
- Conflict of interest with LB Camden acting as developer and planning authority
- Overdevelopment, height, bulk, mass, density, dwarfs existing buildings including even Francis Crick – specifically tower and 6-9 storey building,
- Unacceptable precedent
- Increased pressure on public services such as transport (already at capacity) and open space
- Somers Town not designated as a growth area, Plot 7 (tower) is not within Central Activities Zone, area not suitable for such development – is an area of more limited change, sites not identified in Site Allocations development document
- Construction impact, cumulative impact of other works including HS2, traffic, mud, dust, health of schoolchildren, residents and workers, safety
- Archaeological assessment should be provided
- Amenity; loss of daylight and sunlight, proposals do not meet BRE guidelines, overlooking and loss of privacy – especially to Coopers Lane and 12m separation distance from tower, overlooking of Francis Crick
- Wind and microclimatic impact; unpleasant, dangerous, specific impact on Coopers Lane residents, Francis Crick and ENPS
- Air quality and loss of trees; mechanical ventilation required in tower, poor air quality, an Environmental Impact Assessment should be submitted
- Impact on open space; loss of light/overshadowing, currently lack of open space, open space should not be built upon, loss of open space, objection to proposed amount of hard-landscaping, failure to provide required open space for new residents
- Housing; gentrification, social polarisation, unaffordability, scheme would only provide 10 units affordable housing without external subsidy, few larger affordable units
- Community and cultural facilities; already a MUGA at Regent High School, locals will not have access to proposed MUGA, school building could be designed better to make more efficient use of the site, flats should be built above the school to fund it as with other schools, would provide natural surveillance to park, tenant's hall and community garden to be demolished – will impact on usage

- Heritage and conservation; view 9 in the Heritage, Townscape and Visual Impact Assessment is inaccurate and should be re-provided, kinetic views should be provided views from St Pancras Gardens and Pentonville Road should also be tested, impact on grade I British Library – tower may be visible above library from southern side of Euston Road, impact on rear extension of St Pancras Station and loss of views of this building, precedent from tower
- Design – Plot 2; visually intrusive, would not relate to context including listed terrace, impact on nearby conservation area, unsympathetic form, scale, materials and architectural detail, out of scale, site is not designated for commercial use, safety concerns
- Potential security risk. Massive potential threat to national security and safety.

Officer's response: See sections/sub-sections on Principle of large-scale development, Conservation, Design, Impact on Public Open Space, Impact on Private Open Space, Transport, Impact on neighbouring amenity, Microclimate, Air quality, Viability and affordable housing, Community facilities, Safety and security.

Also: the site is not in an Archaeological Priority Area and therefore an Archaeological Assessment is not required.

Support the following:

- Design for community and cultural facilities appears excellent – particularly new play areas
- Rebuilding of ENPS on site

6.17 Somers Town Community Association

Objection on the following grounds:

- It is our belief that Edith Neville, Plot Ten, Coopers Lane TRA and St Aloysius are not best served by this plan and that there are better and less impactful options to be considered; options that would provide a greater wellbeing for the whole of Somers Town, whilst being able to deliver on the identified Somers Town Priorities.
- seeming lack of consideration given to the accumulative impact of the combined development works being undertaken in Somers Town, with it would seem little cohesive discussion between any of the developers of any note
- the re-designation of much needed free open play space in Somers Town to that of hard landscaping; yet it would seem that it is being to maintain the current open space provision.
- the seeming complete lack of new infrastructure to match the massive development in Somers Town; with access to a G.P.s already ranking as a key issue within the ward.
- the impact of the 25 storey tower block, which could potentially impact on our Nursery outside play space (located on the upper floor of our building) in terms of light and indeed emissions
- the seeming lack of consideration given to issues of disability and equality of movement, both during and after completion of all works

- the manner in which the consultation processes undertaken do not it could be said provide the full story
- the loss of mature trees to be replaced not in their entirety it would seem and by saplings in a community already suffering with the connected medical issues of living in such close proximity to Euston Road, St Pancras and indeed Euston station
- the heights of the proposed new blocks, as this would seem to completely transform the character and beauty of the heart of Somers Town
- community safety
- that people feel safe or quite safe and the area is a peaceful and quiet place to live
- the divisive nature of the proposal, which is dividing the community as opposed to unifying it

Officer's response: See sections/sub-sections on Proposed landscaping and playspace Conservation, Design, Principle of large-scale development, Impact on Public Open Space, Security

6.18 Edith Neville Primary School, Plot 10, St Aloysius Nursery, St Aloysius High School

A deputation was received from Edith Neville Primary School supporting the proposal on the following grounds:

- New school will be state of the art building, rebuilding of 1971 buildings is necessary, other community facility benefits
- Benefits to children, families and Somers Town residents
- Proposals respond to current and future demographics
- Benefits would not be achieved through piecemeal rebuilding
- Private housing necessary to pay for school
- Proposals improve safety/security of area
- Improvement of open spaces, increase in usability
- High quality architecture, respects heritage

6.19 A deputation was received in support from the Chair and Head of Edith Neville Primary School, the Director and manager of Plot 10 Community Play Project, the governor of St Aloysius Nursery, the Head of St Aloysius Primary School, raising the following points:

- The rebuilding works are essential, inadequate learning environments
- Increasing health and safety risks to children using facilities, children's wellbeing, rights of children
- The public open space would be made more secure
- Excellent design and architecture
- Provision of affordable housing

6.20 Coopers Lane TRA

Objection on the following grounds:

- Destruction of unique architectural design of this low-rise estate, estate and open space were built as one
- Building on Purchase Street Open Space
- Proposed building is alien in character and scale

- Loss of privacy (12m distance) – trees will not mitigate, daylight and sunlight to Coopers Lane Estate
- Noise, replacement hall would be noisier as door to community garden would be left open
- Loss of trees, impact on air quality, increase in pollution from Phoenix Court CHP, emissions dispersal would be affected by tower
- Loss of TRA Hall and Community Garden, weaken community cohesion, increased isolation and exclusion, residents of Coopers Lane would not have priority use
- Cumulative impact of construction works in area, more detail of proposed running of hall required
- Residents' views have been repeatedly misrepresented or discounted though consultation process
- Anti-social behaviour from roads being opened
- Proposed community garden would; have little growing space, be shaded for most of the day, not be secure, public would probably help themselves, has a route that could be used by cycles going through the middle, no mention of opening times, replacement would be of lower quality

Officer's response: See sections/sub-sections on Conservation, Design, Impact on Public Open Space, Impact on neighbouring amenity, Air quality, Transport.

6.21 Goldington Estate TRA

Objection on the following grounds:

- Overdevelopment, Somers Town is more suited to smaller scale and more incremental change, height of tower.
- The tower is proposed on public green space. Impact on character and usability of remaining open space, impact on open space from servicing vehicles.
- Lack of affordable housing, social polarisation.

Officer's response: See sections/sub-sections on Conservation, Design, Impact on Public Open Space, Density and infrastructure.

6.22 Camden Town District Management Committee

Objection on the following grounds (whilst supporting rebuilding of Edith Neville Primary School):

- Impact on local environment and health and wellbeing of community.
- There are less damaging options for replacing the school
- Height of building, impact on views of heritage assets
- Microclimate, overshadowing, chill, wind tunnel, impact on surrounding landscape
- Loss of light to homes in Cooper's Lane area
- Disproportionately high subsidy from housing
- Proposal is planned on public open space
- Loss of community garden
- Reduction amenity of replacement TRA Hall
- Impact on Public Open Space, replacements are uninspiring and functional, too much hard surfacing proposed, proposed open space is fragmented and degraded, privatisation of open space
- Loss of trees

- Lack of access to private gardens
- No extra provision of open space to accommodate 136 proposed flats, any alternative open spaces are accessed across busy roads/beside busy roads and are not readily accessible
- Loss of open space to Plot 10
- Impact on air quality, lack of Environmental Impact Assessment, impact from other major infrastructural projects not taken into account, air quality does not take into account emissions from Phoenix Court District Heating System or loss of trees, impact on health, pollution from traffic
- Significant loss of trees
- Cumulative impact of developments in the area not taken into account
- Lack of information to residents

Officer's response: See sections on Alternative options and scheme viability, Public benefits, Design, Land use, Masterplan, landscaping and trees, Impact on neighbouring amenity, Air quality, Sustainable design and construction, Microclimate, Consultation and procedure.

6.23 Camden Disability Action

Objection on the following grounds:

- Loss of parking will impact on disabled parking, blue badge parking availability cannot be guaranteed
- No designated parking for the 14 disabled units within the development
- Loss of light and privacy for disabled people living in the area
- Small scale incremental change is more appropriate for Somers Town

Officer's response: See Transport section

6.24 Scene and Heard (mentoring project for disadvantaged children)

Support the application on the following grounds:

- Scene and Heard works closely with ENPS, St Aloysius and Plot 10 and regularly use their spaces.
- School buildings and Plot 10 are in a state of disrepair.
- Considerable research shows the effect of surroundings on children's development and learning.
- Children and families of Somers Town deserve better facilities.
- Application is an opportunity to develop high quality learning environments for those who need it most.

6.25 Francis Crick Institute

- No objection to principle of development but has concerns relating to the height and location of the Brill Tower on the operations of the Institute and objects on that basis
- Concerns regarding long-term implications/risks that would inhibit operation and economic growth of UK and impact upon potential local, regional, national and global benefits, impact on Med City vision
- Impact on operations from tower due to construction, including construction of basement, vibrations, wish to place holding objection until Francis Crick reviews detailed design of basement structure, electro-magnetic pulses

- Overlooking from tower into laboratories, however acknowledge that the distances are over 18m
- Air quality, impact from emissions from Crick building, close proximity to Crick's flue outlets which were designed to be 53m above ground level to ensure no nuisance to neighbouring buildings, operation of emergency generators for maintenance is likely to result in exceedances from floor 15 upwards (NO2 and exhaust smoke), especially on balconies and winter gardens, potential odour impact from formaldehyde and health impact. The Institute fears its activities which are of national importance may be affected by the future service of an abatement notice in the event that a nuisance arises
- No additional public open space provision to account for uplift in residential floorspace, new design of open space results in less soft-landscaped areas, area is deficient in open space

Officer's response: See sections on Impact on Francis Crick institute, Impact on Public Open Space, External amenity space, Air Quality.

Councillors

6.26 Councillor Paul Tomlinson objects to the proposal on the following grounds:

- Overdevelopment, heights in excess of 6 storeys (local norm), opposed to tower
- Tower would not be located in Central Activities Zone
- Loss of open space, impact on open space, loss of trees (including mature trees), proposed replacement open space features a lot more hard surfacing, impact on wildlife, more green space should be provided, Purchase Street and Polygon Road Open Spaces are not 'under-used' or 'vacant'
- Impact on daylight and privacy of residents
- Somers Town more suited to smaller scale and incremental change
- Air quality
- No provision for parking for disabled people
- Impact on residents' general parking

Officer's response: See sections/sub-sections on Conservation, Design, Principle of large-scale development, Nature conservation and biodiversity, External amenity space, Impact on neighbouring amenity, Air quality, Transport.

6.27 Councillor Roger Robinson objects to the proposal on the following grounds:

- Lack of affordable housing
- Flats are not accessible by disabled people
- Loss of grassland – could be better used for sporting activities, potential loss of trees
- No parking proposed, no parking for people with disabilities, loss of existing parking
- Impact on privacy and security of Coopers Lane residents
- Danger of tower being located next to Francis Crick Institute and 2 railway stations
- Loss of community garden
- Flats could be erected above school

- Concerns regarding consultation methodology – public meetings are much better forum than meet and greet sessions
Officer's response: See sections/sub-sections on Viability and affordable housing, Accessibility, Proposed landscaping and playspace, Trees, Impact on Private Open Space, Consultation and procedure.

Adjoining Occupiers

<i>Number of letters sent</i>	616
<i>Total number of responses received</i>	437
<i>Number in support</i>	375
<i>Number of objections</i>	62

6.28 A site notice was displayed from the 8th of January until the 29th of January 2015. A press advert was placed on 8th January 2015 in the Camden new journal.

Representations summary

Letters and petitions of objection

6.29 Objections were raised on the issues outlined below. These issues raised are considered in the relevant section of this report.

Open space

- Green spaces should not be taken away, loss of public open space, loss of private open space
- Noise
- Park will become an entrance to the flats
- Unlikely that more people would use the park
- Purchase Street Open Space is a nice park
- Park is not big enough, insufficient public open space for proposed flats, pressure on existing open space with increase in residents
- Loss of playspace, proposed playspace is smaller
- Parts of open space will be 'dead zone' around new buildings, which will not be usable
- Loss of green space
- Loss of trees, including mature trees, including Cat A trees, remaining trees at risk of damage during construction work and in shade of new buildings
- Overshadowing
- Impact on dog walkers/dogs, not enough space for dogs
- New community garden is public
- New design will lead to people passing through Purchase Street rather than stopping and enjoying it, nothing wrong with Purchase Street Open Space, quiet green space is fine – doesn't need improvements, proposed park is overly-landscaped, park will be less functional, park is better as it is
- Loss of wildlife, biodiversity
- Purchase Street will remain a street and the parks will not be truly connected

Officer's response: See sections/sub-sections on Proposed landscaping and playspace, Trees, Impact on Private Open Space, Nature conservation and biodiversity.

Design and conservation

- Height of tower, nothing in the area is this height, precedent for tall buildings, Camden refused a tower at 100 Avenue Road, tower is not within the Central Activities Zone (CAZ)
- Height of 9 storey building beside existing Plot 10 play facility, out of character, impact on listed buildings in areas
- Overdevelopment
- Should look at Somers Town as a whole and replace old buildings
- Impact on listed buildings, loss of views of listed buildings, impact on grade I listed St Pancras especially Barlow Shed, grade I British Library
- Impact on skyline
- Impact on character of area
- Flats should be put on school of roof instead of other locations/tower
- Impact on sightlines
- Impact on surrounding conservation areas
- Impact on listed buildings
- Blimp should be provided
- Impact on design of Francis Crick Institute

Officer's response: See sections/sub-sections on Conservation, Design.

Proposed flats

- Won't be for people in the area, will be unaffordable, insufficient affordable housing, only 10 affordable units provided with the other 34 coming from the affordable housing fund, flats will not be genuinely affordable
- Gentrification, will be flats for investment, social polarisation
- Density, area already overcrowded, too much pressure on area, impact on local services

Officer's response: See sections/sub-sections on Tenure mix, Viability and affordable housing, Density and infrastructure.

Amenity impact

- Loss of light, loss of light to Coopers Lane, overshadowing, higher electricity bills due to loss of light, loss of light to Regent's High School, increase in dampness in flats due to loss of light, light was already lost from Francis Crick development
- Loss of views
- Overlooking, loss of privacy
- View will be ruined
- Air quality, pollution, cumulative impact with Francis Crick and Phoenix Court CHP
- Wind impact from tower
- Noise from plant
- Effect on people's mental and physical health, people in Somers Town already suffer from poor health

Officer's response: See sections/sub-sections on Impact on neighbouring amenity, Air quality, Microclimate, Noise, Health. Also: loss of view is not material planning consideration.

Transport

- Loss of parking,
- More pressure on disabled parking spaces
- Does not provide blue-badge parking (14 spaces required)
- Traffic survey done during school holidays – not normal traffic flows
- Transport Assessment uses inadequate data base, was done out of school times
- Increase in cyclists in the area poses a danger to residents including children, new bicycle lane is dangerous
- Increase in pedestrian traffic

Officer's response: See section on Transport.

Community facilities

- What will happen to Tennant's Hall, bigger hall not needed, loss of TRA hall, a community hall is not the same as a TRA hall
- Another community facility is not necessary as there are a number in the area
- Impact on school with reduced playground
- School site could be used more efficiently

Officer's response: See Land use section, Proposed landscaping and playspace Also: there will be no loss of community facilities; the new community facilities will be replacing the existing.

Building works

- Noise and disruption from building works, cumulative impact from building works in area
- Danger to children
- Dust and air quality
- Non-stop building works in the area

Officer's response: See sections on Transport.

Conflict of interest/Procedural concerns

- Council is planner and developer
- Lack of transparency, should be open book on viability
- The decision has already been made
- Undermines localism and democracy
- There are alternatives to funding the school and community facilities, proposals are excessive to fund rebuilding of school
- Somers Town Neighbourhood Plan should be taken into account
- Waste of community assets
- Flawed consultation, questions were framed, poor consultation, misleading
- Insufficient consultation, inadequate opportunity for comment
- Cabinet were not informed accurately of CIP's plans (e.g. re number of trees to be lost)

- Applicant responded to school but not to Coopers Lane residents
Officer's response: See section on Consultation and procedure.

Principle of development

- Lack of benefits to residents of Somers Town
- Proposed tower is not in Central Activities Zone (CAZ) or an area proposed for growth

Officer's response: See sections/sub-sections on Land use, Principle of large-scale development.

Micro-climate

- Wind impact, impact on park.

Officer's response: See sections on Microclimate, Impact on Public Open Space.

Safety and security

- Building on park will make it difficult for people to evacuate in an emergency
- The proposal's claim to improve safety and security is based on inadequate data
- Applicant has manipulated crime figures, area does not suffer high crime
- Risk of terrorism

Officer's response: See section on Safety and security.

Memorial plaque/bench

- Moving plaque/bench will be upsetting for members of the family of the person who was killed on the estate
- Not clear where this will be relocated

Officer's response: The applicant has been in direct contact with the family and met with them to discuss relocating the bench. The memorial would be re-sited in an area of planting at the very southern end of Coopers Lane.

Other issues

- Impact on GP's, schools, leisure centres
- Inadequate Equality Impact Assessment

Officer's response: See sections on Density and infrastructure, Equalities and diversity issues.

Petitions submitted in response to the planning application

6.30 A petition was received with 1058 signatures objecting against:

- Any building on Purchase Street Open Space
- A 25-storey tower is out of character with the area
- The 9-storey building at the end of Charrington Street is in scale
- The destruction of low-rise aspect of certain estates
- Loss of at least 75 trees
- Loss of open space
- Loss of children's playground
- More hard landscaping and less soft landscaping
- The scheme's impact on air quality

- Loss of light to homes
- Loss of views, including from King's Cross Conservation Area
- Loss of much-loved tenant's hall
- Appropriation of private open space
- Loss of 40 parking spaces (including disabled parking spaces)
- More construction work in area
- Misleading nature of CIP (Community Investment Programme) consultation

Officer's response: See sections/sub-sections on Impact on Public Open Space, Impact on Private Open Space, Conservation, Design, Trees, Proposed landscaping and playspace, Air quality, Impact on neighbouring amenity, Community facilities, Transport, Consultation and Procedure.

6.31 A petition was received with 10 signatures requesting that the consultation period be extended to 6 weeks.

Officer's response: The consultation period was extended to 4 weeks instead of 3, given the scale of the proposal. Nevertheless, objections are received up until the committee date.

6.32 A petition was received with 192 signatures from residents of 'Charrington Street and surrounding streets' objecting on the following grounds:

- Height of new proposed tall building on Brill Place, consisting of 26 storeys, is even higher than the Francis Crick building, which exceeds height in the area
- Amount of buildings for 1 small primary school
- Loss of Plot 10 community facilities
- Overlooking the proposed extended park, and children's play area also Regent High School multi-use tennis courts.
- The children's play area is decreased in size.
- The existing separate parks deliver different aspects of what the community needs, and takes pride in. Also they are enclosed areas, which are safer for young children. So there will be no gain for the community by joining them together.
- Loss of sunlight, sense of enclosure from tower, especially for Coopers Lane
- Loss of light from nine-storey and the 2 six-storey buildings
- There are already 3 community centres around this area - another community centre is not needed.
- The community shops, and markets already struggle, there is no need to add more shops around this area
- The 'greenery', and mature trees will decrease and suffer, the majority will be replaced with smaller trees, and will take years to grow, and flourish
- It will be easier for gangs to gather, which will decrease use of park, and increase concern for public safety
- Decrease access for vehicles e.g. rubbish collection, fire engines, police, ambulances, public cars, and so on - therefore can increase risk of public health, and safety as roads will be blocked off

- Structural impact on listed buildings on Charrington Street, buildings already cracking because of the shaking caused by building work.
- The new flats will be on-looking classrooms from Edith Neville Primary School. This will be a cause for concern for child safety, and child protection, from both the nine storey and 2 six-storey blocks, of flats, and the 3 new houses on the end of Charrington Street.
- Agree Edith Neville Primary School should be rebuilt/repared, funding could be used, or student accommodation.

Officer's response: See sections/sub-sections on Design, Conservation, Community facilities, Masterplan, landscaping and trees, Impact on neighbouring amenity, Transport, Safety and security.

Letters and petitions of support

6.33 Letters of support were received making the points laid out below. It should be noted that the while these letters were received from different people, the content of the majority of these letters is identical.

- The application will improve the quality of life and wellbeing for hundreds of children and families who are residents in Somers Town.
- Wide range of improvements and benefits, for diverse community groups, including the Community Play Project Plot 10, St Aloysius Nursery and Edith Neville Primary School.
- Application focuses on current and future demographic and the need for state of the art educational, recreational, sporting and community facilities for increasing numbers of children and families.
- Upgrade and improvement of usability and safety of public open spaces without any loss of public open space.
- Well-designed housing and additional social housing.
- State of the art educational, recreational, sporting and community facilities.

6.34 A petition was received with 762 signatures from parents and stakeholders of St Aloysius Infant School, St Aloysius Junior School, Edith Neville Primary School and Plot 10 Community Play Centre supporting the proposal on the following grounds:

- Proposal provides long-needed rebuilding of 3 important facilities for Somers Town (St Aloysius' Nursery School, Plot 10 and Edith Neville Primary School).
- Improvements to public realm, improvement in terms of safety.

It should be noted that not all of the signatories provided a full name or full address, in accordance with the Council's requirements for petitions.

Pre-application consultation (by the applicant) representations summary

6.35 The following petitions were received in response to pre-application consultation by the applicant rather than in response to consultation for the submitted application. Representations received prior to the submission of the application

are not normally included in officers' reports, however, given the sensitivity of the site, it was agreed to summarise the petitions in this instance

6.36 A petition was received against the proposals (in response to pre-application consultation) making the following points:

- A minimum impact development should be built to fund the rebuilding of the school instead of a tower and high-value housing
- Lack of affordable housing
- Proposal out of keeping with area

6.37 Members of the TRA opposed to the Central Somers Town development proposals carried out a questionnaire among their neighbours on the Coopers Lane estate in March/April 2015. 118 replies were collected. The responses are summarised as follows:

Question	% answering no
Do you want to have a tower block on Coopers Lane estate?	98%
Do you want to have any new buildings on Coopers Lane estate?	81%
Do you want to have any new buildings higher than 4 storeys?	93%
Do you want to lose the community hall?	93%
Do you want to lose the community garden?	94%

6.38 A petition was received in support of the proposals (again in response to pre-application consultation) with 762 signatures making the following points:

- Much needed rebuilding works for the benefit of the children of Somers Town
- Improvements to public realm

7 POLICIES & Guidance

7.1 National Planning Policy Framework 2012

7.2 NPPG

7.3 The London Plan 2016

7.4 Mayor's Supplementary Planning Guidance

7.5 LDF Core Strategy and Development Policies 2010

LDF Core Strategy

CS1 Distribution of growth

CS4 Areas of more limited change

CS5 Managing the impact of growth and development

CS6 Providing quality homes

CS8 Promoting a successful and inclusive Camden economy

CS10 Supporting community facilities and services

CS11 Promoting sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental

standards

CS14 *Promoting high quality places and conserving our heritage*
CS15 *Protecting and Improving our Parks and Open Spaces & encouraging biodiversity*
CS16 *Improving Camden's health and wellbeing*
CS17 *Making Camden a safer place*
CS18 *Dealing with our waste and encouraging recycling*
CS19 *Delivering and monitoring the Core Strategy*

LDF Development Policies

DP1 Mixed use development
DP2 Making full use of Camden's capacity for housing
DP3 Contributions to the supply of affordable housing
DP5 Homes of different sizes
DP6 Lifetimes homes and wheelchair housing
DP12 Supporting strong centres and managing the impact of food, drink, entertainment and other town centre uses
DP15 Community and leisure uses
DP16 *The transport implications of development*
DP17 *Walking, cycling and public transport*
DP18 *Parking standards and limiting the availability of car parking*
DP19 *Managing the impact of parking*
DP20 *Movement of goods and materials*
DP21 *Development connecting to the highway network*
DP22 *Promoting sustainable design and construction*
DP23 *Water*
DP24 Securing high quality design
DP25 *Conserving Camden's heritage*
DP26 Managing the impact of development on occupiers and neighbours
DP27 *Basements and lightwells*
DP28 Noise and vibration
DP29 Improving access
DP31 *Provision of, and improvements to, open space and outdoor sport and recreation facilities*
DP32 *Air quality and Camden's Clear Zone*

7.6 Supplementary Planning Policies

Camden Planning Guidance (2013)

CPG 1 *Design*
CPG 2 *Housing*
CPG 3 *Sustainability*
CPG 4 *Basements and lightwells*
CPG 5 *Town centres, retail and employment*
CPG 6 *Amenity*
CPG 7 *Transport*
CPG 8 *Planning obligations*

7.7 Other documents

The Somers Town Neighbourhood Plan is an emerging plan which has very little weight at present

ASSESSMENT

The principal considerations material to the determination of this application are considered in the following sections of this report:

8	Consultation and procedure <ul style="list-style-type: none"> - Consultation - Procedure - The Secretary of State
9	Alternative options and scheme viability
10	Land use principles <ul style="list-style-type: none"> - Principle of large-scale development - Deprivation in Somers Town - School use - Community facilities - Residential use - Class A commercial use (A1/A2/A3) - Conclusion; land use principles
11	Tenure and unit size mix of the proposed housing <ul style="list-style-type: none"> - Policy review - Mix of units - Tenure mix - Design and layout - Affordable rent levels - Viability and affordable housing
12	Density and infrastructure
13	Amenity of proposed housing <ul style="list-style-type: none"> - Policy review - Daylight and sunlight - Outlook - Noise and vibration - Lightspill and the MUGA - External amenity space - Conclusion
14	Conservation <ul style="list-style-type: none"> - Statutory framework - Policy review - Designations - Charrington Street Terrace (Plot 3) Listed Building Effect on Kings Cross St Pancras Conservation Area - Effects of Charrington Street Housing (Plot 2) on the settings of listed buildings and on the character and appearance of Kings Cross St Pancras Conservation

	<p>Area</p> <ul style="list-style-type: none"> - Effects of Brill Place Tower (Plot 7) on the settings and special interest of listed buildings, on the character and appearance of conservation areas and in views - Effects of the other proposed developments on heritage assets - Conclusion
15	Public benefits versus harm to Chester Terrace
16	<p>Design</p> <ul style="list-style-type: none"> - Policy review - Plot 1 - Plot 2 - Plot 3 - Plot 4 - Plots 5 & 6 - Plot 7 - Conclusion
17	<p>Masterplan, landscaping and trees, Open Space</p> <ul style="list-style-type: none"> - Policy review - Designations - Masterplan - Impact on Public Open Space - Impact on Private Open Space - Proposed landscaping and playspace - Trees - Conclusion
18	<p>Impact on neighbouring amenity</p> <ul style="list-style-type: none"> - Policy review - Daylight and sunlight - Noise and disturbance - Overlooking - Conclusion
19	Impact on Francis Crick institute
20	Equalities and diversity issues
21	Health
22	Land contamination
23	Basement
24	Air quality
25	Sustainable design and construction

	<ul style="list-style-type: none"> - Policy review - The site and the proposal - Energy - Sustainability - Living roofs
26	Flood risk and drainage
27	Nature conservation and biodiversity
28	Microclimate
29	Accessibility
30	Transport <ul style="list-style-type: none"> - Policy review - The site - Trip generation - Travel planning - Cycle parking - Car parking - Construction management - Deliveries and servicing - Public Highway Improvements directly adjacent to the Site - Pedestrian, Cycling and Environmental Improvements in the local area - Excavation in close proximity to the public highway - Footpath between Chalton Street and Charrington Street. - Conversion of Public Highway to Public Open Space - Conclusion
31	Safety and security
32	Refuse and recycling
33	Employment and training opportunities
34	Planning obligations
35	Mayor of London's Crossrail CIL
36	Camden CIL
37	Conclusion
38	Recommendations

39	Legal comments
40	Conditions – planning application
41	Informatives
42	Condition – listed building consent

8 Consultation and procedure

Consultation

- 8.1 A Statement of Community Involvement (SCI) has been submitted as part of the application which details the consultation that the applicant undertook prior to submitting their application. Officers consider this consultation was sufficient, with numerous events over a period of time. The proposal was amended in response to comments received through consultation.

Procedure

- 8.2 This application has been treated as any other planning application and is assessed against local, regional and national policies as per usual. The final decision will rest with the Members on the Development Control Committee.

The Secretary of State

- 8.3 The Secretary of State has requested a grace period to consider whether or not to call in the application following any committee resolution to approve (they would not call the application in should it be refused).

9 Alternative options and scheme viability

- 9.1 The proposal features a 25-storey tower (Brill Place Tower) that would have a height of 76.2m from ground level (AOD of 96.5m) and would be located at the southern end of Purchase Street Open Space. The applicant considered a number of different options in terms of height, bulk and location of the tower during the formative stages of the design process and has responded to feedback from public consultation and from planning officers. These options featured different approaches to accommodating the necessary minimum quantum of private residential flats on site to fund the significant school and community uses.
- 9.2 Low-rise options were considered but these were discounted given they would result in the loss of a much larger area of open space and would result in far worse overshadowing of Purchase Street Open Space. Low-rise options were considered unacceptable given the impact on public open space. Furthermore, these options would result in enclosing the open space and creating a barrier between it and the street. Low-rise options either result in residential at ground floor level which would not provide an acceptable outlook or amenity or the provision of commercial uses at ground floor which would result in less residential development, thus performing poorly in terms of meeting the Council's priority land use.

- 9.3 Following on from considerable public consultation and pre-application meetings, the applicant proceeded with a tower option, given the above issues with low-rise options.
- 9.4 Given Historic England's objection to the proposed tower and its impact on the Grade I listed Nash Terrace and Regent's Park, the applicant has assessed the impact on the overall viability of the scheme of removing 6 storeys from the tower. The applicant states in their response to Historic England's comments (dated April 2016) that the loss of 6 storeys would equate to a loss of 35% of the total floorspace of the tower. These storeys would have to be 'removed' from the middle of the tower as shaving off the top 6 storeys (most of which have less floorspace than the floors below due to the form of the top of the tower). This would result in the loss of 18 private residential units from the tower. The applicant estimates that the loss of these 18 private units would result in a reduction of 20 affordable units (44 units to 24 units). The submitted viability report demonstrated that 20 units was the maximum the proposal could provide without a grant and therefore the scheme on its own (without money from the Council's affordable housing fund) would provide no affordable housing. There would be an increase of 2 private flats if these 6 storeys and therefore the 20 affordable units were to be lost.
- 9.5 Avoiding any harm to the Grade-I listed terrace and park would come at the loss of 20 affordable housing units. Historic England consider that a reduction in storey heights of less than 6 storeys would still cause 'less than substantial harm' to the listed terrace and therefore officers consider that a reduction in a lesser amount of storeys than 6 would not address the objection or sufficiently mitigate the impact to be worthwhile. Given the above, the impact of the tower on the terrace must be weighed up against the loss of 20 affordable housing units. This is discussed further in the 'Public benefits versus harm to Chester Terrace' section below.

10 Land use principles

10.1 The principal land use considerations are as follows;

- Principle of large-scale development
- Deprivation in Somers Town
- School use and Children's Centre
- Community facilities
- Residential use
- Class A commercial use (A1/A2/A3)
- Conclusion; land use principles

Principle of large-scale development

10.2 The scale of the development is required to pay for the new school buildings and other community facilities. The proposal would be an enabling development, with the private residential paying for the provision of the new school and community facilities and securing the provision of affordable housing.

- 10.3 Policy CS1 (Distribution of growth) identifies where the Council will promote change and states that 'more limited change' will be promoted outside growth areas and other highly accessible locations. Whilst no part of the application site is located within the Central Activities Zone (CAZ) or a town centre, the site is on the edge of the CAZ and is highly accessible, with a PTAL rating of 5-6b. King's Cross, St Pancras and Euston railway and underground stations are all close to the site as well as numerous bus services serving the area.
- 10.4 The Council as Local Planning Authority determined that an Environmental Impact Assessment (EIA) was 'Not required' (see history). An EIA is not required as the proposed development did not trigger the thresholds for Schedule 1 Development or trigger the thresholds for Schedule 2 Development, given that the development does not include
- i) more than 1 hectare of urban development which is not dwellinghouse development;
 - ii) more than 150 dwellings (136 units are proposed), or
 - iii) the overall area does not exceed 5 hectares (it covers 2.2 hectares).

Deprivation in Somers Town

- 10.5 Lower Super Output Areas (LSOAs) are a set of geographical areas developed to facilitate the calculation of the Indices of Deprivation. Somers Town performs poorly across these indices economically, socially, educationally and in terms of health. Some deprivation figures for Somers Town are:
- 24.2% of residents have no qualifications (Camden: 12.7%)
 - 30.1% of adults are on the adult social care system (Camden: 16.8%)
 - 70.7% of children are on the children's social care system (Camden: 40.7%)
 - Lower super output areas that fall within 10% most deprived in England (Somers Town: 4 LSOAs)
 - Income deprivation (1 LSOA)
 - Crime and disorder deprivation (1 LSOA)
 - Living environment deprivation (2 LSOAs)
 - Income deprivation affecting children (2 LSOAs)
 - Income deprivation affecting older people (3 LSOAs)
- 10.6 Significant development are planned for the area with High Speed 2, the Euston Station redevelopment and Crossrail 2 and the Somers Town area will be put under pressure. Officers consider it important to develop infrastructure for the community of Somers Town to allow for its growth and to support its residents. Educational and community facilities are important for communities and particularly important for communities suffering from deprivation and pressure from developments such as Somers Town.

School use and Children's Centre

- 10.7 Policies CS10 and DP15 seek to provide educational facilities and a range of community facilities, especially for local groups. These facilities should be easily accessible, flexible and maximise the shared use of the premises.
- 10.8 The National Planning Policy Framework (paragraph 72) states that:

“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools”.

- 10.9 The school on the site is Edith Neville Primary School. The school was built in the 1970s with a short life expectancy and a number of extensions built since. The school is housed in single-storey buildings which are dilapidated and in need of replacement. Officers accept that the existing buildings are not fit for purpose and there is a strong need for new modern educational facilities. The school is a one form entry (1FE) for up to 210 pupils and a nursery/children’s centre and employs 40 staff members and around 70 volunteers. The school is located in Plot 4. Under the proposals there is no increase in pupils and the school would remain 1FE. Staff numbers would rise to 44. The nursery/children’s centre would also be re-provided on site and the number of nursery places (26) would remain. Whilst the school site area would be reduced from 6,378sqm to 4,740sqm under the proposals, the floor area of the school would be increased from 1,415sqm to 2,190sqm, as the proposed school would be two-storey plus a lower ground floor. By maximising the use of the site, including the utilisation of raised spaces, there would be an increase in external space from 3,268sqm to 3,467sqm.
- 10.10 Long term projections suggest that a 2FE is likely to be required in the future, given expected child population growth in the area. The school has therefore been designed to allow future expansion upwards if and when required, to double capacity to 420 pupils. Officers encourage the future proofing of schemes. Such a proposal would of course be subject to a fresh planning application. The school is not being combined with other uses (e.g. flats above the school building), to allow for this future expansion.
- 10.11 Policies CS10 and DP15 support the provision of educational facilities. The school and nursery would be purpose built and would provide a much better learning environment than the current premises.
- 10.12 The existing school is located on the western part of the site. Under the proposals, the new school would be built on the eastern part of the site. This would allow the school to remain operational during construction works, with just the nursery and children’s centre proposed to move off-site. These would be located in a temporary building in the car park of the school. The playground area would be reduced during demolition and construction works. The playground area would remain above minimum requirements (Regulation 10 of the Schools Premises Regulations 2012) during construction of the new school. A range of the existing types of external spaces will be maintained during the construction period. This includes formal hard play court areas (albeit with smaller courts as currently set out in the Infant playground), informal hard play and the habitat areas to the west side of the site, unaffected by the building of the new school. Playtimes would be staggered to enable the KS2 (key stage 2) children to use the KS1 play space at break-times. At lunchtime, playtimes are already staggered and follow on from the staggering of dining provision in the hall. The KS1 external play

area would be timetabled for use by both KS1 and KS2. The school would operate within Health and Safety requirements, drawing on experience of other phased school construction projects. The Construction Management Plan would address construction safety issues.

10.13 The school hall would be made available for community use outside of school hours and a designated community entrance has been included in the proposal. The school hall is intended for use by both the school and the community and the proposed arrangement of the site allows it to be accessed either across the playground without entering the main building; through the main entrance, or completely independently and out-of-hours from Purchase Street. A Community Access Plan for the school would be secured by section 106 agreement. A condition is recommended that no noise generating activities shall take place within the school outside of 07:00 to 22.30 hours Monday to Saturday and 09:00 to 21:00 on Sundays and Bank Holidays, to protect the amenity of existing and prospective local residents.

10.14 The applicant intends to start construction in September 2016 and complete the new school building by April 2018.

10.15 Objections have been received suggesting that new school buildings could be built through the use of Section 106 and CIL money. It should be noted that legislation does not allow for CIL and Section 106 money to be used together for the same thing. The CIL money that the Council has for schools is for all of the schools in the borough and could not be spent on just one school. Even if all the CIL money for schools were to be earmarked for re-providing ENPS, there is insufficient CIL money to pay for this. Section 106 money is collected from approved planning applications, to mitigate impacts from the relevant development. There would need to have been a very large development in the vicinity, which increased pressure on local schools, for section 106 funding to be available, which is unlikely to meet the costs. There have been no such developments in the vicinity in recent years.

10.16 An condition is recommended that the school is provided and fully fitted out prior to the occupation of any residential units.

Community facilities

10.17 Policies CS10 and DP15 seek to provide a range of community facilities, especially for local groups. These facilities should be easily accessible.

10.18 Under the proposals, Plot 10 community facility (the name 'Plot 10' does not relate to the 7 plots that form this application) would be re-provided on site within Plot 1 and St Aloysius Nursery which currently operates from a temporary building in the grounds of Regent High School would also be relocated to Plot 1.

10.19 The proposed community facilities (not including the school and related nursery/children's centre) are as follows:

Use	Existing floorspace (sqm)	Proposed floorspace (sqm)	Proposed location
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Children's nursery, community play facility	141 – off-site on Regent High School land to north	1,554	Plot 1 (Chalton Street)
Tenant's Hall/Community hall	150 (Tenant's Hall)	211 (Community Hall)	Plot 5 (Purchase Street)

10.20 The capacity of the community play facility (currently called Plot 10) would be increased under the proposals from 70 children to 100 children. The facility would operate between 7.30am and 6pm. The re-provision of this use and the increase in the capacity is welcomed in policy terms.

10.21 The proposed community facility would be located below residential accommodation. However, given the moderate increase in capacity and the proposed operating hours, it is not considered that there would be an amenity impact to the area in general. However new residential use is proposed directly above the new facility – and the impact on the proposed flats is assessed later in this report ('Residential use').

10.22 St Aloysius Nursery currently operates from a temporary building in the grounds of Regent High School. The existing premises were meant to be used for a five-year period but have now been in use for over 10 years. The provision of modern, permanent location for this nursery would be of public social benefit.

10.23 The Tenant's Hall currently exists on the site of Plot 5. Under the proposals the existing building would be demolished and re-provided on the same site, with residential use above. The proposed hours of use are 8am – 11pm Monday – Saturday and 9am – 10pm Sundays and Bank Holidays. A condition is recommended limiting noise generating activities to within these hours. The existing capacity of the TRA is estimated at 60 people and the proposed hall would have a capacity of 120.

10.24 Based on the Construction Management Plan submitted as part of the application, the existing Tenant's Hall and Community Garden will continue to function in their current condition until 2021. Construction works would then take approximately 2.5 years to complete Blocks 5 and 6.

10.25 A condition is recommended that the community hall and the community hub are built and fully fitted out prior to occupation of more than 50% of the market residential units.

10.26 The provision of community facilities is welcomed by officers.

Residential use

10.27 136 residential units are proposed altogether. 54 of these would be provided in the Brill Place Tower at Plot 7 and the rest would be spread over the other plots as detailed below. The principle of additional residential floor space is strongly supported as a priority land use under policies CS6 and DP2. Housing is the priority land use for Camden and the Council seeks to maximise the supply of new housing. The principle of housing on the site therefore complies with policy.

Plot	Location	Number of units
1	Above community uses on Chalton Street	10
2	Charrington Street	35
3	Extension to listed terrace	3
5	Above community hall, Purchase Street	20
6	Beside Purchase Street Open Space	14
7	Brill Place (tower)	54
Total		136

Class A commercial use (A1/A2/A3)

10.28 There are 2 sites (Plot 2 and Plot 7) where flexible Class A1/A2/A3/D1 use is proposed. These class uses are as follows:

- A1; Shops
- A2; Financial and professional services (includes banks, building societies)
- A3; Food and drink (not including pubs and hot food takeaways)
- D1; Non-residential institution (includes clinics, health centres, libraries, crèches)

Use	Existing floorspace (sqm)	Proposed floorspace (sqm)	Proposed location
Flexible A1/A2/A3/D1 use (see retail section below)	0	137	Plot 2 (Charrington Street)
Flexible A1/A2/A3/D1 use (see retail section below)	0	70	Plot 7 (Brill Place tower)

10.29 Policy CS7 promotes the provision of retail use. Policy DP10 encourages the provision of small and independent shops.

10.30 The provision of Class A retail uses, such as shops, cafes and restaurants would provide facilities for local residents and employment. These uses would provide active frontages to the ground floors of Plot 2 and Plot 7. Given the above these uses are supported.

Conclusion; land use principles

10.31 The re-provision of the school and valuable community facilities are strongly welcomed. Officers consider that the proposal would bring about significant social and cultural public benefits to an area which suffers from deprivation economically, socially and educationally. The existing school is in a poor state of repair and is not fit for modern educational use. The proposal is a self-funding project where the private residential elements would pay for the provision of modern, quality

school buildings, a nursery, community facilities and a community hall. The proposed uses are assessed in the Land use principles section of this report, below. Such facilities are important for communities and particularly important for communities suffering from deprivation such as Somers Town.

10.32 There is great need for housing in Camden and particularly in Somers Town, where significant population growth is forecast. Housing is the priority land use for the borough and is strongly welcomed.

10.33 The proposed land use mix would provide significant social and community benefits and is considered appropriate to the area and acceptable in principle.

