

BRILL PLACE

PLANNING STATEMENT

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Client
Brill Place Ltd

Project
Brill Place
Central Somers Town

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Brill Place Planning Statement

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1. Introduction

- 1.1 This Planning Statement relates to an application by Brill Place Limited for Minor Material Amendments to planning application 2015/2704/P, relating to Brill Place Tower, plot 7 of the wider Central Somers Town (CST) scheme, which is the London Borough of Camden's Community Infrastructure Project for the Central Somers Town area.
- 1.2 The approved Brill Place Tower comprises a mixed use residential building of 54 market residential units with flexible A1/A2/A3/D1 uses at ground floor level. The proposed MMA comprises the following amendments:
- Revised architectural design (façade) in response to altered technical requirements since granting of the extant permission, including in relation to fire regulations and sustainable design.
 - Rationalisation and optimisation of approved residential layout which has resulted in an increase in the number of residential units by 14 units to comprise a total of 68 units.
 - Alterations to the ground floor layout, including structural column positions, size and the line of the external envelope.
 - Update to the approved Energy Strategy in line with adopted Development Plan.
- 1.3 The MMA application is for amendments to planning conditions 2 (approved drawings), 3 documents (all plots) and 15 (quantum of housing for plot 7) and 80 (cycle parking, plot 7) of the extant permission, to facilitate the above changes sought.
- 1.4 The suggested description of development is as follows:

An application pursuant to s73 of the Town and Country Planning Act 1990 (as amended) to vary conditions 2 (approved drawings), 3 (approved documents), 15 (quantum of housing, plot 7) and 80 (cycle parking, plot 7) of planning permission ref. 2015/2704/P in relation to Plot 7, Central Somers Town.

- 1.5 This application is accompanied by the following supporting documents:
- Planning Application Form and Certificates
 - Community Infrastructure Levy (CIL) form
 - Site location plan
 - Existing and Proposed Drawings (floor plans, roof plan, elevation, sections), plot 7
 - Design and Access Statement, plot 7
 - Planning Statement

- Heritage, Townscape and Visual Impact Addendum
- Energy and Sustainability Statement
- Daylight and Sunlight Assessment
- Wind Microclimate Technical Letter
- Relevant planning application fee

2. Site and surroundings

- 2.1 The site comprises plot 7 of the approved CST development permitted under reference 2015/2704/P on 15 October 2016 for the:

‘Demolition of existing buildings and the provision of approximately 2,190sq.m replacement school (Use Class D1); approximately 1,765sq.m of community facilities (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys in height comprising:

- Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to include a children’s nursery and community play facility with 10no. residential units above;

- Plot 2: 35 residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m);

- Plot 3: Extension of Grade II listed terrace to provide 3no. dwellings;

- Plot 4: Replacement school (Use Class D1) ;

- Plot 5: 20no. residential units over a replacement community hall (Use Class D1) (approximately 211sq.m);

- Plot 6: 14no. residential units; and

- Plot 7: 54no. residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 70sq.m).

Changes to existing public open spaces along with associated highways works and landscaping’.

- 2.2 The entire CST site comprises approximately 2.2 hectares of land covering land at Polygon Road Open Space, Edith Neville Primary School, 174 Ossulston Street and Purchase Street Open space. A plan identifying the CST site and the location of plot 7 within CST is set out below.
- 2.3 The CST site is not within any conservation areas and does not include any locally listed buildings, though there are statutorily Listed Buildings and Conservation Areas in the immediate context of the site. The extant scheme would be visible from Regents Park, as discussed in this statement.
- 2.4 Plot 7, is adjacent to Brill Place toward the southern end of Purchase Street Open Space. As approved, Plot 7: Brill Place Tower includes 54 private residential flats over 70 sqm of flexible A1/A2/A3/D1 floorspace at ground level in a 25 storey building. The planning permission has been implemented by virtue of the development works underway at Plot 4.

- 2.5 Planning application reference 2019/2475/P is a minor material amendment application, currently pending determination, for the inclusion of an electrical substation within the curtilage of plot 7.

