

1EW02 Enabling Works – Area South

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Table 1: List of abbreviations

Abbreviation	Definition
CSjv	Costain Skanska Joint Venture
dWPI	Draft Work Package Instruction
HS2	High Speed 2 Ltd
PM	The Employer's Project Manager
VfM	Value for Money
WI	Works Information
WP	Work Package
WPC	Work Package Price
WPI	Work Package Instruction
WPM	Work Package Manager
WPP	Work Package Plan
WPQ	Work Package Quotation
WPS	Work Packaging Strategy

Table 2: Roles and responsibilities

Role	Summary of responsibilities with respect to the Package Management Plan
Commercial Manager	Responsible for the commercial approach delivered as part of the WP.
Commercial Director	Appointment of the commercial team roles to a WP.
Construction Manager	Co-ordination of works in the delivery stage across the Programme and thus ensuring the WP compliments this.
Function Manager	Responsible for ensuring the technical requirements of the WI and functional plans for which they are responsible are met by the WPP and covered by the WPC.
Procurement Manager	To develop a procurement strategy and engage with the supply chain in order to procure sub-contracted elements of the works.
Programme Manager	Appointment of the WPM and coordination of the approach to delivery.
Proposals Manager	Facilitates the development of a consistent approach across all packages in development and co-ordinates the associated assurance programme.
Sector Manager	Responsible for the coordination of packages with in a sector, the alignment of the works to the overall sector programme of works and that the master activity schedule is delivered.
Work Package Manager	The development, through managing the resources and support required from the wider contract team, of the WPP and WPC, and then the delivery and close-out of the WP against the specific milestones agreed and budget set by the WPI.
JV Board members	To review the overall delivery plans and to approve the submission of packages as required by the Delegated Authority Matrix.

1 Introduction

1.1 Introduction to the application

- 1.1.1 This planning application has been prepared on behalf of High Speed Two (HS2) Ltd ('HS2 Ltd'), the applicant, relating to a four-storey residential apartment block, Richmond House, Park Village East, London NW1 3SX located within the Regents Park Conservation Area within the London Borough of Camden.
- 1.1.2 Where noise from the construction of the HS2 railway is likely to impact residents within their own homes, HS2 Ltd will offer to install a package of noise insulation measures. To help inform this work HS2 Ltd has produced several information papers which outline the eligibility and scale of noise insulation offered based on the level of noise and vibration at these residential properties. Information Paper E23: sets out the HS2 Construction Noise and Vibration Policy and has been consulted as part of this proposal. HS2 Ltd has identified in the Supplementary Environmental Statement 2 (SES2) and Additional Provision (AP)3 Environmental Statement (ES), September 2015, which covers Euston station and approach, residential and other properties around Euston that will be eligible for noise insulation, to mitigate construction noise effects. Richmond House is one of those properties identified.
- 1.1.3 The information paper can be found at the following link:
<https://www.gov.uk/government/publications/hs2-information-papers-environment>
- 1.1.4 The standard noise insulation package which is being offered comprises:
- secondary glazing to eligible windows;
 - where required, acoustic ventilators in habitable rooms, including external grilles; and
 - blinds to treated windows in eligible rooms (where there is a need to control solar gain).
- 1.1.5 During the passage of the HS2 Bill, an Undertaking and Assurance list of works (AP3/SES2) around the advance installation of noise insulation in some 1,300 residential properties within the vicinity of Euston Station was given to the London Borough of Camden. A programme for installing that noise insulation is being progressed by HS2 Ltd in consultation with London Borough of Camden and property owners, based on the AP3/SES2 scheme. The programme includes apartment buildings which have been identified as eligible for noise insulation.
- 1.1.6 The fixed secondary glazing will provide adequate acoustic insulation and will be installed to specified windows of all the eligible face elevations of Richmond House. The fixed secondary glazing is internal and does not require planning permission, however a room based ventilation system may be required. The Sonair system, (which includes an external ventilation grill - the subject of this planning application), is an air supply unit that ensures a controlled supply of fresh filtered outdoor air.
- 1.1.7 The Sonair unit provides a ventilator that allows residents an additional source of ventilation in order that they can keep their windows closed. All windows within the habitable rooms will however remain openable for purge ventilation or at the discretion of the occupier.
- 1.1.8 To fit a Sonair system a 100mm diameter hole in an outside wall is required. The wall will be lined with duct and fully sealed to make a channel from the outside to the ventilation unit. On the outside wall a ventilation grille will be fitted, to stop rain and debris getting into the duct.

All vents will be finished in white, which will not detract from the exterior rendered material finish of Richmond House.