11 Tenure and unit size mix of the proposed housing

11.1 The considerations with regards to tenure and unit size and mix are as follows:

- Policy review
- Mix of units
- Tenure mix
- Design and layout
- Affordable rent levels
- Viability and affordable housing

Policy review

11.2 Policies CS6, DP2, DP3, DP5, DP6 and CPG2 (Housing) are relevant with regards to new housing, including to tenure and unit size.

Mix of units

11.3 Policy DP5 requires homes of different sizes. The proposed unit mix should broadly accord with the Dwelling Size Priorities Table in this policy, although the Council will be flexible when assessing development.

11.4 The proposed unit mix across the whole site is as follows:

Unit size	Social rented	Private	Total
One-bed units	13 (29.5%)	42 (45.6%)	55
Two-bed units	23 (52.3%)	44 (47.8%)	67
Three-bed units	8 (18.2%)	6 (6.5%)	14
Total	44	92	136

11.5 It should be noted that the scheme itself generates sufficient capital to provide 20 affordable units (45% of all the affordable proposed and 15% of all units). However, due to a separate Cabinet report and decision, there is an agreement in place to use a grant from the Council's Affordable Housing Fund, and thus the number of affordable units proposed in this scheme is boosted to 44, with 24 more affordable units added in (55% of all the affordable proposed and 18% of all units).

11.6 With regard to unit mix, Policy DP5 sets out the targets for affordable provision, which reflect broad needs across the borough. As identified in the planning submission, Policy DP5 seeks a target of 50% of units in the social rented tenure to be 3-beds or more. In this case, 8 out the 44 social rented units proposed are 3-

bed+, which calculates to 18%. However it should be acknowledged that this scheme is bringing forward a significant supply of social rented affordable housing, and that the mix provided will still meet significant outstanding needs in the borough. The unit mix proposed also includes a number of larger 2b/4p units, and the proposed residential units meet National Space Standards. It should be noted that in the draft Somers Town Neighbourhood Plan, desire has been expressed through local consultation to make provision for smaller 1 and 2-bed units in the social rented sector, in order to provide for existing residents looking to move independently outside of the parental home. Given the above, and the significant demand for all sizes of housing within the social rented sector, the scheme proposals are considered acceptable in the context of DP5.

Tenure mix

- 11.7 Under London Plan policies 3.10, 3.11 and 3.12, Camden policies CS6 and DP3 and CPG2 (Housing), 50% of housing provision should be affordable. The split of the affordable housing provided should be 60% social rented and 40% intermediate.
- 11.8 Objections have been raised with regards to the lack of affordable housing proposed. Please see the section below on 'Viability and affordable housing' with regards to the level of affordable housing proposed.
- 11.9 136 units are proposed in total. 44 of these units would be affordable housing which calculates as 29% of floor area (or 32% of units).
- 11.10 The population of Somers Town is expected to grow by an estimated 47.4% by 2028 (the Camden growth rate is estimated at 16.1%). The area has a clear housing need, particularly for affordable housing. 100% of the affordable housing would be social rented, with no intermediate housing provided. The Council's planning policies seek a 60%/40% split between social-affordable rent and intermediate housing within the affordable elements of any scheme. These proposals provide only social rented accommodation. However, the Council's planning policies do allow for flexibility on this tenure split, and specifically state that the Council may accept wholly social rented schemes where the level of affordable is below the 50% target outlined in DP3. In particular, paragraph 3.22 states that the Council will apply this policy flexibly in instances where high land costs and residential values make intermediate affordable housing too expensive for households who would otherwise seek homes that cost more than social rent and less than market housing. Somers Town is one such location where shared ownership intermediate provision is likely to be too expensive to provide even within the GLA income caps of £71,000. On that basis it is considered appropriate to prioritise social rented housing in this instance.
- 11.11 The 44 affordable units would be provided in Plot 1 (10 units), Plot 5 (20 units) and Plot 6 (14 units). All of the 92 market housing units would be provided in Plot 2 (35 units), Plot 3 (3 units in the terrace) and the Brill Place tower in Plot 7 (54 units). The private housing and affordable housing would not be mixed within any of the plots. It is a requirement of social housing providers that social rented affordable housing does not share a core with private housing, for management

reasons. It should be noted however, that the affordable and private blocks are spread across the site rather than being separated.

11.12 Policy requires 10% of units to be wheelchair accessible. 14 units would be fully wheelchair accessible, which represents 10.3%. 4 of these would be in the social rented flats (1 in Plot 1, 2 in Plot 5 and 1 in Plot 6) and 10 would be in the private units (4 in Plot 2 and 6 in Plot 7).

11.13 Target rents for the affordable units will be secured via legal agreement, with specific clauses specifying that the units will be provided at target rent levels in perpetuity.

Design and layout

11.14 The proposed residential units have been designed to a high standard. The units have been set out to be 'tenure blind' in that there is no identifiable distinction between the private and affordable units. The social rented units have been designed to a high quality that meet the requirements set out in the development plan (including Council and London Plan standards). All units are dual aspect and the vast majority have access to a private balcony.

11.15 Camden Planning Guidance 2 (CPG2) states that new self-contained dwellings should satisfy the following minimum areas for overall floorspace (excluding communal lobbies and staircases):

Number of persons	1	2	3	4	5	6
Minimum floorspace (m ²)	32	48	61	75	84	93

11.16 All of the proposed units meet Camden's floorspace standards both in terms of overall size and bedroom size.

Viability and affordable housing

11.17 The site is currently owned by the Council. It is proposed to sell the plots that would accommodate private housing blocks (Plots 2, 3 and 7) to generate a land receipt which is required to fund the rebuilding of ENPS and the community facilities.

11.18 The applicant has submitted a viability report (by Savills) to justify not providing a policy-compliant level of affordable housing (50%). This report has been independently assessed by a viability expert (BPS) for the Council. The applicant's viability appraisal shows that 14% affordable housing (20 units) is the maximum that can be delivered. The applicant is, however, proposing to deliver 44 affordable units equating to 30% of the residential floorspace. It is able to do this with a grant of up to £10.3m from the Council's affordable housing fund (AHF) to eliminate the viability deficit. Without this subsidy, the deficit for the scheme with 44 affordable units (all social rent) is shown as -£9.49m.

11.19 The Council (as applicant) would separately procure the construction of the new ENPS school and community infrastructure. As such the application scheme as proposed would be delivered by two separate parties being the Council and a residential developer.

- 11.20 The viability assessment seeks to anticipate the value of the private residential housing with a view to determining a likely land sale value.
- 11.21 This sale value is then contrasted with the anticipated costs of constructing the new school, community infrastructure and affordable housing.
- 11.22 The viability assessment anticipates that the residential land sale receipt would be insufficient to meet the costs of (a) the new school; (b) the community infrastructure works and (c) the provision of more than 20 units of social rented housing affordable housing.
- 11.23 The Council's Cabinet has agreed to further cross subsidise this scheme from its affordable housing fund (AHF) up to a figure of £10.3m in order to deliver a total of 44 units of social rented affordable housing.
- 11.24 Should the land sale receipt significantly exceed the currently anticipated level then the scale of the subsidy from the AHF would be reduced proportionately to achieve a break even.
- 11.25 The Council's Cabinet decision of 16 December has confirmed that any surplus will be spent on affordable housing. However in the first instance any such payment would be used to reduce the level of subsidy from the affordable housing fund (AHF) required by the scheme.

12 Density and infrastructure

- 12.1 In order to make the most efficient use of land and meet the objectives of policies CS1 and CS6, higher density development is encouraged in appropriately accessible locations and there is an expectation that densities will be towards the higher end of the density ranges set out in the London Plan. The emphasis on higher density development is reinforced by policy DP2 (Making full use of Camden's capacity for housing) of the LDF Development Policies, but should at all times be subject to other policies such as those protecting resident and neighbour amenity and securing the height, bulk and massing appropriate to an area in terms of good design.
- 12.2 Policy 3.4 of the London Plan requires development to optimise housing output for different types of locations taking into account local context, design and transport capacity as well as social infrastructure, open space and play space. Table 3.2 of the policy sets out various density ranges as a guide according to the urban setting and accessibility criteria. The application site has a PTAL rating ranging between 5 ('Very good') and 6b – 'Excellent'.
- 12.3 The density of the proposal has been calculated excluding the public open space as this would skew the results, making the proposal seem much lower density. The proposal features 367 habitable rooms (hr) on an area of 0.4235 hectares. The site density of the proposal is therefore 866.59 hr/ha. The London Plan Density Matrix for a site in an 'urban' setting within PTAL 5 to 6b is 200-700 hr/ha.

12.4 The proposed density is not considered to be significantly above the density matrix guidelines. Furthermore, the Density Matrix is just a guide and what is acceptable on a given site will turn on a variety of considerations rather than rigid application of the matrix. The density matrix's density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure, open space and play. The London Plan requires that the potential of sites is optimised. Given the site's Very good/Excellent PTAL rating, its location close to the major interchanges at King's Cross, St Pancras and Euston as well as bus links, it is considered that the proposed density is acceptable subject to design, heritage, amenity and health considerations.

12.5 Furthermore, given the site's Very good/Excellent PTAL rating and its proximity to transport connections, it is considered that there is sufficient access to facilities in the area and the proposal will not materially impact on local services. ENPS and existing community facilities will be upgraded under the proposals and the public open spaces will be significantly improved.

13 Amenity of proposed housing

13.1 The considerations with regards to the amenity of the proposed housing are as follows:

- Policy review
- Daylight, sunlight and aspect
- Noise and vibration
- Lightspill and the MUGA
- External amenity space
- Conclusion

Policy review

13.2 London Plan policy 3.5 and Camden policies CS6 and DP6 are relevant with regards to accessibility. London Plan policy 3.8 and Camden policies CS14 and DP29 seek to promote inclusive access.

Daylight, sunlight and aspect

13.3 None of the proposed flats are single aspect. Given the location, orientation and aspect of the proposed flats, it is considered that they would receive sufficient levels of light and would benefit from good outlook. With regards specifically to the tower, most of the units are dual aspect and some are triple aspect due to the shape and number of corners to the building forms.

13.4 The 3 properties proposed in Plot 3, continuing the existing listed terrace on Charrington Street would face westwards on to the street. The rear of these properties would form the boundary with the ENPS playground. To mitigate overlooking into the playground (and back into the houses), angled louvres would be attached on the outside of the rear windows and also on the edge of the proposed terrace at second floor level. A condition is recommended requiring the louvres to be installed prior to occupation and maintained in perpetuity. The proposed houses on Plot 3 would have sufficient outlook at the front and receive sufficient light.

Noise and vibration

13.5 A Noise Assessment has been submitted for the application, which includes individual assessments for each plot. The individual assessments have concluded that the site is largely unconstrained by noise and that typical acoustic façade insulation values, associated with traditional thermally insulating construction techniques would be adequate to ensure appropriate internal noise levels for both the residential and educational developments. The Council's Noise Officer has appraised the submitted Noise Assessments and has no objection to the application subject to conditions on sound insulation between residential and commercial premises and noise levels in rooms in the development.

Lightspill and the MUGA

13.6 The location of the MUGA on the roof of the community play facility is intended to optimise land use by allowing ground level space for programmes with essential level connections to the street. By placing the MUGA at the centre of the block its separation from the housing elements is maximised to avoid noise nuisance. The living spaces of the housing units are located to avoid overlooking the MUGA and the bedrooms that require smaller openings are located facing it. The same strategy is used on the Chalton Street elevation to avoid overlooking concerns. This layout also means that the proposed living spaces benefit from southerly aspect and views over park.

13.7 The proposed MUGA on the roof (first floor level) of the lower building in Plot 1 would be floodlit, with the lights located 5m above floor level. The MUGA would not be used after 9pm and a condition is recommended to secure this. Light pollution would be minimised with lights pointed downwards. A condition is recommended requiring details of the proposed lighting to be submitted for approval, to ensure that these are acceptable in amenity terms. The proposed flats in Block A would be located 15m away from the MUGA, however it is considered that there would not be a material impact on the occupiers of these flats, given that the MUGA would be used at specific times (see hours condition) and that views would be obstructed by the boundary of the MUGA.

13.8 It is not considered that there would be an amenity impact from lightspill from the residential properties, given their domestic use and the distances to other properties.

13.9 The recommended condition on hours of use would also ensure that the MUGA would not cause noise disturbance at anti-social hours, as it would not be used later than 9pm.

External amenity space

13.10 The majority of units would have a balcony, terrace or winter garden, in accordance with the London Plan. The only units that would not have external amenity space are those located on the higher floors of the tower; on the 15th floor and upwards. This is due to the air quality issues as a result of the proximity to the chimneys on the roof of the Francis Crick Institute nearby. This issue is explained further in the Air Quality section of this report. Given this specific issue, that there is public open space available to the residents of these flats and that the majority

of units within the scheme would have access to private amenity space, the proposal is considered acceptable in terms of the provision of external amenity space.

13.11 On the 15th floor, winter gardens with a filtered air supply would be provided for the apartment at the eastern corner, whilst either balconies or winter gardens without ventilation would be provided on the façade where predicted pollution from the chimneys would be lower. At the 14th floor and below, air quality meets the relevant objectives and open balconies are considered acceptable here and below. With regards the 15th floor and above, the balconies for the proposed flats would not meet air quality standards. The decision to redesign without balconies at the higher levels ensures that amenity space will not be lost as a result of poor air quality, as occupants will be able if required to seal the replacement winter gardens without losing any amount of amenity.

13.12 With regards to Plot 3, as there would be no rear gardens to the houses, external amenity spaces for the new homes would be provided within their footprint in the form of inset balconies. The internal organisation of space is arranged to optimise access to these external terraces so the kitchen and living room are located on the first and second floors and the lower and raised ground floors contain the three bedrooms. The rear windows and enclosure of the external terraces are designed so as not to compromise the safeguarding or operation of the school.

13.13 The provision of 136 new residential units without provision of additional open space would not comply with LDF policy and guidance. CPG6 (Amenity) states that 9sqm of open space should be provided per occupier. It is estimated that there would be 420 new residents as a result of this application and therefore 3,780sqm of open space would be required to accord with this guidance. However, this requirement is considered to be off-set by the improvements to Purchase Street and Polygon Road Open Spaces which are detailed in the Masterplan, landscape and trees section.

Conclusion

13.14 All of the proposed flat would provide a good level of amenity to prospective occupiers in terms of outlook and light. The majority of the proposed flats would have a balcony in line with the London Plan. Sufficient justification has been provided on air quality grounds for the flats in the higher part of the tower to not have balconies. The contribution towards Public open Space would mitigate the impact of the additional pressure on the open space on the area.

14 Conservation

14.1 The conservation considerations are follows:

- Statutory framework and implications
- Policy review
- Designations
- Charrington Street Terrace (Plot 3) Listed Building Consent and effect on Kings Cross St Pancras Conservation Area

- Effects of Charrington Street Housing (Plot 2) on the settings of listed buildings and on the character and appearance of Kings Cross St Pancras Conservation Area
- Effects of Brill Place Tower (Plot 7) on the settings and special interest of listed buildings, on the character and appearance of conservation areas and in views
- Effects of the other proposed developments on heritage assets
- Conclusion

Statutory Framework and Implications

- 14.2 Sections 16, 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) are relevant.
- 14.3 Section 16(2) provides that in considering whether to grant listed building consent for any works to a Listed Building special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 14.4 Section 66(1) provides that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 14.5 Section 72(1) requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area when considering applications relating to land or buildings within that Area.
- 14.6 The effect of these sections of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas and the preservation of Listed Buildings and their settings. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption. The NPPF provides guidance on the weight that should be accorded to harm to heritage assets and in what circumstances such harm might be justified (section 12). This section of the report assesses the harm to heritage assets from the proposal. The balance of the harm and the benefits from the proposed scheme is discussed in the conclusion.

Policy review

- 14.7 NPPF section 12 paras. 126 to 137 in particular, NPPG section 18a, London Plan policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7, policies CS14, DP24, DP25 and CPG1 (Design) are relevant with regards to conservation.

Designations

- 14.8 The terrace 18-41 Charrington Street to the north-west of the site (within the King’s Cross St Pancras Conservation Area) is Grade-II listed, as are the other terraces along this street to the north. The end property of this terrace is located within the application site. There are no other listed buildings on the application site.

14.9 There is a concentration of Grade-I listed buildings in the near vicinity; St Pancras Station and the former Midland Grand Hotel, King's Cross Station and the British Library (recently listed in July 2015). The impact of the proposal on the settings of these buildings is discussed below. The tomb of Sir John Soane in the churchyard of St Pancras Old Church is listed at Grade I, while the church itself is listed at Grade II*, with several monuments and structures in its churchyard are listed at Grade II. Other Grade-II listed buildings closer to the site include: Pancras Road Arches; housing on Goldington Street, Goldington Crescent and Medburn Street; Walker House, Chamberlain House and Levita House on Chalton Street; the Great Northern Hotel, the German Gymnasium and Stanley Buildings; Camden Town Hall; and 295 and 297 Pentonville Road. Around a mile to the west, Regent's Park is a Grade-I Registered Park and Garden and several terraces of houses surrounding it are listed at Grade I. The proposed residential tower on Brill Place would be 25 storeys high and 76.2m from ground level (96.5m AOD) which is comparable in height with the tower of St Pancras Station which is slightly taller at 99m AOD.

14.10 The King's Cross St Pancras Conservation Area adjoins the central part of the site to the north-west, and is also located close to the eastern part of the site. The proposed tower will be visible from parts of the Regent's Canal, Regent's Park and Bloomsbury Conservation Areas, as well as in some longer views including from Primrose and Parliament Hills. The site is not covered by any viewing corridors, but there is a viewing corridor (Blackheath Point to St Paul's Cathedral) to the south-west.

Charrington Street Terrace (Plot 3) Listed Building Consent and effect on Kings Cross St Pancras Conservation Area

14.11 The proposed extension to the terrace, nos. 1-17 Charrington Street (Grade II), is a piece of high quality contextual design in modern materials which will alter but not harm the contribution of the setting of the listed buildings to their special interest, and will have no harmful impact on their fabric. The careful contextual design of the three proposed terrace houses in fact restores the end of terrace lost to the building of the Edith Neville Primary School, while inverting the tones of the stucco and stock brick of the existing with a concrete plinth and white brick above to mark the break, and allowing the corner house to terminate the terrace with a varied treatment, drawing on the memory of that which was demolished. The proposed extension will do no harm to the special historic and architectural interest of the terrace, but will on the contrary enhance it.

14.12 The proposed terrace extension would appear in views south from the westernmost parts of the conservation area (CA), though most of the terrace lies outside its boundaries. The effect of the proposal on the character and appearance of the CA is entirely associated with that of the special interest of the listed terrace itself, representing a sympathetic and interesting modern extension that explicitly references the character and appearance of the CA and promises to enhance it at this edge.

Effects of Charrington Street Housing (Plot 2) on the settings of listed buildings and on the character and appearance of Kings Cross St Pancras Conservation Area

- 14.13 The proposed housing, at 9 storeys, will rise much higher than the Charrington Street terraces (Grade II) and others nearby, though it is comparable in scale to nearby 6-storey twentieth century housing blocks, including Walker House (Grade II), with its steep roof and tall chimneys. Viewed from Charrington Street, it will be read against a varied urban context beyond, another phase in the 2 centuries of housing developed in the immediate area. It is sufficiently distanced from the end of the Charrington Street terrace, orientated with its tallest element to the south, not to loom over the terraces themselves. In its materiality and detailing the housing will defer to the palette and style set by the terraces: it will have high-quality brickwork for instance; simple fenestration of punched apertures, slightly varied to break-up glazing and add modern interest distinct from that of the terrace; and a valley roof profile which will help to soften its mass towards the top, with explicit reference to the roof of the terraces themselves. The setting of the listed terraces on Charrington Street and nearby, and of the listed housing blocks on Chalton Street, will not be harmed by the addition of this block to the streetscape.
- 14.14 The housing will have a similar effect on the character and appearance of the Kings Cross St Pancras CA as it will have on the setting of the streets of listed terraced houses within it, since these make up most of the western corner of the CA. It will lie outside this part of the CA but borrow its prevailing materials and the details of some of its forms. It will be read in views from the CA as a new phase of brick housing, set against the rising scale of the buildings to the south. In these ways it will reinforce aspects of the CA's character, and in its carefully-designed appearance it will do no harm.
- 14.15 The housing may be visible alongside other nearby listed buildings, including the British Library as seen from the end of Ossulston Street, but at such distance that – given also its quality and careful design – it will have no substantial effect on their setting and so will cause no harm to any listed buildings.

Effects of Brill Place Tower (Plot 7) on the settings and special interest of listed buildings, on the character and appearance of conservation areas and in views

- 14.16 Because of its height, the Brill Place Tower would be widely visible, and so would form part of the settings of several listed buildings and conservation areas in Camden, as well as other parts of the townscape and some locally-listed buildings. Only those buildings for which the proposed tower will represent a substantial change in setting are considered in detail here, since in other cases the tower would form part of the general background of development in and around central London.
- 14.17 The tower would affect the setting of some listed buildings by appearing above the rooflines and so potentially altering appreciation of visual or spatial aspects of their special interest. The tower's design process has limited its appearance and prominence in sensitive views by locating it with great care,

reducing its mass, creating its refined scissor profile termination with a substantially glazed finish that will reflect the sky, and orientating it so that its broadest faces are presented to the north and south.

The British Library (Grade I)

14.18 The British Library is orientated to face Euston Road, which lies beyond its south-west facing courtyard. Kinetic views produced to supplement the Heritage, Townscape and Visual Impact Assessment (HTVIA) in response to the concerns of the Twentieth Century Society and local groups show that the proposed tower will not be visible above the roofline of the British Library from anywhere except in a glimpsed view of the top of the tower from the pavement on the south side of Euston Road, over the ridge of the British Library roof above the entrance. The tower will appear behind chimneys of the Francis Crick Institute which are currently glimpsed there, and both are screened by trees planted on the southern boundary of the British Library courtyard. Where it is partially visible alongside the British Library in views east along Euston Road or north along Pancras Road, the proposed tower will accord with the monumental scale of the library's eastern range and its neighbour, St Pancras Station and the Midland Grand Hotel, with which the British Library shares group value.

14.19 The Twentieth Century Society objects to the proposed tower, arguing that the setting of the British Library will be harmed by its visibility from north-facing roof terraces at the rear. The views from a building are not a material planning consideration. Nevertheless, the upper storeys of the tower would not negatively alter the mixed urban character of views from these terraces, which are at present dominated by the Francis Crick Institute, a development site immediately adjacent, the flank of St Pancras Station and its modern trainshed extension.

14.20 The setting of the British Library will not be harmed by the proposed tower.

The Stations, Hotels and their neighbours (Grades I & II)

14.21 St Pancras Station and former Midland Grand Hotel (Grade I), by George Gilbert Scott, and King's Cross Station (Grade I) and the Great Northern Hotel and attached railings (Grade II), by Lewis Cubitt, substantially share their setting, and the views of the proposed tower would relate to their special interests in comparable ways. The German Gymnasium (Grade II) and the Stanley Buildings (Grade II) are now part of this urban set-piece – although buildings with their own and separate special interest – and their setting is defined by the visual context created by Battle Bridge Square, between the two stations.

14.22 The monumental trainsheds of the two stations are a large part of their special interest; that of St Pancras, built by William Henry Barlow, was the longest in the world at the time of its construction. Their main facades, their public spaces and their ancillary buildings and surrounding public realm also contribute architectural and historic interest. The stations and their hotels essentially address the commercial artery of Euston Road, and were historically surrounded to the rear by expansive and little-developed depots and goods yards, with areas of nineteenth-century workers' housing between. The goods yards are all now being built-out

with mainly mid- to high-rise mixed use developments, while the workers' housing has in places been renewed and consolidated into blocks more recently.

- 14.23 The tower would be part of the story of the reuse and intensified development of the stations' surrounding yards and ancillary spaces and of the modernisation of their neighbouring housing, and so being able to see it will not in principle threaten the contribution of the stations' settings to their special interest. The proposed tower will be visible from Battle Bridge Square (the new square between the new concourse for KX Station and St Pancras Station), but will appear above the flat modern roofline of the HS1 trainshed extension to St Pancras Station, just as the flues of the Francis Crick Institute do already. It will be read here alongside the large modern buildings of Pancras Square too, likewise building-out old railway land. Its effect here will be equivalent in the settings of the German Gymnasium and the Stanley Buildings.
- 14.24 An additional kinetic views study submitted by the applicants at the request of officers shows that the very top of the tower will be glimpsed over the nineteenth-century trainshed of St Pancras in some very limited views available from parts of the pavement on the south side of Euston Road. This section is roughly that between Birkenhead Street – at which point a tiny corner of the tower will be seen tight up against the roof of the Great Northern Hotel and scarcely distinguishable from it – and Crestfield Street where it will disappear. The traffic of Euston Road and the vents, canopies, trees and furniture of the square also intervene in these views. Elsewhere within the station square and in views towards the stations from 295 and 297 Pentonville Road, and even from further up the hill or Grays Inn Road to the east, the tower will be concealed behind the mass either of the stations themselves, the Hotel, or the large buildings around the bottom of Pentonville Road. The long, clean roofline of the ridge of the historic Barlow trainshed will be undiminished in its essential monumentality, and dominant in the setting of King's Cross Station and the Great Northern Hotel, not harmed by the few available glimpsed kinetic views of its apex.
- 14.25 In terms of the effect of the proposed tower on the setting of St Pancras Station and the Midland Grand Hotel on their west side, the kinetic views study shows that it will not be visible alongside the Station or Hotel from the south, appearing only some way up Pancras Road. There, and in long views towards the station from the north, where it will appear to one side in the foreground, the appearance of the tower will not compromise appreciation of the station: it will stand well north of the end of the Barlow trainshed on Pancras Road and set back to the west of the frontage of the Francis Crick Institute. Its palette and glazed or reflective finishes are designed with careful reference to these surroundings, mediating between the buildings and the park. In the views from the north, its verticality and slim angled termination will echo the vertical mass of the Hotel and Library on either side of the junction with Euston Road.
- 14.26 The proposed tower will not harm the special interest of the stations, their hotels, or the other listed buildings around Battle Bridge Square. It is noteworthy that Historic England does not object to any effect of the tower on the setting of these listed buildings.

Pancras Road Arches (Grade II)

14.27 The proposed tower will appear above the flat parapet of the Pancras Road Arches in views towards them from the north. Its appearance will change the quality of their setting by drawing attention to the redevelopment of the goodsyard they once enclosed and the changed scale of their surroundings. The slim profile, angled roofline and light-toned finish of the tower will minimise its visual interference with appreciation of the architectural qualities of the Arches. The appearance of the proposed tower is consistent with other surrounding development which has changed the setting of the Arches – notably the HS1 trainshed extension directly opposite and the Francis Crick Institute beyond. The very slight harm the tower will do to the setting of the Arches by appearing so prominently in views of them will be understood in this mitigating context.

1-17 (including nos. 20 & 21 Platt Street), 18-41, 42-65 Charrington Street and railings to areas (Grade II)

14.28 The proposed tower will be visible above the flat parapet roofline of the terraces on Charrington Street – particularly above nos. 18-42. From the northernmost parts of the terrace group, the tower will appear sufficiently distant not to significantly alter their setting, but to form part of the general background of large-scale urban development. In views of the southern parts of the group, the taller of the tower's two shafts will be seen over the parapet, sloping down to the east. This will be a visual interruption to the way the terrace's unaltered roofline is currently viewed only against sky or foliage. However, as in other views, its form and finish will make it relatively recessive. It will be understood as part of the changing residential context of the historic terraces, analogous to the large twentieth-century housing blocks which stand nearby. Critically also, the proposed tower will be read in conjunction with other modern alterations to setting to the south – principally the extension to the terrace which is part of this application, and the flues and roof of the Francis Crick Institute, which will also be visible. In this context, harm to the special interest of the listed buildings through alteration of their setting will be negligible and as such at the very lowest end of the category of less than substantial harm.

Old Church of St Pancras (Grade II*), the Tomb of Sir John Soane (Grade I) and associated listed monuments and structures (Grade II)

14.29 The Old Church of St Pancras is a medieval church enlarged in the nineteenth century, its special interest vested somewhat in its architecture and the connection of the newer with the old, but also in the ancientness of its origins. Sir John Soane's tomb has great special interest because of its architectural influence, and that of its designer and occupant. The Church is the backdrop of the tomb in views south, and the setting of both is that of the verdant churchyard imposingly surrounded by the massive structures of the Victorian and modern railway, twentieth-century housing blocks across Pancras Road, and the large buildings around Euston Road beyond. The Francis Crick Institute and the modern extension to the trainshed of St Pancras Station are the most significant of these buildings as viewed from the Churchyard, and their very large forms are expressed in clean, modern elevations and materials. The narrow form of the tower would be

visible at some distance beyond the Church and Tomb, in front of the Francis Crick Institute, and would be another element in this sleek modern urban backdrop, doing no harm to the setting of the Church or the Tomb.

The Regent's Park (Grade I) and 1-42 Chester Terrace (Grade I)

14.30 The Regent's Park and Chester Terrace are part of a grand formal composition of new housing around landscaped parkland, designed by John Nash with James and Decimus Burton as part of a wider conceived ceremonial route extending to The Mall. As such, their special interests are interconnected, and each is important to the setting of the other. Several ancillary structures around the Terrace and the Park are separately listed, but share similarly in the wider special interest of Nash's composition, and very largely share their setting. The Regent's Park is organised around an Inner and Outer Circle, with roads including Chester Road connecting through the latter to the former. Chester Terrace is the longest unbroken façade around the Regent's Park, standing at the east end of Chester Road, and its houses are set behind an elaborate architectural treatment including projecting pavilion blocks with triumphal arches at either end of the street. Some formal paths are laid out across the area of the Park contained by the Outer Circle, and the description of the Park in the national Register identifies the north-south Broad Walk, which crosses Chester Road at a right angle, as the most significant among these. In the northern parts of the Outer Circle, the landscape is less formal parkland. In many areas of the Regent's Park – especially the area around and south of Chester Road – its character is today less rural than Nash intended and much more that of an urban park, bounded by heavy traffic and views over Nash's landscape of high-rise buildings north and south of Euston Road and between Euston and Camden Town.

14.31 The top 6 storeys of the tower will be visible above the roofline of Chester Terrace as viewed along Chester Road from the entrance to the Inner Circle (submitted View 19). It will appear approximately above no. 22 Chester Terrace, the upper storeys of which are part of the terrace's central projecting element, slightly to the left of the axis created by Chester Road. Supplementary information submitted by the Applicant at officers' request shows that the tower would be visible for 159m east along the south pavement of Chester Road from the point at which View 19 was taken, and for 140m east along the north pavement, before disappearing behind the roofline. The tower may also be visible from points within the Inner Circle and within the Park on either side of Chester Road, but heavy and mature tree growth means that any views would likely be limited to glimpses.

14.32 Many framed views in and around the Park and its surrounding houses help to reveal the wider composition and so contribute to the special interest of the heritage assets. View 19 of the HTVIA and other views of Chester Terrace truncating the view along Chester Road contribute to the special interest of both the Park and the Terrace by revealing a planned axis that Nash intended to lend grandeur to his development. The view frames the centre of the Terrace quite tightly however, and even in winter the roofs of no more than 5 of its 42-house long horizontal roofline are visible between trees. At this distance and without views of the wider Terrace, the detail, totality and special length of Nash and Burton's architecture is not easily appreciated. Chester Road itself is lined with cars and

road markings. Other views of Chester Terrace also reveal aspects of its special interest. Views to the east from the Broad Walk are particularly significant; indeed they better reveal the length and horizontality of Chester Terrace than do longer views along Chester Road, and they better set the Terrace in its intended parkland context than do views of it beyond a car-lined road. The tower would not be visible at all in views from the Broad Walk. If the top of the tower is glimpsed in views through mature trees from within the Park on either side of Chester Road, these will only be from limited areas well west of the Broad Walk, which on the north side of Chester Road is an area occupied by a complex of small buildings which form the Regent's Park Allotment Garden.

- 14.33 Historic England and others object to the tower because it considers that it will do significant and serious – though in the terms of the NPPF, less than substantial – harm to Grade-I listed heritage assets. The tower as seen in View 19 alters the setting of the Park and Chester Terrace by introducing a vertical visual interruption to the clear sky behind the Terrace's fairly flat roofline in this axial view. The view is of the small central portion of the Terrace, tightly framed by the trees lining Chester Road, with the slim profile mainly of one of the tower's two shafts seen at approximately a mile's distance behind the roof terrace, without much complex facing to this part of its elevation. At this distance, the tower will not be more prominent in night-time views than by day. On the whole, any visual disruption the tower presents will be limited and its visibility fairly confined, most affecting View 19 and a short part of Chester Road. In areas of the Park where the tower will be glimpsed, nearby tall buildings and dense urban development already form part of the Park's character and setting. As such, the tower will do harm to the settings of The Regent's Park and Chester Terrace but this harm is certainly less than substantial as defined by the NPPF's terms, and can be judged moderate within this category of harm.

Conservation Areas

- 14.34 The tower will appear in views within and out of the King's Cross St Pancras Conservation Area looking south and west. The tower would rise 2.5m short of the clock tower of St Pancras Station, which is the tallest building in the Conservation Area (CA). The proposed tower is nonetheless comparable in its vertical scale to the very large horizontal volumes contained by the 2 stations and trainsheds in the CA, and the adjacent Francis Crick Institute outside the CA. Though the curved roofline of the latter building disguises its great mass, its flues already rise to +69m AOD, while the proposed tower will rise to +97.5m at its highest point.
- 14.35 With the exception of the Old Church of St Pancras and the area of housing bounded by Pancras Road, Chenies Place and Charrington Street, the character of the CA is formed by large-scale, often institutional buildings within its boundary, which have in recent decades begun to rise higher than the two stations' monumental trainsheds. The proposed tower is an extension of the intensified urban development and tall buildings found along the Euston Road corridor which is part of the modern setting of the CA, and now largely reflects the recent development within it. Because of this, and due to its location and orientation, the proposed tower would not harm the character or appearance of the King's Cross St Pancras CA.

14.36 Views of the proposed tower from the Regent's Canal and Bloomsbury CAs would be very limited, generally only glimpsed or available static from particular positions. The tower would appear sufficiently distant not to dominate in any view. The proposed tower will, wherever it is visible, form part of the general background of intensified urban development, and particularly that along Euston Road.

14.37 This context would be particularly apparent in the key views which would be most exposed to the proposed tower, which are concentrated in the southern part of the Regent's Canal CA: in views from Cubitt Square and Lewis Cubitt Park for instance, the proposed tower would appear beyond the radical, modified roofline of the Coal Drops development, and alongside 5 Pancras Square, the Francis Crick Institute, the Post Office Tower and other towers around Euston Road, which are comparable in scale.

14.38 The proposed tower would do no harm to these CAs and in each case their character and appearance would be preserved.

14.39 In those parts of The Regent's Park where the Tower is visible, the character and appearance of Regent's Park CA is entirely determined by the qualities of Regent's Park, its surrounding listed terraces and their associated heritage assets. As such, the visibility of the tower will have an effect on the CA broadly the same as that on the Park itself and Chester Terrace – which is less than substantial.

Strategic views

14.40 The tower would be seen in 2 strategic views within Camden: the panoramas seen from Primrose and Parliament Hills. In both, the tower will appear in the middle ground, at some distance, and its contextual colouring and refined profile would be appropriately identifiable among the other historic and recent large roofscapes and tall buildings in its vicinity.

Other heritage assets

- 14.41 Other heritage assets which may have some co-visibility with the tower are:
- Levita House including attached shops and Somers Town Coffee House (Grade II);
 - Nos.44-58 (Even) Chamberlain House including shops (Grade II);
 - Walker House southern block including The Cock Tavern Public House (Grade II);
 - St Michaels flats, St Anthony's flats, St Francis' House, St George's House, St Christopher's House, St Nicholas's Flats, north of Aldenham Street (Locally Listed);
 - Walker House and other Locally Listed buildings along Phoenix Road

14.42 In each of these cases, the proposed tower represents the continuation of a long process of the consolidation of residential accommodation in Somers Town into blocks, and the redevelopment of the areas around the stations and their goods yards. Other large-scale urban development on Euston Road is already part of the settings of these buildings. The tower's refined profile and design minimises

its visual interference with surrounding architecture of different styles. The tower will in this way be consistent with the existing contribution made by the settings of these heritage assets to their special interest as parts of the different phases of Somers Town's development residential buildings and ancillary commercial buildings.

Effects of the other proposed developments on heritage assets

Plot 4: Edith Neville Primary School and Children's Centre and Plots 5 and 6: Purchase Street housing

14.43 Like those on Plots 2 and 3, the other housing and community facilities proposed on Plots 5 and 6 are to be modern but contextual in design, of high quality and in keeping with the prevailing uses and architectural character of the surrounding area, including the King's Cross St Pancras CA, and heritage assets. The proposed housing and community hall would be screened by extensive foliage, the block at Plot 5 substantially concealing Plot 6 in turn in views from the CA further north on Purchase Street. The proposed housing here is in any case appropriate in scale and materiality to the prevailing character and appearance of the CA, which would be preserved.

14.44 Edith Neville Primary School and Children's Centre on Plot 4 has been very carefully designed to create a state-of-the-art modern primary school of new architectural interest and of a modest scale appropriate to the streetscape of this part of the CA. Its pale palette will complement that of the backdrop of the Francis Crick Institute and that of the extension to the Charrington Street terrace. Each of its three storeys being set back behind a ground-level perimeter wall on the Purchase Street elevation, the proposed school will not appear prominent enough in any views from the CA to materially alter its character or appearance, or the settings of any other heritage assets, except by addition of sympathetic and interesting new architecture.

14.45 The Community Hub on Plot 1 would also be visible from the terraces, across the clear site opposite, but will be sufficiently distant and small in scale as to have no material effect on their setting. Its design is sympathetic to the character of the area.

Conclusion

14.46 Most of the proposed development will do no harm to any designated or non-designated heritage assets, and in some instances would be an enhancement. Some very slight, less than substantial harm is identified in the effects of views of the Brill Place Tower (Plot 7) on the settings of Pancras Road Arches (Grade II), 18-41 Charrington Street (Grade II). Views of the tower will also do moderate less than substantial harm to the setting of 1-42 Chester Terrace and of the Regent's Park. The NPPF requires that any harm to a designated heritage asset requires clear and convincing justification and case law indicates that the statutory provisions require considerable importance and weight be attached to the preservation of listed buildings, their settings and to conservation areas. Paragraph 134 of the NPPF identifies that in respect of less than substantial harm

to any designated heritage asset, “this harm should be weighed against the public benefits of the proposal”.

15 Public benefits versus harm to Chester Terrace

15.1 The National Planning Policy Framework (NPPF) (paragraph 134) states that:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”

15.2 The public benefits of the scheme need to be balanced against the harm to designated heritage assets. The most significant harm, as described in the ‘Conservation’ section above, would be caused to the Grade I listed Chester Terrace. The only way to eliminate this harm would be to remove 6 storeys from the tower – as discussed in the ‘Alternative options and scheme viability’ section of this report. The elimination of 6 storeys would result in the loss of 20 affordable housing units (all social rented units) from the scheme and the harm caused to Chester Terrace and Regent’s Park must be weighed up against the benefit of the provision of these 20 units.

15.3 The GLA estimates that the population of London will reach nine million by 2020 and ten million by 2035. There are significant shortages in housing and in particular affordable housing. Average prices in London rose by twelve per cent between 2013 and 2014 which the London Housing Strategy describes as an ‘affordability crisis’. Housing is the Council’s priority land use and affordable housing is especially welcomed. Somers Town is an area that suffers from deprivation and is in need of housing and particularly affordable housing.

15.4 Officers are of the view that the public benefits of the 20 affordable units are substantial and compelling and outweigh the moderate ‘less than substantial harm’ to Chester Terrace. Officers therefore support the height of the proposed tower due to the public benefits.

16 Design

16.1 The Design considerations are follows:

- Policy review
- Plot 1
- Plot 2
- Plot 3
- Plot 4
- Plots 5 & 6
- Plot 7
- Conclusion

Policy review

16.2 London Plan policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7, policies CS14, DP24, DP25 and CPG1 (Design) are relevant with regards to design.

Plot 1

Summary

- 16.3 The proposal represents a creative and contextual design response to providing community facilities and successfully integrates these with the provision of affordable housing. The proposed arrangement of uses in combination with an inventive façade treatment would provide an attractive and active edge to the re-provided park. By closing off the public footpath and providing lighting and passive surveillance of the public realm the proposal should improve the sense of safety and security for users of the park.
- 16.4 The proposed site configuration, scale and massing would optimise the use of the site and re-provide a nursery, community play facility and MUGA to much improved standards. The form of the proposed development would serve to hold the corner and clearly define the park edge, so positively contributing to the legibility of the townscape and providing greater definition of the public realm.

Introduction

- 16.5 The proposal for Plot 1 is a mixed-use scheme comprising a new St Aloysius nursery, a Community Play Facility and 10 affordable housing units. The brief for the community play facility includes a roof top MUGA and both the nursery and community play facility would provide enclosed external play areas.
- 16.6 The key issues in the assessment of the design of the proposed housing and community facilities on Plot 1 in relation to Core Strategy policy 14 and Development Plan policy 24 are:
- how the proposed building responds to the character of its local context and the form and scale of neighbouring buildings;
 - the provision of appropriate communal and private amenity space;
 - the provision of visually interesting ground floor frontages and contribution to the public realm;
 - the quality of materials to be used and their compatibility with their surroundings;
 - the suitability of the proposed design to its intended use.

Existing site & context

- 16.7 The site for Plot 1 is located towards the northern edge of the existing Polygon Road Open Space. It is bounded to the west by Chalton Street and to the north by a narrow public footpath that runs between Plot 10 and the playground and MUGA of Regent High School. Public consultation has identified this footpath as feeling unsafe and being the location of anti-social behaviour. Polygon Road Open Space directly adjoins the proposal site on its long southern edge. The site itself is currently occupied in part by a section of Polygon Road Open Space and in part by the existing Plot 10 play facility.
- 16.8 Mid-rise apartment buildings characterise the scale of built form near the site - 4/5 storey housing across Chalton Street to the west and across Polygon Road Open Space some distance to the south is Walker House at 5/6 storeys. Close to the northern corner of the proposal site lies a former pub now converted to residential use at 130 Chalton Street that stands at 3 storeys plus mansard roof.

Description: Layout, form, scale, massing and public realm

16.9 The proposal removes the public footpath to the north of Polygon Road Open Space so the northern edge of the site directly adjoins the sites of 130 Chalton Street and Regent High School. Moving west to east across the site, building mass is alternated with the lowered mass of the walled play spaces to aid operational demands and create a tripartite civic elevation that fronts the new park. On the western portion of the site a proposed 6 storey building contains a 5 storey housing element above the nursery. The walled nursery play space is located to the east of this, followed by the community play facility building which is a single storey building with roof top MUGA and landscaped external play area to the east. The plot is enclosed by a continuous wall.

