



Camden Hawley Street ERU Depot Planning Application Planning Statement

May 2020

I. Introduction

I.1. Background

- I.1.1. This Planning Statement has been prepared by Transport for London (TfL) on behalf of London Underground Limited (LUL) in support of a full planning application for the proposed change of use of the former Hawley School to an Emergency Response Unit (ERU). This document is to be read in conjunction with the planning drawings and other supporting technical documents.
- I.1.2. The former Hawley School ('the site') is located within the London Borough of Camden (LB Camden). The site is currently vacant and has been since December 2016 following the relocation of the school to Hawley Road.
- I.1.3. The site has been purchased by TfL as part of the Camden Station upgrade project. A meanwhile operational use has been identified at the site to accommodate an ERU, which is currently operating from a leased premise at 63 Pratt Street, Camden. This premise is due to be redeveloped hence the requirement to find a new site to accommodate the ERU. The date for vacating the current premises is mid-June 2020 but LU are in negotiations to extend this date to the end of December 2020.
- I.1.4. The LUL ERU provides 24/7 coverage for any railway related incident that may occur on the following services; London Underground, London Rail, Croydon Tram Link, the Docklands Light Railway, London Overground and the Elizabeth Line (Crossrail), which is currently under construction. There are four ERU hubs, covering north, south, east and west London; these are currently situated in Camden, Battersea (soon to be Oval), Stratford and Acton.
- I.1.5. The four teams on duty work 12-hour shifts and are ready to respond to any incident or emergency that occurs. Each team consists of six highly trained railway engineers who respond in two specially built LGVs (tenders) which carry a large amount of specialised railway engineering equipment. The teams are coordinated by a Duty Manager who is responsible for prioritising and dispatching the teams to the incidents.
- I.1.6. Two ERU units have an Immediate (Blue Light) response capability with specially trained British Transport Police (BTP) drivers. These are currently located at Stratford and Camden. The two teams will attend all major incident that affect the railway, these can include; Person Under Train Incidents, Terrorist Incidents such as the 7/7 attack and stalled trains where several thousand commuters may be stranded, and many more.
- I.1.7. Camden provides quick access to central London, both the 'West End' and the 'City of London'; areas where an incident has a much greater potential to escalate quickly and impact a large number of passengers. Thus, the time taken to travel to these areas is an important factor so the ERU needs to be able to access this part of London swiftly.

1.2. Structure of the Planning Statement

1.2.1. This Planning Statement considers the pertinent issues arising from the proposed development and is set out as follows:

- Section 2 describes the application site and surrounding area;
- Section 3 describes the proposed development;
- Section 4 outlines the relevant planning history of the site;
- Section 5 provides an appraisal of the proposal against relevant planning policy and guidance;
- Section 6 provides conclusions.