- 1.1.9 The external grilles will require planning approval from the London Borough of Camden. The secondary glazing and ventilation system comprises of internal works and would not constitute 'development' under the definition of section 55 (2) (a) of the Town and Country Planning Act 1990 (as amended).
- 1.1.10 The application proposal seeks permission for the installation of up to 96 external grille vents to the eligible face elevations of Richmond House, depending on resident take-up in the property. The vent grilles are integral to the installed air ventilation system which provides an alternative air flow following the installation of secondary glazing within habitable rooms of each apartment of the main building. The grilles are shown in a uniform manner on the enclosed elevations.
- 1.1.10 This supporting planning statement sets out the content of the planning application, details of the proposal, policy review and analysis, sets out why the proposal is acceptable in planning terms and concludes as to why planning permission should be granted.

1.2 The Planning Application

- 1.2.1 The planning application consists of the following documentation:
- a) This supporting planning statement;
 - b) Completed planning application forms and Certificates;
 - c) Sonair Ventilation Unit Specification brochure (internal, for information only);
 - d) Information brochure, including photographs, for Richmond House;
 - e) Section Plan through wall;
 - g) The following drawings:
 - Site Location/Red Line Plan – 1:1,250 @ A4
 - EW-NI-RICHMOND HOUSE-EX-EL-01 Rev 01 – External Elevation – Existing
 - EW-NI-RICHMOND HOUSE EX-EL-02 Rev 01 – External Elevation – Existing
 - EW-NI-RICHMOND HOUSE-EX-EL-03 Rev 01 – External Elevation – Existing
 - EW-NI-RICHMOND HOUSE-EX-EL-04 Rev 01 – External Elevation – Existing
 - EW-NI-RICHMOND HOUSE-EX-EL-05 Rev 01 – External Elevation – Existing
 - EW-NI-RICHMOND HOUSE-EX-EL-06 Rev 01 – External Elevation – Existing
 - EW-NI-RICHMOND HOUSE-EX-EL-07 Rev 01 – External Elevation – Existing
 - EW-NI-RICHMOND HOUSE-EX-EL-08 Rev 01 – External Elevation – Existing
 - EW-NI-RICHMOND HOUSE-EX-EL-09 Rev 01 – Detailed Elevation – Existing
 - EW-NI-RICHMOND HOUSE-PR-EL-01 Rev 01 – External Elevation – Proposed

- EW-NI-RICHMOND HOUSE PR-EL-02 Rev 01 – External Elevation – Proposed
- EW-NI-RICHMOND HOUSE-PR-EL-03 Rev 01 – External Elevation – Proposed
- EW-NI-RICHMOND HOUSE-PR-EL-04 Rev 01 – External Elevation – Proposed
- EW-NI-RICHMOND HOUSE-PR-EL-05 Rev 01 – External Elevation – Proposed
- EW-NI-RICHMOND HOUSE-PR-EL-06 Rev 01 – External Elevation – Proposed
- EW-NI-RICHMOND HOUSE-PR-EL-07 Rev 01 – External Elevation – Proposed
- EW-NI-RICHMOND HOUSE-PR-EL-08 Rev 01 – External Elevation – Proposed
- EW-NI-RICHMOND HOUSE-PR-EL-09 Rev 01 – Detailed Elevation – Proposed

1.3 Planning Application Fee

- 1.3.1 The application fee of £407, for works relating to two or more dwellings, will be paid by Direct Transfer from the Applicant for this application, to the London Borough of Camden.

1.4 Noise and Air Quality Matters

- 1.4.1 As detailed in the 'Camden Local Area Requirements for Planning Applications', an Air Quality Assessment (AQA) is required to be undertaken for 'any development that could have a significant impact on air quality, either directly or indirectly'. The installation of emission free Sonair vents would not have a significant impact on the properties either directly or indirectly as they do not exceed any local or industry criteria/threshold that would reasonably trigger the need for an air quality assessment.

- 1.4.2 In addition, recognised industry guidance, namely 'Land-Use Planning & Development Control: Planning for Air Quality' (January 2017, by EPUK, IAQM) provides guidance on when an AQA may be required. This guidance states:

'It is reasonable to expect that an assessment will be required where there is the risk of a significant air quality effect, either from a new development causing an air quality impact or creating exposure to high concentrations of pollutants for new residents.'

The guidance provides a non-exhaustive list of examples that could trigger the need for an AQA, but none could be considered, to be akin to the installation of a Sonair vent in a property.

- 1.4.3 The primary purpose of the proposed Sonair units is to provide acoustically attenuated background ventilation to properties to limit intrusive noise from the exterior; it is anticipated that units would be operated in this mode whilst nearby construction activity is taking place. In doing so, the units operate in a passive mode and consequently there is no noise generated which could be transmitted to the exterior environment.

