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**From:** Fowler, David  
**Sent:** 03 July 2019 16:59  
**To:** Planning  
**Subject:** FW: 2019/2475/P - Submission for a Minor Material Amendment to planning permission 2015/2704/P

Please upload representation. 2019/2475/P

Thanks,

David

David Fowler  
Principal Planner

Telephone: 0207 974 2123



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**From:** [REDACTED]  
**Sent:** 28 June 2019 10:25  
**To:** Fowler, David <[David.Fowler@camden.gov.uk](mailto:David.Fowler@camden.gov.uk)>  
**Subject:** RE: 2019/2475/P - Submission for a Minor Material Amendment to planning permission 2015/2704/P

David

Sorry for the delay, as highlighted below, the Crick currently objects to the proposed S73 application in the absence of reports into the potential environmental and other impacts of the changes proposed. This is a sensitive location, as all parties have accepted, and the impacts of noise, air quality and electro-magnetic interference are well documented; in the latter dating back to the Cross River Tram proposals.

I have responded to your queries below, as best that I can, in **orange** text.

We are very willing to sit down and discuss through these issues with the applicants technical people or yourselves.

Kind regards

Paul

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**From:** Fowler, David <[David.Fowler@camden.gov.uk](mailto:David.Fowler@camden.gov.uk)>  
**Sent:** 05 June 2019 11:35  
**To:** [REDACTED]  
**Subject:** RE: 2019/2475/P - Submission for a Minor Material Amendment to planning permission 2015/2704/P

Hi Paul,

Thanks for your email. A few queries in red below, before I go back to the applicant.

Happy to discuss.

Regards,

David

David Fowler  
Principal Planner

Telephone: 0207 974 2123



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**From:** [REDACTED]

**Sent:** 04 June 2019 10:24

**To:** Fowler, David <[David.Fowler@camden.gov.uk](mailto:David.Fowler@camden.gov.uk)>

**Cc:** Cullen, Bethany <[Bethany.Cullen@camden.gov.uk](mailto:Bethany.Cullen@camden.gov.uk)>; [REDACTED]

**Subject:** 2019/2475/P - Submission for a Minor Material Amendment to planning permission 2015/2704/P

Dear David,

Following our discussion last week, I am writing in respect to planning reference 2019/2475/P in respect to the Central Somers Town CIP project and specifically in respect to the proposed amendment to the ground floor of Plot 7 (the Brill Place Tower). This amendment seeks a change to the internal layout to include the provision of an electricity substation on the ground floor of the tower block; an element not included in the original scheme.

Whilst the proposed change might, in the general scheme of things, comprise a minor change to the plans and internal layout of the building, the facility proposed may have a wider implication to adjoining and existing neighbours, and specifically to the Francis Crick Institute. As you are aware from the original planning application (2015/2704/P) the Crick is a unique sensitive receptor and whilst they have no objections to the principle of the development of adjoining land there are issues, including environmental, that need to be identified, assessed and responded to. The importance of the Crick to Camden, London and the UK as a whole was fully identified by Members when they came to determine the outline application and a series of conditions and S.106 obligations were attached to the decision that were designed to protect the Crick's operations through construction and beyond. In respect to the latter, this included provisions that impacted design and the specification requirements of the residential accommodation proposed in the block. Amongst those technical/environmental elements were noise and potential electro-magnetic interference.

Arguably, the importance of the Crick in post-Brexit Britain is much greater and under the Government's 2018 Industrial Strategy the Francis Crick Institute is specifically recognised in terms of the economic case that the sector contributes to the UK economy and the benefits of investment into cutting-edge facilities which included the Crick. Indeed, the Crick is identified as one of the world's largest research institutes and an important part of the UK's life sciences sector which itself is identified as a UK-wide endeavour.

On behalf of the Crick, I am writing to register a provisional objection to the proposed amendment pending further investigation into the impacts of noise and electro-magnetic interference.