2. Site and Surrounding Areas

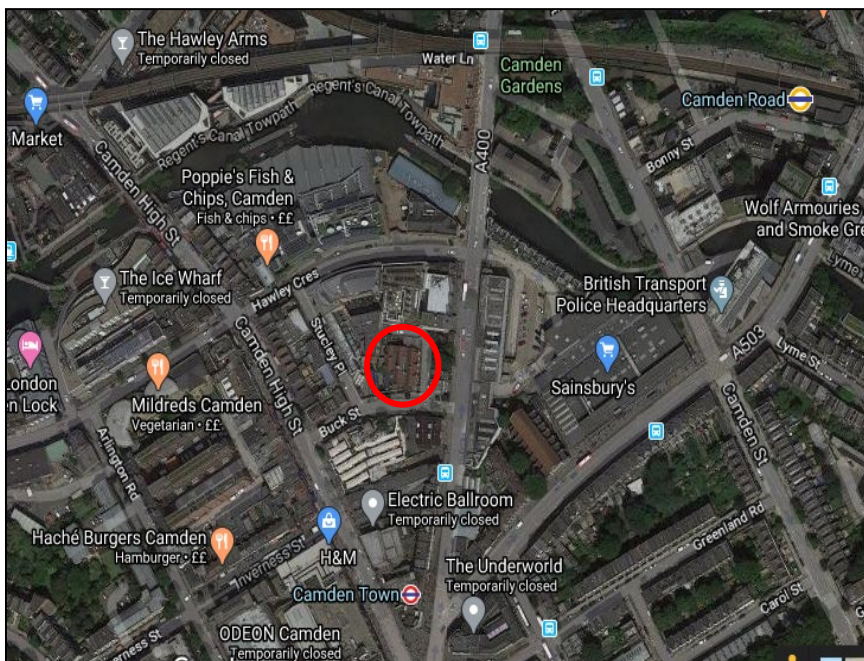
2.1. Site Location

2.1.1. The site is located within LB Camden, at grid reference 528898E, 184036N at its central point. The site is located to the north of the River Thames and to the south of Regent's Canal. The site is bound by Buck Street to the south, whilst to the north, east and west the site is bound by the rear of buildings fronting onto Hawley Crescent, Kentish Town Road (A400) and Stucley Place respectively.

2.1.2. Buck Street connects Kentish Town Road and Camden High Street, which merge south of the site where the road is then designated as a red route on the Transport for London Road Network (TLRN).

2.1.3. The general location of the site in context of its surroundings can be seen in Figure 1.

Figure 1: The Site Location



2.2. Site Description

- 2.2.1. The former school site (pictured in Figure 2) has an area of approximately 1485 square metres and is located within an area of land now under the ownership of LUL. The site is comprised of the former school building (reaching a maximum height of three storeys), a mature tree on the eastern site boundary, a vehicle access gate onto Buck Street and vehicle parking spaces.
- 2.2.2. Hawley Infant School was built in 1873 and later expanded in 1912 to accommodate an additional three classrooms on the east side of the building. The last major structural change to the school building was the addition of a mezzanine floor to 'classroom C' in the early 2000s.

Figure 2: Photographs of the site



2.3. Surrounding Area

- 2.3.1. Mansion Lock House, a student accommodation block fronting onto Hawley Crescent, lies immediately to the north of the site. Adjacent to this block to the east sits the Devonshire Arms, a public house.
- 2.3.2. Immediately to the east of the site sits 25 and 27 Kentish Town Road, two Georgian residential townhouses that reach a maximum height of four storeys.
- 2.3.3. Immediately to the west of the site lies a hot-desking and shared office space run by the Camden Collective, who provide such spaces for creative start-ups.
- 2.3.4. Opposite the site, on the southern side of Buck Street, lies Trinity United Reformed Church as well as a pedestrian and vehicle access to Buck Street Market. The market is open daily between 10am and 7pm, for retail and food.
- 2.3.5. The site lies within the area designated as Camden Town's 'major town centre'. Camden Town Underground Station lies just under 100m to the south, whilst Camden Road Overground Station lies just over 300m to the north-east. Regent's Canal is also in close proximity to the site, lying approximately 150m to the north, where the popular Camden Market is situated.

3. The Proposed Development

- 3.1.1 Full planning permission is sought for the proposed scheme under the Town and Country Planning Act 1990 (as amended). The description of the development is as follows:
- 3.1.2 *The proposal seeks to change the use class of the premises from D1 (education) to 'sui generis' operational railway use. To accommodate this change of use, the existing building shall house the following internal uses; locker room, mess accommodation, office space, the storage of large items of heavy equipment needed for emergencies and PPE, and a gym. The site will also provide parking for two tender LGV vehicles.*
- 3.1.3 The accommodation will be utilised in a similar way to a fire station, it will act as the 'Home' location for the Camden based teams. As well as housing the team of six on duty at the ERU, 14 management and admin staff will be working in the building. The storage space will be used for uniforms, overalls, kit and equipment, as well as several Track components and signal equipment spares.
- 3.1.4 The benefits of the scheme are as follows:
 - London Underground's ERUs provide a specialist search, rescue and recovery service that has served London and its commuters for 28 years. During that time many thousands of incidents have been attended and resolved.
 - The ERUs are ready to assist in any incident/failure/fatality across the London Rail Infrastructure. Losing this vital resource from the Camden area would have a negative impact on responding to incidents and ensuring the provision of safe London railways.

