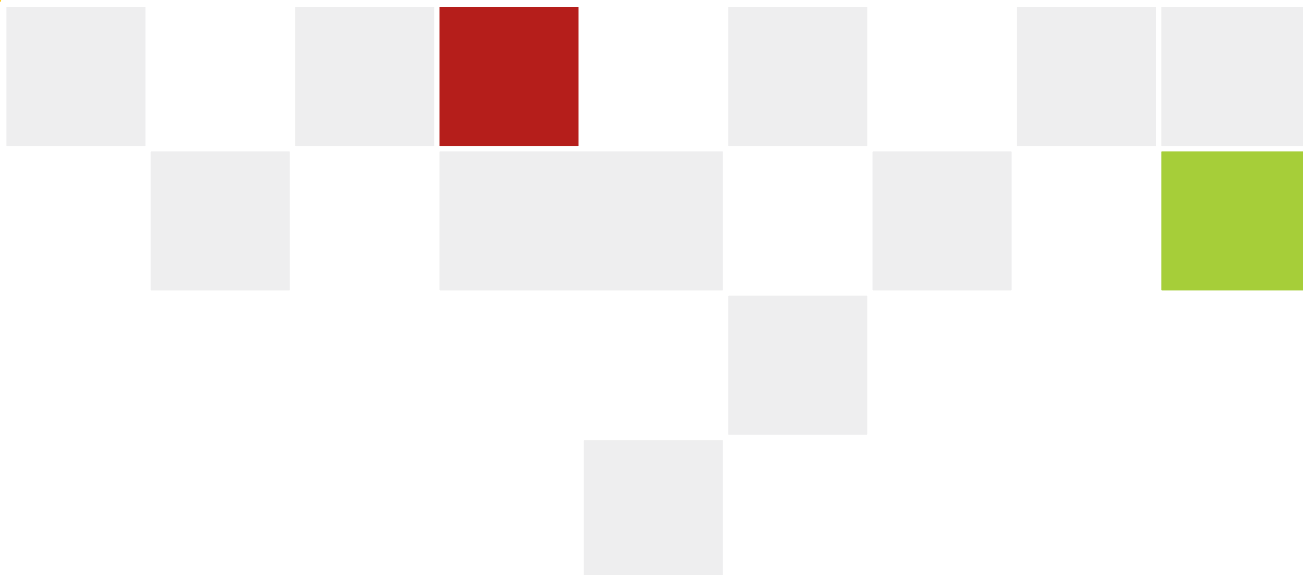


# The Hall School

## Planning Statement



# Boyer

## Report Control

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# 1. Introduction and proposal

- 1.1 This Planning Statement is submitted on behalf of the Hall School in support of a planning application at the Hall Senior School site at 23 Crossfield Road, London, NW3 4NU. The application seeks planning permission for the:

*“Demolition of the 'Centenary' and 'Wathen Hall' buildings and erection of new four storey building with glazed link to original school building, two storey rear extension with external terrace and enlarged basement replacing the existing Wathen Hall, and enlargement of rear roof storey and insertion of three dormer windows to old school building, all in association with providing additional accommodation for the existing school use (Class F.1)”.*

- 1.2 This planning submission follows the previous planning permission (ref: 2016/6319/P) granted on 5th July 2018, and a subsequent Section 73 permission (ref: 2019/1325/P) granted on 19th November 2019. The 2019 Section 73 application sought design alterations related to the removal of an entire basement floor from the previously approved scheme. This new application seeks planning permission for an almost identical scheme to that approved in 2019.
- 1.3 That extant redevelopment scheme (ref: 2019/1325/P) is required to secure the School’s future in Camden by providing significant improvements to a key educational establishment and, in particular, creating superb new teaching spaces fit for a twenty first century education. However, the permission must be implemented prior to July 2021 as, since 2012, it has not been possible to extend the life of extant planning permissions. Whilst the School had originally intended to commence works at the site by summer 2020, the current COVID-19 pandemic rendered this impossible. In particular, it was considered that the necessary social distancing measures for pupils could not be implemented whilst pupils were taught in temporary accommodation (secured under permission ref: 2019/1447/P), throughout the duration of construction works to the main school buildings
- 1.4 As a result, it is now proposed to submit a new planning application for an almost identical scheme to the subsequent Section 73 permission approved in 2019 (ref: 2019/1325/P). The only proposed alterations to that previously approved scheme are those required to ensure that the current proposals adhere to the latest energy and sustainability policies outlined within the Intend to Publish London Plan.

