

9 May 2019

Delivered by email

Mr David Fowler, Principal Planner
Regeneration and Planning Development Management
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Dear David,

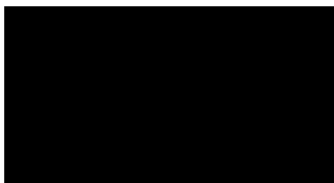
**SECTION 73 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) APPLICATION FOR
MINOR MATERIAL AMENDMENT TO PLANNING APPLICATION REF: 2015/2704/P – PLOT 7, CENTRAL
SOMERS TOWN, LONDON, NW1**

We write on behalf of Camden Council, with regard to Plot 7, the Brill Place Tower as approved under planning permission reference 2015/2704/P at Central Somers Town, London, NW1 to seek minor amendments to the approved drawings (condition 2) at ground and basement level of the plot 7 residential tower only, under section 73 of the Town and Country Planning Act 1990 (as amended).

The minor changes are required to incorporate an electrical substation (24sqm GEA) within the curtilage of the approved building at ground level. The proposed amendments result in an increase in gross internal area (GIA) of 67sqm, approximately 1% of the total GIA of the approved tower. This results in a small addition to the approved building with associated minor changes at ground and basement level of the building only.

The proposed amendments are discussed in full within this planning letter which includes a planning assessment of the changes sought and confirming their compliance with planning policy. In addition to this letter, the following information is submitted in support of this amendment application:

- Application form and Ownership Certificates;
- CIL Form;
- Site Location Plan;
- Noise Assessment, prepared by MLM;
- Design Document, prepared by drMM Architects;



- Amendment drawings prepared by drMM Architects as detailed within the submitted drawing schedule.

Payment for the requisite planning application fee of £234 has been made to the Council via the Planning Portal. We trust that the submitted information comprises a valid application submission and provides sufficient information in order to consider the application.

The Site

The site comprises plot 7 of the approved Central Somers Town (CST) development permitted under reference 2015/2704/P on 15 October 2016 for the:

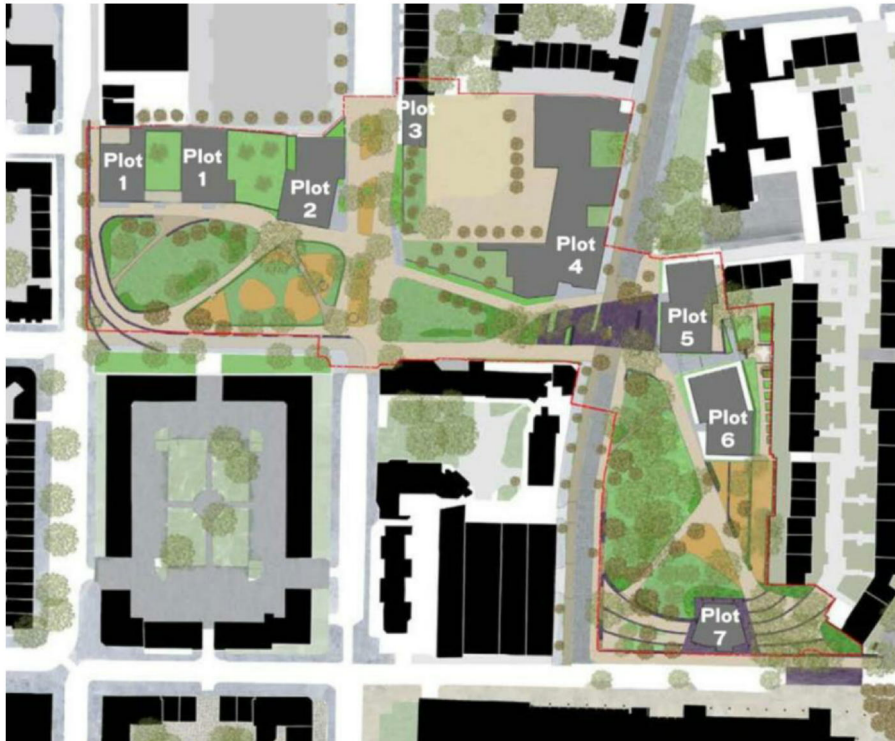
Demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings 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).*

Changes to existing public open spaces along with associated highways works and landscaping.