16.10 At 6 storeys the height of the nursery/residential block steps up slightly from the general five-storey datum of Chalton Street. The tall part of the building is pushed away from 130 Chalton Street to preserve neighbouring residential amenity (daylighting) and a single storey covered entrance space to the nursery separates the six storey building from its neighbour to the north. Both the residential entrance and nursery entrance are located on the Chalton Street face of the building. There is a secondary entrance from Polygon Road Open Space to the nursery playground for certain events. The community play facility and separate MUGA entrance are also located on Polygon Road Open Space. Both the nursery and Community Play Facility have a two-tier entrance sequence to allow control of visitors for child protection. It is envisaged that the doors connecting the community play facility and nursery external play area would be used infrequently but allow interchangeability of use in future and for special events.

Urban design assessment: Layout, form, scale, massing and public realm

16.11 The layout of courtyards and buildings has been carefully designed to maximise flexibility and adaptability in their configuration. The resulting elevation, alternating between building and walled play spaces, creates a varied and active edge to the park that responds to context through allowing glimpses into private courtyard space that visually extend the open space of the public realm. In combination with the proposal to close off the public footpath to the north of the site the proposal should serve to improve the sense of safety and security for users of the park.

16.12 The height of the six storey nursery/residential block on Plot 1 in combination with the Plot 2 housing, serves to bookend the new urban block. It also completes the enclosure of the junction of Chalton Street/Aldenham Street. Although slightly higher than the prevailing height of development on Chalton Street it has a small footprint so its scale and massing is considered to complement its surroundings. It succeeds in providing an accent point that holds the corner and clearly defines the park edge, so positively contributing to the legibility of the townscape and providing greater definition of the public realm. It terms of layout, form, scale and massing it complies with London Plan policy 7.4, Core Strategy policy 14 and Development Plan policy 24.

Description: Elevations, detailed design and materials

- 16.13 Ground floor openings to the community uses are formed of curved archways, echoing those on the Ossulston Estate, to animate the façade and identify the hierarchy of entrances. The single storey nursery entrance, defined by an arched gateway, terminates the view down Aldenham Street and a series of curved arches form the ground floor of the southern elevation. The residential entrance is a rectangular opening. The brick enclosure to the MUGA uses an inverted arch form to continue the same architectural language. The roof parapets of the residential block are also slightly curved to reflect these arched forms, as are the tops of the courtyard walls.
- 16.14 The openings to the park-facing nursery elevation are described as ‘shop’ windows that provide a semi-active frontage to the park – these are deep windows used as showcases within which objects are displayed that restrict views in. They can also be illuminated at night with security achieved through the use of internal roller shutters located at the back of the deep window recess. The rectangular residential windows are grouped to allow the area of solid brick façade at the corners to be maximised to create a sense of solidity. The balconies to the residential units are inset on floors 1-3 and project on the 4th and 5th floors.
- 16.15 The main facing material is a light warm grey brick selected to reflect the colour of the Ossulston Estate and avoid competing with other strong brick colours in the area. There would be a mixture of brick bonds and soldier/header courses to cap the walls. The concrete plinth that connects all the community uses throughout the scheme will be used at low level and will also create low planters and doormats. The glazing system to all openings would be finished in a warm toned (dark gold) powder coated aluminium and steel balustrades would have the same finish. An aluminium panel system forms the residential entrance and provides ventilation to the nursery windows.
- 16.16 As the MUGA occupies a prominent location within the scheme its design is intended to provide greater visual interest than a standard sports fence. The inverted brick arches form a 1.2m kick-board that extends upwards to support a tension cable net system to contain balls. A lightweight steel mesh would drape over the cables so give the appearance of looseness but is in fact rigid. The boundary treatment is also designed with shock pads to eliminate fence rattle and reduce noise nuisance to residential units.

Design assessment: Elevations, detailed design and materials

- 16.17 The south elevation to the building provides a welcoming and playful appearance appropriate to the community uses within it. The use of the curved arched openings and inverted arches to the MUGA fencing is an innovative approach to bringing a coherence that ties together a diverse programme of uses, providing the building with a distinctive identity. The approach to fenestration allows it to strike a good balance between presenting active frontage to the public open space day and night, whilst also providing the required degree of privacy to the nursery. The combination of the lit ‘shop windows’, the MUGA that is lit until 9pm and the lighting of selected planting and play structures within the external play spaces would mean that these facilities could activate and animate the park into the evening, providing it with an increased sense of safety and security. The

proposal conforms to London Plan policy 7.3 and DP24 through the use of its design to reduce the risk of crime and a sense of safety in the public open space.

- 16.18 The proposals for the two outdoor play spaces are creative designs that have been carefully developed with users. The community play facility would provide very rich adventure play possibilities including raised beds for growing, water play, trees and play equipment/structures. The nursery garden would also provide a small but rich and versatile play offer for young children.

Plot 2

Summary

- 16.19 The proposed mid-rise residential block on Plot 2 is of a high quality, contextual, modern design that would provide a high standard of accommodation.

Introduction

- 16.20 The proposal for Plot 2 is a housing block of part six and part nine storeys with a ground floor commercial unit. It would provide 35 residential units contributing to the aim of the CST CIP to maximise the delivery of new affordable housing alongside the school, community facilities and park.

- 16.21 The key issues in the assessment of the design of the proposed housing on Plot 2 in relation to Core Strategy policy 14 and Development Plan policies 24 and 25 are:

- how the proposed building responds to the character of its local context and the form and scale of neighbouring buildings;
- the quality of materials to be used and their compatibility with their surroundings;
- the provision of visually interesting frontages at street level;
- its impact on views and vistas particularly in relation to the wider historic environment and to ensure that it does not cause harm to the character and appearance of the King's Cross and St Pancras conservation area or to the setting of listed buildings; and
- the suitability of the proposed design to its intended use.

Existing site & context

- 16.22 The site of Plot 2 is currently occupied by the eastern part of the Plot 10 community play facility. It borders the playground and MUGA of Regent High School to the north, Polygon Road Open Space to the south and to the east is a pedestrianized area of public realm that joins Ossulston Street in the south to Charrington Street in the north. Facing the site to the east is the boundary fencing of the existing Edith Neville Primary School.

- 16.23 The site lies in relatively close proximity to the south-western part of the King's Cross and St Pancras Conservation Area and to grade II listed Georgian terraced houses on Charrington Street. The site has a green character with a number of trees.

Description: Layout, form, scale, massing and public realm

16.24 In layout and massing the plot 2 housing block is divided into two parts. The shorter, six storey component aligns with the urban grain of Charrington Street and Ossulston Street and the nine storey component is rotated slightly away from this alignment. The placement of the building is intended to extend the street frontage on this north-south axis.

16.25 The proposed main residential entrance is located on this eastern face of the building and the ground floor commercial unit occupies the southern portion of the building. There are generally 4-5 units per floor per core. Almost all units are dual aspect and some are triple aspect due to the shape and number of corners to these building forms. Generally living spaces occupy the corners of the building and all units exceed London Plan standards providing maximum flexibility in use and tenure. The orientation of the blocks provides good opportunities for sunlight and daylight to the new dwellings and aims to optimise outlook for residents on to the park and public realm, although this is restricted to the west and north because of safeguarding concerns relating to the community play facility and Regent High School.

16.26 The roof of the taller nine storey block is a pitched roof in three parts with its shallow gabled eaves orientated towards the east and west and the flat parapet facing south. The roof of the shorter northern block takes the same form but is rotated through ninety degrees from the taller block so that its gabled face is viewed from the north. This choice of roof form is a nod to the butterfly roofs of the surrounding Victorian terraces but also contains lift overruns and allows extra ceiling height to units on the upper floor of each block.

Urban design assessment: Layout, form, scale, massing and public realm

16.27 The division of the proposed building into two parts and the shift in orientation of the proposed blocks is intended to allow the building to relate both to the orthogonal street grid of the surrounding context and to the new context of the park. It succeeds in providing active frontage to an area of public realm that is currently not overlooked and so conforms to London Plan policy 7.3 and DP24 though using the layout and ground floor openings to contribute to passive surveillance reducing the risk of crime and a sense of safety in the public realm.

16.28 At part six and part nine storeys the proposed building is taller than any of the buildings in its immediate context. However it is sufficiently distant from them to be considered a standalone building and the existing mature trees that surround the site help to soften its visual impact so that it sits comfortably in its surroundings. The change in height and orientation between the two conjoined blocks helps to diminish the perceived bulk of the proposed building relative to its neighbours and gives its massing a more informal, organic quality that helps it relate to its setting within the park. The design of the proposed building in its scale, massing orientation and pitched roof forms represents an appropriate response to the character of the local context so complying with Local Plan DP24 and London Plan Policy 7.4.

Description: Elevations, detailed design and materials

16.29 The approach to fenestration and balcony openings of the buildings “combines formal composition and orchestrated irregularity”. Rather than being

aligned in a grid, the openings for windows and balconies are allowed to shift around the façade. Openings are formed of a brick outer sleeve with white innards as this was observed by the architects to be a standard feature of domestic architecture that is characteristic of the local area. The white innards allow the position of windows to bedrooms to be shuffled within the brick opening so responding to specific conditions such as an adjacency to a tree or neighbour or to accommodate specific view, and contributing further to the animated, irregular façade treatment.

16.30 Balconies would generally be part recessed and part projecting, formed in concrete with a white metal balustrade.

16.31 Brick is the predominant building material in the area and the proposed main facing material for this building is a blend of yellow, brown and red bricks. These would be tumbled bricks with chipped corners and edges to soften the newness of the brick work and bring a rough texture that contrasts with the precision and crispness of the metalwork to windows, doors and balconies. The metalwork would be polyester powder coated in matt white linking to the materiality of the proposed school building

16.32 The openings to the ground floor commercial unit on to the park will feature large areas of glazing above a low concrete plinth and the entrances would be defined by a surround detail in the same pigmented precast concrete in a colour to suit the brick colours.

Design assessment: Elevations, Detailed Design and Materials

16.33 The pitched roof forms reflect local context so the elevations of the building either feature a flat parapet or shallow-gabled eaves. Observations of context have informed the roof form, approach to fenestration and the materiality of the building but it is also a modern style of architectural expression that would contribute to local distinctiveness. In the attention paid to the specific site conditions of each unit within the proposed building, the animated external appearance is defined by a commitment to optimising the quality of internal accommodation provided.

Plot 3 - Extension of Grade II listed terrace to provide 3no. dwellings

Summary

16.34 The proposed new houses are of a careful and high quality contextual modern design that restores the end of terrace lost to the building of the Edith Neville Primary School in the 1970s.

Introduction

16.35 The proposal for Plot 3 is 3 three-bedroom, four-storey houses. They would be built on the same footprints as the 3 houses that were demolished in the early 1970s to make way for the current Edith Neville Primary School and Children's Centre so are designed to 'complete' Charrington Street's Grade II listed Georgian terrace.

16.36 The key issue in the assessment of the design of the proposed houses in relation to Core Strategy policy 14 and Development Plan policies 24 and 25 is how closely the design responds to the scale, form and proportions and materials of the existing terrace in order to preserve and enhance the character and appearance of the King's Cross and St. Pancras Conservation Area, which the new buildings will sit adjacent to, and to ensure that it does not harm the setting of the listed terrace. Consideration should also be given to the suitability of the proposed design to its intended residential use.

Existing site & context

16.37 The site for the Plot 3 housing in the northern corner of the primary school site, formerly occupied by 3 terraced houses, lies adjacent to the southern boundary of the King's Cross and St. Pancras Conservation Area. Its northern boundary is set by the flank wall of the end house (once a mid-terrace house) at the southern end of Charrington Street's Grade II listed Georgian terrace. This was previously a party wall and following the demolition of its neighbouring houses in the early 1970s it was buttressed and treated in a sand-cement render.

16.38 The western and eastern site boundaries are set by the continuation of the external walls, lightwells and railings of the existing terrace and the southern boundary is set out from the assumed location of the previous houses. There is an angled flank to the southern boundary aligning with the previous continuation of Aldenham Street.

16.39 The existing four-storey terraced houses on the eastern side of Charrington Street were built in the 1840s and 1850s. They are typical of the period in their plan form, elevational hierarchy, and variety of architectural detail employed across the terrace. The buildings feature a lower ground floor, raised ground floor and 2 upper level floors. The entry level is raised four steps above the external ground level and separated from the street by a lightwell. At the rear, the properties have a small private garden at lower-ground floor level rising to a larger shared garden at external ground level.

Description: layout, height, massing and public realm

16.40 The 3 new houses proposed would be 4 storeys in height including a semi-basement lower ground floor. Their height, width and depth are aligned with the existing terrace to the north but the upper 2 floors are pushed back to the rear to allow a skylight to the lower ground floor and to create external terraces. These upper floors have a 'butterfly' plan form and roof form in elevation. This allows the parapet to turn the corner to 'end' the terrace.

Urban design assessment: layout, height, massing and public realm

16.41 There is a strong logic to placing housing in this location. Firstly it restores the historic terrace. Second, its location would positively address the increased visibility of the unfinished flank wall with the relocation of the school on Plot 4. Thirdly, in this location the masterplan site directly adjoins heritage assets that form part of its historic setting offering an opportunity to propose a new building that can respond to both 'contexts' to help the project as a whole relate to its historic surroundings.

16.42 Given the uniformity of the existing terrace it is appropriate that the proposed new houses are in close conformity with the plot width, depth and height of the houses that once occupied the plot in order to provide continuity with the terrace. Where the proposed houses depart from the building line set by the existing terrace to the rear it is to address the site specific constraints set by the privacy needs of the school and the requirement to minimise the area of the school site to be released to housing. This is an acceptable adaptation to the requirements of context and wider masterplan objectives.

16.43 The proposed development makes a positive contribution to the public realm by extending the passive surveillance provided by the existing terrace further to the south and by actively 'ending' the terrace helping to reinforce townscape legibility.

Description: Elevations, detailed design and materials

16.44 The proposal is to create a front elevation formed of 2 mid-terrace continuations and one end of terrace house that is richer in detail to visually terminate the terrace. The heights of the parapets, doors, window heads and cills are aligned with the existing terrace to provide continuity with it. The internal floor levels also broadly align with the levels in the existing terrace so the proposed entry doors are reached via a short flight of steps and are inset with top lights. The proposed brickwork coursing and plinth also align with the existing terrace.

16.45 In order to actively 'end' the terrace, the proposed pre-cast concrete reveals to the windows relate in depth and thickness to the decorative stucco surrounds of the windows at the northern end of the terrace rather than to the elevations of the terrace immediately adjacent to the site. It is the design of the first floor rather than ground floor windows that provides this 'end.' The end of terrace house features a large first floor window that departs from the proportions of the rest of the terrace to mark the corner and respond to the history of a plot once occupied by a shopfront.

16.46 The main facing materials are a smooth mid-grey pre-cast concrete to the ground and lower ground floor level and sculpted window reveals and a rough white brick to first and second floor. White steel handrails are proposed for external railings and balustrading to the Juliet balconies and thin profiled aluminium window frames would be white or grey.

Design assessment: Elevations, detailed design and materials

16.47 The principal elevation is a contemporary design that reflects the proportions of the existing terrace. It has been developed through a process of careful analysis of the existing terrace, successfully reconciling this with site specific constraints and the need to relate to the future context of Central Somers Town. In texture and coursing the proposed materiality relates to the existing terrace and in lightness of tone it adopts the palette of the proposed school building, so linking the 2 as is appropriate to the interface position of the site.

Plot 4 – Edith Neville Primary School

Summary

16.48 The proposal for the school building, external spaces and the site perimeter is a highly bespoke design that responds to a complex and challenging brief. The brief was developed through careful analysis of the school's context and site constraints, the wider needs of the Central Somers Town project as a whole, and extensive consultation aimed at identifying the specific educational and community needs of the school. The proposed design is a contextually sensitive and innovative response to the design concept of a school as an extension of its parkland setting that uses both building and boundary treatments as a foil to the landscape. It satisfies all relevant parts of the London Plan design policies 7.4, 7.5, 7.6 and CS14 and DP24.

Introduction

16.49 The primary objective of the Central Somers Town project is the redevelopment of the Edith Neville Primary School and Children's Centre to provide a replacement one form entry school with a nursery and children's centre.

16.50 In common with the existing school, the proposed new school would occupy a site at the centre of the Somers Town Community. However, the new school would be bounded on 2 sides by the renewed public park and would sit on a reduced site area, discharging just over a quarter of its existing site area to public open space along its southern boundary.

16.51 The key issues in the assessment of the design of the proposed school in relation to London Plan design policies, Core Strategy policy 14 and Development Plan Policy DP24 are:

- How the proposed design has considered and responds to site constraints and the character of its context and its setting;
- The suitability of the proposed design to its intended use;
- The contribution of the proposed building and surrounding spaces to the public realm and the provision of visually interesting frontages at street level;
- The provision of appropriate hard and soft landscaping especially at its boundaries and given its position at the heart of a renewed public park; and
- The quality and contextual appropriateness of materials and detailing.

Existing building and site conditions

16.52 The site of existing primary school and children's centre has one closed boundary to the north shared by the gardens of three storey Victorian terraced housing on Somers Close and Charrington Street and to the other 3 sides it is bounded by public open space and public highway. Charrington Street/Ossulston Street run to the west of the site with Polygon Road Open Space beyond. A five storey housing block faces the site to the south across the pedestrianised section of Polygon Road and Purchase Street borders the eastern edge of the site. The terraced housing on Charrington Street adjacent to the north-west corner of the site is grade II listed and the northern edge of the site adjoins the King's Cross and St Pancras Conservation Area.

16.53 The site is mostly level except for a sunken area in the south western corner of the site. The existing school is a single storey 'island' building that occupies the

western half of the site. Key site constraints are the presence of a number of trees located on the site boundaries, including a large Category A Ash tree on the Purchase Street boundary, the protection of residential amenity to the north and the protection of the setting of the Grade II Listed terrace on Charrington Street.

- 16.54 The 3 sides of the site bounded by roads and cycle paths have open fencing and railings to the perimeter with relatively little vegetation or screening. This public and exposed playground environment presents safeguarding concerns due to unwanted interaction between pupils and the public.

Description of proposed school

- 16.55 The proposed building would be 2 storeys as a 1FE school, in the form of a ground floor with set-back upper floor. (Future expansion would be at second floor level and would be of a lightweight, prefabricated construction designed to minimise disruption to the school and visual impact). The eastern wing of the building provides the majority of the school accommodation and a more secondary, lower wing occupies the south-eastern section of the site. The building is located on the site boundaries with Purchase Street and Polygon Road enclosing the external play space on 2 sides.
- 16.56 The pupil entrance to the school would remain in its existing location in the south-west corner of the site on the corner of Charrington Street/Polygon Road. The pupils would cross the playground to enter the school building. The main entrance is located between the 2 main wings of the building at the junction of Polygon Road and Purchase Street. There would be a third entrance close to the north eastern corner of the site on Purchase Street.
- 16.57 The site boundary, whether formed of 'fence' or building, has an inner and outer 'skin' arrangement. The outer skin, or 'veil', is a visually semi-permeable perimeter to the site. The base of the perimeter of the site whether 'building' or 'fence' is a plinth of varying height formed of precast concrete in a smooth mid-grey or lightly pigmented colour. On the western boundary the concrete plinth is low and above it there are vertical steel fins with tensile steel planting wires between them. This forms a secure 2.4m high perimeter to the external play space of the school but allows views through to the vegetation and longer views to the sculpted roof profile of the building. These views of the green roof and first floor set within the tree canopy support the key design concept of a school site connected to the park landscape.
- 16.58 In the south western corner of the site the plinth steps up to form a gated arch that frames the pupil entrance. Then, turning the corner to the southern boundary, the concrete plinth is again low and above it would be a screen of mesh made from white aluminium featuring a large opening framing a key view into the site. The views to the densely planted areas between the inner and outer skin on these western and southern boundaries restrict views into the site. There would also be a planted verge between the site boundary and footpaths in the park providing a buffer helping to ensure an appropriate degree of privacy to the external play areas of the school.

16.59 The high point of the outer skin marks the main entrance. At this point the concrete plinth steps up to a full storey height and folds under to create a covered, inset entrance to the building. The entrance area is formed of full height glazed sliding doors and next to them external seating is integrated into the concrete plinth. The building mass at first floor level is set back from the mesh outer skin forming external terraces that would be used as teaching spaces.

16.60 On Purchase Street, the concrete plinth is a full storey height so the ground floor of the building forms a solid rather than permeable boundary with the public realm while the upper floor would be clad in profiled perforated aluminium sheet. There are variety of size and type of punched openings to the ground floor of the building. A large 'shop-front' type window that would showcase the activities of the school is a feature of the Polygon Road elevation. The drop-in space that occupies the south eastern corner of the site has a series of large windows that would use manifestation to achieve the required level of privacy. Other smaller windows punctuate the Purchase Street elevation and there would be very large openings in the screening of the external courtyard spaces on this façade.

Design assessment

16.61 The massing of the proposed development on the eastern part of the site has been designed to ensure that it does not compromise residential amenity or the setting of the conservation area to the north. Although the positioning of the proposed building on this part of the site would mean that a Cat A tree would be lost on the Purchase Street boundary it is agreed that this option best balances the need to respond to the other site constraints such as residential amenity and the setting of heritage assets, the educational needs of the school including the requisite amount of external space and to allow for future expansion (see Trees section). A further advantage of the proposed layout is that it supports the creation of an important civic focal point at the heart of the Central Somers Town masterplan in the south eastern corner of the site.

16.62 The proposed design has evolved to respond to pre-application discussions concerned with achieving an appropriate degree of openness to the public realm without compromising the privacy requirements of the school. The arrangement of the building and site with an 'outer' skin or 'veil', in combination with a variety of types of window opening, should succeed in controlling the extent to which activity within the school is concealed or revealed so reconciling the need to provide visually interesting frontages at street level whilst addressing the school's concerns regarding privacy. The screened set-back first floor allows for the classrooms to have large windows that open on to the external terraces, so benefitting from good outlook and daylighting.

16.63 The main facing materials of pigmented concrete and white coloured perforated aluminium sheet, steels fins or white brick have a lightness of tone that would give the proposed building an attractive luminous appearance. This should provide a distinctive identity and convey, with some subtlety, the sense of it acting as a beacon within the park as is appropriate to its important community function and as a place of learning. The proposed materials also reflect the desire that the school should be thought of as a civic building with a mature presence.

16.64 The layered façade provides depth to the elevations and supports the concept of the site and building as an extension to the park landscape. It would achieve this by allowing the extensive planting that lies between the inner and outer skin of the site perimeter on the west and southern boundaries to help visually connect to the park landscape beyond. The neutral backdrop of concrete and white metal finishes are intended to act as a foil to the planting which is an integral part of the design. Glimpses of the activities within the building and play area would also be 'showcased' by the simplicity of detailing and neutral colour palette.

Plots 5 & 6

Summary

16.65 The proposed low to mid-rise residential blocks on Plots 5 and 6 are of a high quality contextual modern design that would provide 34 residential units of a high standard of accommodation and an improved replacement community hall. The position of the proposed buildings on the site would serve to enclose a safe and secure re-provided community garden and would address security concerns associated with this sunken area of the park.

Introduction

16.66 The proposal for Plots 5 & 6 is 2 housing blocks of part 4 and 6 storeys (Plot 5) and part four and three storey components (plot 6). The lower ground floor of the Plot 5 building would also re-provide the community hall that forms part of the exiting site. Both buildings will help to enclose an extended community garden.

16.67 Plot 5 would provide 20 residential units and Plot 6 would provide 14 residential units contributing to the aim of the CST CIP to maximise the delivery of new affordable housing alongside the school, community facilities and park.

16.68 The key issues in the assessment of the design of the proposed housing and community facility on Plots 5 and 6 in relation to Core Strategy policy 14 and Development Plan policy 24 are:

- how the proposed building responds to the character of its local context, the form and scale of neighbouring buildings and the existing natural features of its site such as topography and trees;
- the provision of appropriate hard and soft landscaping including boundary treatments;
- the provision of appropriate communal and private amenity space;
- the provision of visually interesting ground floor frontages and its contribution to the public realm;
- the quality of materials to be used and their compatibility with their surroundings;
- the suitability of the proposed design to its intended use.

Existing site & context

16.69 The proposed buildings on Plots 5 and 6 would occupy the site of the TRA hall on Hampden Close and walled community garden to its rear and a sunken area of Purchase Street Open Space that currently provides a hard landscaped children's play area enclosed by railings and small area of more naturalistic play equipment. There is a change of level of approximately 2m between Purchase

Street and this sunken area of open space and, due in part to the way it is hidden from view to passers-by, it is an area prone to anti-social behaviour.

16.70 The character of the site as a whole is of an open space defined by deciduous trees that provide a dense canopy during summer months. Across Purchase Street to the west is a residential block of 5/6 storeys. Immediately to the north east of the site are two storey terraced houses on Hampden Close and facing the site to the north are the four-storey apartment blocks of Clyde Court.

16.71 The north-western corner of the site marks the northern entrance to the Coopers Lane Estate on Hampden Close. The Coopers Lane Estate was developed in the 1970s on the site of the former Somers Town Coal Depot. It provides low rise housing of 2-4 storeys. The rear gardens of three storey terraced housing on Coopers Lane forms the eastern boundary of the proposal site. These rear gardens are currently exposed to the Purchase Street Open Space and their brick walled boundaries have been extended upwards with trellis and chain-link fencing.

Description: Layout, form, scale, massing and public realm

16.72 In layout and massing the 2 housing blocks are each divided into two parts. In each case the shorter storey component relates to the existing context, through alignment with the urban grain of Purchase Street and Coopers Lane Street and the taller component rotates to relate to the new context of the park. The proposed Plot 5 building is formed of 4 storey and 6 storey components. The ground floor of the taller part of the building contains the re-provided Coopers Lane TRA hall in close proximity to its current location. The Plot 6 building is part three storey and part four storey.

16.73 In both buildings, the main residential entrance is located on the western face of the building at the crease in the break in height and alignment between the taller and short parts of the building, so providing an intuitive point of entry. Planted beds and light wells around the building edges provided a buffer space to the residential units to ensure privacy in their park setting. There are generally 4-5 units per floor per core.

16.74 In common with the proposed building on Plot 2, designed by the same architects, the roofs of the blocks are pitched which is a design response to local context - to the butterfly roof forms of the surrounding terraces – and to respond to near neighbours, views or to minimise daylight and sunlight impact. The pitched roof form also contains lift overruns and the top floors of accommodation gain extra volume to their living spaces.

16.75 The building defines and encloses the re-provided and extended Community Garden on two sides. The existing rear facades and garden walls to Hampden Close and Coopers Lane complete the garden enclosure. The garden can also be accessed from the new community hall on the lower ground floor of Plot 5 and via 2 secure gateways, one located on Hampden Close between the proposed Plot 5 building and adjacent housing and another located off the Purchase Street open space between the proposed Plot 5 and Plot 6 buildings.

Urban design assessment: Layout, form, scale, massing and public realm

- 16.76 The height and scale of the proposed buildings are designed to correspond closely with neighbouring buildings and to create an attractive composition to the group of buildings as a whole. The broken, stepped arrangement of massing is appropriate to the undulating landscape setting of Purchase Street open space and acts to break down the perceived bulk of the proposed buildings.
- 16.77 The tallest part of the proposed buildings, the 6 storey component of Plot 5, forms a focal point that terminates the long vista down Polygon Road from the west. The ground floor of this part of the building contains the re-provided Coopers Lane TRA hall so the additional height also acts as a marker of this civic function. The proposed new community hall would provide an improved facility with a much large main hall space, and improved accessibility and visibility of the activities within. The interior volume would have greater height and spatial interest than the current TRA hall.
- 16.78 The lower ground of the Plot 5 building is at community garden level, 2m below the level of Purchase Street. The positions the residential ground floor at 1m above the level of Purchase Street providing it with a slightly elevated position that allows privacy to the occupants whilst allowing passive surveillance over the park.

Elevations, detailed design and materials

- 16.79 See description and assessment for Plot 2 buildings by the same architects. The approach is the same for these buildings except for the brick colour - the proposed main facing material for these two buildings is a blend of purple, brown and red bricks. The entrance to the community hall on Plot 5 would be defined by a surround detail in pigmented precast concrete in a colour to suit the brick colours and the same pre-cast concrete would be used to form gateposts, doormats and edging kerbs.

Plot 7 – Brill Place Tower

Summary

- 16.80 The key urban and building design issues in the assessment of this part of the application are the suitability of the site for a tall building and the architectural quality of the proposed building.
- 16.81 The proposed tower would not adversely affect the character of the area and is designed to relate to the varied form, scale and grain of neighbouring buildings. It can be read as a means of mediating between the divergent scale and character of its immediate surroundings and as a bold and dynamic response to context. It would also improve the legibility of the public realm at ground level, provide passive surveillance of the renewed park and serve as a distinctive local landmark.
- 16.82 The high quality of the proposed materials and detailed design would create an attractive and interesting building and all of the flats would benefit from a high standard of residential amenity.

Introduction

16.83 The proposed building on Plot 7, the Brill Place Tower, would provide 54 of the 136 housing units in the masterplan. It would be 25 storeys high from ground level and as such would be the tallest element in the Central Somers Town masterplan, standing significantly taller than its neighbours. Many of the design criteria that a tall building must address apply to any proposed new building. However additional criteria and a requirement for careful examination apply in the evaluation of proposals for tall buildings because of their scale and widespread visibility and their potential impact on the environment.

16.84 This proposal has been assessed against policies CS14 and DP24 para 24.10, Camden Planning Guidance SPD, CPG 1 Design and CPG6 Protecting and improving quality of life, London Plan Policy 7.7 and Historic England Advice Note 4 Dec 2015. London Plan Policy 7.7 sets out a set of urban design criteria against which applications for tall buildings should be assessed and DP24 is in alignment with these. They are referenced where relevant in the urban design assessment that follows.

Site and immediate context

16.85 The site of the proposed tower occupies a position at the southern end of Purchase Street Open Space, adjacent to Brill Place. Purchase Street Open Space extends to the north with the two-four storey Coopers Lane Estate backing on to its eastern edge. St Pancras Station lies further to the east across Midland Road. The Francis Crick Institute, currently under construction, dominates the context of the proposal site to the south, across Brill Place. This is a very large and bulky structure that rises to +65m AOD at its highest point (the flues) although will be approximately +48m on its ridge line and +30m on Brill Place.

16.86 Due to its scale and visibility, consideration of the relevant context of the proposed tower should extend beyond the immediate context described here. Assessment of its wider context is discussed in the Conservation section above.

Description of proposed development: Layout, form, scale and massing

16.87 The proposed Brill Place Tower is positioned towards the eastern side of Purchase Street open space directly adjacent to Brill Place. It would be 25 storeys high from ground level, terminating at 76.2m from ground level (+96.5m AOD). The double height ground floor is designed to have a minimal footprint. Above this the tower is split into two 'micro towers' in plan. The northern tower is slightly narrower to allow views from units in the southern tower to the park to the north.

16.88 The vertical form of the proposed tower is composed in thirds; a body which represents the lower two thirds of its height, and the 'scissor' profile of the opposing inclined roof planes which represent the top third. This reduction in massing in the upper third of the building gives it a more slender appearance.

16.89 The ground floor would provide a small commercial space facing west and north and residential lobby with concierge facing north and east. The residential bin and cycle stores are accessed from Brill Place and located in a basement that extends significantly beyond the ground level building footprint.

Urban design assessment: Layout, form, scale, massing and public realm

16.90 The relevant tests of the acceptability of the tower in terms of layout, form, scale and massing and public realm in accordance with London Plan policy 7.7 are that tall buildings should:

- only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
- relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
- have ground floor activities that provide a positive relationship to the surrounding streets; and
- Contribute to improving the permeability of the site and wider area, where possible.

The same criteria are relevant with respect to satisfying CS14 and DP24 para 24.10, Camden Planning Guidance SPD, CPG 1 Design and Historic England Advice Note 4.

16.91 The diverse context to the site in the form, proportion, composition, scale and character of surrounding buildings presents a considerable design challenge in defining its character and identifying an appropriate design response. The Design and Access Statement records a number of reasons for selecting a tower in preference to a lower, linear building but the height is primarily a response to the problem of how to accommodate the required quantum of development without contributing to a net loss of Public Open Space, a key masterplan objective. What must be assessed is whether the tower that is the product of these design drivers would detract from or enhance the qualities that are valued about this place.

16.92 The context to the proposed tower does not have a character that is defined by a prevailing scale or form of development so cannot be considered particularly sensitive to a tall building in these terms. The site occupies a position where the curving mass of the 10-16 storeys Francis Crick Institute and the suburban scale of the Coopers Lane estate are abruptly juxtaposed. Whilst the change of scale, form and character is particularly marked between these 2 neighbours, in a more general sense the site lies between the fine grained mid-rise residential development of Somers Town and the very large, bulky structures of the institutional buildings and transport infrastructure to the south and east. The proposed tower can be read as a means of mediating between the divergent scale and character of its immediate surroundings and as a bold and dynamic response to context. Its vertical scale acts as foil that contrasts with and corresponds to the horizontal extent of the Francis Crick Institute as it rises up against its curving northern façade but in the finer detail of its massing derived from inset balconies and projecting bays, it has the scale and grain of a building with a distinctly domestic character. In this assessment the proposed tower offers an opportunity to bring coherence to the character of the area by tying together these divergent contexts.

16.93 The position of the tower towards the eastern end of Brill Place helps to define a gateway space to the Coopers Lane Estate and re-worked Purchase Street Open Space at the eastern side of the proposed building so improving the legibility of the public realm. The small footprint of the building does present a challenge to

arranging ground floor activities to relate positively to the public realm. The proposed residents lobby with concierge is located on the eastern and northern faces of the building and the commercial unit faces west and north. Both proposed uses do have a return on the southern elevation on Brill Place but the short, street-facing edge of the building is also the location of the service access. Of the 4 faces of the building, Brill Place has the most limited active frontage and therefore the least visual interest to passers-by and passive surveillance of the public realm. However, this is the logical point for service access and it can be argued that the public open space stands to benefit more than Brill Place from improved overlooking.

- 16.94 The compact building footprint of the tower offers further advantages to the public realm over lower, linear building forms. It opens up views and pedestrian movement around it on the ground floor, maintaining permeability between the park and Brill Place. This is an important consideration given the existing condition of openness and the future aspirations to encourage greater use of the park and movement through it. In combination with the degree of transparency provided by the fully-glazed, double height ground floor, the tower would allow clear sightlines into the renewed park on approaches from the east and west and should contribute to providing a welcoming entrance to it.

Views and townscape

- 16.95 A particularly important aspect of the evaluation of a proposal for a tall building is its impact on views and vistas. In the assessment of this proposal, its impact on views is the key determinant of the acceptability of its height. Special emphasis should be placed on understanding how the tower would affect protected views, the historic environment and buildings, spaces and features of local historic value.
- 16.96 It should also be understood that the visibility of a well-designed tall building can serve a positive townscape function by enhancing legibility and identity. London Plan policy 7.7 states that tall buildings should improve the legibility of an area by emphasising a point of civic and visual significance, and enhance the skyline and image of London. The location and height of the proposed tower would have no impact on the skyline and image of the city as a whole. As is to be expected given the dense urban setting, the tower would be completely screened by interposing development in many views.
- 16.97 However, in some local views the proposed tower would be glimpsed down narrow streets and in such cases its visibility would give it a local landmark function, giving emphasis to a point of civic and visual significance. It would act as a focal point at the southern gateway to the re-worked Purchase Street open space and in views from the west would mark the eastern end of the east-west Phoenix Road-Brill Place route, a strategically important connection between Euston Station and King's Cross and St Pancras Stations. The 'scissor' profile of the most visible upper third of the proposed tower give it a distinctiveness that serves to underpin the role it would play in shaping local identity and enhancing legibility.

Description: Facades, materials and detailing

- 16.98 The double height ground floor would have a full height clear glazed curtain walling system with integrated frameless automatic sliding door to the residents lobby that sits behind a free-standing structure of smooth finished concrete columns. The sculpted soffit to the ground floor extends from inside to outside and is finished in angled silver anodized aluminium interlocking panels. A main communal staircase is visible on the south elevation that would be of steel construction and coloured sulphur yellow. It would be enclosed in a frameless curtain walling system with translucent PVs integrated into the glass.
- 16.99 Above ground floor the fully glazed treatment of the facades continues, comprising transparent and opaque elements as dictated by internal use and energy calculations. The north and south facades have a curtain walling system with a glass rain screen overlay in a dark blue/black. The flats are all dual aspect and have bedrooms located on these closed facades so the overlay provides privacy as well as generating depth and relief and achieving the appearance of punched windows within the rain screen. On the north side of the west elevation the balcony position alternates and this informs an alternating projecting bay on the north elevation.
- 16.100 The living spaces and balconies are located on the east and west elevations. On levels 2 to 14 these facades would be full height clear glazed and the balconies have glass balustrades and soffits formed in white metal panels. Passive solar shading is provided by sliding screens made from satin anodised aluminium panels with a bespoke perforated pattern that relates to the location of the tower next to the Francis Crick Institute by referencing DNA sampling patterns. The shutters would move on double tracks on an aluminium channel between each floor that is a continuous element wrapping around the perimeter of the building. The screens perform a number of functions as well as providing solar shading. They bring animation and visual unity to the façade, reducing the need to control acceptable window dressings and allow residents privacy and shelter from the wind when using their balconies.
- 16.101 Some of the glazing is fixed and some is in a sliding panel with glazed balustrades recessed just behind the main façade line to allow the space to operate as outdoor amenity space when conditions allow.
- 16.102 The material of the solid areas of roof would be a standing seam silver coloured metal with some fritted glazed areas. Façade access and maintenance would be carried out using a static powered Building Maintenance Unit (BMU) located in a recess in the centre of the roof from which all parts of the facade and roof can be accessed. The BMU could be described as a permanent fixed crane with a moveable arm that unfolds to carry a two person cradle and glass replacement hoist. There is also a lifting beam stored at roof level to allow the installation and replacement of some large pieces of glass in bays used in the projecting bays on the north elevation that exceed the maximum lifting capacity of the BMU. This is all hidden from view when not in use.

Design assessment: Facades, materials and detailing

- 16.103 The quality of the materials and detailed design of the proposed tower are an important consideration in reaching a judgment on its visual effects. The Design

and Access statement records how different approaches to the materiality, colour and texture of the proposed building were explored once its form and massing were established.

16.104 The reflectiveness of the fully glazed facades would give the building a neutrality to avoid it jarring visually with the diverse palette and materials of the Crick, the varied brick tones of Somers Town and the landscape setting to the north. The design introduces articulation and texture to the east and west elevations of the lower two thirds of the building through the use of the inset balconies and perforated shutters that run on recessed horizontal channels. The bay windows on alternate floors of the north elevation that relate to the alternating balcony position on the west elevation also introduce variation. The rainscreen cladding brings depth to the north and south elevations. These design features serve to break down the mass of the building to give it a domestic scale that expresses its residential function.

16.105 On the ground floor the continuity of the sculpted soffit treatment in combination with the full height glazing helps to give the sense that the interior of the building is connected to the public space around it. The warmth and tactile qualities of the timber cladding to the interior, which would be visible externally, seems appropriate both to creating an inviting residential lobby and commercial space such as a café and to connecting to its setting within a landscape dominated by trees.

Conclusion

16.106 The proposed high standard of architectural quality conforms to relevant parts of London Plan policy 7.6, Core Strategy policy 14 and Development Plan policy 24. The application specifies high quality materials and colours that defer to context and includes selected details for all plots demonstrating design intent. Elevations for the proposed brick buildings feature carefully considered brick detailing and, in relation to residential buildings, the application includes typical details of entrances, balconies and windows in plan, elevation and section. These are important to ensure that the materials and details are credible and robust and that the development will have longevity, making a positive contribution to the area in the long-term. The details relating to the boundary treatment of plot 4 are also vital to ensuring that the proposed building makes a positive contribution to its surroundings and shows consideration for its local context.

16.107 It is important that the materials specified and proposed high standard of architectural quality is maintained throughout the process of procurement, detailed design and construction through the use of a condition requiring that detailed drawings, and materials samples shall be submitted to and approved in writing by the Council before the relevant part of the work is begun.

17 Masterplan, landscaping and trees

17.1 The Landscaping, public realm and trees considerations are follows:

- Policy review
- Designations
- Masterplan

- Impact on Public Open Space
- Impact on Private Open Space
- Proposed landscaping and playspace
- Trees
- Conclusion

Policy review

17.2 Core Strategy Policy CS15 and Development Policy DP31 seek to protect and improve designated open space, provide additional open space at King’s Cross and improve connections between spaces.

Designations

17.3 Purchase Street Open Space is designated as Public Open Space. This open space is approximately 6,450sqm.

17.4 Polygon Road Open Space (aka Chalton Street Open Space) is also designated as Public Open Space. This open space is approximately 5,310sqm.

	Existing open space (sqm)	Proposed open space (sqm)
Public Open Space	11,760	11,765

Masterplan

17.5 The Central Somers Town CIP defined site area is approximately 2.2 hectares at the heart of Somers Town. The site comprises Polygon Road Open Space, the site of Edith Neville Primary School and Children’s Centre and Purchase Street Open Space. The project aims to deliver significant improvements to Public Open Space, a replacement primary school and children’s centre, a nursery, a community play facility and community hall and garden as well as 136 units of housing.

17.6 Rationalising and intensifying the use of publicly owned land underpins delivery of the CIP project. The commitment to maintaining the existing quantity of Public Open Space and significantly upgrading it, underlies a design strategy founded on landscape and scene setting as pivotal to the process of place-making. The key driver of the masterplan proposal is the idea of creating one welcoming and well connected park at the heart of Somers Town, around which the new homes and community facilities are located. The following section describes the way in which the application proposes to achieve this.

17.7 The first move of the masterplan is to reduce the site area of the school by moving its boundary to the north. This releases land to Public Open Space and a new area of parkland is created in a position that connects the existing open spaces of Polygon Road and Purchase Street. The community play facility is re-provided on its existing site to the north of the Polygon Road Open Space next to the new nursery. This responds to consultation that identified the importance to the community of the play facility maintaining its location between 3 primary schools in Somers Town. New housing is positioned on 6 sites around the edges of the new park providing overlooking, enclosing the re-provided community garden and in most cases is located above ground floor community or commercial uses.

