



PLANNING STATEMENT

PROPOSED DEVELOPMENT AT THE MARIA FIDELIS SCHOOL
SITE, EUSTON

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1 Introduction

- 1.1 This Planning Statement has been prepared by Quod, on behalf of Camden Council and LCR (“the Applicant”), in support of a planning application for the redevelopment of the Maria Fidelis School (“the Site”) to include:
- Change of use of the school building to provide office floorspace (Use Class B1(a));
 - Use of the existing Maria Fidelis School gym building as multi-use community facility (Use Class D1/D2);
 - The erection of a new educational facility comprising a Construction Skills Centre (Use Class D1); and
 - Provision of new temporary public open space.
- 1.2 Maria Fidelis School is located in the London Borough of Camden. The Site sits adjacent to a construction site for the new High Speed Two (“HS2”) station at Euston Station, and was previously in use as a school. However, the school use was relocated in Easter of 2019 to allow for the construction works to the rear of the Site to take place, and the Site has been vacant since 22 April 2019. All elements of the proposal are proposed to be in situ for circa 10 years as interim uses prior to the sites redevelopment as a result of HS2 works.
- 1.3 The Site consists of a number of buildings, which each formed part of the school use. The redevelopment will consist of the demolition of three existing buildings on Site, the refurbishment of the main school building into managed workspace, the provision of a new multi-use community hall (through the change of use of an existing building), and the construction of a new Construction Skills Centre.
- 1.4 The existing school use at the Site has ceased as a result of adjoining HS2 works, and the school has been relocated elsewhere in the borough. It is understood that the Site will be redeveloped in its entirety at a later date, and as a result these proposals effectively seek to secure a meanwhile use on the Site until the HS2 works are complete. The proposed development is therefore an ‘interim’ use, which seeks to utilise the Site prior to its total redevelopment in the future for HS2.
- 1.5 The primary purpose of this Planning Statement is to analyse the conformity of the proposed development against the Development Plan, whilst having regard to other material considerations, including national policy and guidance.
- 1.6 The submission of this planning application follows a period of positive pre-application engagement with the Council and other key stakeholders, further details of which are set out within this Planning Statement and within other supporting documents (including the Design and Access Statement and the Statement of Community Involvement).
- 1.7 The remaining sections of this Planning Statement are structured as follows:
- **Section 2** details the factual background relating to the Site and surrounding area;
 - **Section 3** provides details of the pre-application consultation activities undertaken;
 - **Section 4** provides a description of the Proposed Development;
 - **Section 5** summarises the relevant planning policy framework within which the application should be assessed;

- **Section 6** identifies the key planning considerations;
- **Section 7** provides details on the proposed Heads of Terms and CIL Contributions; and
- **Section 8** provides a summary.

2 Factual Background

Site and Surrounding Context

- 2.1 The Site is bound by Starcross Street to the south, North Gower Street to the west and the HS2 construction site to the north. The Exmouth Arms (public house) sits immediately adjacent to the Site to the east and residential properties sit opposite the Site to the south. A copy of the Site Location Plan is attached at **Appendix 1**. The Site measures approximately 0.62ha.
- 2.2 The Site is occupied by a Victorian school building of 3/4 storeys. The Site was previously occupied by a school, but was vacated on 22 April 2019. Several other buildings are in place at the Site, each associated with the school use, and the remainder of the Site is made up of hardstanding used in conjunction with the school. The Site currently consists of the following buildings:
- An Edwardian school building (the main school building);
 - 1950's single storey teaching building to the north of Starcross Street;
 - 1995 portacabin structure previously used as classrooms to the rear of the main school building;
 - A small mobile unit to the western boundary of the Site, previously in use as Special Education Needs classrooms; and
 - A sports hall adjacent to North Gower Street.
- 2.3 Entrance to the Site is currently achieved via the corner of North Gower Street and Starcross Street (southern tip of the Site). The immediately surrounding uses are mainly residential, with the Exmouth Arms (public house) sitting to the east of the Site. The wider area is a busy commercial zone, with Euston Station located 0.1miles to the east of the Site.
- 2.4 The Site sits immediately opposite a number of listed buildings including nos. 190-198 and 200 – 204 North Gower Street.
- 2.5 The Site has a Public Transport Accessibility Level ("PTAL") of 6b (the best and most accessible) and is located in Flood Zone 1.

Planning History and Existing Lawful Use

- 2.6 The Site has a long history of use as a school, dating as far back as the 1950s. Planning records for the building date back to 1979. The most relevant and recent planning applications for the Site are summarised below.
- 2.7 Planning permission (ref. 2013/0412/P) was granted on 19 March 2013 for *"Erection of extension to link main building and single-storey outbuilding and alterations to windows and doors of outbuilding in connection with existing school (Class D1)"*.
- 2.8 Planning permission (ref. 9400707) was granted on 24 June 1994 for *"the erection of a two storey six classroom block on the north east side of the playground."*
- 2.9 The existing lawful use of the Site (including the main building and all associated ancillary buildings, structures and external spaces) is Class D1 (education).