The entire CST site comprises approximately 2.2 hectares of land covering land at Polygon Road Open Space, Edith Neville Primary School, 174 Ossulston Street and Purchase Street Open space. A plan identifying the CST site and the location of plot 7 within CST is set out below.

The CST site is not within any conservation areas and does not include any locally listed buildings, though there are statutorily Listed Buildings and Conservation Areas in the immediate context of the site.



Plot 7, is adjacent to Brill Place toward the southern end of Purchase Street Open Space. As approved, Plot 7: Brill Place Tower includes 54 private residential flats over 70 sqm of flexible A1/A2/A3/D1 floorspace at ground level in a 25 storey building. The amendment application relates only to the ground and basement floors of the approved building at Plot 7.

Proposed Amendments

The proposed amendments arise as a consequence of the introduction of an electricity substation to the ground level of the Brill Place tower. The substation is a standardised UK Power Network (UKPN) design with respect to its dimensions, orientation and ventilation requirements.

The proposed amendments are set out on the submitted drawings and design document prepared by drMM Architects which can be summarised as follows:

- Inclusion of 24sqm (GEA) substation at ground level, resulting in an increase in footprint area of 31sqm;
- Service entrance relocated to west elevation on ground floor away from the main entrance into Purchase Street Space;
- Access for maintenance and equipment renewal taken directly from the street from west elevation;
- Louvred façade treatment to the doors and walls to ensure adequate ventilation at ground level on proposed south bay elevation;
- Goods and service lift re-orientated and relocated to south west corner of ground floor;

- Relocation of bin collection/presentation area of equivalent size to in front of the substation louvers;
- Residents' lobby interior reconfigured at ground floor;
- Commercial/cafe interior reconfigured at ground floor;
- Residents' waste room reconfigured at lower ground level;
- Commercial waste room reconfigured and enlarged at lower ground level;
- Service and cycle access now from west façade;
- Final exit moved to South Façade;
- Footprint angles adjusted to account for incorporation of substation and to retain a symmetry of the building footprint;
- Associated minor amendments to ground floor façade with surrounding landscape altered to suit as appropriate;
- Overall internal area increase of 67sqm (GIA), including enlarged back of house spaces on mezzanine level (less than 1% of the total GEA of the approved and proposed building).

The overall architectural composition of the building is the same as the approved design. The proposed elevations at ground level are very similar to those approved. For example the symmetrical arrangement, the materiality and glazed treatment all align with those approved. It is also noted that there have been no other design changes sought or approved by the Council to the Brill Place Tower. The amendments sought seek approval for modest changes at ground and lower ground level only which are negligible in the overall context of the approved 25 storey tower.

Further design commentary is presented in the submitted design document which should be reviewed for further detail.

The application drawing schedule denoting substitute plans/ drawings for which approval is sought, is appended to this letter.

Planning Policy

The amendments proposed should be considered against relevant policies contained in the current adopted Development Plan for Camden Council comprising of the following planning policy documents:

- The London Plan (2016);
- Camden Local Plan (2017);
- Site Allocations Plan (2013) and
- Policies Map (2019).

Relevant policies from the adopted Development Plan are discussed in full within the Planning Assessment section below.

Planning Assessment

Principle

The principle of development is already established through the extant planning permission. The proposed changes sought are to introduce an electrical sub-station of a modest scale into the basement level of the building and as required for operational reasons. This is compliant with planning policy. It does not conflict with any conditions of the permission, the approved design rationale for the tower or any other material planning consideration pertinent to this building as part of the planning permission.

It is relevant to note that there is no change to the amount of Public Open Space approved under 2015/2704/P it remains at 11,765sqm.

Design

As per the extant permission, the Brill Place tower, comprising of 25 storeys met all relevant planning policy considerations with respect to design including London Plan Policy 7.6. Camden's new Local Plan Policy D1 seeks to secure high quality design in development. It is considered that the minor amendments sought to the basement and ground level of the approved building at plot 7 continues to meet the requirements of design policy. The minor amendments sought at ground and basement level only, continue for the tower to:

- Provide legibility of public realm at ground level;
- Provide passive surveillance of the renewed park;
- Propose high quality materials to the amendments sought at ground level which continue to deliver an attractive and interesting building overall;
- Continues to comprise of a small footprint which allows the opening up of views and contributing to the permeability of the site and the wider area as per the approved tower;
- Continues to provide ground floor activities to provide a positive relationship with surrounding streets;
- The south elevation is retained as the service access;
- The level of glazing proposed is retained to allow views into the renewed park;
- The soffit treatment with glazing is retained to continue the connection with the landscape.