On the issue noise, you will be aware that this is a major concern to the Crick and was raised at the initial application. The concern then was associated with the potential impact of a 'black start' scenario and the background noise levels in the area. At the time of the application the applicants advisers stated that *"There is no evidence to suggest that the generators would be expected to be used with increasing frequency in the future as the National Grid is put under increasing pressure as suggested in the CBRE letter."* Since then, there have been two actual black start occurrences, one lasting 5-days in 2018 and the other on Easter Sunday this year. The concerns raised as part of the original application remain as valid now, if not more so, as they did then.

The major difference, and a matter that must be considered in the context of this submission (as a wholly new planning permission will be issued as a result), is that there has been a change in circumstances since the original application in that the risk from black start situations is a real one, not a hypothetical one. Accordingly, the potential

cumulative noise impact arising from the installation of the substation needs to be assessed in the context of the background and existing noise levels prevalent around the site; essentially the noise analysis carried out as part of the original application needs to be updated to include a new noise generating activity associated with the development. This is necessary as the previous assessment identified that a number of units would require specific mitigation measures to meet the standards set in the planning permission and the application was amended accordingly. The introduction of another noise generating source may change the position assessed at the outline stage and this should be addressed as part of this submission. The noise report submitted with the S.73 submission is a generic one with the noise study submitted confirming that *'The Assessment is based on assumed substation noise taken from past projects'*.

There were concerns with the original application around air quality, in the eventuality of a black start. I don't recall any concerns regarding noise in the event of a black start and there is nothing in the committee report on this specifically. Noise was also an issue but early engagement with the PM and amendments to the scheme meant that it was addressed. However, the principle question is will the substation be a noise generator and in wider context add to the cumulative amount of noise in the area that creates a problem. It maybe that the equipment to be installed, which is not specified, is of specification that gives no noise issues but this needs to be clarified.

On the issue of electro-magnetic interference, this did not arise in the original application insofar as it related to the completed building. Whilst this is being addressed in the Constraints Document that the Crick is discussing with the potential developers, this is still work in progress at the current time. Further, the constraints document deals only with the situation during construction and so is not specifically relevant to this submission. The Crick needs to assess what the potential electro-magnetic input might be on their operations, if any, from the proposed substation; being a facility that does generate an electro-magnetic field. It would be helpful if the applicants could provide the full technical details of the substation proposed as part of this submission so that the Crick can assess the impact of it.

Are you able to provide more detail of what the technical details you require? Again without knowing what the specification of the equipment to be installed is to be it hard to answer your question. The equipment will come with a specification details that will set out what its electro-magnetic fields are, how far these reach, what the rating is etc. With that information we can make a judgement. Alternatively you might consider a condition that limits the extent of any electro-magnetic fields to no further than the boundary of the site or as a limit the northern curb of Brill Place.

On the issue of the Constraints Document, we do expect to finalise this soon and as suggested by the prospective developers, and yourselves in our discussion, it might be appropriate to include this as part of the final S.106 agreement and linked to the Construction Management Plan requirement. See separate emails on this.

Finally, in the covering letter to the submission, it is indicated that a Deed of Variation is also being sought to the S.106 agreement; or in this case a change to the shadow S.106 agreement that the developer will sign once they acquire the site. As discussed, the Crick would be extremely concerned if there was any intention to dilute the provisions of the shadow S.106 in any way. Both the Mayor and Members were aware when the original application came to be determined that that the shadow S.106 incorporated the controls that the Crick required to remove its original objections to the development and Members agreed to the need for the controls to be put into place. We were reassured in the conversation that the Deed was purely to carry the provisions of the shadow S.106 over to the new submission, and that no dilution would occur to the agreement without the Crick being consulted.

I look forward to hearing from you in respect to the above and would be grateful if you could advise the developers of the information that the Crick is seeking in respect to assessing the possible electro-magnetic effects. As soon as we can review both this and the noise element we will be able to advise whether there is any outstanding issue or what might be required to resolve the Crick's initial concerns. We very much expect an approach similar to that undertaken previously.

Kind regards