3. Proposed amendments

3.1 In summary, the amendments sought to 2015/2704/P specific to Plot 7 can be described as follows:

- Revised architectural design (façade) in response to altered technical requirements since granting of the extant permission, including in relation to fire regulations and sustainable design.
- Rationalisation and optimisation of approved residential layout which has resulted in an increase in the number of residential units by 14 units to comprise a total of 68 units.
- Alterations to the ground floor layout, including structural column positions, size and the line of the external envelope.
- Update to the approved Energy Strategy in line with adopted Development Plan.

3.2 These amendments are each discussed in further detail below.

Architectural design

3.3 The architectural approach to the revised façade is set out within the supporting DAS produced by project architects Stiff + Trevillion (S+T). The form, profile and height of the building will be materially unchanged.

3.4 The amended design approach results from a number of technical and policy challenges, related to updated fire regulations, as well as more onerous sustainable design standards. The design changes are also led by an updated architectural approach to the site by S+T, which is an award-winning architectural practice with a reputation for high-quality design and execution.

3.5 Changes in the materiality and façade detail are to directly address the most up to date fire regulations along with energy requirements of the London Plan. The extensive use of glazing as currently approved for the tower does not deliver a safe or sustainable building against current, more stringent, standards.

3.6 The revised design has been subject to detailed and painstaking design testing, both in-house and through engagement with officers and LBC and via two reviews by Camden's independent Design Review Panel. The proposals are of the highest architectural quality, befitting the sensitivities of a tall building in this location.

Internal layout and residential quantum

3.7 It is proposed to increase the number of residential units in the tower by 14 units to comprise a revised total of 68 units. The proposed housing mix is virtually identical to the consented mix, as set out in the following table.

Table 3.1: Extant and proposed mix of new homes

Bedrooms	Extant units	Extant %	Proposed units	Proposed %
1	27	50	33	48.5
2	24	44	31	45.6
3	3	6	4	5.9

- 3.8 As approved, all residential units are proposed as market housing units – this is as per the extant scheme and was considered acceptable (with regards to affordable housing policy) on the basis that plot 7 cross-subsidised the wider regeneration scheme.
- 3.9 All units comply with housing space standards. As approved, all residential units up to level 14 of the tower include a balcony as external amenity space. Residential units from floor 15 are provided with a winter garden.

Energy Strategy

- 3.10 An amended Energy Strategy is proposed, which is for Plot 7 to be fully served from the existing Central Somers Town energy centre. The previous energy strategy proposed to use the district energy connection for hot water only, with heating provided from gas absorption heat pumps. It was also proposed to implement a PV array on the southern elevation of the Proposed Development. The revised strategy will make use of existing capacity within the energy network, which is a low carbon energy source.
- 3.11 The scheme will target a 53.7% carbon dioxide emission reduction compared to the Part L 2013 ‘gas boiler baseline’, which will be an improvement on the 40% reduction secured under the extant permission.

Scale/floor plans

- 3.12 In rationalising the residential layout and floor plans, the redline footprint area from first floor level has resulted in an adjustment as a consequence of thicker insulation being required to external cladding to meet current design and safety (fire) standards. This results in a minor adjustment to the approved footprint on all floors from first floor level. Approved and proposed layout plans setting out this modest change are included within the DAS. Importantly, such an increase will not be noticeable in visual terms.
- 3.13 Alterations are also proposed to the ground floor layout, including to structural column positions, the size and number of structural columns and the line of the external envelope. In comparison to the pending s73 application, which allows for the incorporation of a substation, the ground floor plan would be smaller, with a ‘cut-out’ proposed to the eastern corner of the present revised proposals, similar to the original and extant scheme.