- 17.8 The redesigned park would serve existing residents and new residents as well as visitors and passers-by. The park is defined by 2 principal diagonal pedestrian routes and within these a secondary meandering path network. The primary routes would be a means of connection and the secondary paths would serve the new homes and local community for whom the park would be a place of recreation. The new buildings would provide a continuous edge to the open space, framing it and reinforcing desire lines. The spread of residential, community and commercial uses is intended to sustain activity across the site throughout the day and into the evening. They are positioned to improve passive surveillance of the public realm, reducing opportunities for crime and anti-social behaviour and increasing the sense of personal safety to users of the park.
- 17.9 The planning application as a whole represents a considerable collaborative effort. Through the masterplanning process, the landscape and buildings have been developed as a collective and cohesive whole. However, a key principle of the masterplan is that all of the proposed new buildings should sit comfortably within the existing fabric of Somers Town rather than read as part of a new homogeneous entity. Therefore each project has its own identity and language defining a character to suit the specifics of its context but they also reference one another to aid legibility and coherence of the public realm. The key linking device architecturally is the use of precast concrete plinth elements that define all of the building entrances, and community entrances in particular, so tying together the different components of the masterplan.
- 17.10 The prevailing height of development in Somers Town is low to mid rise housing blocks with occasional taller blocks such as the ten-storey Goldington Street Estate to the north. The proposed buildings are mostly consistent with the surrounding building heights with the exception of the twenty five storey tower on Plot 7, the nine storey southern section of Plot Two and six storey southern section of Plot 5. The main driver for proposing taller buildings on the site is to minimise the footprint of the residential component of the masterplan but the taller buildings are also positioned to provide architecture that performs a townscape function, acting as markers that provide a focal point on key routes.

Impact on Public Open Space

- 17.11 With regards to building on open space, the NPPF states that:
“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless...the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.”

Under the proposals, significant parts of Purchase Street Open Space and Polygon Road Open Space would be lost with the erection of new buildings (Plots 1, 2, 5, 6 and 7). However, there would be no loss of Public Open Space overall (with a slight increase by 5sqm), as a result of part of the ENPS site being given over to Public Open Space (school site area falling from 6,378sqm to 4,740sqm). The existing and proposed areas of Public Open Space include hard-surfaced areas as well as soft landscaped areas; as is the norm. The proposals would therefore comply with the NPPF requirement for equivalent replacement. In terms of the quality of the proposed Public Open Space, this is considered to be a

significant improvement – this is discussed below in ‘Proposed landscaping and playspace’. The Public Open Space would continue to be managed by the Council.

- 17.12 The applicant has undertaken an overshadowing analysis, assessing the impact of the proposals at the Spring Equinox (as suggested by BRE guidelines) and also for the 22nd June. This study shows that around half of Purchase Street Open Space is overshadowed at 9am as existing and that this would increase to the majority of the open space with the construction of the proposed tower. By 11am only the south-eastern corner would be overshadowed as a result of the tower. In the afternoon, the overshadowing would reduce further. Given the above, it is not considered that there would be a material overshadowing impact. The overshadowing analysis submitted for 22nd June (not required under BRE guidelines) shows there would be significant overshadowing from the tower at 9am but the majority of the park would be sunlit at 11am. Given the slim profile of the tower, its shadow would quickly pass over Purchase Street Open Space and would not affect it in the afternoon.
- 17.13 With regards to the gardens of properties on the Coopers Lane Estate, given the slim profile of the tower, these would not be affected for a long period. For example, the rear gardens of the southern end of the properties on the western side of Coopers Lane Estate (those closest to the tower) would start to be overshadowed at 11am on the 22nd June would be completely overshadowed at 1pm and would be unaffected at 3pm.
- 17.14 The other buildings are located to the north of the open spaces and would therefore have limited overshadowing impact. During the Spring Equinox, the nine-storey block would overshadow the playground of Regent Park High School at 9am. However, the shadow would pass by 1pm.
- 17.15 With regards to ENPS, there would be overshadowing from Plot 2 starting around 1pm. Around half of the playground would be overshadowed at 3pm. On June the 22nd, the playground would be shadow free until 3pm when the western fringes would start to be overshadowed.
- 17.16 Officers consider that the overshadowing of the parks, neighbouring schools and residential gardens is not unusual in urban settings, would comply with the BRE guidelines and would not materially affect the amenity of the users of these spaces.
- 17.17 The proposed landscaping improvements are considered significant benefits for the local community and are welcomed.



22nd March 9am



22nd March 11am



22nd March 1pm



22nd March 3pm

Figure 3 – Overshadowing diagrams; Spring Equinox

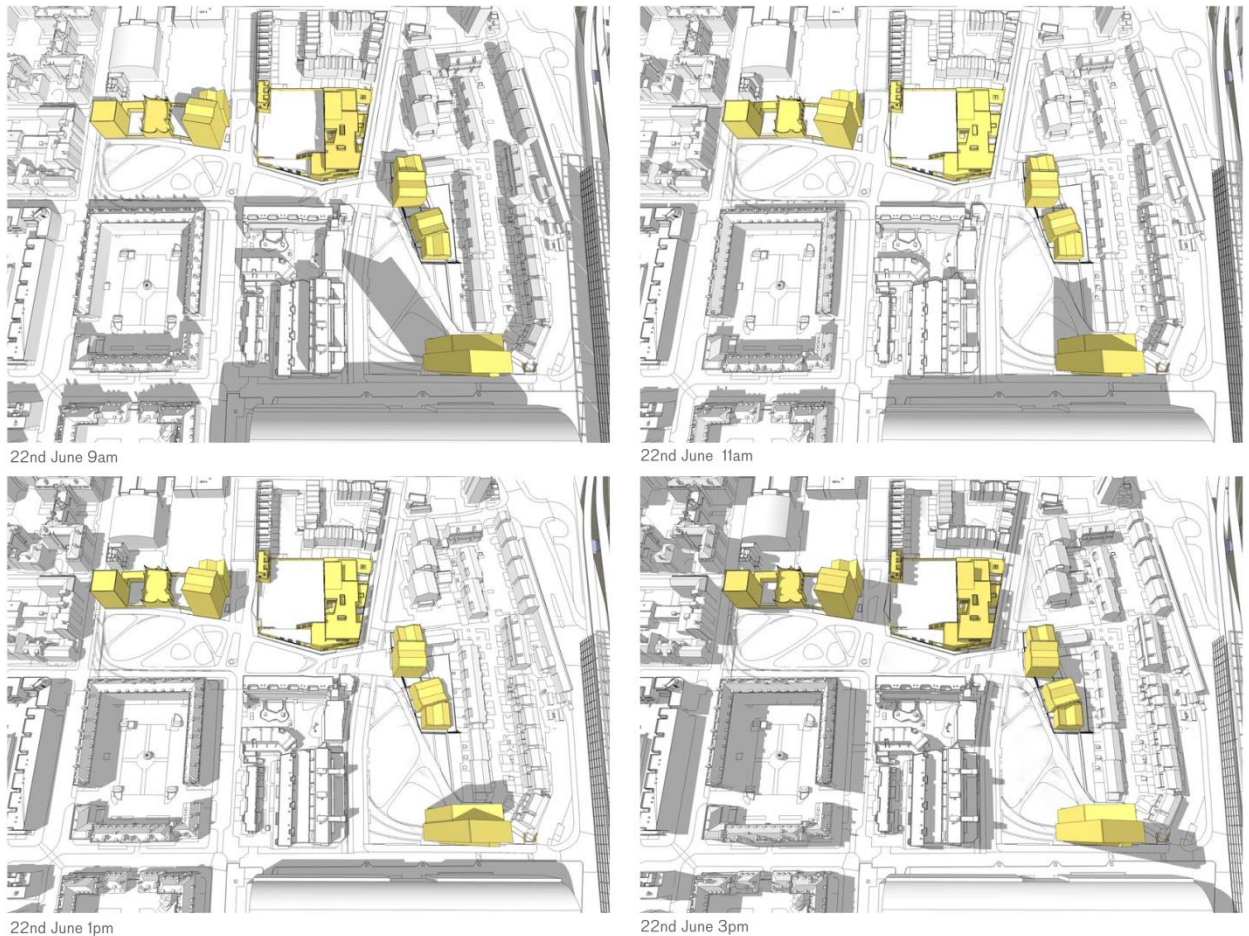


Figure 4 – Overshadowing diagrams; Summer Solstice

Impact on Private Open Space

17.18 Under the proposals there would be a reduction in private open space from 6,170sqm to 4,775sqm. This is largely a result of private open space becoming public open space, including the community garden.

17.19 Plot 10 Adventure Playground is designated as Private Open Space. Under the proposals, the school buildings at Edith Neville Primary would be rationalised (with land given over the Public Open Space) and the remaining private open space provided on this site would be more usable than at present. There would be an increase in external space from 3,268sqm to 3,467sqm.

17.20 The play space reprovided as part of the school and community play facility has been purpose designed with input from stakeholders to ensure that it meets their current needs and can adapt too any changes in the future as well as being easier to use and supervise.

17.21 The Community Garden is currently designated as Private Open Space and would become Public Open Space under the proposals which officers welcome. The garden is currently only accessible through the existing TRA hall and access is therefore reliant on key holders of the hall. There would be an increase in area of the community garden from 375sqm to 455sqm.

17.22 It is proposed that the MUGA to be lost at Purchase Street will be re-provided on top of the children's centre. To ensure that a reasonable level of public access to this is secured, a section 106 obligation is attached for a public access strategy.

17.23 The loss of the Private Open Space will not have an impact on any existing users of these spaces, and the benefits of bringing existing areas of Private Open Space into use as Public Open Space will outweigh any perceived harm.

Proposed landscaping and playspace

17.24 Under the proposals, the connection between the two parks would be strengthened, with a traffic-calmed area bridging Purchase Street, forming part of the new community square. The open spaces would be divided into areas of differing characters to maximise their use and function.

17.25 In terms of playspace, there would be infant play, junior play, an activity area, an outdoor gym (as there is at present) and 'incidental' play would also be provided.

17.26 The existing site is characterised by the extent of semi-mature and mature trees. The dense canopy cover of Purchase Street open space gives it a wooded character whereas Polygon Road Open Space has less tree cover and consequently more sunny open areas of amenity grass and activity. The proposed soft landscape proposal will build on the existing character of these spaces but address the issues that detract from their quality. The analysis of the existing landscape identifies that the parks currently suffer from a lack of definition of routes, narrow paths, steep changes of level and an ad-hoc collection of fences that create a cluttered environment and incoherent sequence of spaces. There is also a lack of ground-cover within the planting scheme.

17.27 The western part of Polygon Road Open Space is the location of the entrances to the external play areas of the proposed nursery, community play facility and the primary school playground. It would feature large, sunny grassy open spaces fringed by meadow planting to provide separation from the pedestrian footpaths. The eastern part of the park would have a quieter character with new paths defined by new woodland ground cover augmenting the existing tree canopy. Its undulating topography will be maintained. The new community square, an important and prominent civic space framed by the main entrance to the school to the north and entrances to the community hall and community garden to the east, is located at the hinge point connecting the western and eastern parks. An enlarged raised table would signify pedestrian priority at this point on Purchase Street.

17.28 The park would be unified by the new building edge to its north and east and in the landscape through elements of furniture, lighting and surface treatment. Rather than the park being defined by its sense of enclosure, its character would be shaped by the route through it. The main path surface would be a bound gravel but the gateway points on Brill Place and Chalton Street would be marked by 'ripples' of inlaid purple/grey brick pavers in the path that relate to the materiality of the goods yard walls that surround Purchase Street Open Space. The brickwork also appears at the Purchase Street crossing. Signage will be embedded into low

brick walls at the gateways and into the precast concrete thresholds and plinths to the building entrances within the park.

- 17.29 It is proposed to remove most barriers/fences in the park to create a large single space. Low enclosures to certain areas where required would be formed of a hedge with integral fence. The gateways to the community garden from Hampden Close and the park will be gated black metal portal frames that are open in the day and secured at dusk. Sections of the existing Purchase Street wall would be removed to increase visibility of the park from the street and bands of engineering brick would mark sections of wall that have been removed.
- 17.30 The landscape proposal is for holistic play provision meaning that opportunities for play would be evident across the whole park, re-providing existing play as well as improving its quality and introducing greater variation in the type of play experience offered. There would be age specific enclosed play space but with blurred boundaries between different areas. Play and activity surfaces will use a porous rubber that resembles natural woodchips. Other features of the landscape proposal include lawns, picnic areas, mounds, paths, timber decking and nature zones. Seating and gathering spaces will be provided in a range of different types. Seating and other street furniture is proposed in a material palette of warm timber, galvanised metal and black metal.
- 17.31 Timber lighting columns would line the main path through the park. Selected trees would also be illuminated. The lighting strategy is designed to increase community safety and encourage active use of the application area after dark for evening activities. The strategy also allows for unlit spaces after a natural curfew in order to maintain the residential character of the area.
- 17.32 Overall, the proposed planting seeks to create a colourful and sensory environment with a strong ecological and community focus. There is a detailed planting scheme chosen with regard for aspect, microclimate, maintenance, screening and seasonal interest. The drawings and the Design and Access Statement provide a high level of detail on the specification of plant species and on the design and specification of materials of the different elements of the landscape proposals.
- 17.33 The Community Garden would continue to be maintained by volunteers from the community and will be accessible to all during the day and locked at night. The proposed community garden will be larger and more accessible than the existing garden. The garden has a range of sun and shade and 73% of the garden passes the BRE test for sunlight access. The garden is designed to have a range of security features; the main security feature is in line with the western façade of Plots 5&6, this 2.4m fence is designed to be closed at dusk so that the route behind plot 5&6 is access controlled. In addition to this there is a lower fence/hedge separating the main community garden from the path to allow a secondary level of informal control. The garden has been designed to be flexible enough to accommodate different types of use be that a productive garden or a community space for activities.

17.34 Officers welcome the enhancements to the open space that the scheme offers, particularly in terms of connectivity, overlooking and safety. A condition is recommended regarding the detailed landscape proposals and for construction in accordance with these further details. The landscape details should include an Open Space Management Plan which is also recommended as a condition. In line with the SuDS proposals, all play surfaces would need to be permeable and appropriate materials should be shown on the plans. A condition is recommended that a Public Open Space construction plan be submitted for approval which details what proportion of open space is closed during construction works. This will ensure that a sufficient area of Public Open Space remains open at all times. Given the above, the proposed quality (as well as quantity of Public Open Space is considered to be in accordance with the NPPF.

17.35 The Council’s Parks Department has assessed the proposals and considers that the proposed enhancements would be well above what would be secured via public open space contribution. Given the above, no contribution to public open space is sought from this development.

17.36 An objection was received on behalf of the Francis Crick Institute stating that they had paid a Section 106 contribution towards Public Open Space (of £74,000) which should be repaid if not to be used for the Public Open Spaces on site. However, this contribution was not earmarked specifically for the Public Open Spaces on the current application site, but were allocated to the Greening Somers Town Project. This contribution is for the creation of green spaces in Somers Town, such as grass verges, pocket parks, rain gardens and greening of housing estates. The Council has appointed a consultant to look at places in Somers Town suitable for the greening project. The Public Open Spaces that are part of the application site are not included in this project.

Trees

17.37 There are currently 144 trees plus 5 groups of trees. The arboricultural report submitted with the application contains a tree survey in line with BS5837:2012 – “Trees in relation to design, demolition and construction” which has categorised all trees included within the application site as follows:

Tree grade	BS5837:2012 definition	No. of trees
A	High quality, est. remaining life span of >40 yrs	5
B	Moderate quality, est. remaining life span of >20 yrs	96 + 1 group
C	Low quality, est. remaining life span of >10 yrs or below 150mm diameter	37 + 4 groups
U	Poor quality, est. remaining life span of <10 yrs	6
	TOTAL	144 + 5 groups

17.38 Of these 149 trees/groups of trees, the scheme proposes the removal of 39 trees and 5 small groups of trees. The categorisation of these trees is as follows:

Tree	BS5837:2012 definition	No.
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grade		
A	High quality, est. remaining life span of >40 yrs	3
B	Moderate quality, est. remaining life span of >20 yrs	19 + 1 group
C + U	Low quality, est. remaining life span of >10 yrs or below 150mm in diameter	17 + 4 groups
	TOTAL	39 + 5 groups

- 17.39 Of the 39+5 groups (i.e. groups of low-quality, very young, self-sown trees) proposed to be removed, approx. 40% of these are cat. C or U (17 trees + 4 groups) which are not considered to be a significant constraint on development in line with BS5837:2012. The other 22+1 group proposed to be removed is still a significant number of trees. There would also be a temporary impact with the removal of trees and before the new trees had been planted.
- 17.40 The applicant has included with the submission a detailed breakdown of the proposed replacement trees to be planted to mitigate against the loss of canopy cover to facilitate the scheme. It is proposed that 50 trees are planted within the boundary of the application site, with a further 10 trees planted outside of the boundary. Excluding the proposed mitigation planting outside red line boundary, the replacement planting on the application site would provide an overall improvement in the diversity of the tree stock and overall net gain in canopy cover at maturity. Given the above, the Council's Arboricultural Officer has assessed the proposals and is satisfied. As such, the proposals are considered to be acceptable.
- 17.41 With regards to tree planting off-site, the arboricultural report states that trial pits were excavated on neighbouring land to assess the viability of tree planting on the west side of Purchase Street adjacent to Edith Neville Primary School to mitigate against the loss of T178, a large cat. A ash tree. The report states that the investigations concluded that it would be viable to plant trees in at least 3 locations on the west side of Purchase Street, with an additional fourth tree pit likely to be viable. There are also 4 trees proposed to be planted on the east side of Chalton Street although no investigatory excavations were carried out. A section 106 contribution of **£6485.20** would be secured to fund planting on neighbouring streets to mitigate against the proposed tree loss in addition to replacement trees on site would be acceptable.
- 17.42 The term "group" is intended to identify trees that form cohesive arboricultural features either aerodynamically (e.g. trees that provide companion shelter), visually (e.g. avenues or screens) or culturally, including for biodiversity (e.g. parkland or wood pasture), in respect of each of the three subcategories (see 4.5). The trees that have been grouped in the CST arboricultural report in line the British standard above. This method is industry standard and is used on most tree surveys that cover a large area/high number of trees.
- 17.43 The proposed replacement tree planting contains a broad range of species and sizes which is considered to be a sustainable approach and to be generally acceptable, although a landscaping condition is recommended to finalise the species selection/sizes/form. Trees of large ultimate size should be proposed

wherever possible as should those species that perform well at removing air-borne particulate pollution and these would be sought when the condition was being discharged. A pre-commencement tree protection condition is recommended.

Conclusion

17.44 The proposed Central Somers Town project would generate around 420 new residents but would not result in a net increase in public open space. The acceptability of the proposal depends on demonstrating that the improvements to the Public Open Space, in combination with the provision of high quality new play spaces for the school, nursery and community play facility, as well as increasing community access to the MUGA, will provide for the open space needs of existing and new residents.

17.45 The masterplan is supported by a detailed and high quality landscape design proposal. It has been carefully developed to build on the existing qualities of the public open space and address its negative features so responds to policy DP24 by providing appropriate hard and soft landscaping that positively responds to its local character. The proposed improvements in quality of the landscape, including the increased diversity in opportunities for play and exercise, sitting and gathering and the improved legibility and lighting of the park would all contribute to more active and inclusive use of Public Open Space, serving to meet the needs of the whole community.

18 Impact on neighbouring amenity

18.1 The considerations on the impact on the amenity of the occupiers of neighbouring properties are as follows:

- Policy review
- Daylight and sunlight
- Outlook
- Overlooking
- Noise and disturbance

Policy review

18.2 Policies CS5, DP26 and CPG6 (Amenity) are relevant with regards to the impact on the amenity of residential properties in the area. Any impact from construction works is dealt with in the transport section.

Daylight and sunlight

18.3 A Daylight, Sunlight and Overshadowing Report has been submitted as part of this application which details any impact upon neighbouring residential properties and open spaces. Detailed daylight and sunlight assessments have been carried out to the surrounding residential windows. In accordance with the BRE guidelines detailed assessments have not been carried out to the surrounding commercial or non-habitable room windows as they are not considered to have a reasonable expectation of daylight or sunlight. Daylight has been assessed in terms of Vertical Sky Component (VSC), sunlight has been assessed in terms of Annual Probable Sunlight Hours (APSH) and overshadowing has been assessed against BRE guidelines.

18.4 The VSC is calculated at the centre point of each affected window on the outside face of the wall in question. A window looking into an empty field will achieve a maximum value of 40%. BRE guidelines suggest that 27% VSC is a good level of daylight. If a window does not achieve 27% VSC as a result of the development, then it is assessed whether the reduction in value would be greater than 20% of the existing VSC – which is when the reduction in light would become noticeable to occupants. However, officers consider that VSCs lower than 27% are normal for urban areas, with 20% still considered acceptable.

18.5 Properties on the following streets where analysed for the impact of the proposal (see diagram below for location):

- Coopers Lane
- Hampden Close
- Clyde Court
- Somers Close
- Charrington Street
- Regent High School
- 130 Chalton Street
- St Anthony's Flats
- Phyllis Hodges House
- 101-113 Chalton Street
- Walker House
- Monica Shaw Court
- 40-42 Purchase Street
- Phoenix Court



Figure 5 – Properties assessed in Daylight, Sunlight and Overshadowing Report, with the most affected properties circled in red

18.6 Officers consider that properties on the following properties would be most affected by the proposal in terms of loss of light:

- 13-35 Coopers Lane,
- 8 Hamden Close,
- 130 Chalton Street,
- Phyllis Hodges House,
- 105-113 Chalton Street
- Phoenix Court.

Please refer to Figure 5 above for the location of these properties (highlighted with a red circle).

13-35 Coopers Lane

18.7 The loss of light to Coopers Lane would be as a result of Plots 5, 6 and 7.

18.8 62 windows serving 42 habitable rooms were tested on these properties. 7 of these 62 windows would not meet the BRE guidelines as a result of the development.

18.9 There are a number of windows where there would be a loss well over 20% with the greatest % loss being in the mid-forties for some windows (44.24% being the highest) on lower floors, serving properties at 13-27 Coopers Lane. However, the majority of these rooms would maintain a VSC above or only marginally below 20%, which is considered normal for an urban setting.

18.10 The windows tested that serve Coopers Lane have very high VSCs for an urban setting due to the fact that the site to the rear is undeveloped. Therefore some windows would experience a large percentage loss but would still retain good VSC's for an urban setting. All of the Coopers Lane rooms that were tested would continue to receive good levels of sunlight. It should be noted that most properties on Coopers Lane are dual aspect.

8 Hampden Close

18.11 The loss of light to Hampden Close would be as a result of Plots 5, 6 and 7. 41 windows were assessed in this building. 13 of these windows, which serve 7 rooms, would not meet BRE guidelines, however all of these windows would retain a VSC above 20% which officers consider acceptable for an urban area.

130 Chalton Street, Phyllis Hodges House and 105-113 Chalton Street

18.12 The loss of light to Phyllis Hodges House and the properties on Chalton Street would be as a result of Plot 1.

18.13 130 Chalton Street is a former public house that has permission to be converted into flats. Windows on this building were assessed and 7 of these would not meet BRE guidelines in terms of VSC. Most of these windows are secondary windows and the rooms are served by another window that does meet BRE guidelines, with only 2 of these windows not being secondary. These 2 windows serve a small kitchen and a bedroom, which are considered less important than living rooms, dining rooms or kitchen/dining rooms. The impact on 130 Chalton Street is therefore considered acceptable.

18.14 39 windows serving 20 rooms were tested in Phyllis Hodges house. 19 of these windows would not meet BRE guidelines, however these would all retain a VSC above 20% which officers consider normal in an urban setting such as this.

18.15 With regards to the windows that would receive the lowest VSC as a result of the development, these are located at the lower floors of 105-113 Chalton Street, with resultant VSCs of 13.82 and 15.07 at the very lowest. However, the majority of windows in these properties would remain well above the 27% VSC guideline (unless they were already below, where the % loss is very low and well below 20%).

Phoenix Court

18.16 The loss of light to Phoenix Court would be as a result of the Plot 7 tower.

18.17 78 windows which serve 70 rooms were assessed. 39 of these windows would not meet the BRE VSC guidelines, however only 6 of the 70 rooms would not meet the guidelines. These windows have relatively low VSCs due to the fact the flats are deck access and the windows are recessed from the building line. A small reduction in VSC therefore calculates as a high percentage. It should also be noted that most properties on Phoenix Court are dual aspect.

Conclusion – Daylight and sunlight

18.18 In central urban locations where the proposed site is currently undeveloped, reductions of daylight and sunlight beyond the BRE guidelines as a result of redevelopments such as this are considered likely. It should be noted that the BRE guidelines target value of 27% VSC is based on sub-urban settings. The guidelines also state that alternative criteria can be used in more urban areas. Officers consider that 20% VSC is normal for urban areas and areas such as Somers Town. Applying the BRE guidelines 20% reduction rule can still result in a level above what is considered a good level of daylight or sunlight for an urban context. The above properties would be the most affected by the proposals largely given that they currently receive very high levels of daylight due to the fact that they are located next to undeveloped open space; much higher levels than is the norm for urban areas. The conclusions reached have therefore included consideration of alternative target values more suitable for an urban location where the general BRE guidelines are not met.

18.19 The majority of the windows assessed would have VSCs above the BRE guidelines or losses that would not be noticeable by the occupants. Officers consider that the number of windows affected and the scale of the impact is not sufficient to warrant a refusal on loss of light.

Outlook

18.20 As stated above, the Plots 5 and 6 would be located to the rear of properties on Coopers Lane and the distance between these proposed plots and Coopers Lane would be 12m at the closest. Given that this is the closest point and that the new buildings would be positioned at an oblique angle from Coopers Lane (as opposed to perpendicular), there would still be sufficient outlook for an acceptable

level of amenity. No other properties would be materially impacted in terms of outlook.

Noise and disturbance

- 18.21 Conditions are recommended with regards to noise levels within rooms, noise from plant and hours of operation of the proposed uses. Suitably conditioned, there would be no material noise impact on existing residents from the proposals.

Overlooking

- 18.22 Plots 1 and 2 are separated from the nearest residential accommodation by existing streets (Chalton Street and Charrington Street respectively) and therefore the relationship between these buildings and other residential buildings would be normal in an urban context. Privacy and safeguarding concerns mean that balconies on the northern boundary with the school are avoided and on the western boundary with the community play facility, balconies would be fully inset aiding the reciprocal privacies of residents and users of the play facility. The fully inset balcony also serves to push the internal living space back from the façade.
- 18.23 With regards to Plot 5, there would be no material impact with regards to overlooking other residential properties. However, the windows serving the southernmost bedrooms of the flats on the upper floors of the northern block (units B03, B06 and B011) would directly overlook the rear gardens of Hamden Close. These windows would be just 3m away from these rear gardens and therefore it is considered necessary to attach a condition requiring obscured glazing here. This would not be required for the ground floor flat, given that views would be restricted by the boundary. The 3 rooms required to have obscured glazing are bedrooms, where outlook is considered less important for proposed flats than a living room or dining room. Balconies and living spaces have not been located on the eastern boundary with Coopers Lane and Hampden Close housing to avoid overlooking.
- 18.24 With regards to Plot 6, there would be significant overlooking to the windows serving the rear of properties on the Coopers Lane Estate, with separation distances of just 12m at the closest, as opposed to the minimum guideline of 18m. Therefore a condition is recommended that obscured glazing be installed on all windows on the upper floors of the southern block which face north-east, directly towards the rear of the Coopers Lane Estate (serving units C03, C07 and C11). These rooms are all bedrooms or have a second aspect. With regards to the northern block of Plot 6, there would be a greater separation distance at 15m at the closest point (rising to 18.8m at the furthest point. Whilst 15m is below the 18m guideline, there would be an oblique angle in views from the proposed flats, and this separation distance is not unusual in urban contexts. Given the above, the scheme is considered acceptable on overlooking grounds.
- 18.25 Plot 7 would be located 18m away from the closest property (at the bottom end of the western side of Coopers Lane), measuring corner to corner and there would be no windows facing each other directly given the oblique angles of the building lines. Given the distance involved here as well as the angles, there would be no material impact in terms of overlooking from the tower.

Conclusion

18.26 The proposals have been designed sufficiently in terms of location, footprint, height, bulk, massing and orientation to not impact on the amenity of neighbours in terms of loss of light or privacy. Subject to conditions on hours of use, noise and obscure glazing, the proposals are considered acceptable on amenity grounds.

19 Impact on Francis Crick Institute (FCI)

19.1 With regards to concerns raised by the FCI on overlooking, it should be noted that the amenity of commercial properties is not considered a material planning issue. However, should overlooking impact on the ability of a neighbouring use to function, then this is considered material. The proposed flats would be located 16.5m away, which is less than the 18m required between habitable rooms serving residential properties, however there is a public highway in-between and it is considered that these buildings would have a normal relationship for an urban environment in terms of separation distance. Phoenix Court, to the west of the site of the proposed tower, is located closer to the FCI than the proposed tower. Officers consider that overlooking of a non-residential use to be acceptable.

19.2 With regards to the concerns raised by the FCI on air quality, please see the Air Quality section of this report for more detail.

19.3 On the 15th floor winter gardens, a filtered air supply would be provided for the apartment at the eastern corner, whilst either balconies or winter gardens without ventilation would be provided on the façade where predicted concentrations are lower. At the 14th floor and below, air quality meets the relevant objectives and open balconies are considered acceptable here and below. The decision to redesign without balconies at the higher levels ensures that amenity space will not be lost as a result of poor air quality, as occupants will be able if required to seal the replacement winter gardens without losing any amount of amenity.

19.4 With regards to the concerns raised by the FCI on construction impacts, a Construction Management Plan (CMP) and a Basement Construction Plan (BCP) would be secured via section 106. The CMP would include a Construction Working Group (CWG) which the FCI could potentially join. The applicant has indicated their willingness to work with the FCI on these issues.

19.5 Given the above, officers consider that the proposal would not impact on the viability of the FCI operations.

20 Equalities and diversity issues

Duty on public bodies (section 149, Part 1)

20.1 Given the scale of the application, officers consider that it is important to set out how it sits in the context of the Equality Act 2010 and an Equalities Impact Assessment has been carried out (attached at Appendix 2). This was undertaken to act as a tool to assist officers in making a recommendation on the application as a decision maker in fulfilling its duties under the Act. The EQIA considers and assesses the impacts on protected groups/ communities who could be particularly affected by the proposals within Camden and the relevant wards. However it also

considers the potential wider social impact of the proposals. A summary of the possible negative and positive impacts that have been identified for each protected group in relation to the proposals forms part of the assessment within the EQIA.

20.2 The Section 149 of the Equality Act 2010, which came into force on 5th April 2011 imposes important duties on public authorities in the exercise of their functions, including a duty to have regard to:

“(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”

20.3 For the purposes of this obligation the term “protected characteristic includes:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

20.4 Officers have in the preparation of this report had regard to the requirements of this section and have concluded that a decision to grant planning permission for this proposed development will comply with the Council’s statutory duty under this important legislation.

Planning Context and balance of considerations

20.5 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework 2012 (NPPF) provides guidance for local planning authorities as a material consideration in determining applications. At the heart of the NPPF is a presumption in favour of sustainable development which for decision-takers means approving development proposals that accord with the development plan without delay. Paragraph 7 of the NPPF notes the social role of sustainable development which requires the planning system to support strong, vibrant and healthy communities with accessible local services that reflect the community’s needs and support its health, social and cultural well-being.

20.6 The NPPF also states that where the development plan is absent, silent or relevant policies are out-of-date, decision-takers should grant permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.

20.7 Paragraph 69 of the NPPF, notes that planning can play an important role in facilitating social interaction and creating healthy, inclusive communities. Policies should aim to achieve places which promote opportunities for meeting between members of the community who might not otherwise come into contact with each other, safe and accessible environments and safe and accessible developments.

20.8 Policy 7.2 of the London Plan notes that development is required to achieve the highest standards of accessible and inclusive design and seeks to ensure development can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances.

Advancing equality of opportunity (section 149, Part 2)

20.9 The proposal is part of the Somers Town Community Investment Programme (STCIP). The proposed development would replace existing dilapidated school buildings and community facilities and aid regeneration in the wider Somers Town area. The proposal would provide modern, usable facilities to the benefit of users in the community. The proposed commercial land use mix would encourage integration with the wider community. The development includes the provision of 44 new affordable homes and 92 market homes.

20.10 Physical accessibility and legibility of the site would be improved for pedestrians.

20.11 The new buildings proposed as part of the application would be required to comply with current legislative requirements in respect of equality and diversity related matters, for example access for the disabled under Part M of the Building Regulations. Only the 3 houses proposed at the end of the terrace on Charrington Street would have non-compliant stepped access – this is addressed in the Accessibility section of this report.

20.12 The proposal is found to accord with development plan policies as they relate to the relevant equalities and diversity matters, by providing a high quality inclusive design approach which creates an environment that is accessible to all and would continue to be over the lifetime of the development. The design of the proposed development is such that the site would, as an area of land, become significantly more accessible to all members of the community. In this sense the development would have a positive effect in terms of equalities and diversity matters.

20.13 It is considered by officers that the submission adequately demonstrates that the design of the development and the approach of the applicant are acceptable with regard to equalities and diversity matters. The proposals do not conflict with equalities and support the council in meeting its statutory equality responsibilities.

20.14 In considering the impacts of the proposed development officers have had regard to the policies and guidance contained within the National Planning Policy Framework, the London Plan and Camden's Local Plan policies contained within the Local Development Framework. The relevant policies in the consideration of the proposed application are referred to above.

21 Health

21.1 Officers undertook an assessment of the open space element of this development proposal in relation to health and wellbeing. Open space can have a positive impact upon health outcomes by increasing physical activity and improving mental wellbeing. It is known that a perceived sense of safety, access and quality affects the use of open space. The proposal retains the public open space and play areas, which encourage physical activity amongst children and adults. Overall it was considered that the proposed linkages and enhanced accessibility of the Public Open Space would increase their usage and the amount of time spent in these areas.

22 Land contamination

22.1 A Contaminated Land Assessment, including geotechnical and geoenvironmental desk studies has been submitted as part of this application.

22.2 The former industrial land use was a Coal Depot and unknown industrial activity and the site was located adjacent to a Photographic Works all of which are considered high risk and have the potential to cause ground contamination.

22.3 The Council's Contaminated Land Officer has assessed the application and has no objections subject to conditions on further assessment, remediation and reporting and management of significant additional contamination.

23 Basement impact

23.1 Policy DP27 states 'In determining applications for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The council will only permit basement development that does not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability. Policy DP27 states that developers will be required to demonstrate with methodologies appropriate to the site that schemes maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and runoff or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area.

23.2 A single-storey basement is proposed under the Brill Place tower (Plot 7). This basement would have a floor area of 593sqm (approximately one third greater than the ground floor footprint) and a depth of between 1.5m and 6.2m below ground level. No other basements are proposed in the application. There are no buildings adjacent to the proposed basement, with open space to the north and Brill Place to the south.

23.3 The application was accompanied by a Basement Impact Assessment (BIA). The independent review by the Council's basement consultant (Campbell Reith) concluded that the BIA is adequate and in accordance with policy DP27 and guidance contained in CPG4 (Basements and Lightwells) 2015, subject to the

completion of a Basement Construction Plan (BCP), which is required by S106. The applicant has satisfactorily demonstrated that the proposed basement would not cause harm to the built and natural environment and would not result in flooding or ground instability.

24 Air quality

24.1 Policies CS16 and DP32 are relevant with regards to air quality.

24.2 An Air Quality Assessment (AQA) has been submitted as part of this application.

24.3 The application site is located in an area where air quality is mainly influenced by emissions from road transport from Midland Road and Euston Road, plus emissions from rail transport at the nearby St Pancras Station. The submitted AQA concludes that Plots 1-6 of the proposed development are within air quality objectives, and where exceedances are expected at Plot 7, mitigation measures are set out as per Policy DP32. The Air Quality Neutral Assessment has indicated that the proposed development can be considered Air Quality Neutral as per Camden's requirements.

24.4 Camden accepts the methodology used to set the background NO₂ concentrations for the site.

24.5 Camden's DP32 sets out that "mitigation measures will be expected in developments that are located in areas of poor air quality". The AQA sets out mitigation measures as per DP32 for the design of Plot 7 (Brill Place tower). Officers consider the proposed mitigation measures (local heat recovery ventilation units fitted with NO_x filters) and their proposed efficacy to be adequate. Despite the mitigation measures, the AQA notes that continued exceedances of hourly air quality objectives are still likely, however the chance of EU objectives for short term exceedances being broken is minimal. In addition, the chances of these exceedances negatively impacting on amenity and resident health are low. The mitigation measures set out are acceptable, anticipating that the filters installed by the developers are as a minimum as effective as those proposed in the AQA.

24.6 No mitigation measures are deemed necessary at Plots 1-6 due to the modelled levels of air quality being within relevant air quality objectives which is considered acceptable.

24.7 The proposed development includes an extensive landscaping strategy, which includes extensive tree and shrub planting across the public open space and within each of the development Plots that will contribute to mitigating the impacts of air quality. NO_x filters used in the final building would meet the targets set out in the Air Quality Assessment as a minimum.

24.8 With regards to the concerns raised by the FCI on air quality, the number of hours that the generators will run under the updated maintenance regime is significantly higher than that set out by the FCI in its Environmental Statement. Nevertheless, the air quality of residents of the tower must meet acceptable standards. The increase in the hours the generators are likely to be run for maintenance purposes

has resulted in an increase in the number of hours when residents on the higher floors of the tower may be exposed to high concentrations of pollutants on balconies and winter gardens without mitigation. As a result of this new information and subsequent modelling, it is now proposed that there would be no balconies on the 16th floor and above and that the winter gardens provided on these floors would be included within the ventilation strategy for these apartments and therefore supplied with filtered air.

24.9 An assessment of dust risk has been carried out indicating a 'medium' risk of dust soiling and impacts on human health during demolition, and a 'high' risk during earthworks, construction and track out. All dust mitigation measures listed in the dust risk assessment set out in the submitted Construction Management Plan (CMP) and in the AQA would need to be secured via the CMP.

24.10 As this is a high risk site, real-time PM10 monitoring will be required – this will also need to be secured by section 106 legal agreement. The monitor locations will need to be installed 3 months prior to demolition and locations agreed with the Air Quality officer prior to installation. We usually require 4 monitors on large sites such as this.

25 Sustainable design and construction

25.1 The sustainable design and construction considerations are as follows:

- Policy review
- The site and the proposal
- Energy
- Sustainability

Policy review

25.2 Pursuant to London Plan policies 5.2, 5.3, 5.6m, 5.7, 5.9, 5.10, 5.11, 5.12, 5.13, 5.14, 5.15 and 5.17, Core Strategy policy CS13 and Development Policies DP22 and DP23 all developments in Camden are required to make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

25.3 Policy DP22 encourages non-domestic developments in excess of 500sqm to achieve "very good" (58%). The minimum scores in the following categories must also be achieved: Energy 60%; Water 60%; and Materials 40%. Policy: CS13 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement.

The site and the proposal

25.4 The proposal is a high density scheme in very close proximity to Excellent/Very good public transport links (PTAL 5-6b). The scheme is mixed use. The principle of the scheme is therefore highly sustainable.

Energy

- 25.5 A range of energy and sustainability documents have been submitted as part of the application.
- 25.6 Good energy efficiency measures have been proposed across all plots, providing a 4.7% reduction below the Part L 2013 baseline. All plots except the mews houses are proposing to connect to the Somers Town Energy Network in line with policy. This will increase the heat demand to be met by the network, permitting the installation of a larger CHP in heat network energy centre and enabling the delivery of low carbon electricity and low carbon heat both to the development and beyond the development boundary. Connection to the energy network will further reduce CO2 emissions to 20.2% below the Part L 2013 baseline. Renewable energy is proposed in the form of PV on roof areas and a gas absorption heat pump in the Brill Place Tower. This will further reduce CO2 emissions to 38.5% below the Part L 2013 baseline, exceeding the London Plan policy target.
- 25.7 It should also be noted that each plot individually will also achieve the London Plan 35% CO2 reduction requirement. It's calculated that a 22.9% CO2 reduction target would be achieved for the whole development. 87kWp photovoltaic (PV) integrated on the roof of all the buildings, except for Brill Place Tower (Plot 7), where they would be integrated on the south-facing facade, to satisfy some of their electricity demand. In addition, a 35kW gas absorption heat pump (GAHP) system is proposed for Brill Place Tower (Plot 7) to supply space heating.

Sustainability

- 25.8 For non-residential buildings there is a requirement to achieve a BREEAM Very Good (minimum) rating, aspiring to 'Excellent' and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).
- 25.9 The sustainable design principles stated in policy DP22 (Promoting sustainable design and construction) would be achieved. Measures include low water use fixtures and fittings, rainwater recycling (in Plots 1, 4, 5 and 6), green/brown roofs on the Community Hub (Plot 1) and Edith Neville Primary School & Children's Centre (Plot 4). Construction materials with a low environmental impact will be specified, recycled and/or secondary aggregates will be used wherever feasible, and insulating materials with low Global Warming Potential (GWP) will be used, where possible. Waste sent to landfill would be minimised through the Site Waste Management Plan (SWMP) and adequate dedicated storage space for recyclable waste in the buildings and composting facilities in the community garden will be provided.
- 25.10 Each non-residential building (i.e. Edith Neville Primary School, the Children's Centre and the Community Hub), is targeting a BREEAM 'Excellent' rating, with the minimum credit requirements under Energy, Materials and Water all exceeded.
- 25.11 The Council's sustainability policies require that developments demonstrate that they are capable of achieving a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for all residential dwellings. All of the proposed residential units would achieve this and a condition is recommended securing this for the residential units in plots 1, 2, 3, 5, 6 and 7.

26 **Flood risk and drainage**

- 26.1 Policies CS13 and DP23 are relevant with regards to flood risk and drainage.
- 26.2 Thames Water has been consulted and has no objections.
- 26.3 A Flood Risk Assessment has been submitted as part of this application. This document states that there is a low risk of flooding.
- 26.4 The proposals for Plots 1, 2, 5 and 6 would all include below-ground attenuation tanks as the main form of attenuation. In addition to this, Plot 1 proposes a green roof and permeable landscaping which is supported.
- 26.5 The submitted Flood Risk Assessment does not address all the flooding issues for the application and therefore a condition is recommended that a Flood Risk Assessment be submitted to the Council for approval.

27 **Nature conservation and biodiversity**

- 27.1 An ecological assessment has been submitted as part of the application, including a Phase 1 Habitat Survey.
- 27.2 No protected species were found on the site in the ecological survey. The ecology report indicates that the Plot 10 main building that is proposed to be demolished has low - moderate value for supporting bat roosts. Emergence and re-entry surveys would need to be carried out in accordance with EU law before this application can be approved as recommended in the ecology report section 4.10. A Precautionary Bat Survey is recommended as a condition, in line with comments from the Council's Biodiversity Officer.
- 27.3 The proposal has been assessed in terms of arboricultural impact in the Trees section.
- 27.4 The landscape design would provide ecological enhancements through habitat creation, plant priority species, nesting and roosting features and the extension of wildlife corridors.

Living Roofs

- 27.5 Green and brown roofs are proposed on the Community Hub (Plot 1) and Edith Neville Primary School & Children's Centre (Plot 4). A condition is recommended to secure full details of these.