- 1.5 When viewed from ground floor level there are very few perceptible differences between the approved scheme and the newly proposed scheme. The proposed alterations are as a result of a review of the development's ventilation and heating/cooling strategies, which have been updated to comply with new thermal comfort and ventilation requirements emerging from the Intend to Publish London Plan.
- 1.6 The external design amendments are covered in detail within the Design and Access Statement (page 26 onwards) and consist of the following:
  - Proposing three new external air handling units on the existing roof with acoustic enclosures for noise attenuation. These units are mounted at low level and will be located on the existing internal roof structure between the roof's pitches. Consequently, these not be visible from street level.
  - New roof mounted MVHR. This will also be located within the main pitched roofs, ensuring that it is not visible from street level.
  - New roof termination sets and slight relocation of skylights with the Wathen Hall roof.
  - Removal of PV panels from the main roof level, which no longer form part of the energy strategy.
- 1.7 The extant consented scheme established the principle of the demolition of the prosaic Centenary Building and its replacement with a modern four storey building with glazed link, and extensions to the Wathen Hall. For this reason, this Planning Statement does not re-visit the planning issues relating to these parts of the scheme in great detail.
- 1.8 This Planning Statement assesses the proposals against the policies in the Development Plan and other material considerations which are relevant to the determination of the application. The Statement is structured as follows:
  - Section 2 – describes the site and surrounding area;
  - Section 3 – describes the proposals in detail;
  - Section 4 – details relevant planning history;
  - Section 5 – provides an overview of the principle national, regional and local planning policy and guidance relevant to the assessment of the proposed development;
  - Section 6 – provides an assessment of the proposal against the provisions of the Development Plan and other material considerations;

- Section 7 – concludes the findings of the assessment of the proposed development.

1.9 The application is supported by the following information:

- Scheme drawings, visualisations and Design and Access Statement by NORR
- Transport Statement and Draft Green Travel Plan by Ramboll UK
- Draft Construction Traffic Management Plan by Ramboll UK
- Daylight and Sunlight Assessment by GIA
- Noise Survey Report by Ramboll UK
- Energy and Sustainability Report by Elementa
- Structural and Civil Engineering Report Elliot Wood Partnership
- Basement Impact Assessment by Elliot Wood and Geotechnical & Environmental Associates
- Drainage Strategy and SUDs Report by Elliot Wood Partnership
- Flood Risk Assessment by Elliot Wood Partnership
- Ecology Report by Ramboll UK
- Arboricultural Report by Barrell Tree Consultancy

## 2. The Site and surrounding area

- 2.1 The Hall School Senior School is situated on the eastern side of Crossfield Road, near the junction with Adamson Road. The Hall Middle School, with which there is a high degree of interdependence between the sites, is located very close the Senior School at the junction of Crossfield Road and Eton Avenue. The School also has playing fields at Wilf Slack Memorial Ground in the London Borough of Barnet.

### *The Site*

- 2.2 The existing school consists of the original 1889 building and its twentieth century annex (known as the Centenary Building or Wathen Building), both of which front Crossfield Road. The Wathen Hall, located under the rear wing of the Wathen Building, provides basement accommodation which is used for sports, school assemblies and theatrical productions. A play area is located to the rear. The buildings occupy roughly three quarters of the site, whilst the remaining play area is hard-standing.
- 2.3 None of the school buildings are listed and the site does not adjoin any listed buildings. The nearest listed building to the site is located on Eton Avenue to the south of the application site, but it is not considered to be in the school's immediate context. The site is, however, located within the Belsize Conservation Area.
- 2.4 The original red brick Hall School building (excluding the twentieth century Centenary Building) on Crossfield Road is identified as making a positive contribution to the conservation area. The building is also visible in views along Adamson Road and is the most notable building in these streets. While the Centenary Building is not specifically identified as detracting from the conservation area, it is a prosaic and plain addition to the streetscene.
- 2.5 There is a large mature London Plane tree which is the subject of a TPO in the rear of the site. A previous application for extensions and alterations to the school buildings was refused (and dismissed at appeal) in 2006 due to the potential impact on this tree.