4. Planning History

4.1.1. A planning search was undertaken for the site and its surroundings. The history relating to the site itself is detailed below:

Planning Application No.	Proposal	Decision
2010/2319/P	Alterations to include the replacement of two rooflights at first floor flat roof level and dormer windows to the second-floor pitched roof, at an infant school (Class D1).	Granted 28-06-2010
2006/3126/P	Installation of a new external access ramp to rear school entrance to replace the existing ramps and associated external alterations.	Granted 29-08-2006
PEX0200067	The demolition of an existing garage building and the erection of a single storey storage shed within the school grounds. As shown on drawing numbers: SK/Store 1 and 2, St-1 and 2, and AB-03 and 04.	Approve - Council's Own Reg 3 12-03-2002
PEX0000474	The erection of a single storey extension to provide additional toilet accommodation. As shown on drawing numbers: AD-1 and AD-2	Approve- Council's Own Reg 3 18-07-2000
9501954R1	Change of use of ground floor and basement for classrooms, and first and second floors as a self-contained maisonette at 27 Kentish Town Road. As shown on Drawing Numbers 1292/1A, 2B, (as amended by letter dated 29/05/96 and 1292/rev.1/drg 2.	Granted 14-06-1996
8601339	Alterations including the repositioning of the existing fire gates from the Kentish Town Road wall to the Buck Street wall the existing store by the Buck Street wall to be repositioned by the Kentish Town Road wall and the repositioning of the drinking water fountains from the Buck Street wall to the kitchen wall as shown on drawing numbers ABC SK 07 08 09 10.	Granted 10-09-1986

5. Planning Policy Appraisal

5.1. Introduction

- 5.1.1. This section provides an appraisal of statutory planning policy at a national, regional and local level, together with other relevant guidance and policy as appropriate.
- 5.1.2. At the national level, the appraisal considered the National Planning Policy Framework (NPPF), published in February 2019 and supersedes most of the National Planning Policy Statements and Guidance. The NPPF represents the most up-to-date planning policy at the national level and is a significant material consideration in the assessment of this planning application.
- 5.1.3. At the regional level, the appraisal considers the London Plan (consolidated with alterations since 2011), March 2016 which is the strategic level development plan for London, setting out the integrated economic, environment, transport and social framework for the development of London over the next 20-25 years. A new 'Intend to Publish' London Plan was issued to the Secretary of State by the Mayor for consideration in December 2019. This document is a material consideration in planning decisions, and it gains more weight as it moves through the process of adoption.
- 5.1.4. At the local level, the appraisal considers Camden's Local Plan (adopted July 2017), which replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.
- 5.1.5. The planning policy appraisal considers the following key issues:
- Promoting sustainable development;
 - Design;
 - Transport and Access;
 - Built Heritage;
 - Noise and Air Quality;

As the site is not in a designated Flood Zone, the flood risk of the site is not considered a relevant consideration for this proposal.

5.1.6 The site has the following policy designations:

- Camden Town Centre
- Secondary Protected Frontage
- Opposite Camden Town Conservation Area to south, Regent's Canal CA to the east.

5.2. Promoting Sustainable Development

- 5.2.1 The NPPF seeks to promote development and growth with the presumption in favour of sustainable development. It recognises the three overarching objectives of a sustainable

planning system; economic, social and environmental. These 'are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives' (paragraph 8). The promotion of sustainable transport is one of the Framework's key principles.

- 5.2.2 Paragraph 8 also recognises that responsible waste management is an element of achieving the environmental objective of sustainable development. Waste from development should be minimised.
- 5.2.3 The London Plan's strategy encompasses the principles the principle of sustainable development through its overall vision; 'excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change' (paragraph 1.52).
- 5.2.4 The concept of 'Good Growth runs through the New London Plan; this seeks growth which is socially and economically inclusive and environmentally sustainable.
- 5.2.5 Policy 5.16 (Waste Net Self-Sufficiency) of the London Plan, and Policy SI 7 of the New London Plan work towards achieving zero biodegradable or recyclable waste to landfill by 2026. This will be achieved by minimising waste.
- 5.2.6 At the local level, Camden's Local Plan addresses sustainable development under Policy CCI Climate Change Mitigation, whereby developments have to minimise the effects of climate change. This can be partly achieved by locating developments in areas which can be easily accessed by public transport, thus reducing the number of cars travelling to a site.
- 5.2.7 Policy CC5 (Waste) aims to reduce the amount of waste produced in the borough by increasing recycling and ensuring that developments include facilities for the storage and collection of waste and recycling.