- 1.4.4 The units however, can provide supplemental ventilation to provide for purge ventilation of rooms, such as may occasionally be required for the removal of high concentrations of pollutants and water vapour released from occasional activities such as painting and decorating

or accidental releases of smoke from burnt food or water spillage, or control of thermal comfort. When providing supplemental ventilation, the sound power level of the Sonair units varies between L_w 26 dBA at $46\text{m}^3/\text{hr}$ and L_w 59 dBA at maximum duty ($186\text{m}^3/\text{hr}$). The acoustically attenuated air intake duct which penetrates the wall has a normalised sound level difference of $D_{n,e,w}$ 54 dB. Consequently, even at maximum duty the sound emitted to the exterior is negligible.

- 1.4.5 Given the nature and specification of the Sonair installation, use in either background or supplemental ventilation modes will comply with the requirements of Camden planning policy in respect of noise emissions to the exterior and will not give rise to any adverse effects upon amenity or health.
- 1.4.6 Therefore, no additional noise or air quality information is provided as part of this application.

2 The Site and Planning History

2.1 The Application Buildings

- 2.1.1 Richmond House is a four-storey building, containing 44 apartments, located on Park Village East and situated towards the north west of Euston Station, finished in a cream render facing material.
- 2.1.2 The apartment block is interspersed by green spaces and parking areas.
- 2.1.3 Richmond House is bounded by residential apartments immediately to the North (Silsoe House), to the East is Park Village East with the West Coast mainline railway beyond. To the West is Regents Park Barracks, whilst immediately to the south is Goldsmiths House, a five-storey hostel.
- 2.1.4 Richmond House is located within Regents Park Conservation Area and the only statutory listed buildings within the vicinity of the site is Block K of the Regents Park Barracks. As there will be no proposals for the west elevation of the building, the impact of the proposals on the setting of the listed building, is negligible.

2.2 Planning History

- 2.2.1 The Council's online planning portal indicates some historic planning records are available online for Richmond House.
- 2.2.2 In 2016 and 1989 respectively, consent was granted for replacement trees and works to various trees within the boundary of the site (LBC Reference: 2016/3104/T and 8992158). In August 1991 planning permission was granted for the erection of a pitched roof, re-cladding of the building and the installation of new window frames (LBC reference: 9130010 and submission of details reference: 9230001).
- 2.2.3 In July 1969, planning permission was granted for the provision of block of flats and garages on the site immediately adjoining Richmond House (LBC reference: 7125).
- 2.2.4 The Council's records indicate that various minor works have also been approved at residential blocks elsewhere within the vicinity and other blocks in close proximity to the application site are subject to applications for grille installation, including Cartmel.

3 The Development Proposal

3.1 Details of the Development Proposal

- 3.1.1 To mitigate noise disturbance, a Construction Noise Insulation Scheme has been established which enables the installation of secondary glazing to residential properties that are eligible under the scheme. Sonair air ventilation units will be installed in habitable rooms of each apartment to which additional glazing is proposed if the owner/occupier decides to proceed with the mitigation.
- 3.1.2 The permanent installation of external grille vents for which planning permission is being sought, involves minor external alterations to each of the 44 flat apartments of Richmond House to provide an alternative means of ventilation following the installation of secondary glazing. The application proposal involves the insertion of up to 96 upvc external air vent grilles (the 'maximum case' scenario, depending on the take-up rate), which are 117mm x 225-390mm in dimension, adjacent to existing fenestration as per the proposed elevations of Richmond House. The grilles will only protrude 20mm from the wall. A cross section drawing showing the installation of the acoustic air ventilation system is also provided as part of this application.
- 3.1.3 The accompanying information brochure prepared by Costain Skanska sets out a description of the proposed grille vents, ventilation units and references relevant photographs and drawings of the building. Specifications are detailed in the accompanying drawings which show the positioning of a proposed grille vent on the external wall, including a cross section. Costain-Skanska are arranging a house visit to discuss the noise insulation package in detail with each resident. These discussions will include the secondary glazing type, blinds and ventilation options/location.