Biodiversity features

- 27.6 This development is ideally located to provide a useful 'biodiversity stepping stone' between the Camley Street nature reserve, St Pancras Gardens, St James' Gardens and Regent's Park in a location that is otherwise devoid of biodiversity value. The proposal offers a unique opportunity to increase resilience of local ecology. In addition to this, given the size of the development there is real opportunity to be innovative in terms of biodiversity proposals and the applicant has been encouraged to aim higher in terms of the enhancements proposed.

27.7 The biodiversity measures proposed in the Masterplan Design and Access Statement for the open space are considered very good and commendable by the Council's Nature Conservation Officer. The ecology report submitted recommends inclusion for bird and bat boxes, and a condition is recommended to incorporate these into the design for each building where appropriate. In addition to this, the attached advice notes should be followed to guide the inclusion of additional biodiversity enhancement measures on the buildings.

Breeding Birds

27.8 As breeding birds are protected species, a condition is recommended regarding the timing of vegetation clearance.

28 Microclimate

28.1 London Plan policies 7.6 and 7.7 and Camden policies CS5, DP26 are relevant with regards to microclimatic impacts.

28.2 The microclimatic impact of a tall building on its local environment at ground level as a result of overshadowing and increased wind speeds is an important area of assessment of the acceptability of the proposed tower. As discussed previously, the slim tower building form has the advantage over alternative building types of a compact and dynamic shadow. This 'sun-dial' effect means that the shadow moves across the park to the north of the tower so that no part of the park is in shadow for an extended period of time. The overshadowing impact is assessed in the Impact on Public Open Space section above.

28.3 A wind assessment was carried out to determine the wind conditions in the surrounding area if the building were to be constructed. The results concluded that mitigation of the effects would be needed in one area of the public realm where the entrance to the ground floor commercial unit is exposed to prevailing south-westerly winds. The wind environment in the plaza area would not be suited to an outdoor café seating area but with the introduction of several trees the wind speeds would be reduced to achieve the required comfort levels for it to be useable as an entrance point to the building. A condition is recommended relating to the provision of details of mitigation measures, such as planting.

28.4 It has been demonstrated that its effect on its surroundings in terms of wind turbulence and overshadowing are within acceptable limits

29 Accessibility

29.1 14 of the units would be wheelchair accessible (10.3%) and all of the units would feature level access with the exception of the 3 units proposed for Plot 3. It is proposed to erect 3 houses on Plot 3, to continue the listed Georgian terrace on Charrington Street. All of the existing properties within this terrace have steps up to the front door. Officers consider that it is appropriate to replicate this entrance for the new houses, for conservation and design reasons. Given that only 3 of the proposed 136 units would not have level access and given the conservation and design rationale, officers consider that stepped access is acceptable in this

instance. The Accessibility Officer has been consulted on this aspect, and accepts the above, given the accessibility of the other units proposed as part of this application.

29.2 The redesigned Public Open Spaces have been designed to be fully accessible.

30 Transport

30.1 The following transport considerations are covered below:

- Policy review
- The site
- Trip generation
- Travel planning
- Cycle parking
- Car parking
- Construction management
- Deliveries and servicing
- Public Highway Improvements directly adjacent to the Site
- Pedestrian, Cycling and Environmental Improvements in the local area
- Excavation in close proximity to the public highway
- Footpath between Chalton Street and Charrington Street.
- Conversion of Public Highway to Public Open Space
- Conclusion

Policy review

30.2 Policies CS11, DP16, DP17, DP18, DP19, DP20, DP21 and CPG7 (Transport) are relevant with regards to transport issues.

The site

30.3 The site is afforded a PTAL rating of 5-6b, meaning the site has Very good-Excellent accessibility to public transport facilities. The nearest train stations (national rail and underground) are Kings Cross, St Pancras International and Euston. Bus stops are located nearby on Midland Road, Pancras Road, Euston Road and Eversholt Street all within a five minute walk from the site.

30.4 The site is located within the Somers Town Controlled Parking Zone (CPZ). CPZ (CA-G) operates on Monday to Friday between 0830 and 1830 hours and Saturday between 0830 and 1330 hours. The ratio of parking permits to parking spaces in the Somers Town CPZ is 1.04. This indicates that the demand for on-street parking is stressed in this area, and over capacity. This figure derived from Council records does not include any impact as a result of motor vehicles parked on single and double yellow road markings outside of CPZ hours.

Trip Generation

30.5 The proposed development would have an insignificant impact on the surrounding transport network. The residential elements of the proposal would be 'car free'. So any additional motor vehicle trips would be low in number, being limited to residents with a registered disability and in possession of a blue badge parking permit. The residential elements of the proposal would generate increased trips on

foot and by public transport. However, the surrounding transport network has the capacity to accommodate this.

Travel Planning

- 30.6 The applicant has submitted a draft travel plan (TP) in support the proposal. This is welcomed as it will help to encourage staff, pupils/parents and residents to use sustainable modes of transport such as cycling, walking and public transport rather than private motor vehicles. The draft TP has been reviewed against Transport for London guidance and is a good example of what we expect from developers during the planning application process.
- 30.7 A strategic level residential travel plan and a school travel plan (and associated monitoring fees) would be secured as section 106 planning obligations if planning permission is granted.
- 30.8 Transport for London encourages developers to use the TRICS database for trip generation predictions. We will require the applicant to undertake a TRICS survey after study and provide TfL and Camden with the results on completion of the development. TfL would then be able to update the TRICS database with the trip generation results for the various use categories associated with this development. The necessary after surveys and results would be secured by condition as part of the Travel Plan review and monitoring process.

Cycle Parking

- 30.9 TfL cycle parking standards require 1 space per 1 or 2 bedroom unit and 2 spaces for larger units.
- 30.10 London Plan (Revised Early Minor Alterations) cycle parking standards are as follows:

C3 residential	1/ one or studio bed 2/ all other dwellings
D1 nurseries/schools	1/8 staff 1/8 students
D1 other (community facilities)	1/8 staff

- 30.11 One of the Council's key aims is to promote cycling in the borough and this is detailed in Camden's Transport Strategy, CS11 (Promoting Sustainable and Efficient Travel), DP17 (Walking, Cycling and Public Transport), and CPG7 (Transport). Indeed, Camden's Transport Strategy has set a target of 20.5% for cycling as a proportion of road traffic flows in the borough by 2020 (Executive Summary, E6.1).

Plot	Cycle parking provision
1 - Community hub and housing	20
2 – Charrington Street housing	55
3 – continuation of terrace	6
4 – school	8 spaces for staff, scooter storage and 14 cycle spaces for

	pupils
5 – Purchase Street housing north and community hall	31
6 – Purchase Street housing south	24
7 – Brill Place tower	86

30.12 All of the cycle parking for the residential use (as detailed in the table above) would meet London Plan standards with the exception of the Edith Neville Primary School and St Aloysius Nursery.

30.13 For 40 staff and 210 pupils, 5 staff spaces and 27 pupil cycle parking spaces would be required for Edith Neville Primary School and St Aloysius Nursery. The applicant originally proposed scooter parking only for pupils as currently there is no demand for cycle storage and the school stakeholders do not believe that this is likely to change in the near future. However, in response to comments from TfL, 14 cycle parking spaces have been provided for pupils, in addition to the scooter parking. Officers accept that given the age of the children attending ENPS that a lower provision of cycle parking is acceptable, and given the scooter parking spaces, 14 cycle parking spaces are considered acceptable. No designated cycle storage is proposed for the community hall (in Plot 5) or the ground floor flexible commercial spaces in Plots 2 and 7, however short-stay cycle parking will be distributed across the public open space and on local streets which will provide for any demand associated with these units.

30.14 The proposed cycle (and scooter) parking would be secured by condition.

Car parking

30.15 As already mentioned, the site is highly accessible by public transport with the highest possible PTAL rating of 5-6b. Development Policy DP18 states that the Council will expect development to be car free in the Central London Area, in our town centres and other areas within Controlled Parking Zones that are easily accessible by public transport. As the site is located in the Somers Town CPZ while also having an Excellent/Very good PTAL rating, a 'car free' development is required to make the proposal policy compliant.

30.16 The proposal has been designed as a 'car free' development (except for disabled parking). This means that standard car parking spaces would not be provided within the site. It is proposed to provide 3 fully wheelchair accessible parking bays on Hampden Close. This is welcomed as it would provide dedicated parking spaces within 50 metres for the wheelchair housing units forming part of the social rented houses adjacent to Purchase Street (Plot 5). The proposal also suggests that fully wheelchair accessible parking bays should be provided within 50 metres of the social rented houses adjacent to Chalton Street. This would require amendments to existing traffic management orders (e.g. conversion of single yellow lines or residents parking bays to accommodate fully wheelchair accessible parking bays). Parking surveys undertaken in support of the planning application indicate that this would be feasible without having a detrimental impact on parking demand. Nevertheless, a separate consultation would need to be undertaken by the Transport Design Team (part of Transport Strategy Service). This element of the proposal would therefore be dealt with as part of the highway

works required to mitigate the impacts of the development (discussed later in this report).

- 30.17 The car free requirement means that residents would not be eligible to apply for on-street parking permits from the Council. However, residents with a registered disability and in possession of a blue badge parking permit would be able to park in residents' parking bays.
- 30.18 The car parking proposals comply with CS11, DP18 and DP19 and are therefore acceptable in transport terms. The 'car free' agreement would be secured as a section 106 planning obligation if planning permission is granted.

Construction management

- 30.19 A draft Construction Management Plan (CMP) has been submitted in support of the proposal. The CMP represents a generic approach to construction. However, it lacks detail with regard to the transport impacts of construction and appropriate mitigation measures to be employed. This is not unusual given that a principal contractor is yet to be appointed.
- 30.20 As the CMP submitted provides minimal information in connection to transport impacts and associated mitigation measures, it is not possible to make an objective assessment of the construction impacts on the transport network over an indicative construction period of 6 years.
- 30.21 The highway authority needs to ensure that the proposed development can be constructed without being detrimental to the operation of the road network in the local area. Construction vehicle movements would need to be scheduled to avoid peak periods (including school runs) wherever practicable in order to minimise traffic congestion and road safety issues.
- 30.22 Officers do not foresee any significant road safety problems associated with the redevelopment of this site as long as best practice arrangements are followed (e.g. vehicle movements into and out of the site to be supervised by trained banksmen). Officers would expect most types of construction vehicle to be able to enter and exit the site in a forward gear and would secure this unless alternative safe means were proposed. The principal contractor would need to investigate ways to make this possible. Some temporary highway works may be required in order to facilitate turning movements for larger construction vehicles (e.g. construction of temporary dropped kerbs).
- 30.23 A more detailed CMP would need to describe how the proposed works would be programmed and managed during the construction period. The various highways licences which would be required would need to be discussed in more detail. The development would need to be registered with TfL's 'Fleet Operator Recognition Scheme' (FORS), the 'Considerate Constructors Scheme' (CCS), and TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS). Contractors would also be required to follow the "Guide for Contractors Working in Camden" also referred to as "Camden's Considerate Contractors Manual".

30.24 Officers would expect a high level of community liaison for a development of this size if planning permission is granted. The final CMP would need to provide a section discussing public consultation on the draft CMP, including any feedback received and measures taken to overcome issues raised. The applicant would also be required to set up a Construction Working Group (CWG) which would include representatives from the local community (e.g. Ward Councillors, residents, community representatives, school representative and businesses). CWG meetings would need to be held prior to the final CMP being submitted to Camden and TfL for approval. Any problems raised and mitigation measures identified should be discussed in the final CMP.

30.25 A more detailed CMP would need to be approved by the Council prior to any works commencing on site. The points raised above would be incorporated into the final CMP which would be secured as a section 106 planning obligation if planning permission is granted. A schedule to describe the detailed transport considerations to be incorporated within the final CMP would be included in the section 106 agreement.

30.26 Given the extent and time frame of works being proposed, a financial contribution of **£6,780** would be secured to allow the Highway Authority to manage and monitor the construction of the development to ensure adherence to the CMP.

Deliveries and Servicing

30.27 The proposal has been designed so that all deliveries and servicing activity including refuse and recycling collections would take place from the public highway directly adjacent to the site. It is generally preferable for on-site loading bays to be provided for developments of this scale. However, this was not possible in this case for various reasons. This includes the need to maximise the amount of public open space, provision of affordable residential units and wider public realm improvements.

30.28 It should be noted that the non-residential elements of the proposal including the reconfigured school and community facilities would generate a low level of deliveries and servicing trips by motor vehicle. This is also the case for the residential elements of the proposal. It was therefore agreed that on-site loading bays would not be required if it could be demonstrated that deliveries and servicing activity could take place without being detrimental to the safe and efficient operation of the public highway. Assessment of the proposals and detailed observations on-site indicate that the proposed arrangements would not be detrimental in these respects.

30.29 A separate consultation would need to be undertaken by the Transport Design Team (part of Transport Strategy Service) should any highways works be required. This element of the proposal would be dealt with as part of the highway works required to mitigate the impacts of the development (discussed later in this report). Given the above, officers consider that a Deliveries and Servicing Plan with further servicing information would not be required under section 106.

Public highway improvements directly adjacent to the site

30.30 The highway authority would need to secure a financial contribution for highway works directly adjacent to the site if planning permission is granted. This would allow for any damage to the public highway caused as a direct result of the development to be repaired. It would also ensure that the proposed development would tie into the surrounding public highway.

30.31 The highway works required as direct mitigation would be undertaken on Brill Place, Chalton Street, Charrington Street, Polygon Road and Purchase Street, and would include the items below. These would be secured via a Section 106 contribution.

- Repaving the carriageways directly adjacent to the site in like for like materials.
- Repaving the footways directly adjacent to the site in high quality natural stone paving slabs.
- Removal of redundant and/or unnecessary items of street furniture in the general vicinity of the site.
- Amendments to the existing traffic management orders directly adjacent to the site (e.g. to amend single yellow lines to loading bays and disabled parking bays where necessary). This item would require a separate consultation exercise which would be undertaken by the Transport Design Team (part of Transport Strategy Service).

30.32 The proposed highway works must be treated as indicative at this stage, even if planning permission is granted. This is because planning permission does not guarantee that the proposed highway and public realm improvements would be implemented in their current form. Such proposals are always subject to further investigation, consultation, detailed design, and approval by the Council as Highway Authority.

30.33 A cost estimate will be prepared by the Transport Design Team. A financial contribution for the relevant amount would need to be secured as a section 106 planning obligation if planning permission is granted.

30.34 It should be noted that the Transport Design Team would need to undertake a separate public consultation exercise as the works would involve amendments to existing traffic management orders and physical changes to the public highway.

30.35 These highway works as described above would be designed by the Transport Design Team and implemented by Camden's term contractor for highway works.

Pedestrian, cycling and environmental (PCE) improvements in the local area

30.36 The highway authority would seek to secure a financial contribution towards Pedestrian, Cycling and Environmental improvements in the local area, given the scale of the proposed development. The policy basis for this is detailed in Camden Planning Guidance; specifically CPG8 (Planning Obligations). It is acknowledged that the proposal would provide a car free development. However trips by sustainable modes of transport would have an impact on the surrounding cycling and pedestrian routes and public transport facilities in the local area. This

financial contribution would therefore be used to help mitigate such impacts while also helping to encourage sustainable transport choices.

30.37 The Camden Transport Strategy contains various objectives and policies which are relevant to the Council's case for seeking a financial contribution towards Pedestrian, Cycling and Environmental improvements in the local area.

30.38 The proposed development includes a wider vision to improve the public realm in the general vicinity of the site for cyclists and pedestrians. As previously stated, this element of the proposal is merely indicative at this stage and should not be considered part of the scheme as the improvements would require works on the public highway.

30.39 The proposed public realm improvements on the public highway would include:

- Introduction of traffic calming measures on Brill Place (i.e. raised table near junction with Midland Road).
- Reducing the carriageway width on Chalton Street to incorporate a wider footway and the introduction of street trees.
- Reducing the extent of carriageway at the southern end of Charrington Street to accommodate a slight increase to the public open space adjacent to the reconfigured school.
- Enhancements to the cycling and pedestrian facilities on the section of Polygon Road between Ossulston Street and Purchase Street.
- Amendments to the road layout on the section of Polygon Road between Chalton Street and Ossulston Street to reduce the dominance of motor vehicles, thereby making cycling and walking more pleasant.
- Enhancements to the cycling and pedestrian facilities on Purchase Street, including potentially extending the segregated 2-way cycle track southwards to the junction with Brill Place.
- Introduction of traffic calming measures on Purchase Street (i.e. raised table at junction with Polygon Road; this might require the relocation of the existing zebra crossing).

30.40 As stated before, the proposed highway works must be treated as indicative at this stage, even if planning permission is granted and planning permission does not guarantee that the proposed highway and public realm improvements would be implemented in their current form.

30.41 A cost estimate will be prepared by the Transport Design. A financial contribution for the relevant amount would need to be secured as a section 106 planning obligation if planning permission is granted.

30.42 It should be noted that the Transport Design Team would need to undertake a separate public consultation exercise as the works would involve significant amendments to existing traffic management orders and physical changes to the public highway. Parking surveys undertaken in support of the planning application indicate that this would be feasible without having a detrimental impact on parking demand.

30.43 These highway works (if feasible) as described above would be designed by the Transport Design Team and implemented by Camden's term contractor for highway works.

Excavation in close proximity to the public highway

30.44 The highway authority needs to ensure that the stability of the public highway adjacent to the site is not compromised by the proposed basement excavations. A basement impact assessment (BIA) has been submitted in support of the planning application.

30.45 An 'Approval In Principle' (AIP) report would need to be approved by the Highways Structures & Bridges Team (part of Engineering Services) prior to any basement excavations being undertaken in the vicinity of the public highway. This would include structural details and calculations to demonstrate that the proposed basement excavation works would not affect the stability of the public highway adjacent to the site. This would also include an explanation of any mitigation measures which might be required. The AIP and an associated assessment fee of £1,800 per elevation would be secured as a section 106 planning obligation if planning permission is granted.

Footpath between Chalton Street and Charrington Street

30.46 The proposal would require the existing footpath between Chalton Street and Charrington Street to be extinguished in order to facilitate the construction of the buildings described as Plot 1 and Plot 2. The footpath would be relocated to the south side of the new buildings.

30.47 The relocated footpath would be more welcoming to pedestrians when compared with the existing situation. This element of the proposal is therefore acceptable.

30.48 It must be pointed out that a separate stopping up order will be required to allow the existing footpath to be relocated. The stopping up order would need to be approved by the highway authority prior to any works commencing on this area of the site. The requirement for a stopping up order to be approved by the highway authority prior to commencement would need to be secured as a section 106 planning obligation if planning permission is granted. This would include a commitment to set aside appropriate funding to cover all associated costs involved in assessing and determining the stopping up order application.

Conversion of public highway to Public Open Space

30.49 The proposal would require some minor re-appropriation of land currently maintained as public highway to land maintained as public open space. This includes small strips of footway on Chalton Street and Purchase Street (between Chalton Street and Ossulston Street). This would be dealt with under the stopping up process discussed above.

Conclusion

30.50 Subject to conditions and planning obligations, the proposed development is acceptable in transport terms.

31 Safety and security

- 31.1 Policy CS17 and CPG1 (Design) are relevant with regards to secure by design.
- 31.2 The Designing Out Crime officer was consulted prior to the application being submitted and was involved in the design process.
- 31.3 The project presents an opportunity to develop a comprehensive lighting strategy across the park and buildings. The illuminated windows of buildings at night will suggest natural surveillance of the public realm and these will be linked by lighting of the pedestrian route.
- 31.4 Some areas of the parks are prone to anti-social behaviour due to being sunken or not overlooked. The proposed blocks will provide a perimeter to the Public Open Spaces and provide natural surveillance. Through positioning plots 5 and 6 to enclose a safe and secure community garden the security concerns currently associated with this sunken area of public realm are addressed.
- 31.5 The alleyway to the north of the existing Plot 10 community facility would be removed under the proposals. This alley is narrow and not overlooked and does not conform with Secure by Design principles. Its loss if therefore supported, with alternatives routes through Polygon Road Open Space to the south being improved.
- 31.6 Objections have been raised with regards to introducing a tower near to potential terrorist targets such as railway stations and the Francis Crick Institute. The applicant has engaged with King's Cross and St Pancras Stations as well as the Council's Emergency Management Team and the Designing out Crime Officer. No concerns have been raised from these bodies. If there is a terrorist attack, people are instructed to stay within their homes. This would apply to the residents in the tower. The Council's Emergency Management have undertaken a review of the Central Somers Town CIP application and have no comments to make.

32 Refuse and recycling

- 32.1 Policies CS18, DP26 and Camden Planning Guidance 1 (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 32.2 All blocks have space for refuse and recycling. The Council's Environmental Services Officer has been consulted and has assessed the refuse and recycling storage and also proposed waste collection arrangements and has no objections to the proposal.

33 Employment and training opportunities

- 33.1 The proposed development is large enough to generate significant local economic benefits. Policy CS19 and Camden Planning Guidance state that in the case of such developments the Council will seek to secure employment and training opportunities for local residents and opportunities for businesses based in the Borough to secure contracts to provide goods and services.

33.2 In line with CPG8, a range of training and employment benefits are to be secured in order to provide opportunities during and after the construction phase for local residents and businesses. This package of recruitment, apprenticeship and procurement measures will be secured via S106 / condition and will comprise:

- Local employment
- Construction apprenticeships and work placement opportunities through the King’s Cross Construction Skills Centre
- Local Procurement
- Community based enterprise initiatives
- Work apprenticeships
- To promote job vacancies to local residents.

33.3 The proposals are therefore in accordance with the guidance set out in CPG5 and policies CS8 and DP13 of the LDF.

34 Planning obligations

34.1 The Council cannot enter into a section 106 agreement with itself, and therefore a ‘shadow’ section 106 will be drawn up.

34.2 The following contributions are required to mitigate the impact of the development upon the local area, including on local services. These heads of terms will mitigate any impact of the proposal on the infrastructure of the area.

Contribution	Amount (£)
Tree planting	6485.20
Highways	To be confirmed
Pedestrian, cycling and environmental contributions	To be confirmed
Legible London signage	16,000
Travel plan monitoring for school	6,780
Travel plan monitoring for tower	6,780
Approval in Principle (AIP) report – review and sign off	1,800
TOTAL	31,360 plus ‘To be confirmed’

35 Mayor of London’s Crossrail CIL

35.1 The proposal will be liable for the Mayor of London’s Community Infrastructure Levy (CIL) as it includes the addition of private residential units. Based on the Mayor’s CIL charging schedule and the information provided as part of the application, the Mayoral CIL is based at £50 per sqm (i.e. [Chargeable Housing] 9,416.91 sqm + [Commercial] 2,935.08 sqm = 12351.99 sqm x £50 per sqm [Mayoral CIL] = **£617,599.5**). This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index.

36 Camden CIL

36.1 The proposal would be liable for the Camden Community Infrastructure Levy (CIL). The site is located within Zone A. The estimate based on the uplift of floorspace and the proportion of market housing and commercial floorspace proposed, the Camden CIL liability is **£1,485,913**.

37 CONCLUSION

37.1 The proposals include the following benefits:

- Reprovision of existing dilapidated school buildings with modern high-quality buildings
- Reprovision of existing community facilities with modern high-quality buildings
- 136 residential units would be provided, including 44 social rented units (24 of which would be delivered with a grant from the Council's affordable housing fund).
- All of the proposed buildings are considered high-quality architecture
- Significant qualitative improvements to both Public Open Spaces

37.2 The public benefits of the scheme need to be balanced against the harm. Specifically, the harm from the 6 storeys that would appear above the listed terrace need to be weighed against the benefits of the provision of 20 affordable units. Given the moderate 'less than substantial harm' and the significant amount of affordable housing (20 units) that would be lost from the proposal should 6 storeys be removed, officers support the application.

37.3 The proposals would reprovide the existing school which is in serious need of replacement. The proposals would fund a high-quality building suitable for modern educational needs and also fund the reprovision of valuable existing community facilities in modern buildings. Housing is the priority land use for the borough and the provision of housing and especially affordable housing is welcomed. Such facilities are important for communities and particularly important for communities suffering from deprivation such as Somers Town. Given the above, the proposed land use package is welcomed.

37.4 Providing less than 50% affordable housing is considered acceptable in this instance given that the proposed flats would enable the reprovision of the school and the community facilities. Any surplus would result in a lower grant from the Council's Affordable Housing Fund. The proposed housing is therefore considered acceptable in tenure mix as well as unit mix and amenity.

37.5 The architecture of the 7 proposed plots is considered to be of a high quality that responds to its context. The tower element is considered to be located to minimise any impact and maintain a sense of openness.

37.6 There would be no loss of Public Open Space under the proposals and the proposal includes significant environmental benefits with improvements to the existing Public Open Spaces on the site; Purchase Street Open Space and the Polygon Open Space.

37.7 The proposal is car-free which officers welcome. A final CMP is included as a head of term.

37.8 Whilst the proposal includes significant benefits as listed above, officers acknowledge that there would be some impacts from the proposal:

- Harm to Grade-I listed Chester Terrace and the Regent's Park and the grade-II listed Pancras Road Arches and 18-41 Charrington Street
- Amenity impact on residential properties in the area
- Impact on quality of Public Open Space

37.9 Whilst there would be some loss of daylight/sunlight, given the distance and orientation to the nearest residential properties, the proposal would not have a material impact on the amenity in terms of loss of light or privacy subject to a condition on obscured glazing although the extent of obscure glazing requirement will have a minor detrimental effect on the amenity of the future occupants of a small number of the flats. This is confined however to only a few rooms within the scheme.

37.10 There would be some overshadowing of the Purchase Street Open Space from the proposed tower and there would be a loss of existing trees, including the loss of a Category A Ash tree. The overshadowing impact has been assessed, as well as the impact from the loss of trees, and these are considered acceptable given the significance of the impact (assessed in the report), the improvements to Purchase Street Open Space and the overall benefits of the scheme as a whole.

37.11 Officers acknowledge that there would be moderate 'less than substantial harm' to the settings of the Grade-I listed Chester Terrace and the Regent's Park and very slight 'less than substantial harm' to the settings of the Grade-II listed Pancras Road Arches and 18-41 Charrington Street but have considered this impact against the benefits of the proposal detailed above. Officers consider that the significant benefits – specifically from the provision of modern school buildings and community facilities, as well as the provision of much-needed housing, quality architecture and improvements to the Public Open Spaces, outweigh this harm and complies with the NPPF. Specifically, officers consider that the moderate 'less than substantial harm' to the listed Chester Terrace and Regent's Park is outweighed by the benefit from the provision of 20 affordable housing units.

37.12 Officers are of the view that the public benefits of the proposal are substantial and compelling. Given the above, the development would be appropriate and in accordance with relevant National and Regional Guidance, Core Strategy and Development Policies and Camden Planning Guidance for the reasons noted above.

38 RECOMMENDATIONS

38.1 **Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:-**

Affordable housing

- Target rents
- Affordable housing and Deferred Affordable Housing Contribution (capped at the equivalent of 50% of proposed flats)

Basement

- Basement Construction Plan (BCP)

Community facilities

- Provision of school and community facilities prior to first occupation of the residential premises
- Community Access Plan for Community Hall, and MUGA

Employment and training

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, or a specified number (to be agreed) of work experience placements following the completion of the building. Work experience placements can be organised through the council's work experience coordinator, Tom Humphreys, who can be contacted via Thomas.Humphreys@camden.gov.uk.
- If the build costs of the scheme exceed £3 million the applicant must recruit 1 construction or non-construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre.
- If the value of the scheme exceeds £1 million, the applicant must also sign up to the Camden Local Procurement Code, as per section 8.19 of CPG8.
- The S106 should broker a meeting between the end user(s) of the ground floor retail units and the Economic Development team to discuss our employment and skills objectives.
- The applicant should deliver at least 1 supplier capacity building workshop/Meet the Buyer event to support Camden SMEs to tender for construction contracts in relation to the development.
- The applicant provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

Energy and sustainability

- BREAAM Excellent compliance and post construction review, targets as stated in the energy and sustainability statements for Energy, Materials and Water
- Energy measures including on-site renewables
- Energy provisions to be secured through Energy Efficiency & Renewable Energy Plan - each plot should achieve a minimum 35% CO2 reduction beyond Part L 2013 AND 20 % reduction through renewables as defined within the approved statements.
- Sustainability measures for the whole development in accordance with approved statements

Landscaping, trees and open space

- A contribution of £6,485.20 towards planting trees in the area
- Completion of public open space
- Sections of Open Space to remain open during construction

Transport

- Car free housing
- Construction Management Plan (CMP) and associated requirement for a Construction Working Group to be formed prior to commencement.
- Financial contribution for highway works directly adjacent to the site. Works to include repaving of carriageways and footways on Brill Place, Chalton Street, Charrington Street, Polygon Road and Purchase Street. Works also to include amendments to existing traffic management orders
- Level Plans are required to be submitted for all plots at the appropriate stage showing the interaction between development thresholds and the Public Highway to be submitted to and approved by the Highway Authority prior to any works starting on-site. The Highway Authority reserves the right to construct the adjoining Public Highway (carriageway, footway and/or verge) to levels it considers appropriate.
- Financial contribution for pedestrian, cycling and environmental improvements in the general vicinity of the site (i.e. aspects of the wider vision for public realm improvements within the public highway).
- Financial contribution of £30,000 for Legible London signage.
- Residential Travel Plan and associated monitoring contribution of £6,002.
- School Travel Plan and associated monitoring contribution of £6,002.
- Approval in Principle (AIP) report for all elevations of the site where a basement is adjacent to the public highway (e.g. Brill Place). A financial contribution of £1,800 per elevation is also required in connection to the review and sign-off of the AIP from our Structural Engineering service, and this is required prior to any works starting on-site.
- Stopping up order to be approved by the highway authority prior to commencement of the buildings described as Plot 1 and Plot 2; including all associated costs.
- A Construction Working Group

38.2 Listed Building Consent is recommended subject to conditions.

39 LEGAL COMMENTS

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

40 Conditions – planning application

1	<p>Three years from the date of this permission</p> <p>This development must be begun not later than three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 92 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>I. Plot 1</p> <p>Existing 057/4002, 057/4010, 057/4050, 057/4051, 057/4052, 057/4053.</p> <p>Proposed 057/4102, 057/4110, 057/4111, 057/4112, 057/4113, 057/4114, 057/4115, 057/4150, 057/4151, 057/4152, 057/4153, 057/4160, 057/4161, 057/4162, 057/4163, 057/4164, 057/4165, 057/4220, 057/4221, 057/4222, 057/4223, 057/4300, Z(--)-232/P2, V(21)006</p> <p>II. Plot 2</p> <p>Existing (00) P100, (00) P101.</p> <p>Proposed (01) P100, (01) P102, (01) P103, (01) P104, (01) P105, (01) P106, (01) P107, (01) P108, (01) P109, (01) P110, (01) P111, (01) P201, (01) P202, (01) P203, (01) P204, (01) P210, (01) P211, (01) P301, (01) P302, (01) P303.</p> <p>III. Plot 3</p> <p>Existing 176 A001, 176b A010.</p> <p>Proposed 176b A100, 176b A101, 176b A102 R1, 176b A103 R1, 176b A104, 176b A200, 176b A201, 176b A202, 176b A203, 176b A204, 176b A205, 176b A206,</p>

176b A207, 176b A208, 176b A210, 176b A211.

IV. Plot 4

Existing

176 A001, 176 A010, 176 A011.

Proposed

176 A101, 176 A102, 176 A103, 176 A104, 176 A201, 176 A202, 176 A203, 176 A204, 176 A221, 176 A222, 176 A223, 176 A224, 176 A225, 176 A226.

V. Plots 5 & 6

Existing

A228_A_(00)_P100, A228_A_(00)_P102, A228_A_(00)_P103.

Proposed

A228_A_Z5_(01)_P104, A228_A_Z5_(01)_P105, A228_A_Z5_(01)_P106, A228_A_Z5_(01)_P107, A228_A_Z5_(01)_P201, A228_A_Z5_(01)_P202, A228_A_Z5_(01)_P203, A228_A_Z5_(01)_P204, A228_A_Z5_(01)_P210, A228_A_Z5_(01)_P211, A228_A_Z5_(01)_P301, A228_A_Z5_(01)_P302, A228_A_Z5_(01)_P303, A228_A_Z6_(01)_P102, A228_A_Z6_(01)_P103, A228_A_Z6_(01)_P104, A228_A_Z6_(01)_P105, A228_A_Z6_(01)_P106, A228_A_Z6_(01)_P201, A228_A_Z6_(01)_P202, A228_A_Z6_(01)_P203, A228_A_Z6_(01)_P204, A228_A_Z6_(01)_P210, A228_A_Z6_(01)_P211, A228_A_Z6_(01)_P301, A228_A_Z6_(01)_P302, A228_A_Z6_(01)_P303.

VI. Plot 7

Existing

372-SITE-100_P04, 372-SITE-101_P04

Proposed

372-LB-200_P05, 372-LB-20_P04, 372-LB-202_P04, 372-L01-203_P05, 372-L02-204_P05, 372-L04-205_P05, 372-L05-206_P05, 372-LB-207_P05, 372-LB-208_P05, 372-LB-209_P05, 372-LB-210_P05, 372-LB-211_P05, 372-LB-212_P05, 372-LB-213_P05, 372-LB-214_P05, 372-LB-215_P05, 372-RCP-220_P04, 372-SEC-300_P05, 372-SEC-301_P04, 372-ELE-400_P09, 372-ELE-401_P09, 372-ELE-402_P10, 372-ELE-403_P10, 372-ELE-450_P06, 372-ELE-451_P05, 372-ELE-452_P07, 372-ELE-453_P06, 372-ELE-454_P04, 372-ELE-455_P04, 372-ELE-456_P03, 372-ELE-457_P04, 372-ELE-458_P04, 372-ELE-459_P04, 372-ELE-460_P03, 372-ELE-461_P03, 372-ELE-46_P032, 372-ELE-463_P03, 372-ELE-464_P02, 372-ELE-46_P02.

VII. All plots

Existing

246-100-P-01, , 246-100-P-02, 246-100-P-03, 246-100-P-04, 246-100-P-05, 246-100-P-10, 246-100-P-25, 246-100-P-30, 246-100-P-40, 246-100-P-41, 246-100-P-42, 1108-800, TCP_CNSOMERSTWN_1.

Proposed

246-110-P-01, 246-110-P-2, 246-110-P-03, 246-110-P-04, 246-110-P-05, 246-110-P-056, 246-110-P-07, 246-110-P-10, 246-110-P-15, 246-110-P-16, 246-

110-P-17, 246-110-P-18, 246-110-P-25, 246-110-P-30, 1108-802, 1108-803, TLG-100-P-26_rA, 246-110-P-50, 246-110-P-51, TCP_CNSOMERSTWN_2.

Design and Access Statements

- Design and Access Statement – Masterplan and Landscape (prepared by DSDHA) December 2015
- Design and Access Statement Rev A – Plot 1 - Community Hub and Housing (prepared by Adam Khan Architects) December 2015
- Plot 1 Community Facilities - Landscape Design & Access Statement Rev C (prepared by LUC) December 2015
- Design and Access Statement – Plot 2 - Charrington Street Housing (prepared by Duggan Morris Architects) December 2015
- Design and Access Statement – Plot 3 - Charrington Street Terraced Housing (prepared by Hayhurst and Co)
- Design and Access Statement – Plot 4 - Edith Neville School and Children's Centre (prepared by Hayhurst and Co) December 2015
- Design and Access Statement – Plots 5 and 6 - Purchase Street Housing and Community Centre (prepared by Duggan Morris Architects) December 2015
- Design and Access Statement – Plot 7 - Brill Place Tower (prepared by DrMM Architects) December 2015

Other documents

- Planning Statement (prepared by Turley) December 2015
- Affordable Housing Statement (prepared by Turley) December 2015
- Contamination Land Assessment (prepared by Buro Happold Engineering) 18 September 2015
- Transport Assessment Revision P01 (prepared by Civic Engineers) December 2015
- Framework Delivery and Servicing Plan (prepared by Civic Engineers) December 2015
- Framework Travel Plan (prepared by Civic Engineers) December 2015
- Draft Construction Management Plan (produced by BAM Construction) December 2015
- Heritage, Townscape and Visual Impact Assessment (produced by Turley) December 2015
- Heritage, Townscape and Visual Impact Assessment: Addendum (produced by Turley) March 2016
- Flood Risk Assessment (produced by AKT) January 2016
- Arboricultural Report (prepared by Arboricultural Solutions) December 2015
- Ecological Site Assessment – Extended Phase 1 Habitat Survey (produced by Penny Anderson Associates Ltd.) December 2015
- Air Quality Assessment (produced by Ramboll Environ) December 2015
- Statement of Community Involvement (produced by Camden Council) December 2015
- Masterplan Energy and Sustainability Statement (produced by Atelier Ten) December 2015
- Energy and Sustainability Statement – Community Hub (Plot 1)

	<p>(prepared by Max Fordham) December 2015</p> <ul style="list-style-type: none"> • Plot 1 Community Facilities – Sustainability and Energy Statement REV C (prepared by Max Fordham) December 2015 • Energy and Sustainability Statement – Plots 2, 5 and 6 Rev D Issue (prepared by Max Fordham) December 2015 • Energy and Sustainability Statement – Plot 3 Charrington Street Terraced Housing (prepared by Max Fordham) • Energy and Sustainability Statement – Plot 4 Edith Neville School and Children’s Centre (prepared by Max Fordham) December 2015 • Energy and Sustainability Statement – Plot 7 Brill Place Housing (Skelly and Couch) December 2015 • Polygon Residential, Plot 2 – SUDS Drainage Statement version 1 (prepared by Price & Myers) 20.11.15 • Polygon Residential, Plot 5 – SUDS Drainage Statement version 1 (prepared by Price & Myers) 20.11.15 • Polygon Residential, Plot 6 – SUDS Drainage Statement version 1 (prepared by Price & Myers) 20.11.15 • Daylight and Sunlight Assessment (prepared by Point 2 Surveyors) December 2015 • Noise Assessment (prepared by Ramboll Environ) December 2015 • Plot 1 Community Facilities - Noise Impact Assessment Revision E (prepared by Max Fordham) December 2015 • Plot 2 – Charrington Street Housing, Central Somers Town - Noise Impact Assessment Rev B (prepared by Max Fordham) December 2015 • Plot 5 – Purchase Street Housing North and Community Hall and Plot 6 – Purchase Street Housing South, Central Somers Town - Noise Impact Assessment Rev B (prepared by Max Fordham) December 2015 • Wind Microclimate Study (prepared by BMT Fluid Mechanics) December 2015 • Basement Impact Assessment (prepared by Buro Happold) December 2015 • Phase 1 Geo-environmental Desk Study (prepared by Pell Frischmann) May 2013 <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Detailed drawings/samples – Plot 1</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p> <p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less</p>

	<p>than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>
4	<p>Detailed drawings/samples – Plot 2</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p> <p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>
5	<p>Detailed drawings/samples – Plot 3</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p>

	<p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p> <p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>
6	<p>Detailed drawings/samples – Plot 4</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p> <p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>

7	<p>Detailed drawings/samples – Plots 5 & 6</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p> <p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>
8	<p>Detailed drawings/samples – Plot 7</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the Council before the relevant part of the work is begun:</p> <p>a) Plan, elevation and section drawings, including jambs, head and cill, of all external windows and doors at a scale of 1:10.</p> <p>b) Samples and manufacturer's details at a scale of 1:10, of all facing materials including windows and door frames, glazing, and brickwork with a full scale sample panel of brickwork, spandrel panel and glazing elements of no less than 1m by 1m including junction window opening demonstrating the proposed colour, texture, face-bond and pointing.</p> <p>A sample panel of all facing materials should be erected on-site and approved by the Council before the relevant parts of the work are commenced and the development shall be carried out in accordance with the approval given.</p> <p>The relevant part of the works shall then be carried in accordance with the approved details</p>

	<p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>
9	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials or satellite dishes shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the Council.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>
10	<p>**Quantum of housing – Plot 1</p> <p>The development constructed and used pursuant to this permission shall provide when completed:</p> <p>Plot 1: no less than 10 social rent residential units within a maximum of 1,220sqm gross external area.</p> <p>Reason: To secure sufficient provision of affordable and other tenures of housing in a balanced and sustainable manner across the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies DP3 and DP4 of the London Borough of Camden Local Development Framework Development Policies.</p>
11	<p>**Quantum of housing – Plot 2</p> <p>The development constructed and used pursuant to this permission shall provide when completed:</p> <p>No more than 35 residential units within a maximum of 3,648sqm gross external area of market housing floorspace.</p> <p>Reason: To secure sufficient provision of affordable and other tenures of housing in a balanced and sustainable manner across the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies DP3 and DP4 of the London Borough of Camden Local Development Framework Development Policies.</p>
12	<p>**Quantum of housing – Plot 3</p> <p>The development constructed and used pursuant to this permission shall provide</p>

	<p>when completed:</p> <p>No more than 3 residential units within a gross external area minimum of 515.sqm gross external market housing floorspace.</p> <p>Reason: To secure sufficient provision of affordable and other tenures of housing in a balanced and sustainable manner across the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies DP3 and DP4 of the London Borough of Camden Local Development Framework Development Policies.</p>
13	<p>**Quantum of housing – Plots 5 & 6</p> <p>The development constructed and used pursuant to this permission shall provide when completed:</p> <p>(a) Plot 5: no less than 20 social rent residential units within a maximum of 2,136sqm gross external area;</p> <p>(b) Plot 6: no less than 14 social rent residential units within a maximum of 1,555sqm gross external area.</p> <p>Reason: To secure sufficient provision of affordable and other tenures of housing in a balanced and sustainable manner across the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies DP3 and DP4 of the London Borough of Camden Local Development Framework Development Policies.</p>
14	<p>**Quantum of housing – Plot 7</p> <p>The development constructed and used pursuant to this permission shall provide when completed:</p> <p>No more than 35 residential units within a maximum of 7,153sqm gross external area of market housing floorspace.</p> <p>Reason: To secure sufficient provision of affordable and other tenures of housing in a balanced and sustainable manner across the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies DP3 and DP4 of the London Borough of Camden Local Development Framework Development Policies.</p>
15	<p>Refuse and recycling</p> <p>Prior to first occupation of the residential units in each plot, the refuse and recycling storage areas shall be completed and made available for occupants of that plot.</p> <p>The development of each block shall not be implemented other than in accordance with such measures as approved. All such measures shall be in place prior to the first occupation of any residential units in the relevant plot and shall be retained thereafter.</p>