### *Surrounding context*

- 2.6 The school is within a predominantly residential area. There are a number of schools in the vicinity but no other land uses in the immediate context. The Council's Development Management Policies document recognises, under its Transport

section, that the concentration of schools in this part of the borough causes traffic congestion, particularly during the 'school run' hours.

- 2.7 Whilst the northern end of Crossfield Road has a general consistency in the building line along the streets, the heights of the buildings, use of London Stock brick and the short front gardens defined by boundary walls, the buildings surrounding the application site are more varied. Directly to the south is a post-war terrace of three storey properties with integral garages. Directly opposite the site, on the corner of Crossfield Road and Adamson Road is a six storey block of flats, and further to the south is the more modern Hall School Middle School site which was developed in the late 1990's.
- 2.8 The school site is not subject to any other planning policy designations under the Local Development Plan.

#### *Access*

- 2.9 Crossfield Road is a local access road and there is no off-street car parking associated with the school.
- 2.10 The Swiss Cottage/Finchley Road Town Centre is a short distance to the west, where Swiss Cottage underground station and other amenities including retail, food and drink, library and leisure centre uses are located. The site has a PTAL of 4.
- 2.11 The site is located within the Belsize Controlled Parking Zone (CPZ).
- 2.12 More detail on the local transport network relevant to the proposals can be found within the accompanying Transport Statement from Ramboll UK



### 3. Description of the amendments

- 3.1 There are very few perceptible external differences between the approved scheme and this amended scheme. The proposed alterations are as a result of a review of the development's ventilation and heating/cooling strategies, which have been updated to comply with new thermal comfort and ventilation requirements emerging from the Intend to Publish London Plan.
- 3.2 The external design amendments are covered in detail within the Design and Access Statement (page 26 onwards) and consist of the following:
- Proposing three new external air handling units on the existing roof with acoustic enclosures for noise attenuation. These units are mounted at low level and will be located on the existing internal roof structure between the roof's pitches. Consequently, these not be visible from street level.
  - New roof mounted MVHR. This will also be located within the main pitched roofs, ensuring that it is not visible from street level.
  - New roof termination sets and slight relocation of skylights with the Wathen Hall roof.
  - Removal of PV panels from the main roof level, which no longer form part of the energy strategy.
- 3.3 There is no proposed alteration to the basement design or proposed drainage system. Consequently, new Basement Impact Assessments, Flood Risk Assessments or Drainage Strategies have not been prepared for this submission. However, the previously submitted documents are re-submitted for information only, and each contain a statement from the scheme Engineer confirming that no changes are proposed within this iteration of the scheme.
- 3.4 The School's cycle and scooter parking strategy is unchanged since the previous permission (ref: 2019/1325/P).
- 3.5 As was the case with the extant planning permission, there is no intention to increase the roll of the Senior School which will remain at 162 pupils.

## 4. Planning History

### History of the Site

- 4.1 The planning applications listed below are considered to be relevant to the assessment of the planning application.

Ref	Description of development	Decision
<b>2019/1325/P</b>	Variation of Condition 2(approved plans) and removal of condition 4(staircase details) of planning permission dated 05/07/2018 ref no2016/6319/P for demolition of the Centenary and Wathen Hall buildings erection of new four storey building, two storey rear extension, enlarged basement; changes to include reduction of basement area and depth by one floor, reduction in scale of the extension to replace Wathen Hall, removal of external staircase and terrace, new louvers to windows on front elevation.	Planning permission granted (2019)
<b>2016/6319/P</b>	Demolition of the 'Centenary' and 'Wathen Hall' buildings and erection of new four storey building with glazed link to original school building, two storey rear extension with external terrace and enlarged basement replacing the existing Wathen Hall, and enlargement of rear roof storey and insertion of three dormer windows to old school building, all in association with providing additional accommodation for the existing school use (Class D1).	Planning permission granted (2018)
<b>2005/3902/P</b>	Excavation in the school playground to create a basement swimming pool at the rear, the erection of two single storey extensions plus installation of roof plant to the existing single storey PE hall, erection of new glass canopy and lighting along southern boundary plus replacement of 2 existing trees by five new trees on site, to create additional facilities for The Hall School.	Refused and appeal dismissed.
<b>2004/5199/P</b>	Construction of a basement swimming pool to rear of site and minor extensions, alterations and installation of roof plant with screening to the existing PE hall.	Withdrawn
<b>8700144</b>	Alterations to the proposed annex and memorial hall as an amendment to planning permission granted by letter dated 3 <sup>rd</sup> July (Reg. No. 8600711R1) for alterations and extension to the existing school as shown on drawing nos. 503/01C; 02E; 03G; 04D; 05D; 06F; 08C and 503/68 and 69 revised on 24 <sup>th</sup> March 1987	Planning permission granted (1987)