Accordingly, it is considered that amendments sought are compliant with Policy D1 and in particular parts f, j, p and t of the policy which require development to integrate well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contribute positively to the street frontage (part f). Requiring any proposal to respond to natural features and preserve open space and with respect to a tall building, give attention to how the base of the building fits in with the streetscape (part p) and how it contributes to pedestrian permeability (part t).

The small extended ground floor footprint is accommodated under/within the soffit of the approved design projecting at first floor in the same way as the approved scheme (31sqm GEA). The proposal is for a very small change to the building already granted planning permission and does not alter the development significantly from what was described within the planning permission, as can be seen from the submitted drawings and design information.

Given the very modest scale of the enlarged footprint does not extend beyond the soffit, and that change from is at the south of the plot adjacent to Brill Place, there is no change to the pedestrian access points to the open space and routes through it are unaffected. The glazed volume is maximised on the east /west to optimise views into the park. This accords fully with planning policy.

Moreover, passive surveillance of the renewed park is maintained and the new substation is located away from the park with access provided from Brill Place. This accords with the LPA's expressed view that Brill Place "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" (officers' planning committee report para 16.93).

Furthermore, the proposed minor amendment would have no impact on the settings and special interest of listed buildings, or on the character and appearance of conservation areas, or on views. The

application therefore complies with Camden Local Plan Policy D2 which seeks to preserve heritage assets and their settings.

Overall, it is considered that the minor amendments sought to the design of the Brill Place tower at ground and basement level only, are modest and fully compliant with planning policy.

Noise

Submitted with this application is a Noise Assessment, prepared by MLM and dated 5 April 2019, which assesses the acoustic impact of the proposed electricity substation. The report finds that the expected levels of noise in the nearest residential bedroom to the substation are compliant with the council's requirements. The assessment concludes "*given the findings of this assessment, internal substation noise transfer should not provide a constraint to the granting of planning permission for the proposed development*".

In advance of submission, this assessment has been shared with the council's Noise Officer who has provided the following comments via email:

"Based on the final substation design detailed in the Technical Note, I am satisfied the noise impact from the substation on neighbouring residents is acceptable, basis the impact has been calculated below the Councils Noise Thresholds for habitable rooms (Appendix 3 of the Local Plan 2017). As the impact is below the Council's "Green Effect Level" this correlates to No Observed Effect Level (NOEL) in terms of NPPF. Therefore, in principal the proposal is acceptable."

Accordingly, the Noise Assessment submitted is considered to be compliant with Policy A1 'Managing the impact of development' and Policy A4 'Noise and vibration' of the Local Plan.

Deliveries and Servicing

The approved tower was designed so that all delivery and servicing activity including refuse and recycling collections would take place from the public highway directly adjacent to the site as detailed within the approved Framework Delivery and Servicing Plan (prepared by Civic Engineers, December 2015).

This approach is retained as part of this amendment application, noting that the south elevation is retained for all servicing activity associated with the building. It is therefore considered that the proposals are compliant with Policy A1 Managing the impact of development and Policy T4 Sustainable movement of goods and materials.

Planning Conditions

Plot specific conditions are detailed within planning decision notice 2015/2704/P. It is considered that the conditions as per the planning decision notice are still relevant and applicable to plot 7 and do not need to be reconsidered as part of any decision pursuant to this minor material amendment application.

Deed of Variation

As Camden Council own the land, a shadow Section 106 Legal Agreement sits alongside the extant planning permission. A Deed of Variation is submitted in support of this application for completeness.

Summary and Conclusions

This minor material amendment application relevant to Plot 7, The Brill Place Tower pursuant to planning permission reference 2015/2704/P seeks approval for minor changes to incorporate an electrical substation (24sqm GEA) within the curtilage of the approved building at ground level. The proposed amendments result in an increase in gross internal area (GIA) of 67sqm, approximately 1% of the total GIA of the approved tower.

The overall architectural composition of the building is the same as the approved design. The proposed elevations at ground level are very similar to those approved. As is demonstrable from the supporting drawings and design information and as discussed in this letter, the amendments retain the design qualities of the approved Brill Place Tower. No other changes are sought or requested and it is considered that the approval of the minor amendments to the Brill Place tower at ground and basement level only do not give an effect of change upon the extant permission at the CST site, planning permission reference 2015/2704/P.