4. Pre-application engagement

- 4.1 The applicant team met with LBC planning, design and conservation officers through August-November 2019 to engage in pre-application discussions.
- 4.2 The primary focus of pre-application discussions has been on how the architectural design compares with that of the extant scheme. In addition pre-application discussions also covered the technical requirements, around Building Regulations, fire regulations and sustainable design.
- 4.3 During the pre-application stage the scheme was reviewed by LBC's independent Design Review Panel, with a full review in September, followed by a Chair's Review in November.
- 4.4 The scheme was also discussed informally between S+T and the architects of the extant scheme, DRMM, in order to ensure a full understanding of the context to the previous design approach.
- 4.5 The DRP Panel in September highlighted a number of elements which S+T should focus on, in terms of design development, including:
- Interpretation of the successful architectural qualities of the extant scheme, including the distinctive, non-corporate appearance, with 'feathering', depth, layering, texture and transparency. However, the panel also saw virtue in considering a more rational design approach, compared to the extant scheme.
 - Further development of the balcony planting narrative was encouraged; the approach was supported and considered to relate well to the neighbouring park but would require a minimal input from residents for maintenance.
 - The panel recommended further exploration of the detailed resolution of the scissor profile roofline, the fenestration of the north and south elevations, and the cladding of staircases.
 - The panel was clear that the revisions do not represent 'value engineering' and understood the technical drivers for the design revisions.
 - Differences in materiality and solidity of the façade across the height of the building and between elevations could be explored, including a more orderly south elevation and a less-orderly park elevation. Materiality in relation to the park should respond to the park setting.
 - The perception of height should be addressed, and this was successfully addressed in the extant scheme through a 'landscape' orientation to the façade. The perception of width should also be addressed through further design development, particularly in relation to the north elevation.
- 4.6 The DRP Chair's Review took place following further design development, in response to officer comments and the DRP Panel Review feedback. The DRP Chair and additional

panel member were very supportive of the scheme and were clear, during the meeting, that the DRP panel's previous comments had been addressed in a very comprehensive manner and that the scheme represents high quality design-led architecture. The DRP letter, following the Chair's Review, is anticipated subsequent to submission of the application.

4.7 LBC officers were interested in a number of aspects of the design, particularly in the context of the extant permission, including:

- Ensuring a 'non-corporate' appearance
- Reflecting the complexity and layering of the extant scheme and the sense of lightness.
- Materiality, in order to achieve the above two points.
- Relationship of the top part of the tower to the park and appearance in longer views.

4.8 These matters were fully addressed in the presentation to the DRP Chair and considered by the DRP Chair and additional panel member to have been fully addressed.

4.9 The submitted scheme is the result of an in-depth process of design development, which has been informed by construction experts, independent design review, by an external design review panel, and pre-application engagement with officers. The submitted scheme is a high quality piece of architecture on its own merits and also an appropriate response to technical challenges which prevent the extant scheme from being implemented in its approved form.

5. Planning policy and determination

5.1 The proposed amendments should be considered against relevant policies contained in the current adopted Development Plan for Camden Council comprising of the following planning policy documents:

- The London Plan (2016);
- Camden Local Plan (2017);
- Site Allocations Plan (2013) and
- Policies Map (2019).

5.2 In addition, a range of material considerations should be considered in decision-making, including the NPPF and PPG, new national design guidance, Camden Planning Guidance and the draft London Plan, albeit with limited attributable weight to the draft Plan at this stage.

Minor Material Amendment applications

5.3 An application for an MMA is made under Section 73 of the Town and Country Planning Act 1990 (as amended); it is an application to vary or remove conditions associated with a planning permission, including to make amendments to that permission where the scale and/or nature of the changes do not result in a development substantially different from the one approved.

5.4 The effect of the granting of an MMA application is the issue of a new planning permission, sitting alongside the extant, which remains intact and un-amended.

5.5 LBC has confirmed, through pre-application discussions, that the proposed changes can be appropriately addressed through an MMA.

5.6 In determining an MMA Local Planning Authorities should focus their attention on national and Development Plan policies, and other material considerations, which may have changed significantly since the original grant of permission.