<b>8600711</b>	Alterations and extensions to the existing school as shown on drawings 503/01B; 02C; 03C; 04B; 05C; 06D; 07A; 08B revised on 10 <sup>th</sup> June 1986	Planning permission granted (1986)
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### **Pre-application discussions**

- 4.2 Informal discussions about the proposed submission been held with officers over Autumn 2020. The applicant provided proposed drawings, details of the updated Energy Strategy and a list of amended documents which would be submitted with the application.
- 4.3 Officers provided informal comments which confirmed that only key consultant documents would need to be updated and provided guidance on the updated Energy Strategy. Due regard has been paid to the Council's comments in the preparation of this planning application.

## 5. Planning Policy Context

### **The Development Plan**

- 5.1 This section outlines the relevant planning policy context which will be considered in the determination of the application proposals. Section 6 assesses the application proposal against the Development Plan documents which currently comprise the London Plan (as amended 2016) and the Camden Local Plan:
- Camden Local Plan (2017)
  - The Council's relevant Supplementary Planning Documents have also been considered, in particular the Belsize Conservation Area Statement and CPG: Air quality.
- 5.2 Other adopted policy documents that are considered a material planning consideration in the determination of this planning application include the National Planning Policy Framework (NPPF), which sets out the Government's planning policies and how these are expected to be applied.

### ***National Planning Policy Framework 2019***

- 5.3 In 2019, the National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities and Local Government. The NPPF sets out the Government's economic, environmental, and social planning policies for England; it states that the purpose of the planning system is to contribute to the achievement of sustainable development. In terms of development management, the NPPF advises that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development.
- 5.4 The overarching national planning policy theme evident from the NPPF is a presumption in favour of sustainable development, which the Government have advised should be at the heart of the planning system running through both plan making and decision taking.
- 5.5 Section 8 of the NPPF relates specifically to promoting healthy communities. It recognises the importance of planning in facilitating social interaction and creating healthy, inclusive communities.

- 5.6 The NPPF states that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. Local authorities should give great weight to the need to create, expand or alter schools; and work with schools promoters to identify and resolve key planning issues before applications are submitted.

### **Regional Planning Policy**

#### ***London Plan 2016***

- 5.7 The London Plan provides the strategic policy context for all of London and seeks to provide an integrated framework for its development upto 2031.
- 5.8 The Mayor's strategic policies aim to support the provision of childcare, primary and secondary schools, and further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice.
- 5.9 Policy 3.18 states that development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes.
- 5.10 Policy 3.18 also sets out that development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged.

#### ***Intend to Publish New London Plan 2019***

- 5.11 On December 9th the Mayor of London wrote to the Secretary of State setting out that, given there had been no response to a letter he sent on April 24th concerning minor amendments to the draft London Plan, he was intending to publish the new London Plan with a final decision to be taken on December 21<sup>st</sup>.
- 5.12 The Secretary of State replied on December 10th via a letter that set out that he would like his previous comments on the Draft Plan taken on board and also issued two new Directives relating to tall buildings and the release of industrial land to aid green belt protection.
- 5.13 The relevant policies contained within the ITP London Plan are considered to include:
- SI 1 Improving air quality

- SI 2 Minimising greenhouse gas emissions
- SI 4 Managing heat risk

### **Local Planning Policy**

#### ***Camden Local Plan 2017***

5.14 Local development plan policies for the site are contained within Camden Local Plan. The Development Management policies within the Local Plan help to deliver the Council's overarching approach to protecting and providing community facilities.