3 Consultation

- 3.1 Camden Council published a Statement of Community Involvement in July 2016 which sets out how the Council will involve local people, local businesses and other key organisations and stakeholders in the determination of planning applications. The Council strongly encourages all applicants to consult on proposals before submitting a planning application.
- 3.2 As part of the consultation process prior to the submission of this application, a substantial programme of engagement, both with the public and with the Council's planning officers, has been undertaken.
- 3.3 Two public engagement events have been held to date with the local community. These were held in July 2018 and November 2018 prior to submission. Key issues raised at the public consultation events centred on the following points:
 - The 'meanwhile' nature of the proposed use of the Site;
 - Potential noise from the Construction Skills Centre; and
 - The public open space and what the community would like to see provided as part of this space.
- 3.4 A final public feedback session was held in May 2019, which provided the community with a chance to see the submitted development design, and how previous feedback has been incorporated into the proposals.
- 3.5 The project has been developed under a Planning Performance Agreement ("PPA") with the London Borough of Camden, and two pre-application meetings have been held in September 2018 and December 2018. The project has also been assessed as part of a Design Review Panel held in December 2018.
- 3.6 Key points from the pre-application meetings with the Council's planning officers include:
 - The use of the multiuse hall, office floorspace and Construction Skills Centre were welcomed by the officers in principle;
 - Noise and disturbance from the Construction Skills Centre was raised as a potential issue;
 - Car free proposals were supported; and
 - Servicing was raised as an issue with the preferred access retained to the south of the Site.
- 3.7 Since the engagement, the proposed servicing and construction access arrangements have been adjusted to accord with the Council's comments. In addition, the proposals as submitted are car free, and a Construction Management Plan has been submitted to support this application.
- 3.8 The details of this engagement is set out in more detail in the Design and Access Statement (in particular Section 10).

4 Proposed Development

- 4.1 The Design and Access Statement, together with the drawings submitted with this application, describe the Proposed Development in full. This section of the Planning Statement seeks to summarise the Proposed Development.
- 4.2 The proposals are mindful of the Council’s aspirations for the future redevelopment of the Site, and the HS2 station which will be located directly to the north once HS2 construction is complete. Therefore, the proposals have evolved bearing in mind that the Site is only anticipated to be available for development for the next 10 years.
- 4.3 The design has evolved as a direct result of consultation with the Local Planning Authority, key statutory consultees and the public. As a result of these discussions the proposal seeks to provide:
- Office floorspace in the existing school building and associated refurbishment works;
 - A Construction Skills Centre;
 - Community space; and
 - Temporary Public open space.
- 4.4 In terms of floorspace, the existing and proposed quantum are confirmed below.

	Floorspace Sqm GIA
Existing Floorspace	3,713
Demolished Floorspace	700
Proposed Floorspace	4,392

- 4.5 As part of the proposals, the existing main school building will be refurbished and repurposed to provide flexible workspace for office (Use Class B1 (a)), and the existing gym building will be repurposed as a multi-use community facility (Use Class D1/D2). A new Construction Skills Centre will be provided, along with an element of temporary public open space. Three existing temporary school buildings will be demolished as part of the proposals. Each element is described in more detail in turn below.
- 4.6 Cycle parking will be provided at the ground floor level on the south eastern section of the Site. The proposals are car-free, with disabled parking bays available immediately adjacent to the site along Starcross Street.

Main School Building

- 4.7 The main school building will be repurposed to provide office floorspace (Use Class B1(a)) . A new entrance pavilion will be introduced to provide a legible main entrance to the workspace, and will be constructed out of metal cladding, which has been designed to match the materials of the Construction Skills Centre.
- 4.8 Minor interior alterations will be made to the building to make it suitable for use as office workspace. The existing boys/girls toilets will be removed to make way for fully accessible WC’s which will provide showers and locker provision. Existing walls are generally heavy load bearing structures and will remain in place,

with smaller lightweight partitions removed to provide larger open plan office space where possible and practical.

- 4.9 The roof of the building is proposed to be used as outdoor amenity space with planting, seating and lightweight structures to provide a safe and secure amenity space. It is understood that the roof was previously available for use as an amenity space for the pupils of the school, but that this use has ceased in recent years.
- 4.10 A new lift is proposed which will provide accessible access to all levels of the school building, including the proposed amenity space on the roof. This will be provided to the rear of the building to ensure a minimal impact on the character of the area, and minimal noise impact on adjacent uses.

Community Hall

- 4.11 The existing gym building is in a good condition and therefore will be retained as part of the proposals. Minimal refurbishment is proposed to this element of the Site. The intention for the multi-use hall is that it will be available for hire by various organisations for a wide range of uses, including community uses. It is envisaged that the space may be used by the occupiers of the main office building as ancillary workspace during the day for break out space or keep fit activities, depending on demand.. The space will also be made available for hire to local community groups for discounted hire rates.
- 4.12 The proposed building layout includes a room to be used as an office or food prep room. No cooking facilities are to be provided.
- 4.13 The existing changing rooms and toilets will be removed to make way for individual toilets and a shower that will cater to the range of events and uses it is anticipated will take place in the multi-use hall.
- 4.14 In addition, the façade will be painted to provide a mural and a new pedestrian entrance along North Gower Street will be provided to make the entrance to the building more legible. No other changes are planned to this building as a result of the proposals.