Conclusion

- 5.2.8 The proposed change of use of the site from a school to an ERU meets the principles of promoting sustainable development as defined through the three levels of policy. By identifying an alternative use for a vacant building, the proposal ensures that the land, which is in a highly sought-after location, is put to good use. This in turn eliminates the environmental impacts that constructing a new premises might otherwise entail; the lifetime of the existing building is thus extended further to function as an essential service. In turn this has economic benefits as a significant amount of money is saved by utilising an existing building for accommodating the ERU, rather than constructing a new building.
- 5.2.9 The development is not expected to produce any volume of waste above that which is typical of an administrative office of this size. Any waste produced will be stored in bins on site and collected by TfL's in-house Distribution Services, who will follow the same

recycling principles as executed for stations. LUL runs its own fleet of dustcarts and the ERU would be added to their existing rota for station rubbish collection.

5.3. Design

- 5.3.1. The NPPF endorses high quality design in all development schemes and seeks to ensure that developments will function well and add to the overall quality of the area over the lifetime of the development. Development should respond to the local character and history, reflecting the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The framework requires developments to optimise the potential of the site to accommodate and sustain appropriate development which supports local facilities and transport networks.
- 5.3.2. Policy 5.3 (Sustainable Design and Construction) of the London Plan encourages developments to demonstrate sustainable design standards for a proposal, including its construction and operation.
- 5.3.3. Policy D3 (Optimising site capacity through the design-led approach) of the New London Plan encourages developments to make the best use of land, taking due consideration of the site's context and the character of the area.
- 5.3.4. Policy DI of Camden's Local Plan seeks to secure high quality design in developments, which should use quality materials that respect the local context, and that integrate well with the surrounding streets and open spaces. It recognises the benefit of durable construction that is adaptable to different activities and land uses.

Conclusion

- 5.3.5. The proposed development is not altering the external appearance of the existing school building, or initiating any structural changes, thus there will be no impact on the local context around the site. The integral character of the school building as built will remain dominant, with the proposed function not harming the existing design. The adaptable nature of the existing building means that there is minimal internal work needed to make it appropriate for the proposed use.

5.4. Transport and access

- 5.4.1 The NPPF supports sustainable modes of transport where the need to travel is minimised and the use of sustainable transport modes is maximised. The Framework requires the provision of high-quality public transport facilities and the creation of safe and secure layouts. It recognises the importance of considering the patterns of movement and parking when contributing to a well-designed proposal.
- 5.4.2 The London Plan seeks to encourage development which reduces the need to travel by car and promotes travelling by walking, cycling or public transport instead (Policy 6.1). Maximum parking standards for developments are set out in table 6.2, which aims to strike a balance between promoting new development and preventing excessive car parking provision.

- 5.4.3 Policy T2 (Healthy Streets) of the New London Plan states that development should reduce the dominance of both stationary and moving vehicles on London's streets, as well as being connected to public transport networks. Policy T6 (Car Parking) states that adequate provision should be made for efficient servicing and emergency access.
- 5.4.4 Camden's Local Plan promotes walking and the improvement of the pedestrian environment, and public transport within the borough in Policy T1. Policy T2 recognises that parking spaces on-site should be limited to serve essential operational or servicing needs.

Conclusion

- 5.4.5 The integral purpose of the proposed development is to ensure that some of London's key existing and future transport infrastructure can continue to operate safely. The principle of an ERU in this area of London is well established, thus the conclusion focuses on the more immediate transport and access issues at the locality.
- 5.4.6 An ERU requires 24-hour access, 7 days a week. Whilst it is recognised that this differs from the previous use of the existing building as a school, the volume of vehicles travelling to the site is predicted to be substantially less than the levels seen when the building operates as a school. The ERU unit will require two tender vehicles on site (similar in size to a fire engine) and staff will predominately travel to the site using public transport.
- 5.4.7 It is considered that given the unique nature of the proposed use, which provides an essential safety service to the public transport network, that the level of parking on site is appropriate and justified. The site's location is well connected by public transport; thus, this is expected to be made best use of by staff travelling regularly to and from the site, reducing the number of cars on the road and on site.