5.15 The relevant policies contained within the Camden Local Plan are considered to include:

- C1 Community facilities;
- D1 Design
- D2 Heritage
- A4 Noise and vibration
- A5 Basements
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development

#### ***Supplementary Planning Guidance***

5.16 Camden has adopted a number of Supplementary Planning Documents that are relevant to the proposed development. These relate to Design (CPG1), Sustainability (CPG3), Basements and lightwells (CPG4), Amenity (CPG6), Transport (CPG7) and CPG: Air quality.

5.17 These SPDs have been considered and are discussed in the Assessment section below where applicable.

## 6. Assessment of the Proposals

- 6.1 This section assesses the proposed amendments and their potential impacts against the aims and objectives of the Development Plan. This section also demonstrates that the proposed development complies with the Development Plan and national planning policy.

### ***Principle of development***

- 6.2 The principle of the demolition and redevelopment of the site including the excavation of a new basement has already been established by the recent planning permission (ref: 2019/1325/P). This new planning application is almost identical. The only proposed alterations to that previously approved scheme are those required to ensure that the current proposals accord with the latest energy and sustainability policies outlined within the Intend to Publish London Plan.
- 6.3 The redevelopment, with the proposed amendments, will continue to provide improved circulation, accessibility and flexibility in space, and is driven by a desire to make better use of the school's current space, rather than to increase the school's roll. There are currently 162 pupils enrolled at the Senior School and this will not change under the proposals.
- 6.4 The NPPF, the London Plan and Camden's Local Plan acknowledge the importance of existing educational establishments enhancing their facilities. There is therefore a clear imperative to redevelop the existing site for an improved facility that meets the needs of the school's pupils and the wider community.

### ***Design and Heritage***

- 6.5 In assessing the design and heritage impacts of the extant approved scheme, the Council's Planning Committee report at 9.29 stated:
- "The scheme is a well-considered coherent response which carefully adapts; updates and optimises the constrained site in a manner consistent with its heritage value. The scheme is considered to preserve the character and appearance of the area. No harm is considered to be caused by the development."*
- 6.6 When viewed from ground floor level there are few perceptible differences between the approved scheme and this amended scheme. It is proposed to install three new external air handling units on the existing roof with acoustic enclosures for noise

attenuation. These units are mounted at low level and will be located on the existing internal roof structure between the roof's pitches. Consequently, these not be visible from street level. A new roof mounted MVHR is proposed. Again, this will also be located within the main pitched roofs, ensuring that it is not visible from street level.

- 6.7 Finally, new roof termination sets and a slight relocation of skylights with the Wathen Hall roof are proposed. These will have no impact on the amenity of neighbouring residents.
- 6.8 When viewed from Crossfield Road, there is no appreciable difference between the two schemes. It is still proposed to demolish and replace the prosaic Centenary Building. The design and massing of the replacement building and glazed link to the Old School Building, which Officers considered to be of significantly higher architectural quality than the existing building, is unchanged. The extension to the Old School Building's rear roof punctuated by three dormer windows is also unchanged from the extant scheme.
- 6.9 Similarly, the height and massing of the first floor extension above the Wathen Hall, with its curved green roof, are unaltered from the extant planning permission. Accordingly, there will be no greater impact on any neighbouring properties. There is no increase in the proposed floor area, and the number of pupils enrolled at the school will not increase. Overall, we consider the minor proposed amendments continue to ensure that the proposed redevelopment scheme will be of an outstanding quality that would significantly enhance the appearance of the site and the character and appearance of the conservation area.
- 6.10 We consider the proposed scheme thereby complies with Local Plan policies D1 (Design) and D2 (Heritage) which seek to ensure that Camden's places and buildings are attractive, safe and easy to use, and that proposed developments respect the character of the area and the setting of identified heritage assets.