Construction Skills Centre

- 4.15 The proposed Construction Skills Centre is a two storey building, with an associated yard which will provide outdoor space for training. Workshop spaces are provided on the ground floor, along with several smaller classrooms, toilets and a larger office. The first floor provides further workshop spaces, along with a staffroom, toilets, three classrooms and an I.T. room.
- 4.16 The entrance to the building is towards the centre of the layout, and is accessed via a path leading from the entrance to Starcross Street. The building will be constructed out of metal cladding and concrete, which will give a modern feel whilst also emphasising the temporary nature of the structure. The materials used are also proposed as a result of their sound absorbent properties which will help to minimise any noise impact from the workshops on neighbouring uses.

Temporary Public Open space

- 4.17 Public open space will be provided, which wraps around the buildings to the southern part of the Site and which will provide the community with a high quality landscape that helps to mitigate for the loss of green space in the area as a result of the HS2 works. Given that the public open space will be provided for a period of circa 10 years and therefore the proposals are not permanent in nature, the development team are proposing to use currently stored landscape materials from St James Gardens to landscape the space.

5 Relevant Planning Policy

5.1 This section provides a summary of relevant planning policy and guidance, as well as material considerations, and identifies the key planning considerations which will inform the determination of the planning application.

Development Plan

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.3 The Development Plan for the Site comprises the following documents:

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

Key Policy Designations

5.4 The Development Plan confirms that the following site-specific designations are applicable to the Site (as included on the Proposals Map):

- Designated Viewing Corridor;
- Safeguarding Area for HS2;
- Growth Area;
- Central London Area; and
- Euston Area Plan.

Material Considerations

5.5 It is acknowledged that material considerations include the National Planning Policy Framework (“NPPF”) (2018) and guidance such as the Government’s Planning Practice Guidance.

5.6 The Mayor of London is in the process of producing a new London Plan. This document was published for consultation in December 2017. Although not yet adopted, the Mayor of London is taking the draft policies into consideration in the determination of planning applications, and therefore the draft London Plan policies have been taken into consideration in the development of these proposals.

5.7 The North London Waste Plan was published for consultation in March 2019. Although not yet adopted it is being considered in the determination of planning applications and therefore this document has been taken into consideration in the development of these proposals.

5.8 Camden Council’s adopted supplementary planning guidance documents, particularly the Euston Area Plan, have also been taken into consideration in the preparation of our proposals.

Main Policy Considerations

5.9 The preparation of this planning application has taken into account comments received both during the formal pre-application process with the Council and during the public consultation exercise (see Section 3

of this Planning Statement for further details). Careful consideration has been afforded to the evolution of the Proposed Development in this respect.

5.10 In light of the planning policy background, the following considerations are considered of relevance to the determination of the Proposed Development:

- Principle of development;
- Temporary nature of the permission sought;
- Managed Workspace;
- Multi-use community hall;
- Construction Skills Centre;
- Public open space;
- Design and massing;
- Transport;
- Sustainability; and
- Amenity.

5.11 These planning issues are dealt with in turn in Section 6 of this Statement.

6 Principal Planning Considerations

Principle of Development

- 6.1 At the heart of the NPPF is *'the presumption in favour of sustainable development'* which should be seen as the 'golden thread' running through both plan-making and decision-taking. Paragraph 38 of the NPPF states that Local Planning Authorities should approach decisions on proposed development in a positive and creative way.
- 6.2 Euston is identified as an Opportunity Area in the London Plan. Policy 2.13 of the London Plan states that development proposals within Opportunity Areas should seek to optimise residential and non-residential output, and support wider regeneration.
- 6.3 London Plan Policy 3.15 states that proposals which would result in a loss of social infrastructure in areas of defined need without realistic proposals for reprovision should be resisted.
- 6.4 Draft London Plan Policy GG2 states that development must make the best use of land, and prioritise the development of Opportunity Areas, surplus public sector land and sites which are well connected by existing or planned tube and rail stations.
- 6.5 Draft London Plan Policy SD1 states that the Mayor will support regeneration in Opportunity Areas fully to ensure they fully realise their growth.
- 6.6 Draft London Plan Policy SD6 states that London's varied town centres should be promoted and enhanced as hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development.
- 6.7 Draft London Plan Policy S3 states that development proposals should ensure that there is not a net loss of school and education facilities.
- 6.8 Camden Local Plan Policy G1 states that the Council will create the conditions for growth, and will support development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site. Policy G1 states that development is expected to be delivered through a concentration of development in the Growth Areas, which includes Euston.
- 6.9 The Site is located in a Safeguarding area for HS2 works. Given the Site is expected to be required for further HS2 works in approximately 10 years, the proposals provide a worthwhile use of the land in the meantime, allowing it to be gainfully used rather than sitting vacant in the interim period. This is in accordance with London Plan Policy 2.13, draft London Plan Policy GG2 and Local Plan Policy G1.
- 6.10 In addition, the Site is located in a Growth Area and within the Euston Opportunity Area as designated by the London Plan. The proposals will utilise the Site for three different uses, supporting the growth of the area and enhancing its vitality and vibrancy. This is in accordance with London Plan Policy 2.13, Draft London Plan Policy GG2 and Camden Local Plan Policy G1 which all seek to encourage development in Opportunity Areas and support proposals that fully realise the growth potential of sites.
- 6.11 The existing school building was vacated on 22 April 2019 and has been relocated elsewhere in the borough. Therefore there has been no loss in education facilities as a result of the proposals. The Council agreed that

the reuse of the Site is supported in principle, and the loss of the school has been accepted as an inevitability of the works associated with the construction of the new HS2 station.