5.5. Noise and Air Quality

Noise

- 5.5.1. Paragraph 180 of the NPPF states that planning decisions should avoid noise impacts from new development giving rise to significant adverse impacts on health and quality of life.
- 5.5.2. Policy 7.15 (Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes) of the London Plan and Policy D14 (Noise) of the New London Plan seeks to avoid significant adverse noise impacts on health and quality of life as a result of new development.
- 5.5.3. At a local level, Policy A4 refuses developments that are likely to accept unacceptable levels of noise and vibration.

Conclusion

5.5.4 The equipment stored at the ERU requires testing at the start of each team's shift, some of which is diesel plant and some electrical. The two tender vehicles will also need testing to ensure they are functioning correctly. The development will be carefully controlled both during the implementation and operational phases to minimise any negative impacts upon the surrounding environment. The existing area experiences a relatively high volume of noise due to its town centre location, especially from the nearby TLRN red route which sees a high volume of traffic. It is therefore considered that the noise and vibration contributions from this development will be negligible.

Air Quality

5.5.5 The NPPF states that development should contribute to and enhance the natural and local environment by preventing new development from contributing to noise or air pollution (paragraph 180). Paragraph 181 of the NPPF states that planning decisions should ensure that any new development in an Air Quality Management Area is consistent with the local air quality action plan.

5.5.6 The Mayor's Air Quality Strategy 'Cleaning the Air' seeks to improve London's air quality and achieve reductions in pollutant emissions whilst minimising pollution. London Plan Policy 7.14 (Improving air quality) of the London Plan seeks to promote sustainable design and construction to reduce emissions from the demolition and construction of buildings following the best practice guidance in the GLA and London Councils' 'The control of dust and emissions from construction and demolition'.

5.5.7 Policy SI 1 (Improving Air Quality) of the New London Plan requires that developments do not lead to further deterioration of existing poor air quality.

5.5.8 Locally, Policy CC4 specifies that any impact on the air quality will be mitigated and that exposure to poor air quality is reduced in the borough.

Conclusion

5.5.9 The site is not considered to be detrimental to air quality standards. The proposed development will not generate any additional vehicle movements during the operational phase and will therefore not lead to an increase in vehicle emissions. Moreover, the purpose of the development is to support the safe use of London's public transport, thus the wider benefit of the proposal is considered conducive to the air quality interests of the city.

5.6 Built Heritage

5.6.1 The NPPF seeks to preserve heritage assets and takes account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

- 5.6.2 Policy 7.8 (Heritage Assets and Archaeology) of the London Plan and Policy HC I (Heritage Conservation and Growth) of the New London Plan state that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- 5.6.3 Policy D2 (Heritage) of Camden's Local Plan aims to preserve and, where appropriate, enhance Camden's rich and diverse heritage and their settings, including conservation areas and locally listed heritage assets.

Conclusion

- 5.6.4 Whilst Hawley Infant School is not a listed building, it is recognised within 'Camden's Local List', which identifies locally significant buildings of heritage value. It is considered that the proposals will not cause harm to the character and heritage value of the existing building, as it will not be demolished nor structurally altered. The proposed new use offers a new lease of life for the now vacant building, allowing a new group of people to enjoy its heritage whilst putting the vacant space to good use. It is considered that the proposal will be sympathetic to both the existing building and the Conservation Areas in the vicinity of the site.

6.0 Conclusions

The proposed works are necessary to facilitate the temporary relocation of the Camden ERU unit, which delivers an essential service for vital public transport infrastructure in London. LUL and TfL place customer safety as an absolute imperative to provide for Londoners, thus it is considered that this proposal is a crucial element in achieving this objective.

The design of the development has been informed by planning policy requirements. The proposed change of use will have a minimal impact on the existing building and locality, with no structural changes required to be made. It is considered that the proposal makes efficient use of an otherwise vacant building, which in addition means that no construction work is required to provide new accommodation for the ERU team.

This statement has therefore demonstrated that the proposed development is compliant with planning policy at national, regional and local level. As such, it is respectfully considered that this planning application should be approved accordingly subject to relevant conditions.