### ***Basement Impact Assessment***

- 6.11 The extant planning permission includes the demolition of the existing Wathen Hall and Centenary building and an extension to the existing single storey basement below both Wathen Hall and extending under the new Centenary Building.
- 6.12 In assessing the basement element of the extant planning permissions Officers commented within 12.17 of the Planning Committee Report:



*“In conclusion, Campbell Reith consider that the proposal complies with the requirements of policy A5 and associated planning guidance.”*

- 6.13 There is no proposed change to the design of the previously approved basement. The previous Basement Impact Assessment prepared by Elliot Wood, the applicant’s Structural Engineers, is submitted with this application for information only. The document contains a statement by the Structural Engineers confirming that there have been no proposed alterations to the basement design since the previous permission in 2019 (ref: 2019/1325/P).
- 6.14 The BIA confirms that the basement design follows detailed guidance set out in, CPG4 (Basements and Lightwells) and demonstrates that the development will comply with Local Plan policy A5 (Basements).

### **Transport**

- 6.15 The extant planning permission established the principle of the redevelopment of the Hall School site and Officers concluded that the proposed works will not have a demonstrable impact on the local highway network.
- 6.16 The transport impacts have been considered by Ramboll UK, who have prepared a Transport Statement (TS) and draft Travel Plan to accompany the application. In making its assessment, the TS recognises the existing (and potential) transport impacts of the school. It also recognises the various means of transport that are available to pupils and staff.
- 6.17 As previously stated the proposals do not involve any increase in the school’s roll, and the roll for the Senior School site will be not increase from the current attendance of 162. The TS therefore demonstrates that as there will be no increase in pupil numbers, the proposals will not result in any greater impact on the local transport system.
- 6.18 Rather than exacerbating an existing problem, the proposals represent an opportunity to improve the existing situation by providing the necessary facilities to promote sustainable transport methods. The proposed scooter and parking provision is identical to that previously approved in 2019 (ref: 2019/1325/P).
- 6.19 12 new cycle parking spaces (and 22 new scooter parking spaces) are proposed at the Senior School. It is noted that there are 24 cycle parking spaces already offered at the Middle School and a further 16 cycle parking spaces are proposed, to give 40

cycle parking spaces at the Middle School, and a combined 52 cycle spaces across the two school sites.

- 6.20 Furthermore the redevelopment will provide shower facilities for those who choose to cycle to the school. These are provided within the basement accommodation. This represents a significant improvement above the existing situation which provides no formal cycle storage or shower facilities at the Senior School site.
- 6.21 Ramboll UK have also prepared an Travel Plan, which the Applicant is submitting as a means of providing a level of control over how pupils and teachers travel to and from the School. Travel Plans are acknowledged by Camden and the NPPF as an effective means of managing the transport impact of development.
- 6.22 The Travel Plan also provides a detailed Action Plan which sets out a number of actions, deadlines and responsibilities, with the goal of improving sustainable transport to the site.

### ***Amenity Impacts***

- 6.23 In determining the extant permitted scheme Officers confirmed that the proposed redevelopment would not cause demonstrable harm to the neighbouring residential occupiers, or the neighbouring Hereward House School, as a result overlooking, loss of outlook or impact on daylight and sunlight.
- 6.24 The proposed amendments to the extant permitted scheme reduce the scale of the proposals, thereby further minimising the impact on neighbouring properties. Nevertheless, the amenity considerations as set out in Local Plan policy A1 (Managing the impact of development) are addressed in turn below:

#### ***Visual Privacy and Overlooking***

- 6.25 The proposed amendments do not involve the creation of any new windows which would overlook neighbouring properties.

#### ***Daylight and Sunlight***

- 6.26 The extant planning permission established that the bulk and massing of the redevelopment was acceptable in daylight and sunlight terms. As the massing is unaltered, the current planning submission is supported by the same Daylight and Sunlight analysis prepared by Gordon Ingram Associates as was submitted with the previous permission. This assessment concludes that that the scheme is acceptable in terms of any daylight impacts to the Hereward House School art block.

- 6.27 The daylight amenity to the rooms within the block and indeed all other surrounding properties relevant for assessment would remain good following implementation of the scheme. In addition, all relevant rooms within surrounding properties would be compliant with the sunlight criteria.

*Outlook*

- 6.28 The principle of the bulk and mass of the proposed redevelopment has been established by the extant planning permission. Within the previous Planning Committee report Officers, at 10.20 confirmed:

*“Whilst the proposal will be visible from surrounding properties, it is not considered to result in overbearing or sense of enclosure to any neighbouring occupiers.”*

- 6.29 The proposed amendments will not result in any increase in the external bulk and massing of the proposals and, for this reason, there will be no additional effect on the levels of outlook from neighbouring properties.