	<p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
16	<p>Play space</p> <p>Prior to first occupation of the market housing units the children's playspace in the Polygon Road part of the open space shall be completed and made available for use by the public.</p> <p>This playspace is to be implemented in accordance with detailed designs which have been prepared in consultation with local residents and community groups, and approved in writing by the local planning authority. All approved measures shall be retained and maintained thereafter.</p> <p>Reason: In order to ensure adequate play space and amenities are available for the future occupants of the dwellings on site in accordance with the requirements of policies CS6, CS15 and CS19 of the London Borough of Camden Local Development Framework Core Strategy and policy DP31 of the London Borough of Camden Local Development Framework Development Policies.</p>
17	<p>Details of gates</p> <p>Prior to installation, details of the proposed gates to the Community Garden, including a sample shall be submitted to and approved in writing by the Local Planning Authority. The gates shall only be erected in accordance with the approved details.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>
18	<p>Roof terraces</p> <p>No flat roofs within the development shall be used as terraces without the prior express approval in writing of the Local Planning Authority.</p> <p>Reason: To safeguard the amenities of the future occupiers and adjoining neighbours in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
19	<p>Landscape</p>

	<p>No development shall take place on the relevant part of the site until full details of hard and soft landscaping and means of enclosure of all un-built, open areas have been submitted to and approved by the local planning authority in writing. Such details shall include:</p> <ul style="list-style-type: none"> a) details of any proposed earthworks including grading, mounding and other changes in ground levels. b) details of proposals for the enhancement of biodiversity, c) an open space management plan, d) permeable play surfaces for SuDS purposes. <p>The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.</p> <p>Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policy CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.</p>
20	<p>Wind mitigation measures – Plot 7</p> <p>Details of wind mitigation measures shall be submitted to and approved in writing by the Local Planning Authority before the commencement of works at Plot 7. These measures shall be implemented prior to first occupation.</p> <p>Reason: To safeguard the amenities of users of the park and public realm, in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
21	<p>Hours of use: community hall – Plot 5</p> <p>No noise generating activities shall take place within the community hall outside of 0800 to 2300 Monday to Saturday and 0900 to 2200 on Sundays and Bank Holidays.</p> <p>Reason: To ensure that the amenity of occupiers of residential properties in the area is not adversely affected by noise and disturbance.</p>
22	<p>Hours of use: school – Plot 3</p> <p>No noise generating activities shall take place within the school outside of 07:00 to 22.30 hours Monday to Saturday and 09:00 to 21:00 on Sundays and Bank Holidays.</p>

	<p>Reason: To ensure that the amenity of occupiers of residential properties in the area is not adversely affected by noise and disturbance.</p>
23	<p>Hours of use: MUGA – Plot 1</p> <p>The MUGA shall not be used outside of 09:00 to 21:00 on any day.</p> <p>Reason: To ensure that the amenity of occupiers of residential properties in the area is not adversely affected by noise, disturbance and light pollution.</p>
24	<p>Obscure glazing – Plot 5</p> <p>All glazing below 1.8m from floor level shall be obscurely glazed and fixed shut for the windows on the upper floors of the northern block of Plot 5 which face east (serving units B03, B06 and B011). This glazing shall be retained permanently thereafter.</p> <p>Reason: To ensure that the amenity of occupiers of neighbouring residential properties and gardens in the area is not adversely affected by overlooking.</p>
25	<p>Obscure glazing – Plot 6</p> <p>All glazing below 1.8m from floor level shall be obscurely glazed and fixed shut for the windows on the upper floors of the southern block of Plot 6 which face north-east, directly towards the rear of the Coopers Lane Estate (serving units C03, C07 and C11). This glazing shall be retained permanently thereafter.</p> <p>Reason: To ensure that the amenity of occupiers of neighbouring residential properties in the area is not adversely affected by overlooking.</p>
26	<p>Louvres - Plot 3</p> <p>The louvres on the rear elevation of Plot 3 (as shown on drawing 176b A204) shall be installed prior to occupation and maintained in perpetuity.</p> <p>Reason: To ensure that the school can operate safely and securely.</p>
27	<p>SUDS</p> <p>Prior to commencement of the relevant part of the development details of a sustainable urban drainage system shall be submitted to and approved by the local planning authority in writing. Such details shall include details of the following features:</p> <ul style="list-style-type: none"> - Permeable surfacing to all hard standing areas, with a minimum 250mm sub-base, totalling 390m³ attenuation discharging to the public sewer at a reduced rate. - Details of any weirs required within the sub-base to ensure that the full storage volume is utilised and to avoid lower areas becoming

	<p>overwhelmed.</p> <ul style="list-style-type: none"> - Details of how rainfall falling on impermeable pathways or roads is shed and attenuated in adjacent grassed or planted areas to include swales or bio-retention / rain gardens and details of how these are connected to the sub-base of the paving areas to provide an even greater storage volume. - A network of perforated pipes collecting the filtered runoff and conveying it to the public sewer. - Details of permeable surfacing to all play areas. - Full details of wetland areas <p>SUDS will be implemented prior to the opening of the relevant parts of the development.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
28	<p>Flood Risk Assessment – Plot 1</p> <p>Prior to commencement of development a Flood Risk Assessment shall be submitted to the local planning authority and approved in writing.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
29	<p>Flood Risk Assessment – Plot 2</p> <p>Prior to commencement of development a Flood Risk Assessment shall be submitted to the local planning authority and approved in writing.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
30	<p>Flood Risk Assessment – Plot 3</p> <p>Prior to commencement of development a Flood Risk Assessment shall be submitted to the local planning authority and approved in writing.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development</p>

	<p>Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
31	<p>Flood Risk Assessment – Plot 3</p> <p>Prior to commencement of development a Flood Risk Assessment shall be submitted to the local planning authority and approved in writing.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
32	<p>Flood Risk Assessment – Plot 5</p> <p>Prior to commencement of development a Flood Risk Assessment shall be submitted to the local planning authority and approved in writing.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
33	<p>Flood Risk Assessment – Plot 6</p> <p>Prior to commencement of development a Flood Risk Assessment shall be submitted to the local planning authority and approved in writing.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
34	<p>Flood Risk Assessment – Plot 7</p> <p>Prior to commencement of development a Flood Risk Assessment shall be submitted to the local planning authority and approved in writing.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CS13 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
35	<p>Rainwater recycling – Plot 1</p> <p>Prior to implementation of the relevant part of the development full details of</p>

	<p>rainwater recycling proposals for Plot 1 shall be submitted to the local planning authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CS13 (Tackling climate change through promoting higher environmental standards), DP22 (Promoting sustainable design and construction) and DP23 (Water)</p>
36	<p>Rainwater recycling – Plot 4</p> <p>Prior to implementation of the relevant part of the development full details of rainwater recycling proposals for Plot 4 shall be submitted to the local planning authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CS13 (Tackling climate change through promoting higher environmental standards), DP22 (Promoting sustainable design and construction) and DP23 (Water)</p>
37	<p>Rainwater recycling – Plots 5 & 6</p> <p>Prior to implementation of the relevant part of the development full details of rainwater recycling proposals for Plots 5 and 6 shall be submitted to the local planning authority and approved in writing. The development shall thereafter be constructed in accordance with the approved details.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CS13 (Tackling climate change through promoting higher environmental standards), DP22 (Promoting sustainable design and construction) and DP23 (Water)</p>
38	<p>Water efficiency</p> <p>The development hereby approved shall achieve a maximum internal water use of 105litres/person/day, allowing 5 litres/person/day for external water use. Prior to occupation of each Plot, evidence demonstrating that this has been achieved shall be submitted and approved by the Local Planning Authority.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in accordance with policies CS13 (Tackling climate change through promoting higher environmental standards), DP22 (Promoting sustainable design and construction) and DP23 (Water).</p>
39	<p>Non-road mobile machinery</p>

	<p>All non-Road mobile Machinery (any mobile machine, item of transportable industrial equipment, or vehicle – with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the [demolition and/construction] phase of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the [demolition and/construction] phase of the development.</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies CS5 (Managing the impact of growth and development) and CS16 (Improving Camden’s health and wellbeing) of the London Borough of Camden Local Development Framework Core Strategy and policies DP32 (Air quality and Camden’s Clear Zone) and DP22 (Promoting sustainable design and construction) of the London Borough of Camden Local Development Framework Development Policies.</p>
40	<p>Living roof details and installation – Plot 1</p> <p>Full details in respect of the green and brown roofs in the area indicated on the approved roof plans shall be submitted to and approved by the local planning authority before the relevant part of the development commences. The details shall include species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green/brown roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. The green roof shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme of maintenance.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
41	<p>Living roof details and installation – Plot 4</p> <p>Full details in respect of the green and brown roofs in the area indicated on the approved roof plans shall be submitted to and approved by the local planning authority before the relevant part of the development commences. The details shall include species, planting density, substrate and a section at scale 1:20 showing that adequate depth is available in terms of the construction and long term viability of the green/brown roof, and a programme for a scheme of maintenance shall be submitted to and approved in writing by the local planning authority. The green roof shall be fully provided in accordance with the approved details prior to first occupation and thereafter retained and maintained in accordance with the approved scheme of maintenance.</p>

	<p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
42	<p>Tree protection – Plot 1</p> <p>Prior to the commencement of any works for Plot 1, details demonstrating how trees to be retained both on and off site shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction" and should include details of appropriate working processes in the vicinity of trees, a tree protection plan and details of an auditable system of site monitoring. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details."</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of trees and biodiversity in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
43	<p>Tree protection – Plot 2</p> <p>Prior to the commencement of any works for Plot 2, details demonstrating how trees to be retained both on and off site shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction" and should include details of appropriate working processes in the vicinity of trees, a tree protection plan and details of an auditable system of site monitoring. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details."</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of trees and biodiversity in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
44	<p>Tree protection – Plot 3</p> <p>Prior to the commencement of any works for Plot 3, details demonstrating how trees to be retained both on and off site shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details</p>

	<p>shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction" and should include details of appropriate working processes in the vicinity of trees, a tree protection plan and details of an auditable system of site monitoring. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details."</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of trees and biodiversity in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
45	<p>Tree protection – Plot 4</p> <p>Prior to the commencement of any works for Plot 4, details demonstrating how trees to be retained both on and off site shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction" and should include details of appropriate working processes in the vicinity of trees, a tree protection plan and details of an auditable system of site monitoring. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details."</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of trees and biodiversity in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
46	<p>Tree protection – Plots 5 & 6</p> <p>Prior to the commencement of any works for Plots 5 & 6, details demonstrating how trees to be retained both on and off site shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction" and should include details of appropriate working processes in the vicinity of trees, a tree protection plan and details of an auditable system of site monitoring. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details."</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of trees and biodiversity in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London</p>

	Borough of Camden Local Development Framework Development Policies.
47	<p>Tree protection – Plot 7</p> <p>Prior to the commencement of any works for Plot 7, details demonstrating how trees to be retained both on and off site shall be protected during construction work shall be submitted to and approved by the Council in writing. Such details shall follow guidelines and standards set out in BS5837:2012 "Trees in Relation to Construction" and should include details of appropriate working processes in the vicinity of trees, a tree protection plan and details of an auditable system of site monitoring. All trees on the site, or parts of trees growing from adjoining sites, unless shown on the permitted drawings as being removed, shall be retained and protected from damage in accordance with the approved protection details.”</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of trees and biodiversity in accordance with policies CS13, CS15 and CS16 of the London Borough of Camden Local Development Framework Core Strategy and policies DP22, DP23 and DP32 of the London Borough of Camden Local Development Framework Development Policies.</p>
48	<p>Precautionary bat survey – Plots 1 and 2</p> <p>Immediately prior to demolition of Plot 10, an emergence / re-entry bat survey shall be under taken, by a qualified ecologist, at the southern elevation of the main building, in accordance with recommendations in the daytime bat survey report, which identified features in this location with potential to support bats. Evidence that the survey has been undertaken shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of demolition.</p> <p>Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended).</p>
49	<p>Land contamination – Plot 1</p> <p>At least 28 days before the development of Plot 1 hereby permitted commences a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation must be submitted to the planning authority. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and shall include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed. The scheme of assessment must be approved by the LPA and the documentation submitted must comply with the standards of the Environment Agency's Model Procedures for the Management of Contamination (CLR11).</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous</p>

	<p>industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
50	<p>Land contamination – Plot 2</p> <p>At least 28 days before the development of Plot 2 hereby permitted commences a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation must be submitted to the planning authority. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and shall include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed. The scheme of assessment must be approved by the LPA and the documentation submitted must comply with the standards of the Environment Agency's Model Procedures for the Management of Contamination (CLR11).</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
51	<p>Land contamination – Plot 3</p> <p>At least 28 days before the development of Plot 3 hereby permitted commences a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation must be submitted to the planning authority. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and shall include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed. The scheme of assessment must be approved by the LPA and the documentation submitted must comply with the standards of the Environment Agency's Model Procedures for the Management of Contamination (CLR11).</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
52	<p>Land contamination – Plot 4</p> <p>At least 28 days before the development of Plot 4 hereby permitted</p>

	<p>commences a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation must be submitted to the planning authority. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and shall include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed. The scheme of assessment must be approved by the LPA and the documentation submitted must comply with the standards of the Environment Agency's Model Procedures for the Management of Contamination (CLR11).</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
53	<p>Land contamination – Plots 5 & 6</p> <p>At least 28 days before the development of Plots 5 & 6 hereby permitted commences a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation must be submitted to the planning authority. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and shall include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed. The scheme of assessment must be approved by the LPA and the documentation submitted must comply with the standards of the Environment Agency's Model Procedures for the Management of Contamination (CLR11).</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
54	<p>Land contamination – Plot 7</p> <p>At least 28 days before the development of Plot 7 hereby permitted commences a written detailed scheme of assessment consisting of site reconnaissance, conceptual model, risk assessment and proposed schedule of investigation must be submitted to the planning authority. The scheme of assessment must be sufficient to assess the scale and nature of potential contamination risks on the site and shall include details of the number of sample points, the sampling methodology and the type and quantity of analyses proposed. The scheme of assessment must be approved by the LPA and the documentation submitted must comply with the standards of the</p>

	<p>Environment Agency's Model Procedures for the Management of Contamination (CLR11).</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
55	<p>Site investigation and submission of a remediation scheme for land contamination – Plot 1</p> <p>Before the development of Plot 1 commences, a site investigation shall be undertaken in accordance with the approved scheme of assessment and the written results provided to the planning authority for their approval. Laboratory results must be provided as numeric values in a formatted electronic spread sheet. Before development of this plot commences a remediation scheme shall be agreed in writing with the planning authority and the scheme as approved shall be implemented before any part of the development hereby permitted is occupied.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
56	<p>Site investigation and submission of a remediation scheme for land contamination – Plot 2</p> <p>Before the development of Plot 2 commences, a site investigation shall be undertaken in accordance with the approved scheme of assessment and the written results provided to the planning authority for their approval. Laboratory results must be provided as numeric values in a formatted electronic spread sheet. Before development of this plot commences a remediation scheme shall be agreed in writing with the planning authority and the scheme as approved shall be implemented before any part of the development hereby permitted is occupied.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
57	<p>Site investigation and submission of a remediation scheme for land contamination – Plot 3</p>

	<p>Before the development of Plot 3 commences, a site investigation shall be undertaken in accordance with the approved scheme of assessment and the written results provided to the planning authority for their approval. Laboratory results must be provided as numeric values in a formatted electronic spread sheet. Before development of this plot commences a remediation scheme shall be agreed in writing with the planning authority and the scheme as approved shall be implemented before any part of the development hereby permitted is occupied.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
58	<p>Site investigation and submission of a remediation scheme for land contamination – Plot 4</p> <p>Before the development of Plot 4 commences, a site investigation shall be undertaken in accordance with the approved scheme of assessment and the written results provided to the planning authority for their approval. Laboratory results must be provided as numeric values in a formatted electronic spread sheet. Before development of this plot commences a remediation scheme shall be agreed in writing with the planning authority and the scheme as approved shall be implemented before any part of the development hereby permitted is occupied.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
59	<p>Site investigation and submission of a remediation scheme for land contamination – Plots 5 & 6</p> <p>Before the development of Plots 5 & 6 commences, a site investigation shall be undertaken in accordance with the approved scheme of assessment and the written results provided to the planning authority for their approval. Laboratory results must be provided as numeric values in a formatted electronic spread sheet. Before development of these plots commences a remediation scheme shall be agreed in writing with the planning authority and the scheme as approved shall be implemented before any part of the development hereby permitted is occupied.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous</p>

	<p>industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
60	<p>Site investigation and submission of a remediation scheme for land contamination – Plot 7</p> <p>Before the development of Plot 7 commences, a site investigation shall be undertaken in accordance with the approved scheme of assessment and the written results provided to the planning authority for their approval. Laboratory results must be provided as numeric values in a formatted electronic spread sheet. Before development of this plot commences a remediation scheme shall be agreed in writing with the planning authority and the scheme as approved shall be implemented before any part of the development hereby permitted is occupied.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
61	<p>Reporting and management of significant additional contamination – Plot 1</p> <p>Additional significant contamination discovered during development shall be fully assessed and any necessary modifications made to the remediation scheme shall be submitted to the Local Planning Authority for written approval. Before any part of the development of this plot hereby permitted is occupied the developer shall provide written confirmation that all works were completed in accordance with the revised remediation scheme.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
62	<p>Reporting and management of significant additional contamination – Plot 2</p> <p>Additional significant contamination discovered during development shall be fully assessed and any necessary modifications made to the remediation scheme shall be submitted to the Local Planning Authority for written approval. Before any part of the development of this plot hereby permitted is occupied the developer shall provide written confirmation that all works were completed in accordance with the revised remediation scheme.</p> <p>Reason: To protect future occupiers of the development from the possible</p>

	<p>presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
63	<p>Reporting and management of significant additional contamination – Plot 3</p> <p>Additional significant contamination discovered during development shall be fully assessed and any necessary modifications made to the remediation scheme shall be submitted to the Local Planning Authority for written approval. Before any part of the development of this plot hereby permitted is occupied the developer shall provide written confirmation that all works were completed in accordance with the revised remediation scheme.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
64	<p>Reporting and management of significant additional contamination – Plot 4</p> <p>Additional significant contamination discovered during development shall be fully assessed and any necessary modifications made to the remediation scheme shall be submitted to the Local Planning Authority for written approval. Before any part of the development of this plot hereby permitted is occupied the developer shall provide written confirmation that all works were completed in accordance with the revised remediation scheme.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
65	<p>Reporting and management of significant additional contamination – Plots 5 & 6</p> <p>Additional significant contamination discovered during development shall be fully assessed and any necessary modifications made to the remediation scheme shall be submitted to the Local Planning Authority for written approval. Before any part of the development of these plots hereby permitted is occupied the developer shall provide written confirmation that all works were completed in accordance with the revised remediation scheme.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous</p>

	<p>industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
66	<p>Reporting and management of significant additional contamination – Plot 7</p> <p>Additional significant contamination discovered during development shall be fully assessed and any necessary modifications made to the remediation scheme shall be submitted to the Local Planning Authority for written approval. Before any part of the development of this plot hereby permitted is occupied the developer shall provide written confirmation that all works were completed in accordance with the revised remediation scheme.</p> <p>Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
67	<p>Sound insulation – residential/commercial – Plot 1</p> <p>Prior to commencement of the development of this plot, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings, namely eg. living room and kitchen above bedroom of separate dwelling. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise.</p>
68	<p>Sound insulation – residential/commercial – Plot 2</p> <p>Prior to commencement of the development of this plot, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings, namely eg. living room and kitchen above bedroom of separate dwelling. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise.</p>
69	<p>Sound insulation – residential/commercial – Plot 5</p>

	<p>Prior to commencement of the development of this plot, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings, namely eg. living room and kitchen above bedroom of separate dwelling. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise.</p>
70	<p>Sound insulation – residential/commercial – Plot 7</p> <p>Prior to commencement of the development of this plot, details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures separating different types of rooms/ uses in adjoining dwellings, namely eg. living room and kitchen above bedroom of separate dwelling. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise.</p>
71	<p>Noise levels</p> <p>The noise level in rooms at the development hereby approved shall meet the noise standard specified in BS8233:2014 for internal rooms and external amenity areas.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise.</p>
72	<p>Plant and equipment</p> <p>Prior to first use of the relevant part of the development, details of plant machinery shall be submitted to and approved in writing by the Local Planning Authority . The measures shall ensure that the external noise level emitted from plant/machinery/equipment will be lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. A post installation noise assessment shall be carried out where required to confirm compliance with the noise criteria and additional steps to mitigate noise shall be taken, as necessary. Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p>

	<p>Reason: To ensure that the amenity of occupiers of the development site/ surrounding premises is not adversely affected by noise from plant/mechanical installations/ equipment.</p>
73	<p>** Basement Construction Plan (BCP) – Plot 7</p> <p>Prior to implementation of this plot, a Basement Construction Plan shall be submitted to and approved in writing by the Local Planning Authority and confirmation that the necessary measures to secure the independent review of this plan shall be submitted to and approved in writing by the Local Planning Authority. The construction of the basement shall only be carried out in accordance with this plan.</p> <p>Reason: To ensure the proposal would not impact structurally on the area.</p>
74	<p>Cycle parking – Plot 1</p> <p>Prior to first occupation of Plot 1, the following bicycle parking shall be provided:</p> <ul style="list-style-type: none"> - secure and covered parking for 20 resident’s bicycles <p>All such facilities shall thereafter be retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy, policies DP16, DP18, DP19 and DP26 of the London Borough of Camden Local Development Framework Development Policies, the London Plan and CPG7 (Transport).</p>
75	<p>Cycle parking – Plot 2</p> <p>Prior to first occupation of Plot 2, the following bicycle parking shall be provided:</p> <ul style="list-style-type: none"> - secure and covered parking for 55 resident’s bicycles <p>All such facilities shall thereafter be retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy, policies DP16, DP18, DP19 and DP26 of the London Borough of Camden Local Development Framework Development Policies, the London Plan and CPG7 (Transport).</p>
76	<p>Cycle parking – Plot 4</p> <p>Prior to first occupation of Plot 4, the following bicycle parking shall be provided :</p>

	<ul style="list-style-type: none"> a. secure and covered scooter storage for pupils b. 14 cycle parking spaces for pupils c. 8 secure and covered spaces for staff <p>All such facilities shall thereafter be retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy, policies DP16, DP18, DP19 and DP26 of the London Borough of Camden Local Development Framework Development Policies, the London Plan and CPG7 (Transport).</p>
77	<p>Cycle parking – Plot 5</p> <p>Prior to first occupation of Plot 5, the following bicycle parking shall be provided :</p> <ul style="list-style-type: none"> - secure and covered parking for 31 resident’s bicycles <p>All such facilities shall thereafter be retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy, policies DP16, DP18, DP19 and DP26 of the London Borough of Camden Local Development Framework Development Policies, the London Plan and CPG7 (Transport).</p>
78	<p>Cycle parking – Plot 6</p> <p>Prior to first occupation of Plot 6, the following bicycle parking shall be provided:</p> <ul style="list-style-type: none"> - secure and covered parking for 24 resident’s bicycles <p>All such facilities shall thereafter be retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy, policies DP16, DP18, DP19 and DP26 of the London Borough of Camden Local Development Framework Development Policies, the London Plan and CPG7 (Transport).</p>
79	<p>Cycle parking – Plot 7</p> <p>Prior to first occupation of Plot 7, the following bicycle parking shall be provided:</p> <ul style="list-style-type: none"> - secure and covered parking for 86 resident’s bicycles <p>All such facilities shall thereafter be retained.</p>

	<p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy, policies DP16, DP18, DP19 and DP26 of the London Borough of Camden Local Development Framework Development Policies, the London Plan and CPG7 (Transport).</p>
80	<p>Cycle parking – Public Open Space</p> <p>Prior to first occupation of 80% of the residential units, 40 public bicycle parking shall be provided on the Public Open Spaces/public realm. All such facilities shall thereafter be retained.</p> <p>Reason: To ensure that the scheme makes adequate provision for cycle users in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy, policies DP16, DP18, DP19 and DP26 of the London Borough of Camden Local Development Framework Development Policies, the London Plan and CPG7 (Transport).</p>
81	<p>** Car free</p> <p>The proposal will be car free.</p> <p>Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
82	<p>** CMP – Plot 1</p> <p>Prior to commencement of development, including demolition, a Construction Management Plan (CMP) including an Air Quality Assessment) shall be submitted to and approved by the local planning authority. The CMP shall set out all measures that the Owner will adopt in undertaking the demolition of the existing buildings and the construction of the Development using good site practices in accordance with the Council's Considerate Contractor Manual.</p> <p>Such plan shall include measures for ensuring highway safety and managing transport, deliveries and waste (including recycling of materials) throughout the demolition and construction periods and which demonstrates consideration of and liaison with other local concurrent developments. The plan shall also include details of a community working group involving local residents and businesses, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses, a waste management strategy and means of monitoring and reviewing the plan from time to time.</p>

	<p>The measures contained in the Construction Management Plan shall at all times remain implemented during all works of construction and demolition. Where separate Construction Management Plans are submitted for the demolition and the construction phases the provisions of this condition will apply to both plans.</p> <p>Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
83	<p>** CMP – Plot 2</p> <p>Prior to commencement of development, including demolition, a Construction Management Plan (CMP) including an Air Quality Assessment) shall be submitted to and approved by the local planning authority. The CMP shall set out all measures that the Owner will adopt in undertaking the demolition of the existing buildings and the construction of the Development using good site practices in accordance with the Council's Considerate Contractor Manual.</p> <p>Such plan shall include measures for ensuring highway safety and managing transport, deliveries and waste (including recycling of materials) throughout the demolition and construction periods and which demonstrates consideration of and liaison with other local concurrent developments. The plan shall also include details of a community working group involving local residents and businesses, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses, a waste management strategy and means of monitoring and reviewing the plan from time to time.</p> <p>The measures contained in the Construction Management Plan shall at all times remain implemented during all works of construction and demolition. Where separate Construction Management Plans are submitted for the demolition and the construction phases the provisions of this condition will apply to both plans.</p> <p>Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
84	<p>** CMP – Plot 3</p> <p>Prior to commencement of development, including demolition, a Construction Management Plan (CMP) including an Air Quality Assessment) shall be</p>

	<p>submitted to and approved by the local planning authority. The CMP shall set out all measures that the Owner will adopt in undertaking the demolition of the existing buildings and the construction of the Development using good site practices in accordance with the Council's Considerate Contractor Manual.</p> <p>Such plan shall include measures for ensuring highway safety and managing transport, deliveries and waste (including recycling of materials) throughout the demolition and construction periods and which demonstrates consideration of and liaison with other local concurrent developments. The plan shall also include details of a community working group involving local residents and businesses, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses, a waste management strategy and means of monitoring and reviewing the plan from time to time.</p> <p>The measures contained in the Construction Management Plan shall at all times remain implemented during all works of construction and demolition. Where separate Construction Management Plans are submitted for the demolition and the construction phases the provisions of this condition will apply to both plans.</p> <p>Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
85	<p>** CMP – Plot 4</p> <p>Prior to commencement of development, including demolition, a Construction Management Plan (CMP) including an Air Quality Assessment) shall be submitted to and approved by the local planning authority. The CMP shall set out all measures that the Owner will adopt in undertaking the demolition of the existing buildings and the construction of the Development using good site practices in accordance with the Council's Considerate Contractor Manual.</p> <p>Such plan shall include measures for ensuring highway safety and managing transport, deliveries and waste (including recycling of materials) throughout the demolition and construction periods and which demonstrates consideration of and liaison with other local concurrent developments. The plan shall also include details of a community working group involving local residents and businesses, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses, a waste management strategy and means of monitoring and reviewing the plan from time to time.</p> <p>The measures contained in the Construction Management Plan shall at all</p>

	<p>times remain implemented during all works of construction and demolition. Where separate Construction Management Plans are submitted for the demolition and the construction phases the provisions of this condition will apply to both plans.</p> <p>Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
86	<p>** CMP – Plot 5 & 6</p> <p>Prior to commencement of development, including demolition, a Construction Management Plan (CMP) including an Air Quality Assessment) shall be submitted to and approved by the local planning authority.</p> <p>The CMP shall set out all measures that the Owner will adopt in undertaking the demolition of the existing buildings and the construction of the Development using good site practices in accordance with the Council's Considerate Contractor Manual.</p> <p>Such plan shall include measures for ensuring highway safety and managing transport, deliveries and waste (including recycling of materials) throughout the demolition and construction periods and which demonstrates consideration of and liaison with other local concurrent developments. The plan shall also include details of a community working group involving local residents and businesses, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses, a waste management strategy and means of monitoring and reviewing the plan from time to time.</p> <p>The measures contained in the Construction Management Plan shall at all times remain implemented during all works of construction and demolition. Where separate Construction Management Plans are submitted for the demolition and the construction phases the provisions of this condition will apply to both plans.</p> <p>Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
87	<p>** CMP – Plot 7</p> <p>Prior to commencement of development, including demolition, a Construction Management Plan (CMP) including an Air Quality Assessment) shall be submitted to and approved by the local planning authority.</p>

	<p>The CMP shall set out all measures that the Owner will adopt in undertaking the demolition of the existing buildings and the construction of the Development using good site practices in accordance with the Council's Considerate Contractor Manual.</p> <p>Such plan shall include measures for ensuring highway safety and managing transport, deliveries and waste (including recycling of materials) throughout the demolition and construction periods and which demonstrates consideration of and liaison with other local concurrent developments. The plan shall also include details of a community working group involving local residents and businesses, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses, a waste management strategy and means of monitoring and reviewing the plan from time to time.</p> <p>The measures contained in the Construction Management Plan shall at all times remain implemented during all works of construction and demolition. Where separate Construction Management Plans are submitted for the demolition and the construction phases the provisions of this condition will apply to both plans.</p> <p>Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
88	<p>** School travel plan – Plot 4</p> <p>Prior to occupation, a School Travel Plan (TP), shall be submitted to and approved in writing by the Local Planning Authority and confirmation that the necessary measures to secure the monitoring and review of the School Travel Plans shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The travel plan shall set out measures for an initial substantial review within 6 months, a mechanism for monitoring and reviewing, measures to ensure subsequent reviews on the third and fifth anniversary of the Occupation Date, provision for the appointment of Travel Plan Co-ordinator prior to the Occupation Date, identifying means of ensuring the provision of information to the Council and provision of a mechanism for review.</p> <p>The school shall not be operated other than in accordance with the Travel Plan as approved.</p> <p>Reason: In order to ensure that the travel demand arising from the development does not significantly impact on the existing transport system and to accord with the requirements of policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies</p>

	DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.
89	<p>** School travel plan monitoring contribution – Plot 4</p> <p>On or prior to Implementation, confirmation that the necessary measures are in place to review the School Travel Plan over a six year period from the date of first Occupation shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: In order to ensure that the travel demand arising from the development does not significantly impact on the existing transport system and to accord with the requirements of policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
90	<p>** Target rents</p> <p>The rent in all social housing units shall be set at Camden target rent levels.</p> <p>Reason: To secure sufficient provision of affordable housing in the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies D3 and DP4 of the London Borough of Camden Local Development Framework Development Policies.</p>
91	<p>** Affordable housing</p> <p>Affordable housing shall be provided in accordance with the conditions and approved documents as set out in this decision. All affordable housing units shall be constructed and fitted out as units which are suitable for occupation as affordable housing and shall only be occupied and shall be retained in perpetuity for no purpose other than for the provision of social rented housing in accordance with the targets set by the Regulator; not disposing of any interest in the Affordable Housing Units (except by way of mortgage) other than to any other Registered Social Landlord registered with the Regulator or any other body organisation or company registered with the Charity Commissioners for England and Wales and approved by the Homes and Communities Agency or the Regulator or the Council. The total cost of rent and service and management charges for the affordable housing shall meet targets for Social Rented Housing set by the Regulator.</p> <p>Reason: To secure sufficient provision of affordable housing in the development in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policies D3 and DP4 of the London Borough of Camden Local Development Framework Development Policies.</p>

92	<p>** Provision of school</p> <p>The new school building shall be built and fully fitted out prior to first occupation of any residential units.</p> <p>Reason: To ensure the provision of the school building in accordance with the requirements of policy CS10 of the London Borough of Camden Local Development Framework Core Strategy and policy DP15 of the London Borough of Camden Local Development Framework Development Policies.</p>
93	<p>** Provision of community hall</p> <p>The new community hall in Plot 5 shall be built and fully fitted out for use prior to first occupation of more than 50% of the market residential units.</p> <p>Reason: To ensure the provision of the school building in accordance with the requirements of policy CS10 of the London Borough of Camden Local Development Framework Core Strategy and policy DP15 of the London Borough of Camden Local Development Framework Development Policies.</p>
94	<p>** Provision of community hub</p> <p>The community hub facilities in Plot 1 shall be fully fitted out prior to first occupation of more than 50% of the market residential units.</p> <p>Reason: To ensure the provision of the school building in accordance with the requirements of policy CS10 of the London Borough of Camden Local Development Framework Core Strategy and policy DP15 of the London Borough of Camden Local Development Framework Development Policies.</p>
95	<p>** Community Access Plan – Community Hall (Plot 5)</p> <p>A Community Access Plan for the Community Hall shall be submitted to and approved in writing by the Council prior to first operation of the Community Hall.</p> <p>Reason: To ensure the provision of the school building in accordance with the requirements of policy CS10 of the London Borough of Camden Local Development Framework Core Strategy and policy DP15 of the London Borough of Camden Local Development Framework Development Policies.</p>
96	<p>** Community Access Plan – MUGA (Plot1)</p>

	<p>A Community Access Plan for the MUGA shall be submitted and shall be submitted to and approved in writing by the Council prior to first operation of the MUGA.</p> <p>Reason: To ensure reasonable access to community facilities in accordance with the requirements of policy CS10 of the London Borough of Camden Local Development Framework Core Strategy and policy DP15 of the London Borough of Camden Local Development Framework Development Policies.</p>
97	<p>** Open space improvements</p> <p>The improvement works to Polygon open space shall be completed prior to occupation of 50% of Plots 2 and 3.</p> <p>The improvement works to Purchase Street open space shall be completed prior to occupation of 50% of Plots 5 and 6.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
98	<p>** Local employment – Plot 1</p> <p>Prior to commencement the applicant and/or developer shall:</p> <ul style="list-style-type: none"> • work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8. • advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely. • provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, or a specified number (to be agreed) of work experience placements following the completion of the building. Work experience placements can be organised through the council's work experience coordinator, Tom Humphreys, who can be contacted via Thomas.Humphreys@camden.gov.uk. • If the build costs of the scheme exceed £3 million the applicant and/or developer shall recruit 1 construction or non-construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. • If the value of the scheme exceeds £1 million, the applicant and/or developer must also sign up to the Camden Local Procurement Code, as per section 8.19 of CPG8.

	<ul style="list-style-type: none"> • The applicant and/or developer shall provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site. <p>Reason: To ensure the development provides sufficient employment and training in line with the requirements of policy CS8 of the London Borough of Camden Local Development Framework Core Strategy and policy DP13 of the London Borough of Camden Local Development Framework Development Policies.</p>
99	<p>** Local employment – Plot 2</p> <p>Prior to commencement the applicant and/or developer shall:</p> <ul style="list-style-type: none"> • work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8. • advertise all construction vacancies and work placement opportunities exclusively with the King’s Cross Construction Skills Centre for a period of 1 week before marketing more widely. • provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council’s King’s Cross Construction Skills Centre, or a specified number (to be agreed) of work experience placements following the completion of the building. Work experience placements can be organised through the council’s work experience coordinator, Tom Humphreys, who can be contacted via Thomas.Humphreys@camden.gov.uk. • If the build costs of the scheme exceed £3 million the applicant and/or developer shall recruit 1 construction or non-construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council’s King’s Cross Construction Skills Centre. • If the value of the scheme exceeds £1 million, the applicant and/or developer must also sign up to the Camden Local Procurement Code, as per section 8.19 of CPG8. • The applicant and/or developer should deliver at least 1 supplier capacity building workshop/Meet the Buyer event to support Camden SMEs to tender for construction contracts in relation to the development. • The applicant and/or developer shall provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site. <p>Reason: To ensure the development provides sufficient employment and training in line with the requirements of policy CS8 of the London Borough of Camden Local Development Framework Core Strategy and policy DP13 of the London Borough of Camden Local Development Framework Development</p>

	Policies.
100	<p>** Local employment – Plot 4</p> <p>Prior to commencement the applicant and/or developer shall:</p> <ul style="list-style-type: none"> • work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8. • advertise all construction vacancies and work placement opportunities exclusively with the King’s Cross Construction Skills Centre for a period of 1 week before marketing more widely. • provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council’s King’s Cross Construction Skills Centre, or a specified number (to be agreed) of work experience placements following the completion of the building. Work experience placements can be organised through the council’s work experience coordinator, Tom Humphreys, who can be contacted via Thomas.Humphreys@camden.gov.uk. • If the build costs of the scheme exceed £3 million the applicant and/or developer shall recruit 1 construction or non-construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council’s King’s Cross Construction Skills Centre. • If the value of the scheme exceeds £1 million, the applicant and/or developer must also sign up to the Camden Local Procurement Code, as per section 8.19 of CPG8. • The applicant and/or developer shall provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site. <p>Reason: To ensure the development provides sufficient employment and training in line with the requirements of policy CS8 of the London Borough of Camden Local Development Framework Core Strategy and policy DP13 of the London Borough of Camden Local Development Framework Development Policies.</p>
101	<p>** Local employment – Plots 5 & 6</p> <p>Prior to commencement the applicant and/or developer shall:</p> <ul style="list-style-type: none"> • work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8. • advertise all construction vacancies and work placement opportunities exclusively with the King’s Cross Construction Skills Centre for a period of 1 week before marketing more widely. • provide a specified number (to be agreed) of construction or non-

	<p>construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council’s King’s Cross Construction Skills Centre, or a specified number (to be agreed) of work experience placements following the completion of the building. Work experience placements can be organised through the council’s work experience coordinator, Tom Humphreys, who can be contacted via Thomas.Humphreys@camden.gov.uk.</p> <ul style="list-style-type: none"> • If the build costs of the scheme exceed £3 million the applicant and/or developer shall recruit 1 construction or non-construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted through the Council’s King’s Cross Construction Skills Centre. • If the value of the scheme exceeds £1 million, the applicant and/or developer must also sign up to the Camden Local Procurement Code, as per section 8.19 of CPG8. • The applicant and/or developer shall provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site. <p>Reason: To ensure the development provides sufficient employment and training in line with the requirements of policy CS8 of the London Borough of Camden Local Development Framework Core Strategy and policy DP13 of the London Borough of Camden Local Development Framework Development Policies.</p>
102	<p>** Local employment – Plot 7</p> <p>Prior to commencement the applicant and/or developer shall:</p> <ul style="list-style-type: none"> • work to CITB benchmarks for local employment when recruiting for construction-related jobs as per clause 8.28 of CPG8. • advertise all construction vacancies and work placement opportunities exclusively with the King’s Cross Construction Skills Centre for a period of 1 week before marketing more widely. • provide a specified number (to be agreed) of construction or non-construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council’s King’s Cross Construction Skills Centre, or a specified number (to be agreed) of work experience placements following the completion of the building. Work experience placements can be organised through the council’s work experience coordinator, Tom Humphreys, who can be contacted via Thomas.Humphreys@camden.gov.uk. • If the build costs of the scheme exceed £3 million the applicant and/or developer shall recruit 1 construction or non-construction apprentice per £3million of build costs, and pay the council a support fee of £1,700 per apprentice as per clause 8.17 of CPG8. Recruitment of construction apprentices should be conducted

	<p>through the Council's King's Cross Construction Skills Centre.</p> <ul style="list-style-type: none"> • If the value of the scheme exceeds £1 million, the applicant and/or developer must also sign up to the Camden Local Procurement Code, as per section 8.19 of CPG8. • The S106 should broker a meeting between the end user(s) of the ground floor retail units and the Economic Development team to discuss our employment and skills objectives. • The applicant and/or developer should deliver at least 1 supplier capacity building workshop/Meet the Buyer event to support Camden SMEs to tender for construction contracts in relation to the development. • The applicant and/or developer shall provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site. <p>Reason: To ensure the development provides sufficient employment and training in line with the requirements of policy CS8 of the London Borough of Camden Local Development Framework Core Strategy and policy DP13 of the London Borough of Camden Local Development Framework Development Policies.</p>
103	<p>** BREEAM – Plot 1</p> <p>On or prior to the Implementation Date a sustainability plan shall be submitted to and approved in writing by the local planning authority. Such plan shall:</p> <p>(a) be based on a Building Research Establishment Environmental Assessment Method assessment with a target of achieving an Excellent or Outstanding rating and attaining at least 60% of the credits in each of Energy and Water and 40% of the credits in Materials categories;</p> <p>(b) include a pre-Implementation review by an appropriately qualified and recognised independent verification body certifying that the measures incorporated in the Sustainability Plan are achievable.</p> <p>Prior to first occupation of the non-residential elements of the development a post-completion certificate which demonstrates that the employment element has achieved BREEAM Excellent shall be submitted to and approved in writing by the local planning authority.</p> <p>Reason: To ensure the proposal is energy efficient and sustainable in accordance with policy CS13 of the London Borough of Camden Local Development Framework Core Strategy and policy DP22 of the London Borough of Camden Local Development Framework Development Policies.</p>
104	<p>** BREEAM – Plot 4</p> <p>On or prior to the Implementation Date a sustainability plan shall be submitted to and approved in writing by the local planning authority. Such plan shall:</p> <p>(a) be based on a Building Research Establishment Environmental</p>

	<p>Assessment Method assessment with a target of achieving an Excellent or Outstanding rating and attaining at least 60% of the credits in each of Energy and Water and 40% of the credits in Materials categories;</p> <p>(b) demonstrate how the residential element of the development achieves at least Level 4 of the Code for Sustainable Homes attaining at least 50% of the credits in each of the Energy Water and Materials categories and</p> <p>(c) include a pre-Implementation review by an appropriately qualified and recognised independent verification body certifying that the measures incorporated in the Sustainability Plan are achievable.</p> <p>Prior to first occupation of the non-residential elements of the development a post-completion certificate which demonstrates that the employment element has achieved BREEAM Excellent shall be submitted to and approved in writing by the local planning authority.</p> <p>Reason: To ensure the proposal is energy efficient and sustainable in accordance with policy CS13 of the London Borough of Camden Local Development Framework Core Strategy and policy DP22 of the London Borough of Camden Local Development Framework Development Policies.</p>
105	<p>** Public Open Space construction plan</p> <p>A plan detailing the areas of the Public Open Space to be closed during construction works and for how long, shall be submitted to and approved in writing by the Local Planning Authority. Public open space shall only be closed for construction works in accordance with this plan.</p> <p>Reason: To ensure continued public access to sufficient Public Open Space.</p>
106	<p>** Tree planting contribution</p> <p>On or prior to Implementation, confirmation that the necessary measures to secure tree planting in the area shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: In order to ensure that the travel demand arising from the development does not significantly impact on the existing transport system and to accord with the requirements of policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
107	<p>Need for a legal agreement</p> <p>In the event that any owners of the land have the legal locus to enter into a Section 106 Agreement no works shall be commenced on site until such time as they have entered into such an Agreement incorporating obligations in respect of the matters covered by conditions marked with ** in the planning permission granted on XXXXXXXXXXXXXXXX (Camden reference 2015/2704/P) and those obligations shall apply to all conditions above marked with ** which</p>