- 6.12 Given the Sites location in a Growth Area, an Opportunity Area and that the school use has been relocated within the Borough, the principle of development is acceptable in this location and in accordance with adopted and emerging planning policy.

Temporary Nature of the Permission

- 6.13 London Plan Policy 6.2 deals with the safeguarding of land for transport. Policy 6.2 notes that development proposals that do not provide adequate safeguarding will be refused. Policy 6.2 states that boroughs should safeguard sites, land and route alignments to implement transport proposals
- 6.14 Draft London Plan Policy T3 states that development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by safeguarding existing land and buildings used for transport or support functions.
- 6.15 The Euston Area Plan Policy EAP1 states that flexibility will be applied on proposals for appropriate temporary alternative uses on buildings and sites if the current use is no longer viable as a result of HS2 and associated construction works. Support will be given to temporary uses that enhance the vibrancy and vitality of the area.
- 6.16 The Euston Area Plan identifies the Site as being suitable for a potential replacement open space post HS2 works being completed. Although this is acknowledged, it is considered that this is a long term aspiration, and should be explored further once the meanwhile uses on the site are no longer viable.
- 6.17 The proposed development will be provided as an interim use between the Site being vacated by Maria Fidelis school, and the Site being redeveloped in its entirety as for HS2 works. It is anticipated that the use will be in situ for a period of 10 years.
- 6.18 The provision of the uses at the Site as proposed will ensure that it continues to be safeguarded for its future use as part of the HS2 proposals in accordance with London Plan Policy 6.2 and Draft London Plan Policy T3.
- 6.19 The proposals will result in a range of commercial and community uses being in place, along with an area of public open space. These uses are mixed in nature, and will contribute to the diversity of the community at and around the Site. They are proposed to be in place for a period of circa 10 years as a 'meanwhile' use prior to the Sites redevelopment as part of the HS2 works. This is in accordance with Euston Area Plan Policy EAP1 which encourages a mixed use environment and provides a degree of flexibility in acceptable uses for safeguarded sites.
- 6.20 The short-term nature of the proposals in this situation at this Site is acceptable and supported by planning policy.

Office floorspace (Use Class B1(a))

- 6.21 The proposed office floorspace will be contained within the existing main school building. A change of use of the existing building from Use Class D1 (education) to Use Class B1(a) (Office) as part of these proposals.

- 6.22 London Plan Policy 4.1 states that the Mayor will promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors.
- 6.23 London Plan Policy 4.2 states that the Mayor will support the management and mixed use development of office provision to improve London's competitiveness.
- 6.24 Draft London Plan Policy GG1 states that development must seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer and more equal city.
- 6.25 Draft London Plan Policy GG5 states that to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, development must seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London.
- 6.26 Draft London Plan Policy E1 states that improvements to the competitiveness and quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed use development. Policy E1 states that development proposals should take into account the need for lower cost and affordable workspace.
- 6.27 Draft London Plan Policy E2 states that the provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.
- 6.28 Camden Local Plan Policy E1 states that the Council will direct development of new offices to the growth areas in order to meet the forecast demand of 695,000sqm by 2031.
- 6.29 Camden Local Plan Policy E2 states that the Council will encourage the provision of employment premises and sites in the borough.
- 6.30 The Euston Area Plan Policy EAP1 states that between 180,000 and approximately 280,000sqm of employment/economic floorspace across the Euston area will be encouraged. The Area plan also states that *"there is a long term aspiration to relocate the North Gower Street site of Maria Fidelis school to a consolidated site at Phoenix Road/Drummond Crescent, which HS2 are assisting with as the site is immediately adjacent to the main HS2 construction compound... Whilst it will be important to retain the special character of areas such as Drummond Street, there may be circumstances where properties become vacant or the uses are no longer suited to the changed context. In these circumstances, where evidenced and justified, flexibility will be applied where appropriate where considering applications for meanwhile uses particularly during the construction period of HS2."*
- 6.31 The provision of office floorspace will increase the amount of overall office floorspace within the Euston Area in accordance with Area Plan Policy EAP1 and Local Plan Policies E1 and E2. In addition, the office space will be provided as a co-working space, and therefore will be suitable for a range of independent small scale, as well as medium sized businesses. Flexibility is accorded to the meanwhile uses proposed at the Site as set out by Euston Area Plan Policy EAP1, and therefore the provision of office floorspace in this location whilst the Site would otherwise be vacant is considered entirely appropriate.

