

From: Andrew P. Bacon

Sent: 12 September 2019 16:57

To: Marfleet, Patrick

Cc: Sadr, Andy; Colin O'Connor; Miriam Rogers; Kirstin O'Regan; Booth, Mark

Subject: RE: 1044: Maria Fidelis: Planning Submission 2019/3091/P

Dear Patrick,

We have looked through the comments from the local community and have grouped our response to them in 4 main subject headings;

1) During Construction.

We understand that the local community has a very large construction project underway in the locality. This should not be a reason to preclude any further development in the area but we do agree that the construction period needs to be carefully considered and its impact mitigated where possible.

In the context of our application we would note that;

- The applicant, The London Borough of Camden and LCR, will require the main contractor to sign up to the 'Considerate Constructors' scheme, placing additional requirements to ensure impacts and works sequences and programmes are mitigated and conveyed to the local community.
- We note that our preferred access point set out in our planning documents for construction (and later for servicing) is from the Hampstead Road – minimising construction vehicle traffic movements in the locality and importantly avoiding North Gower Street and Starcross Street.
- The placement of the new CSC is to the rear of the site, the furthest position away from Starcross Street that is possible on the site. Works to the front of the main school building are limited.
- We understand that we would need to draw up and consult upon our Construction Management Plan prior to commencing work on site.

2) Occupancy and use – General Site considerations

We have seen that quite a few of the comments posted and from first hand consultation discussions, comment on current anti-social behaviour, litter, noise and nuisance issues. There are some comments that the existing gym is being used (by others / the community) with noise and disturbance late into the night or at weekends recently or in the past. Residents of George Mews have been particularly impacted upon since the closure of St James Gardens.

In the context of our application we would note that;

- Up until recently, the site has been a secondary school and would have had significant noise outbreak, especially during break times.
- The school had a capacity of over 550 pupils.
- A significant number of the pupils would arrive and leave school at the same time through the small gate and onto the narrow pavement along Starcross Street and North Gower Street, generating noise and an element of 'nuisance' given the volume of people in a small space.
- The proposed CSC has an anticipated daily occupancy of 100 learners – substantially less than the existing.
- The managed workspace building will have space for circa 250 people and arrive and leave at a very different movement pattern. This will help reduce the number of people

arriving/departing from the building at one specific time, improving the activity around the entrance to the building.

- The landscape to the corner of the site is being visually and physically opened up to improve the sense of openness, improving views over such areas as St George Mews. The brick wall is being removed and will be replaced with railings.
- The existing vehicle access gates at the end of the North Gower Street will be revised to remove the current hidden setback.
- We are opening up the side of the multi-use hall to create an active frontage at this location – directly opposite some of the prime problem areas at St George Mews
- Waste collection – our preferred solution as you are aware is from within the north west corner of the site, accessed from The Hampstead Road. The alternative approach proposes refuse stores in two locations for the two main uses. These will be covered and gated and under the management and control of the two users and would be collected from the public highway – as per the existing situation.
- We have consulted with Secured By Design and understand a condition requiring SBD approval could be attached to an approval.
- The issues raised by the local community are existing problems, which we believe the proposal will help to significantly reduce.

3) Occupancy and use - Workspace Specific

In the context of our application and to respond to comments or objections made, we would note that;

- The background noise test was carried out on the site when some construction works were underway. A cautious approach has been set out in the noise report as construction noise will be much greater at the majority of the time in the future but also less at times. It sets wording of a condition that could be attached to a permission – which requires plant noise to be below the general background noise level.
- As a result of noise set by HS2 in their reports, the noise profile of the site over the next 10 years will exceed the level of acceptable noise pollution and this was one of the contributing factors to the school vacating the plot. The noise impacts from HS2 construction are therefore not a result of the proposed development. The impact of the HS2 construction noise falls outside the limits of this application, and therefore we are unable to respond on this point. However, in order to combat the impact of noise on the proposed development mechanical ventilation will be provided in order to ensure the noise environment is appropriate. This is set out in more detail in the Noise Report submitted with the proposals.
- Multi-use hall. The applicant is fully committed to offer the space for community use. How or when this is done is commercially sensitive as it requires the agreement of the buildings future operator – yet to be appointed. It also requires a fuller understanding of who wants to use it and to ensure its available for a varied number of groups. The applicant would be hesitant to agree to onerous or specific 'terms/hours/times of the day' in a legal agreement without being able to discuss and agree with the operator, as without it, the whole commercial viability would be at stake.

4) Occupancy and use - CSC Specific

- One of the assurances secured from HS2 was specifically for the creation of a skills centre to be located in the Euston area to support training and employment of local people. The Centre will play a key role in ensuring local people can access appropriate training and employment support and advice to benefit from opportunities arising from

HS2 and other works. There is a great need for a replacement home for the CSC in the locality, supported by the Local Authority and cabinet members.

- Opening hours: It is important that there is scope for some courses and activity to be run in the evening. The levels of noise associated with such activity will be closely monitored and managed to ensure minimum levels of disturbance to residents. This will be from time to time, not a regular occurrence. We would note that after dusk the CSC entrance/exit is alongside the Exmouth Arms pub – which is open and active until 11pm.
- Use of power tools outside – The applicant doesn't foresee the use of power tools as set out in the reports, but there maybe the very rare occurrence when it is required, just as any other local business or home owner could or be allowed to do so unless complaints are made and the noise is excessive or out of hours.
- Roller Shutter doors – as per the previous, it is not intended to leave open. There may be the rare occasion where these doors will need to be opened but as above this would be an exception.
- Both of the previous two comments should be considered in the backdrop to the HS2 works.
- Deliveries: These will be limited and infrequent as it's an education facility that needs some materials at the start and end of the term.

Should you need any further detail please let me know

Thanks.

Kind regards,

Andrew Bacon

Director

FBMArchitects

15-18 Featherstone Street, London, EC1Y 8SL

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