	<p>supersede those of permission 2014/7651/P.</p> <p>Reason: In order to define the permission and to secure development in accordance with policy CS19 of the London</p>
108	<p>** Pedestrian and Environmental Improvements contribution</p> <p>On or prior to Implementation, confirmation that the necessary measures for the provision of pedestrian, cycling, environmental and public realm improvements in the vicinity of the Development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
109	<p>** Residential travel plan – Plot 1</p> <p>Prior to occupation, a Residential Travel Plan (TP), shall be submitted to and approved in writing by the Local Planning Authority and confirmation that the necessary measures to secure the monitoring and review of the Residential Travel Plan shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The travel plan shall set out measures for an initial substantial review within 6 months, a mechanism for monitoring and reviewing, measures to ensure subsequent reviews on the third and fifth anniversary of the Occupation Date, provision for the appointment of Travel Plan Co-ordinator prior to the Occupation Date, identifying means of ensuring the provision of information to the Council and provision of a mechanism for review.</p> <p>The Plot shall not be operated other than in accordance with the Travel Plan as approved.</p> <p>Reason: In order to ensure that the travel demand arising from the development does not significantly impact on the existing transport system and to accord with the requirements of policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
110	<p>** Residential travel plan – Plot 2</p> <p>Prior to occupation, a Residential Travel Plan (TP), shall be submitted to and approved in writing by the Local Planning Authority and confirmation that the necessary measures to secure the monitoring and review of the Residential Travel Plan shall be submitted to and approved in writing by the Local Planning Authority.</p>

	<p>The travel plan shall set out measures for an initial substantial review within 6 months, a mechanism for monitoring and reviewing, measures to ensure subsequent reviews on the third and fifth anniversary of the Occupation Date, provision for the appointment of Travel Plan Co-ordinator prior to the Occupation Date, identifying means of ensuring the provision of information to the Council and provision of a mechanism for review.</p> <p>The Plot shall not be operated other than in accordance with the Travel Plan as approved.</p> <p>Reason: In order to ensure that the travel demand arising from the development does not significantly impact on the existing transport system and to accord with the requirements of policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
111	<p>** Residential travel plan – Plots 5 & 6</p> <p>Prior to occupation, a Residential Travel Plan (TP), shall be submitted to and approved in writing by the Local Planning Authority and confirmation that the necessary measures to secure the monitoring and review of the Residential Travel Plan shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>The travel plan shall set out measures for an initial substantial review within 6 months, a mechanism for monitoring and reviewing, measures to ensure subsequent reviews on the third and fifth anniversary of the Occupation Date, provision for the appointment of Travel Plan Co-ordinator prior to the Occupation Date, identifying means of ensuring the provision of information to the Council and provision of a mechanism for review.</p> <p>The Plot shall not be operated other than in accordance with the Travel Plan as approved.</p> <p>Reason: In order to ensure that the travel demand arising from the development does not significantly impact on the existing transport system and to accord with the requirements of policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
112	<p>** Residential travel plan – Plot 7</p> <p>Prior to occupation, a Residential Travel Plan (TP), shall be submitted to and approved in writing by the Local Planning Authority and confirmation that the necessary measures to secure the monitoring and review of the Residential Travel Plan shall be submitted to and approved in writing by the Local Planning Authority.</p>

	<p>The travel plan shall set out measures for an initial substantial review within 6 months, a mechanism for monitoring and reviewing, measures to ensure subsequent reviews on the third and fifth anniversary of the Occupation Date, provision for the appointment of Travel Plan Co-ordinator prior to the Occupation Date, identifying means of ensuring the provision of information to the Council and provision of a mechanism for review.</p> <p>The Plot shall not be operated other than in accordance with the Travel Plan as approved.</p> <p>Reason: In order to ensure that the travel demand arising from the development does not significantly impact on the existing transport system and to accord with the requirements of policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>
113	<p>** Highways works – Plot 1</p> <p>On or prior to the Implementation Date, confirmation that the necessary measures to secure and highways improvements around the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
114	<p>** Highways works – Plot 2</p> <p>On or prior to the Implementation Date, confirmation that the necessary measures to secure and highways improvements around the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
115	<p>** Highways works – Plot 3</p> <p>On or prior to the Implementation Date, confirmation that the necessary measures to secure and highways improvements around the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London</p>

	Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.
116	<p>** Highways works – Plot 4</p> <p>On or prior to the Implementation Date, confirmation that the necessary measures to secure and highways improvements around the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
117	<p>** Highways works – Plots 5 & 6</p> <p>On or prior to the Implementation Date, confirmation that the necessary measures to secure and highways improvements around the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
118	<p>** Highways works – Plot 7</p> <p>On or prior to the Implementation Date, confirmation that the necessary measures to secure and highways improvements around the development shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
119	<p>** Level plans – Plot 1</p> <p>On or prior to the Implementation Date the Owner shall submit level plans for the approval in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the scheme promotes the use of sustainable transport means in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy.</p>
120	** Level plans – Plot 2

	<p>On or prior to the Implementation Date the Owner shall submit level plans for the approval in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the scheme promotes the use of sustainable transport means in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy.</p>
121	<p>** Level plans – Plot 3</p> <p>On or prior to the Implementation Date the Owner shall submit level plans for the approval in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the scheme promotes the use of sustainable transport means in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy.</p>
122	<p>** Level plans – Plot 4</p> <p>On or prior to the Implementation Date the Owner shall submit level plans for the approval in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the scheme promotes the use of sustainable transport means in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy.</p>
123	<p>** Level plans – Plots 5 & 6</p> <p>On or prior to the Implementation Date the Owner shall submit level plans for the approval in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the scheme promotes the use of sustainable transport means in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy.</p>
124	<p>** Level plans – Plot 7</p> <p>On or prior to the Implementation Date the Owner shall submit level plans for the approval in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the scheme promotes the use of sustainable transport means in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy.</p>
125	<p>** Pedestrian, cyclist and environmental works</p> <p>On or prior to the Implementation Date, confirmation that the necessary measures to secure pedestrian, cyclist and environmental works improvements around the development shall be submitted to and approved in writing by the Local Planning Authority.</p>

	<p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
126	<p>** Legible London signage</p> <p>On or prior to the Implementation Date, confirmation that the necessary measures to Legible London signage shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure that the pedestrian environment and public realm is maintained and improved in accordance with policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP17 and DP21 of the London Borough of Camden Local Development Framework Development Policies.</p>
127	<p>** Approval in Principle (AIP) – Plot 7</p> <p>On or prior to the Implementation Date, an Approval in Principle report shall be submitted to and approved in writing by the Local Planning Authority and confirmation that the necessary measures to secure the review and sign off of the Approval in Principle report shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure the proposal would not impact structurally on the area.</p>
128	<p>** Stopping-up order – Plots 1 and 2</p> <p>Prior to implementation of these plots, a stopping-up order for the lane to the north will be submitted to and approved by the highway authority.</p> <p>Reason: To ensure this lane is legally closed before being developed.</p>
129	<p>** Construction Working Group (CWG)</p> <p>Prior to implementation a CWG involving local residents, businesses and the Francis Crick Institute, a contractor complaints/call-line and measures to be carried out to mitigate the impact of the noise arising from construction and demolition activities on local residents and businesses shall be set up. The CWG shall run for the whole course of construction.</p> <p>Reason: In order to protect the pedestrian environment and the amenities of the area generally and to ensure the continued free flow of traffic in the area in accordance with Policies CS5 and CS11 of the London Borough of Camden Local Development Framework Core Strategy and policies DP16, DP17 and DP26 of the London Borough of Camden Local Development Framework Development Policies.</p>

130	<p>** Basement Construction Plan (BCP) – Plot 7</p> <p>Prior to implementation of this plot, a Basement Construction Plan shall be submitted to and approved in writing by the Local Planning Authority and confirmation that the necessary measures to secure the independent review of this plan shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>Reason: To ensure the proposal would not impact structurally on the area.</p>
131	<p>Biodiversity Enhancements – Plot 1</p> <p>Prior to implementation of the development a plan showing details of biodiversity enhancements on the buildings and within the open space (including bird and bat boxes) appropriate to the development's location, scale and design (including wetland areas) shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan (Consolidated with Alterations Since 2004) and Camden Planning Guidance 2006 and policy CS15 of the London Borough of Camden Local Development Framework Core Strategy.</p>
132	<p>Biodiversity Enhancements – Plot 2</p> <p>Prior to implementation of the development a plan showing details of biodiversity enhancements on the buildings and within the open space (including bird and bat boxes) appropriate to the development's location, scale and design (including wetland areas) shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan (Consolidated with Alterations Since 2004) and Camden Planning Guidance 2006 and policy CS15 of the London Borough of Camden Local Development Framework Core Strategy.</p>
133	<p>Biodiversity Enhancements – Plot 4</p> <p>Prior to implementation of the development a plan showing details of biodiversity enhancements on the buildings and within the open space</p>

	<p>(including bird and bat boxes) appropriate to the development's location, scale and design (including wetland areas) shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan (Consolidated with Alterations Since 2004) and Camden Planning Guidance 2006 and policy CS15 of the London Borough of Camden Local Development Framework Core Strategy.</p>
134	<p>Biodiversity Enhancements – Plot 5</p> <p>Prior to implementation of the development a plan showing details of biodiversity enhancements on the buildings and within the open space (including bird and bat boxes) appropriate to the development's location, scale and design (including wetland areas) shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan (Consolidated with Alterations Since 2004) and Camden Planning Guidance 2006 and policy CS15 of the London Borough of Camden Local Development Framework Core Strategy.</p>
135	<p>Biodiversity Enhancements – Plot 6</p> <p>Prior to implementation of the development a plan showing details of biodiversity enhancements on the buildings and within the open space (including bird and bat boxes) appropriate to the development's location, scale and design (including wetland areas) shall be submitted to and approved in writing by the local planning authority. The measures shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of the London Plan (Consolidated with Alterations Since 2004) and Camden Planning Guidance 2006 and policy CS15 of the London Borough of Camden Local Development Framework Core Strategy.</p>

41 Informatives – planning application

1	<p>Conditions marked with **</p> <p>The matters covered by conditions marked with an ** are matters which would usually be incorporated into a Section 106 Agreement. On Council own schemes because the Council cannot enter into an agreement with itself the usual practice would for the permission to reference the Section 106 requirements for information.</p> <p>If the Council retains ownership of the application site although the reference to Section 106 requirements would not be legally binding they would act as a record of the requirements the Council as planning authority expects the Council as landowner to comply with. If the Council disposes of a relevant interest in the Application Site (which for the avoidance of doubt will not include disposals to individual tenants and occupiers) the incoming owner will be required to enter into a Section 106 giving effect to those requirements which will then become a legally binding document.</p>
2	<p>Indicative highways works</p> <p>The proposed highway works must be treated as indicative at this stage as planning permission does not guarantee that the proposed highway and public realm improvements would be implemented in their current form. Such proposals are always subject to further investigation, consultation, detailed design, and approval by the Highway Authority (in this case the Council).</p>
3	<p>Thames Water – surface water drainage and sewage</p> <p>With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.</p> <p>There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to</p>

	<p>contact Thames Water Developer Services on 0800 009 3921 to discuss the options available at this site.</p> <p>Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.</p>
4	<p>Thames Water – piling</p> <p>No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.</p>
5	<p>Thames Water - Groundwater Risk Management Permit</p> <p>A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.</p>
6	<p>Asbestos</p> <p>For Plots 1 & 4, there may be a risk of asbestos and you are advised to undertake an intrusive pre-demolition and refurbishment asbestos survey in accordance with HSG264 supported by an appropriate mitigation scheme to control risks to future occupiers.</p>
7	<p>Timing of vegetation clearance (breeding birds)</p> <p>You are advised that all removal of trees, hedgerows, shrubs, scrub or tall herbaceous vegetation should be undertaken in line with The Wildlife and Countryside Act 1981 (as amended).</p>

42 Conditions – listed building consent

1	<p>Approved drawings – Plot 3</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing 176 A001, 176b A010.</p> <p>Proposed 176b A100, 176b A101, 176b A102, 176b A103, 176b A104, 176b A200, 176b A201, 176b A202, 176b A203, 176b A204, 176b A205, 176b A206, 176b A207, 176b A208, 176b A210, 176b A211.</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
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APPENDIX 1 - Independent Viability Review (BPS)

Independent Viability Review

9 February 2016

1.0 INTRODUCTION

1.1 We have been instructed by the London Borough of Camden ('the Council') to review a viability assessment that has been undertaken by Savills in respect of a project to redevelop parts of Central Somers Town. The application (Council reference 2015/2704/P) for Full Planning Permission was registered on 4th January 2016. The applicant is the London Borough of Camden as this is a Council-led scheme. It entails the following:

"Demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys in height comprising:

- *Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to include a children's nursery and community play facility with 10no. residential units above;*
- *Plot 2: 35 residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m);*
- *Plot 3: Extension of Grade II listed terrace to provide 3no. dwellings;*
- *Plot 4: Replacement school (Use Class D1) ;*
- *Plot 5: 20no. residential units over a replacement community hall (Use Class D1) (approximately 211sq.m);*
- *Plot 6: 14no. residential units; and Plot 7: 54no. residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 70sq.m). Provision of 11,765 sqm of public open space along with associated highways works and landscaping."*

1.2 This project seeks to replace the Edith Neville primary school and community buildings and provide enhancements to public space, as well as providing residential units, which will be delivered on six plots. The community benefits will be funded by the revenues from private housing development on parts of the Central Somers Town area, including land that is currently part of the school grounds. Because the object is to deliver the school and community buildings, affordable housing delivery is not the primary objective, nevertheless the Council intends to deliver a large number of affordable units.

1.3 CIL Contributions total £2,585,572 in the Savills development appraisal, and are based on Mayoral CIL of £50 per sqm and Camden CIL of £150 per sqm. We have been informed that the project will benefit from 'recycled CIL' monies, but it has not yet been confirmed whether this will act to reduce the level CIL contributions that are included in the appraisal.

1.4 Our review has sought to scrutinise the costs and value assumptions applied in Savills' appraisal, with a view to determining the level of affordable housing that the scheme can deliver while remaining financially viable.

- 1.5 Savills' December 2015 Financial Viability & Affordable Housing Assessment has been undertaken on behalf of the Council. The cost of delivering all the community facilities (including school, open space, public realm works and affordable housing) and residential floorspace has been estimated by Cost Consultancy Sweett, and are incorporated into Savills' assessment.
- 1.6 Savills conclude that in order for the scheme to generate the £[REDACTED] required to cover the cost of the delivering the community facilities, the level of affordable housing cannot be greater than 20 units (all social rent), which is 14.7% of the 136 units (14% by area). This is 10 additional units to that which was reported as a minimum in the Cabinet report of 16 December. With this level of affordable housing the appraisal shows a minor surplus of £220,000. At higher levels of affordable housing, the scheme shows a deficit. These appraisals assume that nil grant is available. It is standard practice when assessing the level of affordable housing that can be delivered by a scheme, for planning purposes, to assume that no grant funding is available. We therefore are in agreement with this particular approach taken by Savills.
- 1.7 Despite 14% affordable housing being shown by the appraisal as the maximum that can be delivered, the applicant is, however, proposing to deliver 44 affordable units, equating to 30% of the residential floorspace. It is able to do this by providing up to £10.3m from the affordable housing fund (AHF) to eliminate the viability deficit. Without this subsidy, the deficit for the scheme with 44 affordable units (all social rent) is shown as -£9.49m.
- 1.8 It is anticipated that land receipts from the sale of the residential element of the scheme to a private residential developer will provide the funding for the community facilities.

2.0 SCHEME DELIVERY AND RELATED ISSUES

- 2.1 We understand the Council is seeking to fund the delivery of the new school and community infrastructure works through the sale of land within the application boundary for development of private residential housing.
- 2.2 Whether the obligation to deliver the proposed affordable housing provision is included within this sale has, we understand, not been concluded but we note the preference is at this stage for this element to be built directly by the Council. This would be a practical solution to delivering some of the affordable housing which is located within community buildings which will be retained by the Council.
- 2.3 The Council will also separately procure the construction of the new Edith Neville school and community infrastructure; as such the application scheme as proposed will be delivered by two separate parties being the Council and a residential developer.
- 2.4 The viability assessment seeks to anticipate the value of the private residential housing with a view to determining a likely land sale value.
- 2.5 This sale value is then contrasted with the anticipated costs of constructing the new school, community infrastructure and affordable housing.

- 2.6 The viability assessment anticipates that the residential land sale receipt will be insufficient to meet the costs of the new school and community infrastructure works and provide more than 20 units of social rented housing affordable housing.
- 2.7 The Council's Cabinet has agreed to further cross subsidise this scheme from its affordable housing fund (AHF) up to a figure of £10.3m in order to deliver a total of 44 units of social rented affordable housing.

- 2.8 This approach raises a number of questions which have been discussed at length with the Council's project team and the questions and answers are summarised below:

What if the land sale does not deliver the anticipated level of capital or the community development works cost significantly exceeds current expectations?

- 2.9 The land sale receipt is sought to be maximised and made more certain through:
- a) Planning consent being obtained before the land is sold in order to create maximum certainty and to reduce planning risk and delay as well as site holding costs. There is consequently likely to be less conditionality and more certainty and value obtained from the bid process.
 - b) The residential developer will not have to make additional provision for affordable housing as this will be delivered by the Council
 - c) Realistic assumptions have been adopted concerning costs and values of the residential element which should ensure that land receipt is not less than anticipated.

- 2.10 We note that significant contingency sums have been included in the cost estimate of the council corks which should help provide a margin against significant cost increases.

- 2.11 Ultimately however, if the project experiences a funding shortfall we understand that further funding could be sought from the Council's Cabinet.

What if the land sale receipt significant exceeds the currently anticipated level?

- 2.12 The anticipated subsidy of £10.3m currently identified to support provision of affordable housing represents a maximum cross subsidy level. In the event that the scheme showed a surplus the scale of subsidy would reduce proportionately to achieve a break even. In this way the scale of affordable housing provision would remain unchanged.

- 2.13 The Council's Cabinet confirmed in its decision of 16 December that any surplus would be used to generate additional affordable housing on site.

Is there a conflict between land sale overage requirements and the Council's deferred contribution requirements?

- 2.14 The council may seek to impose conventional land sale overage provisions on the developer as well as deferred contributions through a S106 Agreement. In both instances the Council may seek up to 50% uplift. In combination these separate provisions could effectively remove any incentive on the developer to drive

additional value from the site as 100% of any uplift would be payable to the council with no benefit remaining to the developer.

2.15 It is clearly in the council's financial interest to have an effective overage agreement in place as there is always a possibility of the developer driving improvements in scheme viability, however it is also essential the developer sees enough potential benefit in order to have sufficient incentive. In deriving maximum up front value from the site the council is likely to seek to minimise restrictions on the private residential development and therefore there is potential for the developer to

A) Apply for a more valuable planning consent

B) Achieve higher than anticipated value from the site at the land bid stage

2.16 A conventional land sale overage provision would seek a proportionate payment from both circumstances and would be limited in scale only the extent of any additional surplus generated. In effect the council's share would be not be capped other than be the extent of the surplus.

2.17 By contrast a deferred payment provision would be limited to the consent as granted so would have to be applied in a subsequent S106 Agreement if a fresh consent were sought. The contribution would also be capped by reference to the shortfall on affordable housing provision. Planning overage agreements cannot be open ended but must relate to policy targets.

2.18 Of the two provisions the land overage provision clearly offers the greatest potential for generating the largest return to the council and therefore it would be reasonable to assume that in this instance the planning based deferred payment provisions be omitted in favour of the land sale overage provision.

2.19 Deferred payment provisions are ring fenced towards provision of affordable housing and if not spent within a given time period must be returned to the developer. By contrast the council is free to spend land sale overage payments as it sees fit.

2.20 In this instance the council's cabinet decision of 16 December has confirmed that any surplus will be spent on affordable housing within the scheme. However in the first instance any such payment would be used to reduce the level of subsidy from the affordable housing fund (AHF) required by the scheme.

3.0 CONCLUSIONS & RECOMMENDATIONS

3.1 Following our review of the viability assessment by Savills and the Cost Plan by Sweett, we conclude that the scheme cannot viably delivery more than the 30% affordable housing that is the currently being proposed. This conclusion is based on present day costs and values in accordance with the requirements for assessing planning viability. Viability may change over time but given the considerations outlined in 2.14 to 2.20 above it would appear to be in the council's best financial interests to rely solely on a land sales overage provision and omit a deferred payment obligation, especially in light of the cabinet's decision of 16 December concerning the application of surplus funding.

3.2 Given that the council has yet to procure the development partner for the private residential element or tender the construction costs associated with the new

school and community infrastructure works there remains significant ambiguity within the scheme's viability which cannot be addressed at this stage. Our cost consultant advises a cost reduction of £9.82m, which we have factored into our review of viability. However this is largely composed of cost contingencies which whilst these exceed normal commercial levels we understand the need to ensure deliverability of this scheme and note that if the scheme delivers an effective surplus this will be available to the scheme to fund additional affordable housing.

- 3.3 The Council is seeking to achieve a break-even position and is not seeking to generate a profit for itself, although Savills have made allowance in the appraisal for a developer's profit that will be required by a typical private developer in respect of the private residential element of the scheme. We regard this as appropriate as this element will not be delivered by the Council. We have not been informed of the profits that have been applied to the private and affordable elements of the scheme. The blended rate in the 30% affordable housing scenario is ■■■% on GDV. We calculate that a profit of ■% on GDV for the private and ■% on GDV for the affordable would generate a blended rate of ■■■%, therefore close to Savills' rate, thus on this basis we accept that the overall profit requirement is reasonable.
- 3.4 Whilst the Council is not seeking to generate profit from the scheme, the objective being to maximise the investment available into the project for delivering the new Edith Neville school, to provide new community facilities, and deliver affordable housing it is nevertheless reasonable in our view to provide for a modest profit on the affordable element of the scheme to cover the development management costs associated with this element as would typically be required by a Registered Provider. This approach appears reasonable even if it transpires that this element is developed by the Council rather than the residential developer.
- 3.5 We understand that it has yet to be established whether the affordable housing will be built out by the Council itself, while selling the plots that include private housing, such as Plot 7, or alternatively whether all the housing plots will be sold to, and then built out by, a private developer. The latter strategy would generate lower land receipts for the Council, given that the private developer(s) would be taking on the liability of delivering affordable housing; this would have the benefit of minimising purchaser's costs. Conversely, if the private housing consents are sold to private developers separately from the affordable housing, this would increase the land receipts as the developer would not take on the liability of delivering a scheme which includes affordable housing, but this would have the effect of increasing the purchaser's costs on the developer thereby negatively impacting on viability leaving the affordable housing to be delivered by the Council. It should be noted purchasers costs typically include stamp duty at 4% and sales agents and legal fees amounting to 1.8%
- 3.6 In the case of Plot 1, this includes 10 social rented units located above ground floor community uses, which raises questions over how this space is to be delivered if two separate contractors are appointed.
- 3.7 We have considered the sales values that have been applied to the private market dwellings, and consider these to be broadly reasonable for this location, taking into account the level of build costs and internal specification that is shown in the Cost Plan. We have very limited information regarding the scheme at this stage, and are only able to give a general view on sales values which do not take account of

specific factors which will become known when a residential developer is appointed.

- 3.8 We agree that the tower development at Brill Place is likely to achieve higher values than the rest of the scheme's proposed private dwellings. Savills have provided suitable comparable sales evidence, which we conclude provide useful support for the estimate sales values. We have not been provided with an accommodation schedule, showing the values ascribed to the individual units. This would be useful, especially in respect of understanding the approach to valuing the penthouse units as these will be a key driver of revenue.
- 3.9 With respect to the build costs, these have been reviewed by our retained Quantity Surveyor, Neil Powling. His full report is in Appendix One. Neil has referred to a total cost of £[REDACTED] for all 10 sections of the Sweett Cost Plan; he has undertaken a benchmarking exercise by reference to BCIS average tender prices, and has arrived at a revised figure of £[REDACTED]. This cost total includes the entire project's costs, including the 'community infrastructure costs'. The total difference is £9.82m. By accounting for changes in finance costs and professional fees, this figure would result in a higher adjustment than £9.82m to the viability position (i.e. over £11m). This would place the 30% affordable scenario in a marginally surplus position, given that the deficit is shown to be £9.49m in Savills' report. Neil does, however, consider the 12% preliminaries and 5% Overheads & Profit to be somewhat low in the current market. On balance, therefore, we agree that the scheme cannot viably deliver more than 30% affordable housing.
- 3.10 In arriving at his revised cost figure of £[REDACTED], Neil has reduced the contingency from 7.5% to 5.0%, excluded the 10% risk allowance, and excluded the cost growth by adjusting the costs to present day (Q1 2016) levels.
- 3.11 It should be noted that when considering developments we would normally adopt the same approach to excess contingencies as noted above. In this instance it can be argued that by adopting higher than normal levels of contingency and risk allowance, the council is ensuring scheme deliverability. A conventional developer always has an additional buffer against risk in the form of high levels of developer profit which are absent from the School build and community infrastructure in this instance. Therefore providing a further risk cushion could be regarded as prudent in the circumstances.
- 3.12 There are significant levels of uncertainty at this stage over some elements of the cost estimate, including the site works, highways, and public realm improvements. These constitute abnormal costs and have not therefore been considered in Neil's BCIS benchmarking. Site works and highways are at an outline level of detail and therefore warrant a more detailed consideration when the design information has progressed. This creates the potential for substantial changes to the overall viability position once more certainty is reached regarding the costs.
- 3.13 The Savills appraisal includes a profit allowance in respect of the residential and commercial elements of the scheme. This is appropriate, given that these residential plots, which will include a small amount of commercial space, are intended to be sold to a private residential developer, which will have its own profit requirement and will factor this in to its bid price the site(s).

Appraisal summary

3.14 The £ [REDACTED] of “community infrastructure costs” includes the following:

Edith Neville Primary School
Community facilities
Site infrastructure
Public Realm
Highways
Applicant costs up to Planning

[REDACTED]

3.15 It does not include the cost of constructing the affordable housing. This cost is instead included within the main appraisal. The results of these residual appraisal are as follows:

- The net residual value of the 14% affordable scenario is £ [REDACTED]
- The net residual value of the 30% affordable scenario is £ [REDACTED]

3.16 The above appraisal results lead to deficits of -£1,534,919 and -£10,097,236 respectively, once the £ [REDACTED] of “community infrastructure costs” are deducted. These figures were different from those in Savills “scheme viability summary”, which shows a minor surplus of £220,000 for the 14% scenario, and a deficit of £9.49m for the 30% affordable scenario. Savills have since revised the figures in this viability summary, and the results are:

- 14% affordable scenario shows a surplus of £219,000
- 30% affordable scenario show a deficit of £8,627,758

3.17 The 30% affordable scenario includes £300,000 of nursery subsidy and £1,169,478 of recycled CIL. This additional revenue raises the residual value to £ [REDACTED] and thereby reduces the deficit to the £8,627,758 shown above.

3.18 In the appraisals, the net residual values of the private and affordable elements have been represented separately. For example, in the 14% scenario, the private figure is £28.7m and the affordable is negative at -£3.1m.

3.19 With respect to purchaser’s costs, Savills inform us that, “*Purchasers costs are captured for the private elements in the Argus appraisals, and within the affordable appraisal for the affordable elements.*” For example, for the 14% affordable scenario, the purchaser’s costs have been calculated as a percentage of £ [REDACTED] (the net residual value, not including affordable housing). This is a suitable approach if the Council intends to sell only the private element of the scheme and keep the affordable elements and its associated negative land value for itself.

4.0 SCHEME VALUES

Private Residential values

4.1 The project site as a whole will benefit from its excellent transport links, and from being somewhat secluded from the main roads of the Kings Cross area. While it is close to the railway station, this station is under cover therefore the site will not be significantly impacted by railway line noise.

- 4.2 The average sales value of the private market units is £■■■ per sqft for Purchase Street North (plot 5), £■■■ per sqft for Purchase Street South (plot 6), £■■■ per sqft for Charrington Street (plot 3), and £■■■ per sqft for Brill Place (plot 7). Plot 7 will have flexible A1/A2/A3/D1 on the ground floor.
- 4.3 The Brill Place plot is known as Plot 7 and will provide 54 private market dwellings and nil affordable dwellings. This plot is located to the south of Purchase Street and roughly to the south east of the existing school. This plot is on the north side of Brill Place and is close to the park area which provides an attractive setting. On the other side (i.e. the southern side) of Brill Place is the Crick Institute building, which has a major impact on the amount of direct sunlight the proposed tower will receive. We assume that the higher values of £■■■ per sqft for Plot 7's dwellings is driven by this being a high rise, tower development which should be able to achieve premium values for the upper floor units. We do not have an accommodation schedule nor a breakdown of value per unit for this tower.
- 4.4 The impressive design of the tower incorporates balconies. A large portion of the tower's value will be in the 'penthouse' units: the 3-bed over levels 20-22 (i.e. the top floors); and the 3-bed duplex over levels 18-19. The values for penthouses in Central London are typically c£3,000 per sqft. The lower floors will have restricted direct sunlight. The building has a substantial lobby for residents. We note the following CBRE research of penthouse values per sqft in London:



- 4.5 We would expect the proposed penthouses to be at the lower end of the range of Central London penthouses. The above table is now historic (2013), as there has been considerable growth in values in the intervening period. Furthermore, taking into account the recent substantial improvements to the King's Cross area, this suggests values per sqft substantially over £2,000 per sqft.
- 4.6 With respect Plots 5 and 6, these are along Purchase Street. Plot 3 is £■■■ per sqft and is along Charrington Street, which is located to the north west of the main school building. There will be 35 private units on this plot. It appears that they may be somewhat impacted by their close proximity to social housing, both the existing and proposed social housing. This may explain the variations in the overall values per sqft on these plots.
- 4.7 The plot 5 units will be located above a replacement hall (Use Class D1). Plot 3 at Charrington Street is an extension of a Grade II listed terrace to provide 3

dwellings, which in our view would be desirable properties. These 3 are larger units and therefore can be expected to achieve lower values per sqft, although this is an attractive Regency terrace which should help to maximise values.

- 4.8 A Comparable Sales Report has been provided by Savills, which includes highly relevant evidence of recent sales and asking prices in the vicinity, including new-build schemes.

Savills' comparable new-build schemes

Site	Developer	£PSF
Tapestry Building	Argent	£1,220
Plimsoll Building	Argent	£1,520
Regent Canalside	Taylor Wimpey	£1,010
Euston Reach	Galliard Homes	£1,290
Randolph Apartments	Car Park Plus	£1,241
XY Apartments	LB Camden	£905

- 4.9 We consider the above schemes to be highly suitable evidence to apply to the subject site, although the limited information we have about the proposed scheme makes comparison problematic.
- 4.10 We are familiar in particular with the Tapestry Building which is a good quality scheme with high level of internal specification, and for this reason we would not expect values per sqft for the proposed dwellings to exceed this level by a substantial margin. It is in close proximity to the subject site on the other side of King's Cross Station.
- 4.11 The Plimsoll Building is very close to the Tapestry Building. It has a 24-hour concierge service, private gardens, residents gym and a business lounge, thus we would not expect values as high as £1,540 per sqft for the proposed scheme's units with the exception of the Plot 7 (Brill Place) penthouses. We assume that this tower will benefit from some high-end facilities, but no details of specification have yet been provided and doubtless will be defined by the eventual residential developer.
- 4.12 Euston Reach is to the north west of the site, near Mornington Crescent tube station. Practical completion is due in Spring 2016. At £1,290 per sqft, this is [REDACTED]. We would typically expect marginally higher values closer to King's Cross, in view of the values achieved at schemes such as the Tapestry Building.
- 4.13 With respect to the lower-valued plots - at £[REDACTED] per sqft for Purchase Street North (plot 5), £[REDACTED] per sqft for Purchase Street South (plot 6), £[REDACTED] per sqft for Charrington Street (plot 3) the advantages and disadvantages of these schemes have not been explained. The unit sizes are not provided, which is a key factor in determining overall values per sqft.
- 4.14 The Regent's Canalside scheme is a useful comparator. It is a more low-rise scheme and does not have a high level of facilities of schemes The Plimsoll building. It is to the north of the application site, in the centre of Camden Town, which similarly has excellent transport links but arguably better nearby amenities than the application site. It benefits from an excellent canalside location. Overall, we

consider this to be a similar scheme in terms of achievable values. At £[REDACTED] per sqft, this is [REDACTED] and [REDACTED].

Affordable Housing values

- 4.15 The average value of the social rent units is £[REDACTED] and £[REDACTED] per sqft for Purchase Street North and South respectively. A detailed valuation has been provided by Savills, showing the valuation assumptions for management fees, rents, yields and other inputs. We have scrutinised this valuation and cross-checked by running our own valuation at these level of rents, which shows a similar overall value, thus we consider this to be a reasonable estimate. For example, a 1-bed at Purchase Street North has a £129 per week rent, which leads to a total value per flat of £[REDACTED], which compares to our estimate of £[REDACTED] per flat for this unit type.

Commercial values

- 4.16 There are commercial floorspace revenues shown in the appraisal, under the headings “commercial unit (Block A)” and “Brill Place Café”. These are ascribed rents of £[REDACTED] per sqft and £[REDACTED] per sqft respectively. The capitalisation rates (yields) applied are [REDACTED]% and [REDACTED]% respectively. No supporting evidence has been provided in respect of these assumptions.
- 4.17 This element of the scheme represents 0.6% of the schemes total GDV and as such has a negligible impact on overall viability.

5.0 DEVELOPMENT COSTS

Build costs

- 5.1 Our Cost Consultant, Neil Powling, has reviewed the Cost Plan that has been provided by Sweett. His full report is in Appendix One. Neil has referred to a total cost of £[REDACTED] for all 10 sections of the Sweett cost plan; he has undertaken a benchmarking exercise by reference to BCIS average tender prices, and arrived at a revised figure of £[REDACTED]. These costs include the ‘community infrastructure costs’ as well as the rest of the scheme, therefore Neil is suggesting a reduction both to the £[REDACTED]m of ‘community infrastructure costs’ and the residential-led scheme’s costs.
- 5.2 The total difference is £9.82m. In arriving at his revised cost figure of £[REDACTED], Neil has reduced the contingency from 7.5% to 5.0%, excluded the 10% risk allowance, and excluded the cost growth by adjusting the costs to present day (Q1 2016) levels.
- 5.3 These allowances have been included by the council to reflect the fact that there remains some significant uncertainty in this scheme in terms of procurement and the private residential land sales. The Council component of the project also does not include any allowance for normal developer profit which would be available to a conventional developer as further buffer against risk. Therefore whilst we would typically discount the allowance as indicated above, the circumstances of this development are such that there is a strong argument for making these additional allowances.

- 5.4 Development finance is calculated using a 6.5% interest rate, which is within the range of typical rates applied in the current lending market. A detailed cashflow has been created in the Argus appraisal model in order to calculate the finance costs. We agree the development periods that have been adopted in this cashflow.
- 5.5 An allowance for project/ design team fees of █% has been made. We consider this a reasonable allowance. The total professional fees for a traditional project using traditional procurement would exceed this figure whilst a design and build procurement approach might be a little less. We have been informed that the project is likely to incur additional levels of professional fees as the Council foresee that the chosen contractor will design the scheme from scratch.
- 5.6 Marketing costs of 2% and the other cost assumptions in the appraisal, includes Sales Fees, are in line with typical benchmark rates.

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Appendix One: Cost Review by Neil Powling FRICS

1 SUMMARY

- 1.1 A comprehensive area schedule would be helpful. We are surprised that no section on areas has been included with the cost plan.
- 1.2 The client contingency has been calculated as 7.5%. For the purposes of assessing viability on a private company's submission we consider 5% an adequate provision for new build work. If this project is treated on the same basis then a 5% contingency would reduce the construction costs by £1,566,000.
- 1.3 A further allowance of 10% risk has been allowed - for all 10 sections this totals £[REDACTED]. We have not seen any explanation for this allowance and consider it should be excluded from a conventional viability assessment.
- 1.4 Additions have been made for inflation totalling £[REDACTED] to update costs to either 2Q2016, 3Q2016 or 4Q2016 for different sections. The cost plan is dated December 2015 on the cover, but annotated 10/08/2015 in the footer. We have assumed the base date for the cost plan as 3Q2015. Viability should be on a current basis for both revenues and costs. The costs should therefore be updated to 1Q2016; the BCIS TPI all-in records forecast figures of 3Q2015 273 and 1Q2016 276 an increase of 1.1%. The total addition for inflation on this basis is £[REDACTED].
- 1.5 See 3.11 below. Discrepancies have arisen in the preparation of the elemental analysis used for benchmarking. We are unable to identify the source as part of our extraction of elemental sums or the Applicant's posting to section summaries.
- 1.6 Our benchmarking of 5 of the 7 sections confirms the costs (excluding % additions) to be reasonable. The remaining two sections are: section 2 the three market houses adjoining the primary school that yields a benchmark of £[REDACTED]/m² compared to the Applicant's £[REDACTED]/m² a difference of £[REDACTED]; and section 7 Block C Purchase St that yields a benchmark of £[REDACTED]/m² compared to the Applicant's £[REDACTED]/m² a difference of £[REDACTED].
- 1.7 Our calculation of the total cost for all 10 sections of the Sweett cost plan is £[REDACTED] compared to the Applicant's total of £[REDACTED]. The differences arise because contingency has been calculated at 5%, risk of 10% excluded, inflation to 1Q2016 calculated at 1.1%.
- 1.8 We note that the amounts included in the Appraisals for construction costs include the full amount for % additions as discussed in items 3.5 to 3.10 above. We consider reduced amounts proportional to the sum in item 3.14 should be included for construction costs. Sections 2, 4, 5 and 6 have been included in the Appraisal as calculated by Sweett. Sections 3 and 7 have been included at a reduced amount.

2 METHODOLOGY

- 2.1 The objective of the review of the construction cost element of the assessment of economic viability is to benchmark the applicant costs against RICS Building Cost Information Service (BCIS) average costs. We use BCIS costs for benchmarking

because it is a national and independent database. Many companies prefer to benchmark against their own data which they often treat as confidential. Whilst this is understandable as an internal exercise, in our view it is insufficiently robust as a tool for assessing viability compared to benchmarking against BCIS.

- 2.2 BCIS average costs are provided at mean, median and upper quartile rates (as well as lowest, lower quartile and highest rates). We generally use mean or upper quartile for benchmarking depending on the quality of the scheme. BCIS also provide a location factor compared to a UK mean of 100; our benchmarking exercise adjusts for the location of the scheme. BCIS Average cost information is available on a default basis which includes all historic data with a weighting for the most recent, or for a selected maximum period ranging from 5 to 40 years. We generally consider both default and maximum 5 year average prices; the latter are more likely to reflect current regulations, specification, technology and market requirements.
- 2.3 BCIS average prices are also available on an overall £ per sqm and for new build work (but not for rehabilitation/ conversion) on an elemental £ per sqm basis. We generally consider both. A comparison of the applicants elemental costing compared to BCIS elemental benchmark costs provides a useful insight into any differences in cost. For example: planning and site location requirements may result in a higher than normal cost of external wall and window elements.
- 2.4 If the application scheme is for the conversion, rehabilitation or refurbishment of an existing building, greater difficulty results in checking that the costs are reasonable, and the benchmarking exercise must be undertaken with caution. The elemental split is not available from the BCIS database for rehabilitation work; the new build split may be used instead as a check for some, but certainly not all, elements. Works to existing buildings vary greatly from one building project to the next. Verification of costs is helped greatly if the cost plan is itemised in reasonable detail thus describing the content and extent of works proposed.
- 2.5 BCIS costs are available on a quarterly basis - the most recent quarters use forecast figures, the older quarters are firm. If any estimates require adjustment on a time basis we use the BCIS all-in Tender Price Index (TPI).
- 2.6 BCIS average costs are available for different categories of buildings such as flats, houses, offices, shops, hotels, schools etc. The Applicant's cost plan should keep the estimates for different categories separate to assist more accurate benchmarking.
- 2.7 To undertake the benchmarking we require a cost plan prepared by the applicant; for preference in reasonable detail. Ideally the cost plan should be prepared in BCIS elements. We usually have to undertake some degree of analysis and rearrangement before the applicant's elemental costs can be compared to BCIS elemental benchmark figures. If a further level of detail is available showing the build-up to the elemental totals it facilitates the review of specification and cost allowances in determining adjustments to benchmark levels. An example might be fittings that show an allowance for kitchen fittings, bedroom wardrobes etc that is in excess of a normal benchmark allowance.
- 2.8 To assist in reviewing the estimate we require drawings and (if available) specifications. Also any other reports that may have a bearing on the costs. These are often listed as having being used in the preparation of the estimate. If not

provided we frequently download additional material from the documents made available on the planning website.

- 2.9 BCIS average prices per sqm include overheads and profit (OHP) and preliminaries costs. BCIS elemental costs do not include these. Nor do elemental costs include for external services and external works costs. Demolitions and site preparation are excluded from all BCIS costs. We consider the Applicants detailed cost plan to determine what, if any, abnormal and other costs can properly be considered as reasonable. We prepare an adjusted benchmark figure allowing for any costs which we consider can reasonably be taken into account before reaching a conclusion on the applicant's cost estimate.

3 GENERAL REVIEW

- 3.1 We have been provided with and relied upon the Viability and Affordable Housing Statement dated December 2015 together with appendices 1 to 7 and in particular Appendix 4 Formal Cost Plan Nr 1 dated 16th December 2015 prepared by Sweett.
- 3.2 We have also downloaded various files from the planning web site mainly drawings and the Design & Access Statement CST Master Planning and Landscape dated December 2015.
- 3.3 The cost plan has been produced in ten sections: seven sections relate to the seven plots plus three further sections for site works, highways and public realm. The latter three sections constitute abnormal costs for the purposes of benchmarking and have not therefore been considered in the benchmarking. Site works and highways are at an outline level of detail and therefore warrant a more detailed consideration when the design information has progressed. The Public realm works are in greater detail; all three sections have the same % additions applied to the other seven sections, and the same comments made below apply to these sections.
- 3.4 No GIA areas have been specifically identified in the cost plan but costs per m² given that enable the areas that have been used to be determined. These are shown and are used to calculate the £/m² for each element and each section in our elemental analysis.
- 3.5 Preliminaries have been calculated as an addition of 12% and overheads and profit (OHP) 5%. We consider these figures reasonable and indeed rather low in the market that has prevailed over recent years as the economy and volume of construction work has grown resulting in rising tender costs. The most recent market information indicates a cooling in the market at the start of this year - the lag in collecting data means it takes some time for these trends to become clear. The most recent firm Tender Price Index (TPI) from the BCIS is 1Q2015; the sample size has barely moved in recent months suggesting very little new data is being collected by the BCIS during this period.
- 3.6 The client contingency has been calculated as 7.5%. For the purposes of assessing viability on a private company's submission we consider 5% an adequate provision for new build work. If this project is treated on the same basis then a 5% contingency would reduce the construction costs by £1,566,000.
- 3.7 An allowance for project/ design team fees of 8% has been made. We consider this a reasonable allowance. The total professional fees for a traditional project using

traditional procurement would exceed this figure whilst a design and build procurement approach might be a little less.