Multi-Use Community Hall

- 6.32 The intention for the multi-use hall is that it will be available for hire by various organisations for a wide range of uses, including community uses. It is envisaged that the space may be used by the occupiers of the main office building as ancillary workspace during the day for break out space or keep fit activities, depending on demand. The space will also be made available for hire to local community groups for discounted hire rates, and may be in use for a wide range of D1/D2 activities including sport activities such as yoga, use by local societies or clubs, and use for small scale assembly events. The proposed multi-use community hall will be located in the existing gym on the Site.
- 6.33 London Plan Policy 3.16 states that development proposals which provide high quality social infrastructure will be supported.
- 6.34 London Plan policy 3.19 states that development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Wherever possible, multi-use public facilities for sport and recreational activity should be encouraged.
- 6.35 Draft London Plan Policy S1 states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
- 6.36 Camden Local Plan Policy C2 states that the Council will facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community. Policy C2 also states that the Council will expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements.
- 6.37 Camden Local Plan Policy C3 states that the Council will seek opportunities for new cultural and leisure facilities in major, mixed use developments and support the temporary use of vacant buildings for cultural and leisure activities.
- 6.38 The Euston Area Plan Policy EAP1 states that education, health and other community facilities should be provided to support new development and reflect local priorities and needs.
- 6.39 The proposed multi-use community hall is envisaged to be provided for a range of people and groups. It may be used as ancillary workspace during the day, and in the evening and weekends it is envisaged that it will be used by local community groups for a range of activities including societies or clubs, small scale court sports or small scale assembly. The space will be available for hire for these uses, and it is proposed that the space will be provided at a discounted rent for use by local community groups. It is envisaged that the community space will be managed by an operator who will facilitate the use of the space in accordance with Local Plan Policy C2.
- 6.40 The multi-use hall will be a new community space which will support local cultural and leisure activities including small scale court sports, and will seek to provide a community hub as an interim use prior to the future HS2 redevelopment plans. The proposals for the space are in accordance with Policy 3.19 and 3.16 of the London Plan, and Local Plan Policy C2 and C3.

Construction Skills Centre

- 6.41 The Construction Skills Centre will be a new building situated at the northern section of the Site, to the north of the main school building.

- 6.42 London Plan Policy 4.12 states that the Mayor will provide the spatial context to co-ordinate the range of national and local initiatives necessary to improve employment opportunities for Londoners, to remove barriers to employment and progression and to tackle low participation in the labour market.
- 6.43 Draft London Plan Policy E11 seeks to support local initiatives, to promote inclusive access to training, skills and employment opportunities for all Londoners. Development proposals should seek to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.
- 6.44 The proposed Construction Skills Centre is a key element of the proposals for the Site. It will provide an educational facility tailored to deliver opportunities for those seeking a career, or seeking to advance their career, in the construction sector. The centre will cater to the needs of local residents and will result in job and training opportunities being created. The proposals are therefore in accordance with London Plan Policy 4.12 and draft London Plan Policy E11.

Temporary Public Open Space

- 6.45 The proposals include the provision of an open space for use until the Site is redeveloped in its entirety (circa 10 years). The landscaped space will offer an attractive public garden which sits to the east of the former school building and to the south of the new Construction Skills Centre. The landscaping will provide a multifunctional space capable of hosting organised sport/community activities such as yoga or tai chi, whilst also providing a high quality green space for use by the general public and the occupiers, staff and pupils of the new facilities at the site.
- 6.46 London Plan Policy 5.10 states that development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm.
- 6.47 London Plan Policy 7.5 states that Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space.
- 6.48 London Plan Policy 7.18 states that the Mayor supports the creation of new open space in London to ensure satisfactory levels of local provision to address areas of deficiency.
- 6.49 Draft London Plan Policy GG3 states that development should plan for improved access to green spaces and the provision of new green infrastructure.
- 6.50 Draft London Plan Policy D1 states that development should provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.
- 6.51 Draft London Plan Policy G4 states that the creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.
- 6.52 Camden Local Plan Policy A2 states that the Council will secure new and enhanced open space.
- 6.53 Euston Area Policy EAP 4 states that development proposals should support the provision of new open spaces and enhancements to existing spaces that make them safer and more accessible, meeting demand from new development and improving the character of the area.

- 6.54 Camden Planning Guidance: Public Open Space (2018) states that development in Camden is expected to make a contribution towards the provision of public open space, and that the Council's priority is for the provision of open space on-site. Developments that are required to make a contribution include developments of 1,000sqm of floorspace / over 1 hectare that are likely to increase the working population of the borough. This will be applied to commercial floorspace within the 'B' Use Class.
- 6.55 The proposals will utilise recycled materials and will provide a range of tree species and ecological enhancements which are set out in more detail on the landscaping plan which accompanies this application. A number of trees are considered low quality and are proposed to be felled, and it is proposed they are replaced with a higher quality species of tree as set out in the Arboricultural Statement which accompanies this proposal.
- 6.56 The proposals are therefore in accordance with adopted and emerging planning policy. In determining the type of open space offered the proposals have had regard to feedback from local residents at public consultation, which is set out in more detail in Chapter 3 of this statement and the Design and Access Statement submitted in support of this application.