3.2 Details of the Sonair ventilation system

- 3.2.1 A uPVC Sonair acoustic air ventilation system measuring approximately 0.445m (h), 0.310m (w) and 0.134m (d) (see accompanying Sonair brochure) will be mounted on the inside of an external wall of a habitable room in each of the flats as required by the owner/occupier. To the external wall of the habitable room, a hole will be prepared and drilled to a diameter range of 104mm to 125mm. This insertion will be lined with a duct and fully sealed to make a channel from the outside to the ventilation unit. An external grille vent is then installed from the inside of the property using an 'umbrella opening' technique. A grille vent measuring 117 mm by 225-390mm will be positioned adjacent to a secondary window and will be fixed in place to prevent any rain or debris entering the duct. The grille will be the only visible element of the noise mitigation works and will be finished in white, not to detract from the external rendered finish of Richmond House.
- 3.2.2 Whilst we are applying for permanent permission for the works as described, the ventilator and associated external grille vent can be removed once the secondary glazing for noise insulation is no longer required upon agreement of the occupier/owner of each flat/ apartment. Upon removal of the ventilator unit, the core hole would be filled, a suitable finish applied internally and decorated appropriately. Externally the grille vent will be removed and the exterior made good to the match the existing render finish façade of the building.
- 3.2.3 The proposed installation of the external grilles is considered to have negligible impact and will not cause any adverse harm to the appearance and character of the residential apartment block.

- 3.2.5 The application is made under the assumption that all 24 flats will wish to take up the offer of alternative ventilation. It is proposed that the option of a ventilation unit and accompanying grille is made available for each habitable room. The scheme applies to all the rooms which are not used as a kitchen, utility room, bathroom, cellar or in sanitary use.
- 3.2.6 Whilst the grilles, like the secondary glazing, are designed to be temporary in nature, they can be left in situ if the owners of the flats so wish, whether this is the London Borough of Camden or leasehold owners. The application is submitted based on the proposals being permanent.

4 Background to the Applicant and HS2

4.1 Background to the Applicant

4.1.1 HS2 Ltd is an executive non-departmental public body, sponsored by the Department for Transport. It is responsible for developing and promoting the Government's proposal for a new high speed north-south railway, High Speed Two (HS2).

4.1.2 Following Royal Assent, HS2 Ltd has been appointed the nominated undertaker, responsible for delivering the Proposed Scheme under the powers granted by the High-Speed Rail (London – West Midlands) Act 2017 ('the Act').

4.2 Background to HS2

4.2.1 HS2 is an infrastructure project of national importance. The primary benefit of the HS2 project is the creation and enhancement of essential infrastructure at a national level that will generate economic benefits for many of the UK's cities. As outlined in the strategic case for HS2, it is stated that the demand for train travel is increasing rapidly and is predicted to increase substantially in the future, and this demand cannot be met through upgrades to existing track. Without HS2, there are likely to be severe constraints on the capacity of the railway network, both in terms of intercity passenger services and freight. HS2 offers a long-term solution to this national transport problem by providing sufficient capacity to meet long term demand and to improve resilience and reliability across the network and improving connectivity by delivering better journey times and making travel easier.

4.2.2 HS2 is being taken forward in two phases: Phase One, which will connect London with Birmingham and the West Midlands; and Phase Two which will extend the route to Manchester, Leeds and beyond. Powers to construct Phase One of HS2 have now been secured through the High-Speed Rail (London-West Midlands) Act 2017, which received Royal Assent on 23 February 2017.

4.2.3 HS2 Ltd is committed to managing potential impacts and reducing disruption to communities, businesses and the environment in ways that reflect the best practice used by the construction industry. The Environmental Minimum Requirements (EMRs) that accompany the Act set out the environmental and sustainability commitments that will be observed in the construction of the HS2 works.

4.2.4 HS2 Ltd is committed to taking all reasonable steps to design and construct the railway in ways that reduce noise, as much as it reasonably can. Where noise from the construction of HS2 is still likely to impact residents within their properties, HS2 Ltd will offer to install a package of noise insulation that reflects statutory noise insulation set out in the Noise Insulation Regulations 1996.

5 Pre-Application Consultation

- 5.1.1 Throughout the passage of the hybrid Bill, HS2 Ltd has continued to engage with London Borough of Camden to secure arrangements for the mitigation of permanent and construction impacts.
- 5.1.2 As part of this process, a commitment was made to mitigate any exceedance of construction noise thresholds. HS2 Ltd sought to consult with all affected properties by publishing a guide to noise insulation and delivering this to all affected properties in the Euston vicinity, offering appropriate noise insulation measures for those who qualified. HS2 Ltd.'s Information papers regarding noise insulation and rehousing policy were also published.
- 5.1.3 No site-specific pre-application consultation has been undertaken specifically in relation to Richmond House, although the development proposals contained within this application have been framed with due regard to the feedback received in relation to the 'Cartmel' apartment block, both as part of the pre-app approach and during the determination of that planning application (London Borough of Camden Ref: 2019/0558/P).
- 5.1.4 Specific decisions made in support of this application, including:
- 1) Installation of white grilles only;
 - 2) Proposed plans include 'front-on' elevations with the grilles in situ;
 - 3) All grilles applied for on an equal basis, regardless of whether the individual properties have been surveyed;
 - 4) All grilles will be centred and aligned where possible;
 - 5) Additional information is included within this planning statement, demonstrating that additional information is not required in relation to noise and dust mitigation.

