

25 July 2019

Delivered by planning portal (PP-08034248)

Mr J. McClue
Regeneration and Planning
London Borough of Camden
5 Pancras Square
London N1C 4AG

Dear Jonathan,

THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

**CAMBRIDGE HOUSE - SUBMISSION OF SECTION 96A 'NON-MATERIAL AMENDMENT'
APPLICATION RELATING TO PLANNING PERMISSION REFERENCE: 2017/7079/P**

On behalf of our client, Birkbeck College Cambridge House Ltd (Birkbeck), we hereby submit a Section 96a Non Material Amendment (NMA) planning application (PP-08034248) with respect to Cambridge House, 373-375 Euston Road, NW1. The Section 96a NMA proposes to remove two planning conditions (Numbers 18 and 22) on the planning permission granted on 13 February 2019, under LPA reference number 2017/7079/P.

Condition 18 requires that:

Prior to commencement of the development, detailed plans showing the location and extent of Air Source Heat Pumps and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Condition 22 requires that:

Prior to occupation of the development, evidence that an appropriate NO2 scrubbing system on the mechanical ventilation intake has been installed and a detailed mechanism to secure maintenance of this system should be submitted to the Local Planning Authority and approved in writing.

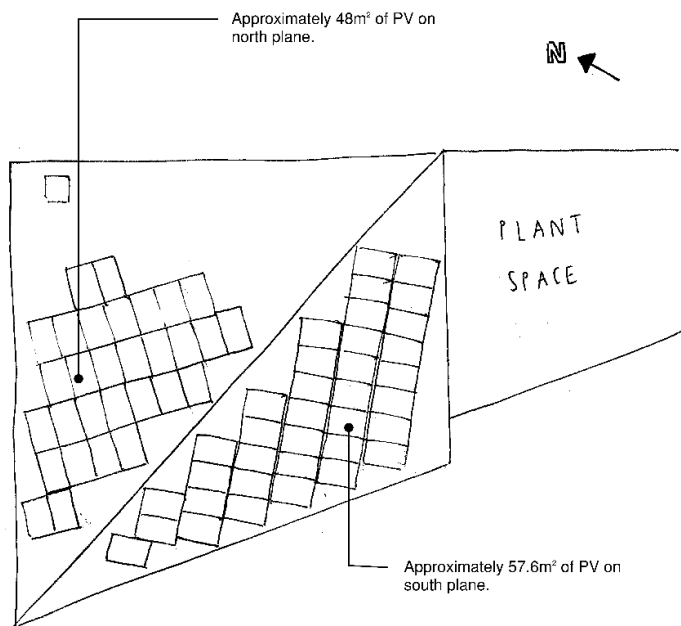
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Context

The proposed development comprises a PV led energy strategy for the building which comprises refurbishment of the existing building and extensions at roof level to accommodate an education use.

The proposed PVs are shown within the figure below and will comprise approximately 58sqm on the south plane, inclined at 15° and 48sqm on the north plane, inclined at 7° to the horizontal.



An Air Source Heat Pump did not comprise part of the proposed or consented energy strategy and this is not required to meeting the consented CO2 reductions. This submission therefore seeks the removal of Condition 18 as it is no applicable.

The inclusion of Condition 22 requiring the provision of NO2 scrubbers was a direct response to the Environmental Health Officer consultation feedback during the Council's consideration of the planning application which comprises the red text below.

Comments	Responses
<p>Clarification: “The staircases form useful stacks within the building to allow warm air to gather and rise, allowing for the mitigation of overheating in the summer months. Proprietary opening vents with seals will allow warm air to escape from the stairwells without impacting the building air tightness. This will reduce heat building up within the airtight façade of the building. These spaces are transient only and are not regularly occupied; whereas air quality in occupied spaces will be managed by mechanical ventilation with air intakes from the roof.”</p> <p>Issue: The above strategy appears to generate a risk of transferring high concentrations of air pollutants to occupants, since we assume that air inlets would also be required (this should be clarified if not the case).</p> <p>If the above approach is taken it is recommended that the following or equivalent Air Quality protection measures be proposed by the applicant or otherwise secured: The internal doors between the mechanically ventilated areas to the stairwells should be airtight when closed and building management plans should ensure that they be kept closed at all times. NOx scrubbers should be added to the air inlets and details should be provided by way of condition.</p> <p>Cooling hierarchy</p>	<p>For the staircases, we will look into omitting intake at low-level and opt for roof level exhaust only. If low-level intakes are still found to be desirable, we will incorporate air quality protection measures described.</p>

As can be noted in the above consultant team response, reference was made that if low-level intakes were required, air protection measures would be incorporated.

Following discussions with the design team, it has been confirmed that in this case the air intake will be located at roof level to the rear of the building fronting Cleveland Street.

Subsequently Waterman have been instructed by the applicant to undertake a further Air Quality Assessment to ascertain the quality of air at the height and location where air will be pulled into the building. The modelling results “*show NO2 is below the AQS objective on all façades. In this scenario whilst air could be drawn in from any façade at roof level, it is recommended that air is drawn in away from the Euston Road street canyon (i.e. from roof level on the eastern, western and southern façade). No further air quality mitigation, such as the use of NOx filtration is required.*”

Now that it has been confirmed that the mechanical ventilation system will pull air into the building from roof level along Cleveland Street and as evidenced within the air quality study prepared by Waterman, it is no longer required to introduce NO2 scrubbers. It is now proposed to remove condition 22.


Submission

This Section 96a Non Material Amendment planning application submission includes the following:

- Application Form;
- Application Fee (£234.00);
- Red line location plan;
- Mechanical Schematic Drawings; and
- Air Quality - Ventilation Strategy, prepared by Waterman.

We trust that the above is in order and look forward to receiving validation of the planning application.
Should you require any further information please contact myself at this office.

Yours sincerely,

A handwritten signature in black ink that reads "Rory McManus". The signature is written in a cursive, slightly slanted style.

Rory McManus
Associate Director
Rory.mcmanus@turley.co.uk

Encl.