Design and Massing

- 6.57 London Plan Policy 7.2 states that the Mayor will require all new development to achieve the highest standards of accessible and inclusive design.
- 6.58 London Plan Policy 7.4 states that development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.
- 6.59 London Plan Policy 7.6 states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.
- 6.60 Draft London Plan Policy D1 sets out that development should use land efficiently by optimising density, connectivity and land use patterns. Development design should respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions. In addition, development should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well.
- 6.61 Draft London Plan Policy D2 states the development should deliver good design. Draft Policy D3 states that development proposals are required to achieve the highest standards of accessible and inclusive design.
- 6.62 Draft London Plan Policy D7 states that development proposals should ensure the public realm is safe, accessible, inclusive, attractive and of the highest quality design.
- 6.63 Camden Local Plan Policy C6 states that the Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all.

- 6.64 Camden Local Plan Policy D1 sets out that the Council requires high quality design in development, and expects proposals to respect the local context and character, preserve the historic environment, utilise sustainable design and construction, comprise of details and materials that are of high quality and are inclusive and accessible to all. Policy D1 also sets out that the Council expects excellence in architecture and design.
- 6.65 Euston Area Plan Policy EAP2 deals with design, and states that development and change should create an integrated, well connected and vibrant place of the highest urban design quality, which builds on existing character and provides an attractive and legible environment for local people, workers and visitors.
- 6.66 Camden Planning Guidance: Design (March 2019) sets out key messages which should be taken into consideration in the development of proposals. Particularly, schemes should consider:
- The context of a development and its surrounding area;
 - The design of the building itself;
 - The use and function of buildings;
 - Using good quality sustainable materials;
 - Creating well connected public spaces and good quality public realm;
 - Opportunities for promoting health and wellbeing; and
 - Opportunities for improving the character and quality of an area.
- 6.67 The design of the proposals has evolved over a period of proactive engagement with both the Council and local residents. In addition, the emerging proposals were presented at a Design Review Panel, and the feedback from this session has been incorporated into the final design of the proposals. This process is set out in more detail in the Design and Access Statement.
- 6.68 The Construction Skills Centre is a two storey building and associated training yard, which is set back to the north of the Site adjacent to the HS2 works. It is visually distinct from the former school building, and its appearance is contemporary in nature with metal and concrete cladding. The aim of the building is to look temporary in nature whilst also maintaining a sleek and modern design. Very little of the building will be visible from the south as the existing school building shields it from view.
- 6.69 The design of the workspace building has focused on making the internal layout usable for office occupants, and providing a new lift to ease accessibility to all levels of the building. The lift will be provided externally and to the rear of the property, and therefore will not be viewable from street level at the entrance to the Site. The internal alterations are also minor in nature, and will provide an improved space for future occupiers. Two existing windows of the existing school building will be increased in size to allow for the entrance pavilion to be provided, which will create a clear entrance to the workspace building and provide improved legibility for those visiting the Site. The entrance pavilion will be constructed from metal sheet to match the materials used at the Construction Skills Centre. The roof is to be used as workspace amenity with planting, seating and lightweight structures to create an amenable and usable space. No other external alterations are proposed at the main workspace building.
- 6.70 The existing gym building will be refurbished to provide a multi-functional community space, with new accessible toilets in the place of the existing changing rooms. A new pedestrian entrance is proposed along North Gower Street to ease access to the building for community groups. A new set of glazed doors will

provide entrance access to the building, and the façade will be painted with a mural, which will be designed to clearly indicate the building is the community space element of the Site.

- 6.71 The design of the proposal has taken into consideration the surrounding uses and character of the area in its development. It provides a modern update to the Site which facilitates the effective use of the existing buildings whilst also facilitating a state of the art Construction Skills Centre to be developed, along with an area of public open space. The design of the Construction Skills Centre has been carefully considered and designed to reflect the proposed use and temporary nature of the building.
- 6.72 The proposal will provide an attractive and functional space, and has been developed in accordance with London Plan Policy 7.2, London Plan Policy 7.4 and London Plan Policy 7.6, as well as Camden Local Plan Policies C6 and D1. In addition, the design has taken the emerging London Plan as well as Supplementary Planning Guidance into account in its evolution, and is compliant with the policies set out in local adopted and emerging planning policy.