6 Planning Policy Context

6.1 Introduction

- 6.1.1 The planning policy context against which this application should be determined is contained within the National Planning Policy Framework (NPPF) 2019, the London Plan (2016), and the Camden Local Plan (2017). Regard will also be made to relevant adopted supplementary planning guidance.
- 6.1.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise.
- 6.1.3 The NPPF (2019) sets out the Government's planning policies for England including the presumption in favour of sustainable development. It is a material consideration in the determination of all applications.
- 6.1.4 The development plan in Camden is the London Plan (2016) and the Camden Local Plan (2017). The key policies of the Local Plan that are considered relevant in the assessment of the application proposal are listed.

6.2 National Planning Policy Framework (NPPF) 2019

- 6.2.1 The National Planning Policy Framework (NPPF) 2019, sets out the Government's overarching planning policies for England. Paragraph 7 of the NPPF stipulates '*the purpose of the planning system is to contribute to the achievement of sustainable development*'.
- 6.2.2 Paragraph 8 outlines three overarching objectives of sustainable development:
- a) **an economic objective** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) **a social objective** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
 - c) **an environmental objective** – *to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
- 6.2.3 Paragraph 9 states that these objectives '*should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities for each area.*'

- 6.2.4 Paragraph 11 sets out the presumption in favour of sustainable development '*Plans and decisions should apply a presumption in favour of sustainable development.*'

. . . . For decision-taking this means:

'(c) approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

Achieving Well-Designed Places

- 6.2.5 Paragraph 124 of the NPPF states: '*The creation of high quality buildings and places is fundamental to what the planning and development process should achieve.*'

6.3 The London Plan 2016

- 6.3.1 The London Plan 2016 sets out the Mayor's spatial development strategy (SDS) for London and legally forms part of the local statutory development plan for London Borough of Camden.

Chapter 1: Context and Strategy

- 6.3.2 HS2 is outlined as an infrastructure project of national importance and will generate economic benefits for many of the UK's cities. Strategically, HS2 provides an essential infrastructure solution at a national level, as the demand for train travel is continuously increasing and is predicted to increase substantially in the future, such a demand can not be met through upgrades to the current capacity of rail network, both in terms of intercity passenger services and freight.
- 6.3.3 Associated with the HS2 infrastructure project are several secondary, social, economic and environmental benefits of the project including the creation of jobs through its supply chain; creation of training opportunities through dedicated college; and being a catalyst for economic growth and delivery of low carbon journeys. The full economic case for constructing HS2 was extensively set out in the strategic business and economic case before Parliament.
- 6.3.4 The Hs2 projects and its inherent benefits complement the strategic policy requirements of Policy 1.1 entitled 'Delivering the strategic vision and objectives for London.'
- 6.3.5 Paragraph 1.39 emphasises the integral role of transport infrastructure will be for supporting London with particular focus upon 'the planning of transport services and the physical infrastructure they require co-ordinated with the growth and development envisaged by the Plan'.
- 6.3.6 Paragraph 1.49 supplements further.....' The approach taken in this Plan is to welcome and support growth and development, but to ensure that it contributes to London's sustained and sustainable development'.

- 6.3.7 The consecutive paragraph 1.50 provided... 'The co-ordinated approach to planning for growth and the infrastructure needed to support it will be essential to meeting the immediate needs of the city and its people and providing foundations for the lasting development and improvement for future generations of Londoners- the approach at the heart of the concept of sustainable development'.

Chapter 3 London's People

- 6.3.8 Within this chapter Policy 3.2 entitled 'Improving health and addressing health inequalities', a strategic approach has been adopted to take account the potential impact of new development proposals upon the health of persons within London. HS2 commitment is to provide noise insulation mitigation measures to residents particularly impacted by the proposed development.
- 6.3.9 Paragraph 3.11 of the chapter emphasizes the need for 'the policies in this plan are intended to enable Londoners to live.... and limiting disturbance from noise, or exposure to poor air'.