6. Planning Assessment

Design and Conservation

- 6.1 Whilst the proposal is addressed through an MMA application, it is not considered that there would be material impacts in relation to fundamental aspects of the original planning assessment, including the relationship to heritage assets.
- 6.2 The key design principles of the approved tower are retained:
- No changes are proposed to the overall height and form of the approved tower; the approved scissor profile and form of two 'micro towers' is retained.
 - The overall massing of the tower is not materially altered, retaining a slim form and with nominal changes to width as a result of altered balcony placement and limited floorplan changes.
 - Limited changes to the ground floor, comprising 11, rather than 7 structural columns (but the proposed columns will have a smaller footprint and therefore be more slender). In addition, in comparison to the pending s73 the ground floor plan will be smaller, with a cut-out to the eastern corner of the plan, similar to the original and extant scheme.
 - The building form still comprises three key sections (the base, middle and top), which is successful in breaking-up the form and massing.
 - The proposed building will continue to providing legibility of the public realm and to serve as a distinctive local landmark. The proposed tower continues to define a gateway space to the Coopers Lane Estate and re-worked Purchase Street Open Space at the eastern side of the proposed building, improving the legibility of the public realm and place shaping role, as approved.
 - The proposals maintain maximum aspect and views into the park, providing passive surveillance.
 - There will be no additional overlooking of the FCI.
 - All residential units benefit from a high standard of residential amenity;
 - The proposal is for a high quality architectural approach and will be delivered with high quality materials and build quality. The proposals will continue to deliver an attractive and interesting building and one which has been carefully designed to be contextually sensitive.
- 6.3 It is recognised that the Brill Place Tower will be widely visible and form part of the setting of several listed buildings and conservation areas in Camden. The Council granted the original permission on the basis that less than substantial harm to heritage assets, including Regent's Park and Chester Terrace, was outweighed by substantial planning benefits. This continues to be the case in relation to the revisions proposed.

- 6.4 The design changes, compared to the extant scheme, are considered to be positive. The revised scheme is a high quality architectural approach, which has been supported through independent design review.

Heritage, Townscape and Visual Impact Assessment

- 6.5 This application is accompanied by an updated Heritage, Townscape and Visual Impact Assessment (HTVIA), which should be read in conjunction with the HTVIA submitted with the original application and also the response to Historic England comments, also submitted in relation to the original application.
- 6.6 The amendments to the consented scheme within the MMA application would result in localised changes. The changes largely relate to the design of the façade treatment of the Plot 7 tower, and would generally only be perceived from the immediate townscape area and short-distance views around the Site. The overall scale and massing of the development would comprise of minimal discernible changes and the effect on townscape character and visual amenity would be limited.
- 6.7 The adopted Local Plan contains policies which are generally similar in effect to the previously adopted Development Plan documents, in place at the time of the extant scheme's determination. Similarly, the NPPF policies specific to heritage, townscape and visual matters are not materially different from those in the 2012 version. However, changes to the national Planning Practice Guidance, with regards to design, have been made and do require a new consideration, as does the 2019 Government publication *National Design Guide: Planning practice guidance for beautiful, enduring and successful places*.
- 6.8 The submitted updated HTVIA takes account of the fact that, since the original planning decision, a number of nearby buildings of scale/height have been constructed or are under construction, including at Pancras Square and Kings Boulevard, Coal Drops Yard, the Tapestry Building and the Gasholders site, and on Euston Road the Unison Building and the Pullman hotel. As a result, the Townscape Character Area 3 (TCA3) identified in the 2015 HTVIA has been altered and photos of the current townscape are included within the HTVIA
- 6.9 However, in overall terms the baseline condition of the previously assessed Representative Viewpoints remains unchanged. The Coal Drops Yard development now completed has a more significant presence in representative viewpoint 04 but overall the significance of the view remains unchanged.
- 6.10 With regards to the relationship of the tower to surrounding heritage assets, the fundamentals of the approach remain unchanged; as set out in the 2015 HTVIA and 2016 HTVIA Addendum *'The tower's design process has limited its appearance and prominence in sensitive views by locating it with great care, reducing its mass, creating its refined scissor profile termination with a substantially glazed finish that will reflect the sky, and orientating it so that its broadest faces are presented to the north and south'*.
- 6.11 The proposed minor amendments associated with the S73 Application, which have the potential to effect the conclusion of the impact assessment on townscape character and visual amenity, are summarised below:

- Alteration of balcony positions and projecting bays, to achieve greater rationalisation and organisation of façade elements
 - Changes to materiality, including amendments to the southern facing stair
 - Removal of automated external screens
 - Changes to percentage of glazing, particularly in upper storeys, which were proposed to be fully glazed
- 6.12 The updated HTVIA concludes that there will continue to be less-than-substantial harm to the particular significance of the Regent’s Park Registered Park and Garden of Special Historic Interest, the listed Chester Terrace and the Regent’s Park Conservation Area. In determining the October 2016 application, the Council were satisfied that the necessary clear and convincing justification for this harm had been provided and that the substantial public benefits delivered by the application would outweigh that harm.
- 6.13 Other than the specific harm identified, the proposed development, like the extant scheme, will preserve and enhance the special interest and setting, and the character and appearance of the relevant listed building, conservation areas respectively, as well as being appropriate with regards to other heritage assets.
- 6.14 There would be a permanent moderate beneficial impact to TCA1 – Somers Town Residential, as per the extant scheme. The changes to the extant planning permission would result in only slight changes in the appearance of the revised building from the remaining TCAs and that the resultant magnitude of change for each TCA would remain unchanged and valid as those identified in the December 2015 HTVIA.
- 6.15 The effects on the representative viewpoints would be the same as those concluded in the previous assessment.
- 6.16 Effects in relation to the Kings Cross St Pancras, Regents Canal, Bloomsbury and Camden Town Conservation Areas remain acceptable, as per the original assessment. Similarly, the relationship with surrounding listed buildings, monuments and registered parks and gardens remains fundamentally unchanged and therefore acceptable, in line with the original assessment and planning decision.
- 6.17 The current proposal would continue to accord with the now updated 2019 NPPF, PPG and local policies of high quality design and is based upon a clear understanding of the townscape characteristics and context. It would continue to contribute and enhance the townscape character and visual appearance of the local area. The overall planning benefits are summarised within this planning statement and have not altered, compared to the extant scheme, except by the provision of additional new homes, which strengthens the positive planning balance.
- 6.18 Accordingly, with regards to design, heritage and townscape, it is considered that amendments sought are compliant with Policy D1 and in particular parts f, j, p and t of the policy which require development to: integrate well with the surrounding streets and open spaces, improve movement through the site and wider area, contribute positively to the street frontage, respond to natural features and preserve open space

and, with respect to a tall building, give attention to how the base of the building fits in with the streetscape and how it contributes to pedestrian permeability.

Housing

Additional housing

6.19 The proposals will deliver 68 new homes, 14 more than the extant permission. Given that residential is the priority land use in Camden (Local Plan Policy H1 – Maximising Housing Supply) the proposed additional residential units are supported in principle.

Housing mix

6.20 As demonstrated in the table below, the proposed housing mix accords closely with the consented housing mix for the Brill Place Tower. All units proposed comprise market housing, as approved.

Table 6.1: Housing mix comparison

Bedrooms	Extant units	Extant %	Proposed units	Proposed %
1	27	50	33	48.5
2	24	44	31	45.6
3	3	6	4	5.9

Housing quality

6.21 All of the proposed units meet the required internal housing space standards of the Local Plan and associated amenity spaces, in the form of a balcony or a winter garden (15th floor and upwards), also meet required space standards. All units proposed are dual aspect and all of them form the corners to the building.

Affordable Housing

6.22 The receipts to LBC from the sale of plot 7 will cross-subsidise the regeneration of Central Somers Town, including the delivery of the approved affordable housing. A subsidy was also provided from LBC's affordable housing fund.

6.23 The minor amendment proposals remain within the overall net saleable residential floorspace approved within the approved Viability Statement. As such there is no requirement for any additional affordable housing provision as part of these minor material amendment proposals. This is an agreed position with LBC officers.

Sustainable design

6.24 The approach to sustainable design is set out within the Energy and Sustainability Assessment, produced by Hoare Lea. The proposed approach is to connect the site to the existing Central Somers Town district heating network to provide heating and hot water. The network is served by gas fired Combined Heat and Power (CHP) plant.

6.25 Plot 7 will be fully served from the existing energy centre. The previous energy strategy proposed to use the district energy connection for hot water only, with heating provided from gas absorption heat pumps. It was also proposed to implement a PV

array on the roof of the Proposed Development. The revised strategy will make use of existing capacity within the energy network, which is a low carbon energy source.