Transport

- 6.73 London Plan Policy 6.9 states that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3.
- 6.74 Draft London Plan T5 states that development should provide appropriate levels of cycle parking in accordance with Table 10.2. Table 10.2 requires the following provision of cycle provision for business uses (Class B1):

Use Class		Long Stay	Short Stay
B1	Business Offices	1 space per 75sqm	First 5,000 sqm: 1 space per 500 sqm Thereafter: 1 space per 5,000 sqm (GEA)

- 6.75 Draft London Plan Policy T6 states that car free development should be the starting point for all development proposals that are well connected by public transport.
- 6.76 Draft London Plan Policy T6.5 states that all non-residential elements of a development should provide at least one on or off-street disabled persons parking bay.
- 6.77 Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car free. Parking will be limited on sites to spaces designated for disabled people and/or essential operational or servicing needs.
- 6.78 The proposals will be car free in accordance with draft London Plan Policy T6 and Camden Local Plan Policy T2. Appropriate levels of disabled car parking spaces are available at the bays immediately adjacent to the Site, and therefore there is no requirement to provide any on Site. The Site has a PTAL of 6b (best) and therefore the provision of a car free development is entirely appropriate.
- 6.79 Cycle parking is proposed in accordance with the London Plan standards as set out in Table 6.3 of the London Plan and the Transport Statement which accompanies this application.

Sustainability

6.80 London Plan Policy 5.2 states that development should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

1. *Be lean*

2. *Be clean*

3. *Be green*

6.81 In accordance with Policy 5.2, non-domestic buildings should aim to be zero carbon by 2019. Major development proposals should include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reductions are to be met within the framework of the energy hierarchy.

6.82 London Plan Policy 5.3 states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime. Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.

6.83 Policy 5.4 deals with retrofitting, and states that the environmental impact of existing urban areas should be reduced through policies and programmes that bring existing buildings up to the Mayor's standards on sustainable design and construction. In particular, programmes should reduce carbon dioxide emissions, improve the efficiency of resource use (such as water) and minimise the generation of pollution and waste from existing building stock.

6.84 London Plan Policy 5.5 states that the Mayor expects 25 per cent of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. London Plan Policy 5.6 states that development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.

6.85 Draft London Plan Policy GG6 states that to help London become a more efficient and resilient city, development must seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050. Development and infrastructure must be designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect.

6.86 Draft London Plan Policy S12 states that major development should be net zero-carbon. In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected.

6.87 Draft London Plan Policy S13 states that major development proposals within Heat Network Priority Areas should have a communal heating system.

6.88 Draft London Plan Policy S14 seeks to minimise internal heat gain. Major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems.

- 6.89 Draft London Plan Policy S15 states that development proposals should minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption), and for commercial development achieve at least the BREEAM excellent standard.
- 6.90 Camden Local Plan Policy CC1 states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards. The Council will:
- a) promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;*
 - b) require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;*
 - c) ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;*
 - d) support and encourage sensitive energy efficiency improvements to existing buildings;*
 - e) require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and*
 - f) expect all developments to optimise resource efficiency.*
- 6.91 Camden Local Plan Policy CC2 states that all development should adopt appropriate climate change adaptation measures such as:
- a) the protection of existing green spaces and promoting new appropriate green infrastructure;*
 - b) not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems;*
 - c) incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and*
 - d) measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.*
- 6.92 Policy CC2 states that the Council will promote and measure sustainable design and construction by ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation, and expecting non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.
- 6.93 Camden Planning Guidance: Energy Efficiency and adaptation (March 2019) sets out that all development in Camden is expected to reduce carbon dioxide emissions by following the energy hierarchy in accordance with Local Plan Policy CC1. Developments are to target a 20% reduction in carbon dioxide emissions from

on-site renewable energy technologies, and the document also requires all non-residential development of 500sqm or more to achieve a BREEAM Excellent standard.

- 6.94 The Energy Strategy which accompanies this application seeks to minimise the use of energy consumption through the implementation of passive measures and efficient systems.
- 6.95 The Construction Skills Centre has been demonstrated to meet GLA and Camden's requirement for a 35% reduction over Part L 2013, and achieve high levels of BREEAM 2019 compliance. The main workspace approach has been to apply consequential improvements through the upgrading of windows and services to minimise energy consumption as far as possible. Details of the measures implemented are set out in the Sustainability Assessment which accompanies this application.
- 6.96 The Construction Skills Centre and managed workspace both achieve a 'Very Good' BREEAM rating. Although the Council target a BREEAM 'Excellent' rating, it has been agreed that a selection of additional credits can be provided as contingency credits. Therefore, although not fully compliant with adopted planning policy requirements, the Council have agreed that a BREEAM 'Very Good' rating is acceptable given the proposals are a 'meanwhile' use, prior to the Sites further redevelopment as part of the HS2 works. This is set out in more detail in the Sustainability Statement which accompanies this application.

Amenity

- 6.97 Draft London Plan Policy D12 states that development proposals should manage noise and other potential nuisances by ensuring good acoustic design to mitigate and minimise existing and potential impacts of noise generated by existing uses located in the area, and exploring mitigation measures early in the design stage, with necessary and appropriate provisions secured through planning obligations. New noise-generating development, such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues proposed close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses.
- 6.98 Camden Local Plan Policy A1 states that the Council will seek to protect the quality of life of occupiers and neighbours, and will grant planning permission for development unless this causes unacceptable harm to amenity. Camden Local Plan Policy A4 states that the Council will seek to ensure noise and vibration is controlled and managed, and will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.
- 6.99 The design of the proposals have been carefully considered in order to maintain the amenity of surrounding users. Several measures have been designed into the scheme in order to reduce the level of noise being emitted from the proposals. Of particular note, the proposed lift in the main workspace building has been positioned to the rear of the property to reduce noise, and the Construction Skills Centre has been constructed out of sound absorbent concrete in order to limit the noise emitted from the building.
- 6.100 The proposed scheme has been arranged to ensure simple servicing of both the proposed building and existing buildings on site whilst complying with Highways and Transport for London. This will ensure that the noise from refuse remains minimal, ensuring minimum disruption to neighbouring uses.
- 6.101 In addition, a draft Construction Management Plan accompanies this proposal, which sets out how construction traffic will be controlled to ensure minimal disruption to local residents.
- 6.102 A Noise Assessment accompanies this application and sets out the anticipated noise emitted as a result of the proposals, and any mitigation measures necessary.