Chapter 7 London's Living Spaces and Places

- 6.3.10 HS2 proposal to mitigate the noise disturbance created by construction works will involve the introduction of secondary glazing to residential properties. A consequence of the installation of this glazing will be the reduction in the natural air ventilation. The installation of an internal air ventilation scheme will overcome this concern; however, these minor works will involve the external placement of vent grilles to the exterior of the host residential properties.
- 6.3.11 Policy 7.6 entitled 'Architecture' provides that any minor external alteration to a residential property are proportionate and should not detract from the overall appearance of the building façade or cause any adverse impact to the amenity of the surrounding land.
- 6.3.12 Policy 7.15 entitled 'Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes' focuses upon the strategic approach to reduce and manage noise to work towards improving the health and quality of life of people within London. Particular emphasis requires all development proposals to strive to manage noise by avoiding significant noise impacts on the health and quality of life by implementing appropriate mitigation or seek to minimise the potential adverse impact of noise.
- 6.3.13 Paragraph 7.52 supplements further that effective noise management can include... 'traditional and innovative noise reduction measures in otherwise unacceptable situations'.

Chapter 6 London's Transport

- 6.3.14 The national importance of the HS2 infrastructure project is reinforced within the policy requirements of Policy 6.1 entitled 'Strategic Approach' which is included as one of the transport infrastructure schemes proposed in the accompanying Table 6.1.
- 6.3.15 Paragraph 6.2 provides there is recognition that transport is integral in spatial planning and often new transport projects causes both beneficial and adverse impacts.
- 6.3.16 Paragraph 6.10 outlines that future and proposed transport policies, proposals and projects should be developed and adopted to support spatial priorities contained within the London Plan, and in particular help supplement and reinforce 'London's world city status by maintaining and improving its links with the rest of the world, including taking a balanced and sustainable approach ... the development of rail and road links between London, neighbouring regions and the rest of the United Kingdom'.

- 6.3.17 This is further endorsed within the Policy 6.4 entitled 'Enhancing London's Transport Connectivity' which reinforces the need for all strategic partners to seek to improve the public transport system in London with specific inclusion for improving and expanding London's international and national transport links for passengers and freight, with reference to High Speed 2.

London Plan Supplementary Planning Guidance Notes

- 6.3.18 The following adopted supplementary planning guidance of the London Plan is also considered relevant to the planning application proposal. Regard will be made that supplementary guidance notes will not have the status of the Development Plan. However, they will be a material consideration in the determination of the planning application.

SPG Character and Context (June 2014)

- 6.3.19 The application proposal for the external air ventilation grille is to be designed sympathetically to not detract from the external appearance of Richmond House. The proposed external alterations have taken account of the established residential character of the area and are assessed not to represent an incongruous feature to the main facades of the apartment block. In doing, the design principles of the application proposal appear to be policy compliant with the requirements of Policy 7.4 entitled 'Local Character' which stipulates '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'.

6.4 Camden Local Plan 2017

- 6.4.1 The Local Plan was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the Borough. The following policies are considered to support the application proposal.

Protected Amenity

- 6.4.2 Policy A1 - 'Managing the Impact of the Development' - strives to ensure all development proposals protect the quality of life of occupiers and neighbours by ensuring the impact of development is fully considered.
- 6.4.3 Policy A4 - 'Noise and Vibration' - reinforces the need that noise impact arising from development proposals should be managed and appropriate attenuation measures can be implemented to ensure that they do not harm the continued operations of the existing uses.

Design and Heritage

- 6.4.4 Policy D1 - 'Design' - seeks to secure high quality design in development and presents the requirements under a list of criteria. Of particular relevance, criterion (a) requires that development respects local context and character. Importantly, Policy D1 states that the Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Sustainability and Climate Change

- 6.4.5 Policy CC2 - 'Adapting to Climate Change' - requires all development proposals to be adapt appropriate climate change adaption measures which details approaches to reducing the impact of urban and dwellings overheating including an application of a cooling hierarchy.
- 6.4.6 Policy CC4 - 'Air Quality' - states 'the Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

Euston Area Plan (January 2015)

- 6.4.7 With the application site located within the designated area of the Euston Area Plan, regard should be made to the policies contained within. Strategic Principle EAP 2 entitled 'Design' which requires development proposals to incorporate urban design principles including 'to consider ... the scale and character of existing buildings and context'.

Camden Supplementary Planning Documents (SPD)

- 6.4.8 The supplementary planning document entitled 'Retrofitting - Planning Guidance (2011, updated October 2013) supports the principle of heat vent recovery within all residential properties and provides advice on relationships with other vents.
- 6.4.9 Camden Planning Guidance (CPG) 1 (Design) requires schemes to consider the context of the development and its surrounding area, the design of the building itself, the use of the building, the materials to be used and public spaces.
- 6.4.10 Camden Planning Guidance (CPG) 6 (Amenity) seeks to ensure that noise is controlled and managed.