- 6.26 The proposals will target a 53.7% site-wide carbon emission reduction compared to the Part L 2013 'gas boiler baseline'. This is an improvement on the approved 40% carbon emission reduction targeted across the masterplan, under the extant permission.
- 6.27 With regards to policies both adopted since the previous planning decision (LBC's Local Plan) and emerging (the draft London Plan), it should be noted the minor material amendments proposed under this present application will be undertaken whilst complying overall with the previous targets for the sustainable design and energy strategy in relation to the extant scheme, which has been implemented. There is no requirement therefore to re-assess the approved strategy and it is noted that the extant permission is a material planning consideration in the determination of this application.
- 6.28 With regards to BREEAM, it should be noted that the commercial space will have an area of less than 500 sq m and therefore no specific policy requirement applies.
- 6.29 PV panels are no longer proposed on the south-facing tower façade, because of this would be unfeasible given updated fire regulations requirements and also the need to solar shading on the southern façade. This is set out in detail within the revised Energy Strategy. PV panels were also considered for the uppermost section of pitched roof; however, safe access for maintenance to this area would not be possible.
- 6.30 Cooling will be by a combination of natural ventilation, filtered mechanical ventilation and mechanical cooling, to allow for instances where open windows are not practical or are not permitted due to a 'black start' event at the FCI.
- 6.31 The revised design and energy strategy has also responded to the need to remove any phenolic foam insulation from the design specification, due to fire risk and changes to the fire regulations in response to the Grenfell fire.
- 6.32 Overall, the energy strategy will improve upon the site-wide carbon emission reduction target of 40%, secured in relation to the extant scheme, with a revised proposal which will target a 53.7% reduction.

Daylight and Sunlight Assessment

- 6.33 Whilst the proposals will make only limited changes to the external envelope, the proposals have nevertheless been re-assessed in relation to daylight and sunlight impacts on surrounding neighbouring properties.
- 6.34 The report, by Point 2 Surveyors, establishes that there will be no material difference in the daylight and sunlight impacts of the scheme, compared with the extant permission. In fact, Point 2 has established that there will be betterments in neighbouring amenity, compared to the extant permission.
- 6.35 Compared to the existing site condition, 82% of tested windows fully meet the generic British Research Establishment (BRE) guidelines; 51% of the remaining windows would

have 20% or more Vertical Sky Component (VSC), which is good within an urban environment. 24% of the remaining windows already have low VSC, such that even minimal impacts will have an unavoidable effect.

- 6.36 With regards to the No Sky Line (NSL), 92% of the tested rooms meet the BRE guidelines and of the remaining windows, 76% will achieve an NSL value in excess of 50%, which is good within an urban environment.
- 6.37 With regards to Annual Probable Sunlight Hours (APSH), 92% of windows meet the BRE guidelines and the remaining windows still demonstrate good APSH levels.
- 6.38 The report also establishes that there will be no material worsening compared to the extant permission and in some cases an improvement. There will be full BRE compliance with regards to VSC, NSL and sunlight, compared to the extant scheme as a baseline, and in a number of cases a betterment compared with the extant scheme.
- 6.39 The assessment concludes that the proposal will protect the amenity of existing neighbours of the site. As a result, the proposal is compliant with policy D1 of the Local Plan, which requires amenities to be protected.

Wind Microclimate Study

- 6.40 WSP has reviewed the submitted wind assessment, produced by BMT Fluid Mechanics (now part of WSP), in relation to the proposed amended scheme. This assessment is based on widely accepted Lawson comfort criteria for wind effects, taking account of the 'London Docklands Development Corporation variant' of these criteria, as is best practice.
- 6.41 The technical letter from WSP, submitted with this application, sets out that wind conditions remain suitable in terms of pedestrian safety and pedestrian comfort.
- 6.42 The original report flagged that the entrance located at the southwest and the balconies at the west of the proposed development would require mitigation. WSP considers that the effects of the proposed façade and envelop changes are likely to be minimal, except for the change of balcony positions at levels 1-14, which is likely to further ameliorate the impact of downdraft at ground level. The proposed vertical planting strategy and the porosity of the proposed railings is also considered likely to have a beneficial effect. In addition, WSP reports that existing planting at ground level is denser than that originally modelled, which is also likely to have a beneficial effect.
- 6.43 Overall, the letter sets out that the scheme and the surrounding environment will experience an appropriate wind microclimate environment, including in relation to the south-west entrance and the residential balconies, and that further mitigation is not required. It is considered that it will not be necessary to raise the height of the balcony parapets (originally suggested in BMT's report on the extant permission) as a result of the revised design, including the proposed planters and the porosity of the railings.
- 6.44 The proposals are not considered likely to give rise to material harm to amenity as a result of wind microclimate. The proposals are therefore considered to comply with the Development Plan and material considerations in this respect, in particular, policy

A1 of the Local Plan, which requires wind microclimate to be considered in relation to effects on occupiers and neighbours of development.