- 3.8 A further allowance of 10% risk has been allowed - for all 10 sections this totals £[REDACTED]. We have not seen any explanation for this allowance and consider it should be excluded from a conventional viability assessment.
- 3.9 Additions have been made in Section 1 the primary school and Section 3 the community play and MUGA areas for: BREEAM/decant, ICT and FFE per pupil and temporary classrooms. We consider these additions a reasonable calculation.
- 3.10 Additions have been made for inflation totalling £[REDACTED] to update costs to either 2Q2016, 3Q2016 or 4Q2016 for different sections. The cost plan is dated December 2015 on the cover, but annotated 10/08/2015 in the footer. We have assumed the base date for the cost plan as 3Q2015. Viability should be on a current basis for both revenues and costs. The costs should therefore be updated to 1Q2016; the BCIS TPI all-in records forecast figures of 3Q2015 273 and 1Q2016 276 an increase of 1.1%. The total addition for inflation on this basis is £[REDACTED].
- 3.11 We have undertaken a detailed elemental analysis of Sweett's cost plan figures; they have estimated the fitting out for each different size of flat for each section and multiplied the numbers for inclusion in the total. The method makes determination of elemental totals difficult and the source of any discrepancies difficult to identify. We have reconciled sections 1 (primary school) and 3 Chalton St. Discrepancies remain for section 2 market houses adjoining the school £[REDACTED], section 4 Brill Place £[REDACTED], section 5 Block A Charington St £[REDACTED], section 6 Block B Purchase St £[REDACTED] and section 7 Block C Purchase St £[REDACTED]. We are unable to say if these discrepancies arise from our exercise to extract the elemental costs or the Applicant's posting of amounts into the section collections.
- 3.12 We have downloaded current BCIS data for benchmarking purposes including a Location Factor for Camden of 133 that has been applied in our benchmarking calculations.
- 3.13 Refer to our attached file "Elemental analysis and BCIS benchmarking". Our benchmarking (excluding the additions for contingency, risk and inflation dealt with above) shows five of the seven sections to be reasonable. Section 2 the three market houses adjoining the primary school yields a benchmark of £[REDACTED]/m² compared to the Applicant's £[REDACTED]/m² a difference of £[REDACTED]. The BCIS average used is for terraced housing £[REDACTED]/m² a low starting cost for the proposed houses. Section 7 Block C Purchase St yields a benchmark of £[REDACTED]/m² compared to the Applicant's £[REDACTED]/m² a difference of £[REDACTED].
- 3.14 Our calculation of the total cost for all 10 sections of the Sweett cost plan is £[REDACTED] compared to the Applicant's total of £[REDACTED]. The differences arise because contingency has been calculated at 5%, risk of 10% excluded, inflation to 1Q2016 calculated at 1.1%.
- 3.15 We note that the amounts included in the Appraisals for construction costs include the full amount for % additions as discussed in items 3.5 to 3.10 above. We consider reduced amounts proportional to the sum in item 3.14 should be included for construction costs. Sections 2, 4, 5 and 6 have been included in the Appraisal as calculated by Sweett. Sections 3 and 7 have been included at a reduced amount.

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Date: 4th February 2016

APPENDIX 2 – Equalities Impact Assessment

Equality Impact Assessments - equality through public services



Our approach

Equality impact assessments (EIAs) are our chosen way for working out the effect our policies, practices or activities (the word activity will be used throughout this form as an umbrella term) might have on different groups before we reach any decisions or take action. They are an important service improvement tool, making sure that our services are as effective as they can be for everyone Camden serves. They also help to prevent us from taking action that might have outcomes we did not intend.

It is essential that you start to think about the EIA process before you develop any new activity or make changes to an existing activity. This is because the EIA needs to be integral to service improvement rather than an 'add-on'. If equality analysis is done at the end of a process it will often be too late for changes to be made.

If a staff restructure of organisational change is identified as necessary following the review of an activity then an EIA needs to be completed for **both** stages of the process, i.e. one when the activity is reviewed and one when the restructure or organisational change is undertaken .

It is vital that the decision makers (be they Cabinet, Committee, Single Member or Officer) have the EIA before them when they make any decision. They need to have seen and considered it as part of their decision making in order to ensure that they give equality issues due consideration. Failure to do this is a breach of the statutory duty

Stage one - what is being analysed and who is responsible for the equality impact assessment?

<p>Name of the activity being analysed</p>	<p>Planning application - Demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys in height comprising:</p> <ul style="list-style-type: none"> • Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to include a children’s nursery and community play facility with 10no. residential units above; • Plot 2: 35 residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m); • Plot 3: Extension of Grade II listed terrace to provide 3no. dwellings; • Plot 4: Replacement school (Use Class D1) ; • Plot 5: 20no. residential units over a replacement community hall (Use Class D1) (approximately 211sq.m); • Plot 6: 14no. residential units; and Plot 7: 54no. residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 70sq.m). <p>Provision of 11,765 sqm of public open space along with associated highways works and landscaping.</p>
<p>Service and directorate responsible</p>	<p>Planning and Regeneration, Culture and Environment</p>
<p>Names and posts of staff undertaking the assessment</p>	<p>David Fowler, Principal Planning Officer</p>
<p>Date assessment completed</p>	<p>June 2016</p>
<p>Name of person responsible for sign off of the EIA</p>	<p>Frances Wheat, Assistant Director Planning and Regeneration</p>

Stage two - planning your equality analysis

This section of the form should be completed when you are developing your proposals for assessing the activity.

The information you will need to collect should be proportionate to the activity that you are looking at. A small change in policy, for example, does not need to be supported by the same amount of evidence and analysis as a major change in service provision.

Outline the activity being assessed

Proposed changes The Equalities Impact Assessment (EIA) considers the impacts of the proposed development on individuals or groups with protected characteristics.

The proposed development is a self-funding CIP scheme, led by the prerogative of re-providing dilapidated school, nursery, community hall and play facilities. There would be public realm improvements as part of the application.

This CIP (Community Investment Programme) scheme was agreed by Cabinet in December 2013 and in December 2015. The CIP scheme brings together a wide range of work considering how best to use the Council's assets to improve, shape and transform key places and services within Camden. The CIP was launched in response to a reduction in funding, including a cut of £200m of capital funding, and responding to this financial climate remains a key challenge for CIP, including ensuring continued investment in schools. The CIP schools budget of £117million was agreed in response to this and was approved by Cabinet in the December 2012 Director of Finance Report to Cabinet 2011/12 Revenue Estimates and Council Tax (FIN/2011/07).

Groups likely to be affected – the residents of this part of Somers Town, young children and parents of young children, users of the existing community facilities.

Desired outcomes Equalities outcomes are not adversely impacted by the implementation of the proposal. If possible, they should be improved, i.e. inequalities experienced by one or more protected characteristic are reduced.

Relations between people with a protected characteristic should be improved, or at least not be adversely impacted.

The Equalities Act requires the Council to have due regard to the need to eliminate discrimination and promote equality with regard to those with protected characteristics such as race, disability and gender and foster good relations between different groups when discharging its functions.

Specifically the duty (section 149) provides:

- (1) A public authority must, in the exercise of its functions, have due regard to the need to-
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to-
 - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are

different to the needs of persons who do not share it;

(c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(3) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular steps to take account of disabled persons' disabilities.

(4) Having due regard to the need to foster good relations between persons who share relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to-

(a) tackle prejudice, and

(b) promote understanding

(5) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

Gather relevant equality data and information

Population: 6,499

Land area: 92 hectares

There are 9,900 jobs

The population will grow by an estimated 47.4% by 2028 (Camden: 16.1%)

44.3% of working age adults are economically inactive (Camden: 31.9%)

7.8% of working age adults are economically inactive due to ill health (Camden: 4.4%)

The average annual household income is £31,472 (Camden: £52,962)

The lowest average household income in the neighbourhood is £29,889

20.1% of working age adults are in receipt of out of ESA or Incapacity Benefit (Camden: 6.4%)

41.7% of lone parents are in receipt of Lone Parents' Allowance (Camden: 26.8%)

In total, 29.9% of working age adults are in receipt of out of work benefits (Camden: 9.3%)

91% of families are receiving tax credits (Camden: 61.1%)

34.4% of residents are living in income deprivation (Camden: 19.1%)

50.7% of children are living in poverty (Camden 36.3%)

49.1% of older people are living in deprivation (Camden: 30.8%)

9.5% of residents have self-reported bad health (Camden: 5.6%)

21% of Y6 primary school children are overweight (Camden: 14%)

19% of adults are obese (Camden: 12%)

Only 29.8% of adults eat healthily (Camden: 41.6%)

Smoking prevalence is at 26% (Camden: 20%)

18% of people over 18 have been diagnosed with anxiety or depression (Camden: 15%)

24.2% of residents have no qualifications (Camden: 12.7%)

30.1% of adults are on the adult social care system (Camden: 16.8%)

70.7% of children are on the children's social care system (Camden: 40.7%)

Lower super output areas that fall within 10% most deprived in England (Somers Town: 4 LSOAs)

Income deprivation (1 LSOA)

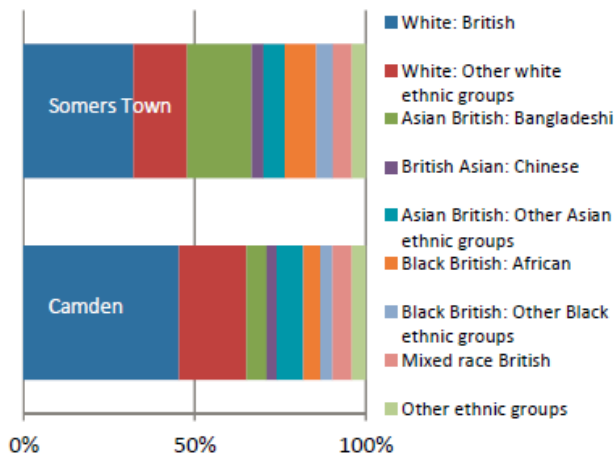
Crime and disorder deprivation (1 LSOA)

Living environment deprivation (2 LSOAs)

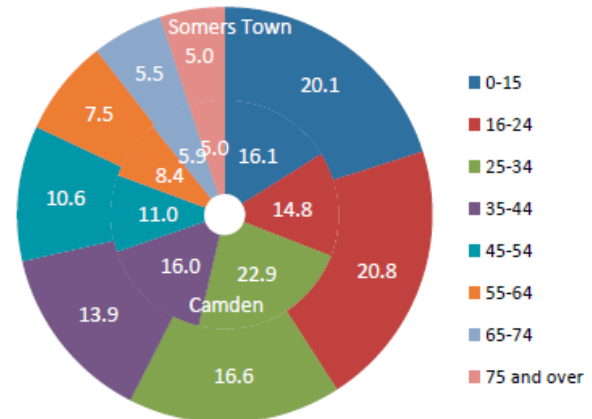
Income deprivation affecting children (2 LSOAs)

Income deprivation affecting older people (3 LSOAs)

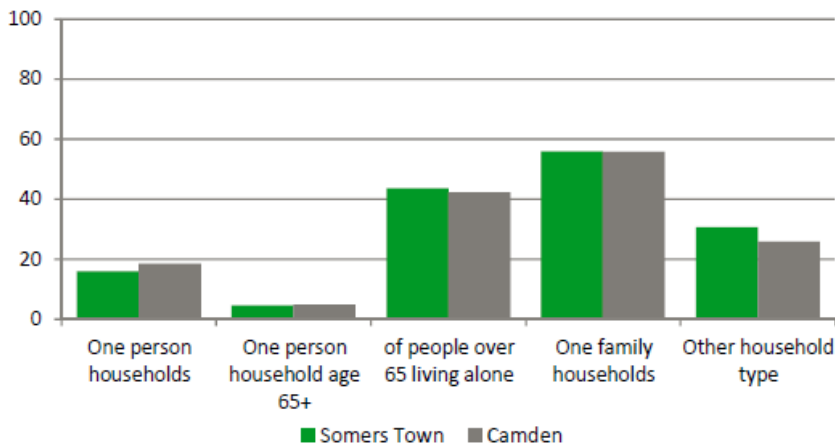
Ethnicity



Age



Households



There are **731** families in Somers Town with dependent children and **1,479** dependent children

43.6% of people aged over 65 live alone compared to 42.2% in Camden

Planning policy context

National Planning Policy Framework

This sets out the Government’s planning policies for England and how these are expected to be applied.

Planning is expected to perform a social role – a key component of sustainable development. This social role supports strong vibrant and healthy communities, with accessible local services that reflect a community’s needs and support its health, social and cultural well-being. One of 12 core land-use planning principles is that the planning system delivers “sufficient community and cultural facilities and services to meet local needs”.

Chapter 8 of the NPPF seeks to promote healthy communities. Planning is seen as helping to facilitate social interaction and inclusive communities. Planning policies and decisions are expected to plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.

Statutory development plan – parts of the London Plan and policies set out in Camden’s Local Development Framework are considered to be relevant to this proposal.

London Plan 2016

Key objectives of the London Plan are ensuring London is:

“a city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.

“a city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London’s built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways, realising their potential for improving Londoners’ health, welfare and development.

Chapter 2 – London’s Places

Policy 2.18 – Green infrastructure: the multi-functional network of green and open spaces

This policy requires the provision and/or improvement of open spaces and encourages the linking of open spaces.

Chapter 3 – London’s People

Sets out policies addressing issues including the provision of social infrastructure and ensuring equal life chances are available to all.

Policy 3.1 – Ensuring equal life chances for all

The strategic statement refers to meeting the needs of and expanding opportunities for Londoners and where it is appropriate to do so, addressing “barriers” which might hinder this approach. Planning decisions should include protecting and enhancing facilities that meet the needs of “particular groups and communities”. London Boroughs may wish to identify clusters of specific groups which experience disadvantage and “consider whether appropriate provision should be made to meet their particular needs such as cultural facilities, meeting places or places of worship”.

The supporting text to the policy recognises the ‘balances’ between securing a more inclusive London based upon shared values as well as meeting the “distinct needs of the capital’s different groups and communities, particularly the most vulnerable and disabled”. Paragraph 3.4 appears to acknowledge that meeting the needs of individual groups or communities can sometimes be contested: it advises “consensual strategies and common grounds...to create a united vision and a sense of belonging” to sustain cohesive communities “built on the bonds that unite rather than the differences which separate”.

Policies 3.3 – 3.13 Increasing housing supply, Optimising housing potential, Quality and design of housing developments, Children and young people’s play and informal recreation facilities, Large residential developments, Housing choice, Mixed and balanced communities, Definition of affordable housing, Affordable housing targets, Negotiating affordable housing, Affordable housing thresholds

The above policies seek to ensure that sufficient high quality homes and neighbourhoods are provided for all Londoners and help tackle the issue of deprivation and inequality in health outcomes.

Policy 3.18 Education facilities

This policy supports the provision of childcare and primary school facilities.

Policy 3.19 Sports facilities

This policy aims to increase participation in sports and tackle inequality of access to sport and physical activity.

Policy

Chapter 7 – London’s Living Spaces and Places

Sets out policies on a range of matters about the places and spaces in which Londoners live, work and visit. In particular it deals with the way people ‘perceive’ and ‘use’ buildings and space.

Policy 7.1 - Lifetime Neighbourhoods

These are well-connected and walkable environments with a range of accessible and adaptable services and infrastructure (including housing) and provide a cohesive community fostering diversity, social interaction and social capital. The policy states that developments should maximise the opportunity for community diversity, inclusion and cohesion; and should contribute to people’s sense of place, safety and security. Paragraph 7.4 states that “people should be able to live and work in a safe, healthy, supportive and inclusive neighbourhood which they are proud to identify”.

Policy 7.2 – An Inclusive Environment

The policy states that the Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design. Whether developments achieve the highest standards will be determined having regard to principles of inclusive design including:

- (a) can be used safely, easily and with dignity by all regardless of the disability, age, gender, ethnicity or economic circumstances;
- (b) are convenient or welcoming with no disabling barriers, so everyone can use them independently without undue separation or special treatment;
- (c) are flexible and responsive taking account of what different people want, so people can use them in different ways;
- (d) are realistic, offering more than one solution to help balance everyone’s needs, recognising that one solution may not work for all.”

Paragraph 7.7 describes inclusive design as a process which ensures “the diverse needs of all Londoners are integrated into development proposals from the outset”. Paragraph 7.8 states the outcome of delivering the policy will be places “where people want to live and feel they belong, which are accessible and welcoming to everyone”.

Policy 7.5 – Public Realm

The strategic statement for this policy says that public spaces “should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces”

Paragraph 7.16 underlines the relationship between the public realm and quality of life “because it affects people’s sense of place, security and belonging, as well as having an influence on a range of health and social factors”.

Camden Local Development Framework – Core Strategy and Development Policies (adopted 2010)

Relevant policies include CS6. Providing quality homes, CS10. Supporting community facilities and services, DP2. Making full use of Camden’s capacity for housing, DP3. Contributions to the supply of affordable housing, DP15. Community and leisure uses, CS15. Protecting and improving our parks

and open spaces & encouraging biodiversity and CS17. Making Camden a safer place.

Policies CS6, DP2 and DP3 seek the provision of quality and mixed residential accommodation. Policy DP29 is intended to deliver the Core Strategy policy (CS14) which promotes high quality places and seeks the highest standards of access in all buildings and places. In line with equalities objectives, DP29 seeks to promote fair access and remove the barriers that prevent people from accessing facilities and opportunities. It is expected that all buildings and places should meet the highest practicable standards of access and inclusion. Paragraph 29.4 of Camden's Development Policies states new buildings and spaces need to be fully accessible to promote equality of opportunity while paragraph 16.4 of the Core Strategy confirms that accessibility is influenced by perceptions as well as physical factors. Buildings and spaces should be designed to *appear*, as well as be accessible.

Camden Council strategies

Camden Plan

The Camden Plan was published in 2012. It sets out a five year vision for the Borough and aims to ensure that people from all walks of life identify Camden as 'home'. There is a particular emphasis on building resilience and self-reliance amongst individuals, communities and businesses. Strategic objective 4 relates to the delivery of ambitions and outcomes pertaining to community facilities and the sustainable provision of services. The Council's immediate and long-term plans include the following:-

- Engaging communities in designing services to tackle the issues that most affect them;
- Working with communities and the voluntary and community sector to establish self-sustaining community outcomes;

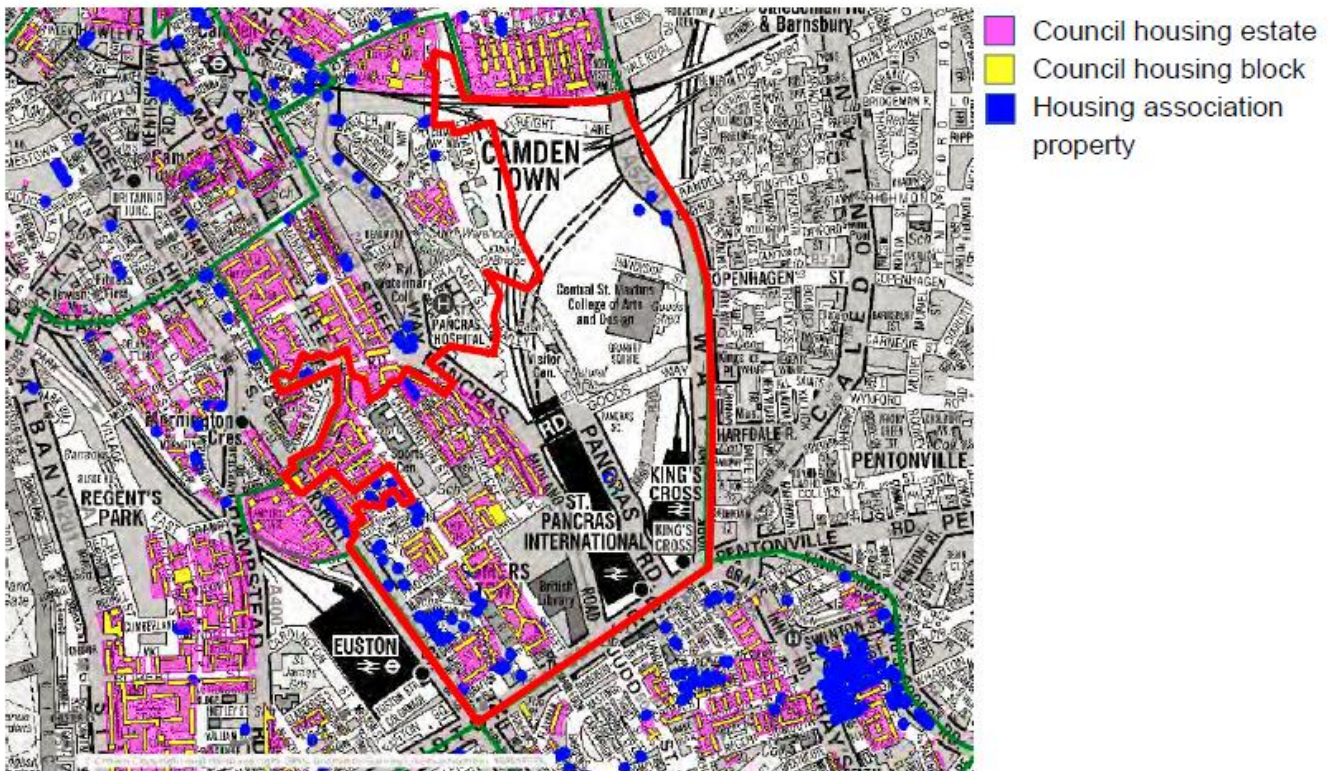
There is a vision that facilities "meet many different needs that are sustainable, highly valued and well used" and "bring the community together" (page 44).

Camden's Equality Objectives

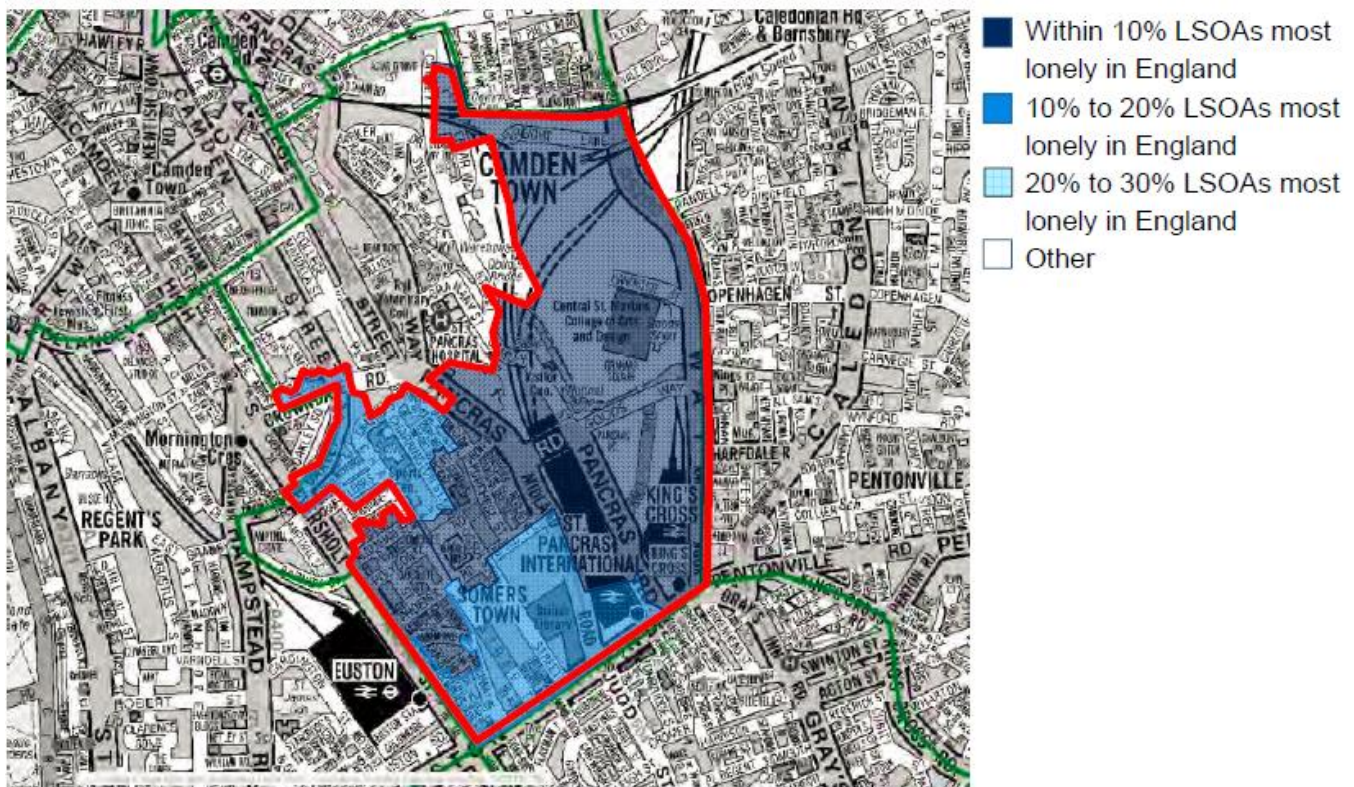
The Equality Act 2010 placed a legal obligation on local authorities to publish equality objectives. In Camden, these were developed to align with the Camden Plan. The objectives related to the wider community (not to the Council itself) are:-

- Protect the social mix of the borough, supporting our communities to get on well together;
- Improve the economic chances for Camden's most disadvantaged groups;
- Prioritise support to those most in need, informed by a greater understanding of our communities;
- Ensure all residents have access to the help they need to resolve their problem;
- Increase the opportunity for all residents to fulfil their potential and participate in the renewal of the borough.

Social housing



Probability of loneliness for those aged 65 and over



Ethnic Group (Jan 2013)	6499	
% White English/Welsh/Scottish/N Irish	2083	32.1
% White Irish	204	3.1
% White Gypsy/Irish Traveller	4	0.1
% White Other	816	12.6
% Mixed White & Black Caribbean	57	0.9
% Mixed White & Black African	95	1.5
% Mixed White & Asian	71	1.1
% Mixed Other	133	2.0
% Asian British Indian	121	1.9
% Asian British Pakistani	41	0.6
% Asian British Bangladeshi	1226	18.9
% Asian British Chinese	232	3.6
% Asian British Other	246	3.8
% Black British African	592	9.1
% Black British Caribbean	130	2.0
% Black British Other	184	2.8
% Other Ethnic Group Arab	100	1.5
% Any Other Ethnic Group	164	2.5

Disability	
Number of people with learning disabilities	30
Number of wheelchair users	147
Number of people partially sighted	26
Number of people with hearing loss	16

Religion	
% Christian	2227 34.3
% Buddhist	65 1.0
% Hindu	68 1.0
% Jewish	21 0.3
% Muslim	1809 27.8
% Sikh	19 0.3
% Other religion	22 0.3
% of no religion	1137 17.5
% religion not stated	1131 17.4

Sex/gender

The resident population in Camden is 220,338 of which 51% are female and 49% male.

Sexual orientation

On the basis of the Integrated Household Survey, the Office for National Statistics (ONS) data (2011-2012) suggests that in London, 91% of those surveyed identified themselves as heterosexual/straight, 2.5% as gay, lesbian or bisexual, 0.4% have an alternative sexual identity and 5.7% do not know or did not respond. The ONS emphasises that the Integrated Household Survey is an

experimental data source undergoing evaluation for inclusion in new official statistics.

Consultation and engagement

A planning application (2015/2704/P) was submitted to the Council as Local Planning Authority on 17/12/2015. The Council sent out and received letters as follows:

<i>Number of letters sent</i>	6 1 6
<i>Total number of responses received</i>	4 3 7
<i>Number in support</i>	3 7 5
<i>Number of objections</i>	6 2

A site notice was displayed from the 8th of January until the 29th of January 2015. A press advert was placed on 8th January 2015 in the Camden New Journal.

Representations summary

Letters and petitions of objection

Objections were raised on the issues outlined below. These issues raised are considered in the relevant section of this report.

Open space

- Green spaces should not be taken away, loss of public open space, loss of private open space
- Noise
- Park will become an entrance to the flats
- Unlikely that more people would use the park
- Purchase Street Open Space is a nice park
- Park is not big enough, insufficient public open space for proposed flats, pressure on existing open space with increase in residents
- Loss of playspace, proposed playspace is smaller
- Parts of open space will be 'dead zone' around new buildings, which will not be usable
- Loss of green space
- Loss of trees, including mature trees, including Cat A trees, remaining trees at risk of damage during construction work and in shade of new buildings
- Overshadowing
- Impact on dog walkers/dogs, not enough space for dogs
- New community garden is public

- New design will lead to people passing through Purchase Street rather than stopping and enjoying it, nothing wrong with Purchase Street Open Space, quiet green space is fine – doesn't need improvements, proposed park is overly-landscaped, park will be less functional, park is better as it is
- Loss of wildlife, biodiversity
- Purchase Street will remain a street and the parks will not be truly connected

Officer's response: See sections/sub-sections on Proposed landscaping and playspace, Trees, Impact on Private Open Space, Nature conservation and biodiversity.

Design and conservation

- Height of tower, nothing in the area is this height, precedent for tall buildings, Camden refused a tower at 100 Avenue Road, tower is not within the Central Activities Zone (CAZ)
- Height of 9 storey building beside existing Plot 10 play facility, out of character, impact on listed buildings in areas
- Overdevelopment
- Should look at Somers Town as a whole and replace old buildings
- Impact on listed buildings, loss of views of listed buildings, impact on grade I listed St Pancras especially Barlow Shed, grade I British Library
- Impact on skyline
- Impact on character of area
- Flats should be put on school of roof instead of other locations/tower
- Impact on sightlines
- Impact on surrounding conservation areas
- Impact on listed buildings
- Blimp should be provided
- Impact on design of Francis Crick Institute

Officer's response: See sections/sub-sections on Conservation, Design.

Proposed flats

- Won't be for people in the area, will be unaffordable, insufficient affordable housing, only 10 affordable units provided with the other 34 coming from the affordable housing fund, flats will not be genuinely affordable
- Gentrification, will be flats for investment, social polarisation
- Density, area already overcrowded, too much pressure on area, impact on local services

Officer's response: See sections/sub-sections on Tenure mix, Viability and affordable housing, Density and infrastructure.

Amenity impact

- Loss of light, loss of light to Coopers Lane, overshadowing, higher electricity bills due to loss of light, loss of light to Regent's High School, increase in dampness in flats due to loss of light, light was already lost from Francis Crick development
- Loss of views
- Overlooking, loss of privacy
- View will be ruined
- Air quality, pollution, cumulative impact with Francis Crick and Phoenix Court CHP
- Wind impact from tower
- Noise from plant
- Effect on people's mental and physical health, people in Somers Town already suffer from poor health

Officer's response: See sections/sub-sections on Impact on neighbouring amenity, Air quality, Microclimate, Noise, Health. Also: loss of view is not material planning

consideration.

Transport

- Loss of parking,
- More pressure on disabled parking spaces
- Does not provide blue-badge parking (14 spaces required)
- Traffic survey done during school holidays – not normal traffic flows
- Transport Assessment uses inadequate data base, was done out of school times
- Increase in cyclists in the area poses a danger to residents including children, new bicycle lane is dangerous
- Increase in pedestrian traffic

Officer's response: See section on Transport.

Community facilities

- What will happen to Tennant's Hall, bigger hall not needed, loss of TRA hall, a community hall is not the same as a TRA hall
- Another community facility is not necessary as there are a number in the area
- Impact on school with reduced playground
- School site could be used more efficiently

Officer's response: See Land use section, Proposed landscaping and playspace Also: there will be no loss of community facilities; the new community facilities will be replacing the existing.

Building works

- Noise and disruption from building works, cumulative impact from building works in area
- Danger to children
- Dust and air quality
- Non-stop building works in the area

Officer's response: See sections on Transport.

Conflict of interest/Procedural concerns

- Council is planner and developer
- Lack of transparency, should be open book on viability
- The decision has already been made
- Undermines localism and democracy
- There are alternatives to funding the school and community facilities, proposals are excessive to fund rebuilding of school
- Somers Town Neighbourhood Plan should be taken into account
- Waste of community assets
- Flawed consultation, questions were framed, poor consultation, misleading
- Insufficient consultation, inadequate opportunity for comment
- Cabinet were not informed accurately of CIP's plans (e.g. re number of trees to be lost)
- Applicant responded to school but not to Coopers Lane residents

Officer's response: See section on Consultation and procedure.

Principle of development

- Lack of benefits to residents of Somers Town
- Proposed tower is not in Central Activities Zone (CAZ) or an area proposed for growth

Officer's response: See sections/sub-sections on Land use, Principle of large-scale development.

Micro-climate

- Wind impact, impact on park.

Officer's response: See sections on Microclimate, Impact on Public Open Space.

Safety and security

- Building on park will make it difficult for people to evacuate in an emergency
- The proposal's claim to improve safety and security is based on inadequate data
- Applicant has manipulated crime figures, area does not suffer high crime
- Risk of terrorism

Officer's response: See section on Safety and security.

Memorial plaque/bench

- Moving plaque/bench will be upsetting for members of the family of the person who was killed on the estate
- Not clear where this will be relocated

Officer's response: The applicant has been in direct contact with the family and met with them to discuss relocating the bench. The memorial would be re-sited in an area of planting at the very southern end of Coopers Lane.

Other issues

- Impact on GP's, schools, leisure centres
- Inadequate Equality Impact Assessment

Officer's response: See sections on Density and infrastructure, Equalities and diversity issues.

Petitions submitted in response to the planning application

A petition was received with 1058 signatures objecting against:

- Any building on Purchase Street Open Space
- A 25-storey tower is out of character with the area
- The 9-storey building at the end of Charrington Street is in scale
- The destruction of low-rise aspect of certain estates
- Loss of at least 75 trees
- Loss of open space
- Loss of children's playground
- More hard landscaping and less soft landscaping
- The scheme's impact on air quality
- Loss of light to homes
- Loss of views, including from King's Cross Conservation Area
- Loss of much-loved tenant's hall
- Appropriation of private open space
- Loss of 40 parking spaces (including disabled parking spaces)
- More construction work in area
- Misleading nature of CIP (Community Investment Programme) consultation

Officer's response: See sections/sub-sections on Impact on Public Open Space, Impact on Private Open Space, Conservation, Design, Trees, Proposed landscaping and playspace, Air quality, Impact on neighbouring amenity, Community facilities, Transport, Consultation and Procedure.

A petition was received with 10 signatures requesting that the consultation period be extended to 6 weeks.

Officer's response: The consultation period was extended to 4 weeks instead of 3, given the scale of the proposal. Nevertheless, objections are received up until the committee date.

A petition was received with 192 signatures from residents of 'Charrington Street and surrounding streets' objecting on the following grounds:

- Height of new proposed tall building on Brill Place, consisting of 26 storeys, is even higher than the Francis Crick building, which exceeds height in the area
- Amount of buildings for 1 small primary school
- Loss of Plot 10 community facilities
- Overlooking the proposed extended park, and children's play area also Regent High School multi-use tennis courts.
- The children's play area is decreased in size.
- The existing separate parks deliver different aspects of what the community needs, and takes pride in. Also they are enclosed areas, which are safer for young children. So there will be no gain for the community by joining them together.
- Loss of sunlight, sense of enclosure from tower, especially for Coopers Lane
- Loss of light from nine-storey and the 2 six-storey buildings
- There are already 3 community centres around this area - another community centre is not needed.
- The community shops, and markets already struggle, there is no need to add more shops around this area
- The 'greenery', and mature trees will decrease and suffer, the majority will be replaced with smaller trees, and will take years to grow, and flourish
- It will be easier for gangs to gather, which will decrease use of park, and increase concern for public safety
- Decrease access for vehicles e.g. rubbish collection, fire engines, police, ambulances, public cars, and so on - therefore can increase risk of public health, and safety as roads will be blocked off
- Structural impact on listed buildings on Charrington Street, buildings already cracking because of the shaking caused by building work.
- The new flats will be on-looking classrooms from Edith Neville Primary School. This will be a cause for concern for child safety, and child protection, from both the nine storey and 2 six-storey blocks, of flats, and the 3 new houses on the end of Charrington Street.
- Agree Edith Neville Primary School should be rebuilt/repared, funding could be used, or student accommodation.

Officer's response: See sections/sub-sections on Design, Conservation, Community facilities, Masterplan, landscaping and trees, Impact on neighbouring amenity, Transport, Safety and security.

Letters and petitions of support

Letters of support were received making the points laid out below. It should be noted that the while these letters were received from different people, the content of the majority of these letters is identical.

- The application will improve the quality of life and wellbeing for hundreds of children and families who are residents in Somers Town.
- Wide range of improvements and benefits, for diverse community groups, including the Community Play Project Plot 10, St Aloysius Nursery and Edith Neville Primary School.
- Application focuses on current and future demographic and the need for state of the art educational, recreational, sporting and community facilities for increasing numbers of children and families.
- Upgrade and improvement of usability and safety of public open spaces without any loss of public open space.
- Well-designed housing and additional social housing.

- State of the art educational, recreational, sporting and community facilities.

A petition was received with 762 signatures from parents and stakeholders of St Aloysius Infant School, St Aloysius Junior School, Edith Neville Primary School and Plot 10 Community Play Centre supporting the proposal on the following grounds:

- Proposal provides long-needed rebuilding of 3 important facilities for Somers Town (St Aloysius' Nursery School, Plot 10 and Edith Neville Primary School).
- Improvements to public realm, improvement in terms of safety.

Have you identified any information gaps?

None identified.

Stage three - analysing your equality information and assessing the impact

This section should be used to review the evidence gathered and assess the likely impacts of the activity – whether these are direct or indirect impacts.

Analysing the evidence outlined above, could the activity have a negative or positive impact on protected groups?

Age – Positive impact from improvements to open space.

Disability – Positive impact from 133 new accessible residential units and new accessible educational, sporting and community facilities.

Gender reassignment – No impact.

Marriage and civil partnership – No impact.

Pregnancy and maternity – there would be benefits with new nursery and community facilities.

Race – No impact.

Religion or belief – Religious or other groups would have the benefit of new community facilities to meet in should they be required.

Sex – The proposals, specifically the open spaces, have been designed to be safe and secure. Whilst this would benefit all people, it may have more of a positive impact for woman.

Sexual orientation – No impact.

Note: in the case of all the protected characteristics any effect arising from a particular impact will vary depending on an individual's level of observance. A particular reaction may be very personal to the individual and is not necessarily shaped or shared with any organised religion to which they may belong. The EIA deliberately focusses on commonalities drawing on the representations made to date on the proposal and desk-based analysis. The protected characteristics are themselves broad constructs. It is accepted this emphasis towards potential impacts shared by significant numbers of people could mask the true diversity of impacts.

Equality impact summary

Please use this grid to summarise the impacts outlined above.

Protected group	Summarise any possible negative impacts that have been identified for each protected group and the impact of this for the development of the activity	Summarise any positive impacts or potential opportunities to advance equality or foster good relations for each protected group
Age	No impacts	<p>The new school and nursery buildings will benefit children as well as their parents. The new community facilities will benefit all ages.</p> <p>The improved park will benefit all, but specifically young people and older people.</p>
Disability	No impacts	<p>The school and community facilities will all be accessible. All of the residential buildings would be accessible with the exception of the proposed 3 houses at Plot 3. These would have stepped access for conservation reasons – to match the existing terrace. These are only 3 units, and 133 new accessible units would be provided.</p>
Gender reassignment	No impacts	Not applicable.
Marriage and civil partnership	No impacts	Not applicable.
Pregnancy and maternity	No impacts	New nursery and community facilities will benefit young children and parents.
Race	No impacts	Community and educational facilities would be provided for all in Somers Town.

Religion or belief	No impacts	Not applicable.
Sex	No impacts	Improved safety and security in open spaces.
Sexual orientation	No impacts	Not applicable.

Stage four - planning for improvement

This section of the form should be completed when you are developing plans for the future delivery of the activity.

The actions identified below can also be included in your service plan to help mainstreaming and for performance management purposes. They should also be included in any decision making reports relating to the activity you are analysing. You may find it helpful to document the actions in an [action plan](#).

What actions have been identified:

- to mitigate against or minimise any negative impacts?
- to advance equality, and therefore improve the activity?

No negative impacts have been identified for any protected group. No unlawful discrimination has been identified.

Stage five - outcome of the EIA

Use this stage to record the outcome of the EIA. An EIA has four possible outcomes.

Outcome of analysis	Description	Select as applicable
Continue the activity	The EIA shows no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken	x
Change the activity	The EIA identified the need to make changes to the activity to ensure it does not discriminate and/ or that all appropriate opportunities to advance equality and /or foster good relations have been taken. These changes are included in the planning for improvement section of this form.	
Justify and continue the activity without changes	The EIA has identified discrimination and / or missed opportunities to advance equality and / or foster good relations but it is still reasonable to continue the activity. Outline the reasons for this and the information used to reach this decision in the box below.	
Stop the activity	The EIA shows unlawful discrimination.	



Stage six - review, sign off and publication

Review

Your EIA will have helped you to anticipate and address the activity's likely effect on different protected groups. However the actual effect will only be known once it is introduced. You may find you need to revise the activity if negative effects do occur. Equality analysis is an ongoing process that does not end once an activity has been agreed or implemented.

Please state here when the activity will be reviewed, and how this will be done, for example through the service planning process, when the service is next procured etc. This will help you to determine whether or not it is having its intended effects. You do not necessarily need to repeat the equality analysis, but you should review the findings of the EIA, consider the mitigating steps and identify additional actions if necessary.

For restructures or organisational change a review should take place once the restructure has been completed. In addition to the areas identified above your review should include an evaluation of how the staff profile after the organisational change compares to Camden's profile, the division profile and the staff profile prior to the change. Your HR change adviser will provide you with the necessary data.

Date when EIA will be

reviewed: 04/05/2016

Sign off:

Frances Wheat

The EIA must be quality assured by someone who has not been involved in the activity being assessed before sign-off by the service head /AD.

Quality assured by:	Alex Bushell Joanne Evans, Strategy and Change
Quality assured by OD for organisational change / restructures:	
Signed off by:	Frances Wheat
Date:	04/05/2016

Comments (If any)