7 Planning Policy Analysis

7.1 National Planning Policy Framework 2019

- 7.1.1 The application proposal has taken account of the guidance set out in the National Planning Policy Framework (NPPF) which seeks a good standard of amenity for current and future occupiers of land and buildings (Para 127). The temporary noise attenuation measures proposed seek to protect the occupants of Richmond House from the noise impact associated with the construction of HS2.
- 7.1.2 The noise attenuation measures are a sustainable form of development and would not adversely impact the appearance or residential character of Richmond House or the surrounding area and would help ensure and maintain the current levels of quality of life during construction of HS2.
- 7.1.3 The design, form, and use of materials for the grilles has considered any potential effect on the residential character and appearance of Richmond House together with any potential impact to the occupants, including the amenity of residents in respect of the guidance provided in the National Planning Policy Framework. The proposed small-scale alterations would not negatively impact any significant architectural or historic fabric of the building, yet would appear as a subordinate element to the facades. The vent grilles will, in conjunction with the secondary glazing, help to mitigate the impact of noise levels during the construction phase of HS2.
- 7.1.4 Overall, the proposed ventilation grilles, as part of the wider noise attenuation improvements seek to safeguard the amenity of the residents of Richmond House during the construction of the HS2.

7.2 London Plan 2016

Chapter 1: Context and Strategy and Chapter 6 London's Transport

- 7.2.1 The strategic importance of the HS2 infrastructure project including any proposed noise attenuation measures is reinforced in Chapter 1 which emphasises the integral role of transport infrastructure as a fundamental element of the growth and development prospects of London. This is supplemented further with the guidance provided in paragraphs 1.49 and 1.50 with the need for supporting London's sustained and sustainable development.

Chapter 3: London's People

- 7.2.2 The noise attenuation mitigation schemes proposed by HS2 comply with the requirements of Policy 3.2 of this chapter when considering the potential impact of the development proposal upon the health of people. These measures also have regard to paragraph 3.11 of the chapter ensuring acceptable mitigation proposals are in place to enable residents to live and have limited disturbance from noise impact and nuisance.

Chapter 7 London's Living Spaces and Places

- 7.2.3 Given the small scale of the external air grille vents proposed as part of the planning application, regard has been made to the guidance principles of Policy 7.6 of this Chapter. The design and proposed locations of the external grille vents that are integral to the internal ventilation system will not detract from the character and appearance of Richmond House. The grille vents

will be a discreet and subservient addition that will not undermine the architectural style and character of the host building. The proposed small-scale external alterations to the eastern and western elevations will not impact upon the residential amenity of the surrounding area and will comply with Policy 7.6.

- 7.2.4 The application proposal will comply with the requirements of Policy 7.15 by seeking to improve the quality of life for residents of Richmond House and seeks to safeguard them from intrusive noise impact from the Hs2 infrastructure project works. The small-scale nature of the proposal in the context of the residential apartment buildings seeks to minimise the potential adverse impact of noise for the wellbeing of the occupants and has carefully considered the guidance of paragraph 7.52 of proposing an effective noise management scheme to mitigate the noise impact.

SPG Character and Context (June 2014)

- 7.2.5 The proposed external vent grilles would be compliant with Policy 7.4 of this supplementary planning guidance. The positioning of the white colour coated grilles would be discreet and inconspicuous and therefore sympathetic to the host buildings. The design of the grilles would not impact on the proportions and external character and appearance of Richmond House, nor cause any unacceptable harm to the residential amenity of the surrounding area.

SPG Sustainable Design and Construction (June 2014)

- 7.2.6 The proposed noise attenuation scheme reinforces the policy requirements of Policy 7.15 of this supplementary planning guidance with specific reference to paragraphs 4.4.6 and 4.4.9 to adopt an effective attenuation measures to alleviate or mitigate any potential harm or impact from noise from proposed developments. The application proposal for the external air vents will allow for a natural air intake to habitable rooms within each of the 24 apartments of Richmond House, without resulting in any coherent detriment to the character or appearance of the property. The sensitive and coherent design approach of these noise mitigation measures will help safeguard the living conditions for the occupants of the flat during the HS2 construction works.

7.3 Camden Local Plan 2017

Amenity

- 7.3.1 The minor works involving the installation of the external ventilation grilles to Richmond House would not have any unacceptable detrimental impact on the character and appearance of the area or the host building. The provision of both secondary glazing and an internal air ventilation system to each of the flat/apartments of the building will be built to modern insulation and energy use requirements.
- 7.3.2 The proposal would not have any detrimental amenity impact on the living conditions of occupiers of Richmond House or to neighbouring properties. The proposal is therefore considered to be policy compliant with Policy A1 of the Camden Local Plan.
- 7.3.3 The provision of an internal air ventilation system and secondary glazing to each flat/apartment within Richmond House will help mitigate against the noise impacts during the construction phase of the Hs2 infrastructure project. The application proposal causes no detrimental harm to the character and appearance of Richmond House, and would therefore be in accordance with Policy A4 of the Local Plan.