Planning obligations

- 6.45 As a minor material amendment, pursuant to Section 73 of the TCPA, it will be necessary for the applicant and council to enter into a Deed of Variation of the section 106 agreement to be entered into on completion of the site purchase, in order to apply the obligations to the new permission. It is not envisaged that there will be a requirement to alter any of the key obligations with the section 106 agreement or add additional obligations.
- 6.46 The Heads of Terms of the agreement, relevant to Brill Place, are as follows:
- Employment and Training support and Local Procurement
 - Construction Management Plan
 - FCI Engagement Commitment, Liaison Group and Neighbour Management Plan
 - Highways contribution, Plot 7
 - Legible London Signage Contribution – which will need to be apportioned
 - Definition (revised) of the Market Housing Units and revised definition of Plot 7
 - Basement Approval in Principle and Detailed Basement Construction Plan
 - Construction Management Plan, Plot 7
 - Construction Working Group
 - Residential Travel Plan and Monitoring Contribution
 - Sustainability Plan
 - Tree Planting Contribution – which will need to apportioned
- 6.47 In addition, the application will be liable for the Community Infrastructure Levy, in accordance with the CIL Regulations, including the provisions relating to Section 73 applications.

7. Conclusions

- 7.1 The approved Central Somers Town redevelopment represents a unique opportunity to provide high quality replacement education and community facilities, enhance an existing area of public open space and provide much-needed new homes, including affordable homes. The approved masterplan sets out an holistic approach to regeneration for the benefit of the community, making the most of this highly sustainable, central location.
- 7.2 The extant permission for the proposed Brill Place residential tower represents a significant element of the masterplan and a significant commercial driver to enable delivery of the wider masterplan. This application to make minor material amendments to the extant permission, in relation to Plot 7, is an important requirement to enable implementation of the tower; amendments are required for a number of technical and regulatory reasons. The applicant is committed to early delivery of the tower and has instructed the submission of this application in order to achieve this.
- 7.3 The revised design is by Stiff + Trevillion; an award-winning practice which has interpreted and developed the original design, within the context of the technical and regulatory requirements which have changed since the original decision and which need to be complied with. S+T has created a design of exceptional quality, which will be an asset to Central Somers Town and the wider area.
- 7.4 The location remains appropriate for a tall building, given its location in close proximity to two strategic transport hubs, King's Cross St Pancras and Euston Station, and the context created by the construction of Francis Crick Institute and the developments in the wider King's Cross area. The proposal has been subject to a fresh Townscape, Heritage and Visual Impact Assessment, which demonstrates that the impact in townscape and heritage terms is not materially different.
- 7.5 The extant planning permission, subject to the proposed amendments, will deliver a number of planning benefits. The most significant of these is considered to be the delivery of housing and the delivery of affordable housing, which Plot 7 facilitates, as part of the wider masterplan to be delivered by the Council's CIP. In the Council's assessment of the extant permission the delivery of affordable housing was considered to outweigh the identified harm to heritage assets.
- 7.6 The residential units have been designed to provide high quality internal environments for future residents. All of the units meet or exceed the Mayor's minimum space standards and include an area of private amenity space in the form of a balcony or winter garden. Furthermore, all of the units are dual aspect. The ability of the building to accommodate 14 additional homes means that this tall building makes an even greater contribution to housing supply, through optimisation of a centrally-located site. Housing mix remains balanced and in-line with the extant permission.

- 7.7 The development will be highly sustainable, and will meet the sustainability targets established through the extant permission, including through connection to the district energy network, which the wider masterplan benefits from.
- 7.8 The proposed amendments to the extant scheme are necessary to enable delivery of the scheme and the associated planning and public benefits. The revised scheme has been designed through an extensive process of architectural and technical design development, in conjunction with pre-application engagement with the council and independent design review. Planning permission for these minor material changes should be granted in order to enable the delivery of this scheme and its associated planning benefits.

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