The proposed amendments are considered to be in accordance and in compliance with planning policy and we respectfully request officers to support this application.

Should you require any further information, please do not hesitate to contact me or my colleague Michael Lowndes at these offices.

Yours sincerely,



Kiran Ubbi
Senior Planner



CST Plot 7: Drawing Schedule

Approved Drawings/Plans – Plot 7			Substitute or New Drawings/Plans – Plot 7		
Ref.	Title	Rev.	Ref.	Title	Rev.
372-SITE-100_P04	Existing Site Plan	P04			
372-SITE-101_P04	Proposed Site Plan	P04			
372-LB-200_P05	Basement GA Plan	P05	372-LB-200_P07	Basement GA Plan	P07
372-LB-201_P04	Ground Floor GA Plan	P04	372-LB-201_P06	Ground Floor GA Plan	P06
372-LB-202_P04	Mezzanine Level GA Plan	P04	372-LM-202_P06	Mezzanine Level GA Plan	P06
372-L01-203_P05	Level 01 GA Plan	P05			
372-L02-204_P05	Level 02 GA Plan	P05			
372-L04-205_P05	Level 04 GA Plan	P05			
372-L05-206_P05	Level 05 GA Plan	P05			
372-L15-207_P06	Level 15 GA Plan	P06			
372-L16-208_P06	Level 16 GA Plan	P06			
372-L17-209_P05	Level 17 GA Plan	P05			
372-L18-210_P05	Level 18 GA Plan	P05			
372-L19-211_P05	Level 19 GA Plan	P05			
372-L20-212_P05	Level 20 GA Plan	P05			
372-L21-213_P05	Level 21 GA Plan	P05			
372-L22-214_P05	Level 22 GA Plan	P05			
372-LB-215_P05	Basement Plan	P05			
372-RF-215_P05	Roof Level GA Plan	P05			
372-RCP-220_P04	Lobby soffit reflected ceiling	P04	372-RCP-220_P06	Lobby soffit reflected ceiling	P06

	plan			plan	
372-SEC-300_P05	East – West Section	P05	372-SEC-300_P007	East – West Section	
372-SEC-301_P04	West – East Section	P04	372-SEC-301_P06	West – East Section	P06
372-ELE-400_P10	North Elevation	P04	372-ELE-400_P12	North Elevation	P12
372-ELE-401_P10	East Elevation	P10	372-ELE-401_P12	East Elevation	P12
372-ELE-402_P10	South Elevation	P10	372-ELE-402_P12	South Elevation	P12
372-ELE-403_P10	West Elevation	P10	372-ELE-403_P12	West Elevation	P12
372-ELE-450_P07	North Bay Elevation	P07			
372-ELE-451_P06	East Bay Elevation	P06			
372-ELE-452_P07	South Bay Elevation	P07			
372-ELE-453_P06	West Bay Elevation	P06			
372-ELE-454_P04	North and South Bay Elevations	P04	372-ELE-454_P06	North and South Bay Elevations	P06
372-ELE-455_P04	East and West Bay Elevation	P04	372-ELE-455_P06	East and West Bay Elevation	P06
372-ELE-456_P03	Projecting Bay Detail	P03			
372-ELE-457_P04	Winter Garden Detail	P04			
372-ELE-458_P04	Balcony and Shutter Detail	P04			
372-ELE-459_P04	Typical East and West Façade Detail	P04			
372-ELE-460_P03	Typical North and South Façade Detail	P03			
372-ELE-461_P03	Typical 'Flag'	P03			

	Façade Detail				
372-ELE-462_P03	Typical Lobby and Commercial Space Material Scoping	P03			
372-ELE-463_P03	Staircase Detail	P03			
372-ELE-464_P02	Bespoke 'DNA' Shutter and Frit Pattern Detail	P02			
1294-SAC-Z01-ZZ-SM-E-V20-200 P1	Power Distribution Schematic	P1			
372_SK132_01	Level 15 and 16 Balcony Plan	01			
372_SK133_00	Level 15 and 16 Balcony Elevation	00			
372_SK134_02	Winter Garden Location and Ventilation Strategy	02			
P1294 SAC Z01 ZZ SM E V20 200 P1	Power Distribution Schematic	P1			