Design

- 7.3.4 The installation of the external vent grilles will be discreet and subservient additions and would not undermine the architectural style or existing character of Richmond House. The surrounding streets are residential in character and many of the buildings are of similar linear design to the host property, with varying heights. Other nearby blocks will be subject to similar proposals as those contained in this application. In terms of the street scene, the external grilles will be evident, (depending on resident take-up), but will be incorporated into the character and form of the existing proportions of the host building by location, size and colour.
- 7.3.5 In assessing the effect of the proposal on the character and appearance of the host building and on the surrounding area, the external vent grilles have no detrimental impact and would be in accordance with Policy D1.

Sustainability and Climate Change

- 7.3.6 The proposed installation of the Sonair air ventilation system as part of the noise attenuation measures is a form of ventilation which is included within the cooling hierarchy category contained within Policy CC2. On balance, the application proposal would positively respond to the requirements of minimising the effects of climate change.

Euston Area Plan (January 2015)

- 7.3.7 The minor scale works of the application proposal are considered consistent with the policy guidance contained within Policy EAP2 as the application property bounds part of the Regents Park Estate in the Area Plan. The proposed positioning and the size of the white colour finished external grille vents have taken account of the scale, proportions and architectural detailing of the residential flat/apartment block and will compliant with the policy.

7.4 Summary of planning analysis

- 7.4.1 The application proposal is compliant with the Policies A1, A4, D1 and supports the requirements of Policy CC2 of the Camden Local Plan (2017). The proposal accords with the Policies 1.1, 3.2, 6.1, 7.6 and 7.15 contained within The London Plan (2016) and the guidance provisions set out in the NPPF.
- 7.4.2 The proposed noise attenuation scheme seeks to protect and safeguard the amenity and quality of life of the residents of Richmond House during the HS2 construction works. The application proposal is minor in scale to the residential building and does not cause any detrimental impact to the residential character and appearance of the host building or the surrounding residential area of Regent's Park Conservation Area.
- 7.4.3 HS2 considers that proposed noise attenuation scheme is reasonable to ensure a satisfactory living environment can be maintained by the occupants of Richmond House. The noise attenuation measures have been designed to accord with the WHO Guidelines for Community Noise, in which the recommended internal noise levels throughout the day for the occupants of both buildings would be achievable, subject to appropriate construction standards and mitigation. The grilles are modest and discrete in size and have limited impact on the overall appearance of Richmond House.
- 7.4.4 In support of the application proposal, HS2 is mindful of the guidance outlined in the National Planning Policy Framework that the London Borough of Camden, as the local planning authority, when assessing and determining development proposals, should apply the



presumption in favour of sustainable development. Accordingly, applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

8 Conclusions

- 8.1.1 HS2 Ltd is undertaking a rail project of national importance. As part of this work it has made a commitment to design and construct Phase One of the HS2 scheme in ways that reduces noise and vibration as much as reasonably practicable, through a standard package of noise insulation measures in line with statutory noise insulation in the Noise Insulation Regulations 1996. The development proposals within this application ensure that the commitment can be met in respect of Richmond House.
- 8.1.2 The application proposal for ventilation grilles is policy compliant with the development plan and national planning guidance relating to the principle of development, design and residential amenity. The grilles are appropriately sized and located and represent sustainable development, by enhancing living conditions at existing residential properties through a minimal amount of work, in combination with internal works which do not require planning permission.
- 8.1.3 The applicant regularly engages with the planning department at the London Borough of Camden on all planning matters connected to HS2 and prior to the submission of the application the applicant undertook pro-active engagement with the planning authority, including several pre-app meetings and the submission of a formal pre-app request relating to another property (Cartmel). Where it is appropriate to do so, issues raised in the Council's pre-app response on Cartmel have been addressed as part of this submission for Richmond House. Where issues raised are better dealt with elsewhere, under building regulations for instance, such matters will be addressed separately.
- 8.1.4 HS2 recommends the planning authority support this application proposal that seeks to provide enhanced ventilation, in association with noise attenuation measures, for the occupants of Richmond House to mitigate against the noise impact from the HS2 infrastructure project works. HS2 would welcome the opportunity to discuss with the planning authority any imposed planning conditions, before the formal determination of the planning application.