7 S106 Obligations and CIL

- 7.1 The proposals are required to provide Section 106 contributions. This section of the report sets out the contributions proposed as part of this application.
- 7.2 Community Infrastructure Levy (“CIL”) is required on all new development which creates a net additional floors space where the gross area of new build is 100sqm or more. This section of the report sets out that the proposals are not CIL liable and why.

Affordable Workspace

- 7.3 Policy E2 (Employment Premises and Sites) of the Camden Local Plan (2017) provides guidance on the Council’s approach to maintaining and securing a range of premises for businesses to support Camden’s economy. Policy E2 confirms the Council will consider higher intensity redevelopment of premises or sites that are suitable for continued business uses provides that (inter alia):

“The proposed premises include floor space suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable.”

- 7.4 Supporting text at Paragraph 5.44 confirms the Council will seek to secure through a planning obligation an element of affordable SME workspace from large scale employment development with a floor space of 1,000 sqm or more.
- 7.5 It also states that where workspace has been specified as Affordable, the Council’s Economic Development Team will work with developers to agree appropriate terms of affordability on a case by case basis. The following are examples of ways in which affordability could be considered:
- An element of the space could be provided at less than 80% of comparable market values;
 - A sponsorship programme through which a number of local businesses are able to access space at reduced rents for an agreed period; and
 - An average of market rents paid by tenants in the area occupying an equivalent type and quality of space.
- 7.6 Paragraph 5.45 confirms the Council will also consider alternative suggestions made by applicants.
- 7.7 A Viability Appraisal Report accompanies this application and sets out that the scheme is unable to viably provide affordable workspace. Despite this, the Applicant has agreed to two forms of affordable workspace to be secured by the planning S106 agreement.
- The applicant proposes that for the duration of the use (circa 10 Years) the rents charged for the Construction Skills Centre (CSC) are restricted to a peppercorn rent only within the planning S106 agreement.
 - The applicant also proposes that for the duration of the use (circa 10 Years) the rents charged for the workspace element of the development will be always capped at 80% of the prevailing local office market rent.
- 7.8 Therefore, despite not being required to provide any affordable workspace (as set out by Policy E2 of the Camden Local Plan), the Applicant has decided to offer the affordable provisions set out above. This

demonstrated that the affordable workspace proposals for the application scheme exceed that required by the statutory development plan.

Community Infrastructure Levy

- 7.9 A CIL Liability form accompanies this application and confirms the elements of the scheme which are CIL liable.

- 7.10 Given that the multi-use community hall is a proposed community space and that the change of use of the main school to office floorspace does not involve a creation of new floorspace greater than 100sqm, these elements are not considered CIL liable. The Construction Skills Centre is an education facility, and therefore CIL is not payable on this part of the scheme.

- 7.11 This has been discussed and agreed with officers throughout our engagement with the Council at the pre-application stage.

8 Summary

- 8.1 The existing building on the Site lies vacant. In addition, it is likely to be redeveloped as part of the HS2 works in 10 years. Therefore, it is currently underutilised and would lay vacant if these proposals were not brought forward. The proposal seeks to provide a Construction Skills Centre, which will allow for much needed training for local people hoping to start a career in the construction industry. In addition, the proposals would provide office and community floorspace which would seek to enhance the vitality and vibrancy of the area, and successfully utilise the site for a period of circa 10 years. Finally the proposals would provide much needed open space for an interim period of circa 10 years, which would provide the local residents with an area of much needed public amenity. It is envisaged that the Site would be a hub of innovation and would bring a currently vacant site back into useful occupation.
- 8.2 The proposal is sympathetic and in accordance with the townscape character of the wider area. It will deliver a significant benefit to the local area, providing education facilities along with community uses and public open space. In addition, it will prevent the site sitting vacant which is against the policies set out in local adopted development plan documents.
- 8.3 Pre-application engagement with statutory consultees and local stakeholders throughout the design development has ensured that the proposal appropriately meets the needs of the local community whilst ensuring compliance with national and local policy.
- 8.4 The proposals will have no significant adverse impacts on amenity, or the wider character of the area.
- 8.5 This Planning Statement has demonstrated that the Proposed Development accords with the relevant Development Plan Policy. In addition, the proposal accords with the principles of sustainable development in terms of social, economic and environmental sustainability and meets the strategic policy goals as set out in Camden's Local Plan.