*Construction-related impacts*

- 6.30 It is recognised that any development of the site will result in temporary impacts on the amenity of neighbours during demolition and construction. Temporary impacts include noise, odour, dust, fumes, and traffic generation. It is impossible to avoid some of these impacts but it is possible to put measures in place to ensure any such impacts are mitigated.
- 6.31 The extant permitted scheme was supported by a detailed draft Construction Management Plan completed by Ramboll UK. The document accompanies this new planning submission and outlines how the applicant will help minimise the construction impacts relating to both on site activity and the transport arrangements for vehicles servicing the site.
- 6.32 In determining the previous application, Council Officers confirmed that the draft CMP submitted by the applicant, was appropriate for that stage of the development. It is noted that the submission of a more detailed CMP forms an obligation within the S106 legal agreement for the extant permission, and this requirement is anticipated on any new S106 related to the current application.

### ***Trees***

- 6.33 The application is accompanied by an Arboricultural Statement by Barrell Tree Consultancy which assesses the impact of the development on trees within the site's context and provides a method statement for the protection of trees.
- 6.34 There is a large mature London plane tree subject of a TPO in the rear of the site adjacent to the Wathen Hall. An application for extensions and alterations to one of the school buildings was refused (and dismissed at appeal) in 2006 because of impacts on this tree. This tree has been pollarded earlier in its life but since then has formed a full crown. The tree is carefully maintained and the crown periodically reduced. The trees on the eastern boundary are useful in terms of softening the appearance of the tall fence required due to ball games in the playground.
- 6.35 The Arboricultural Statement sets out that the mature London plane tree will be protected during development works using a number of appropriate measures.
- 6.36 Overall, the proposed development is not considered to cause unacceptable harm to the trees and is consistent with Local Plan policy A3 (Biodiversity)

### ***Sustainability***

- 6.37 In approving the extant approved scheme, Officers considered that due to the constrained urban nature of the site it was very unlikely that the scheme would be able to viably achieve a BREEAM rating of 'Excellent'. Instead, the proposed redevelopment achieved BREEAM 'Very Good' and this was considered to be acceptable.
- 6.38 This new submission is supported by an updated BREEAM credit analysis report produced by Elementa, and which reflects the design amendments to the scheme. The updated Pre-Assessment confirms that the scheme will continue to achieve 'Very Good'.
- 6.39 In terms of the Energy Strategy, the supporting information prepared by Elementa confirms that the proposed development will achieve 10% carbon reduction at Be Lean stage. This represents a significant improvement from the extant permission which achieves 6% carbon reduction at Be Lean stage. In addition, there is an extant planning permission for the site, which can still be implemented up until July 2021. As a result, the proposed increase in Be Lean carbon reduction represents betterment

over a scheme which the applicant could still implement in the first half of 2021, were they to choose to do so.

- 6.40 The previously approved Section 73 application achieved an on site carbon reduction of 36.1%. Elementa's supporting document confirms that the updated proposals can achieve now achieve a significant improvement to 47%.
- 6.41 The extant permission secured a post-construction review as part of the Section 106 legal agreement, and this obligation is anticipated within any future legal agreement.

### ***Air quality***

- 6.42 It is understood that the Council has adopted WHO targets for PM10 and PM2.5 in its Air Quality Action Plan. A new Air Quality Assessment prepared by Ramboll accompanies this application submission. A review of existing and projected air quality across the whole school site demonstrates that this would be expected to meet all relevant air quality objectives. It is therefore considered that staff and pupils will not be exposed to poor air quality whilst on the school site and the need for the redevelopment proposals to include mitigation in the form of mechanical ventilation with pollution filters has not been identified. Furthermore, air quality is predicted to already meet the more stringent WHO guideline values for PM10 and PM2.5.

### ***Noise***

- 6.43 Ramboll UK have provided an acoustic report that established noise level limits for building services plant associated with the development in accordance with British Standard BS 4142:2014. A background noise survey was carried out to inform the assessment.
- 6.44 The report demonstrates that plant noise will be controlled by the selection of appropriate plant and attenuation, and that the proposed development would comply with Local Plan policy A4 (Noise and Vibration).

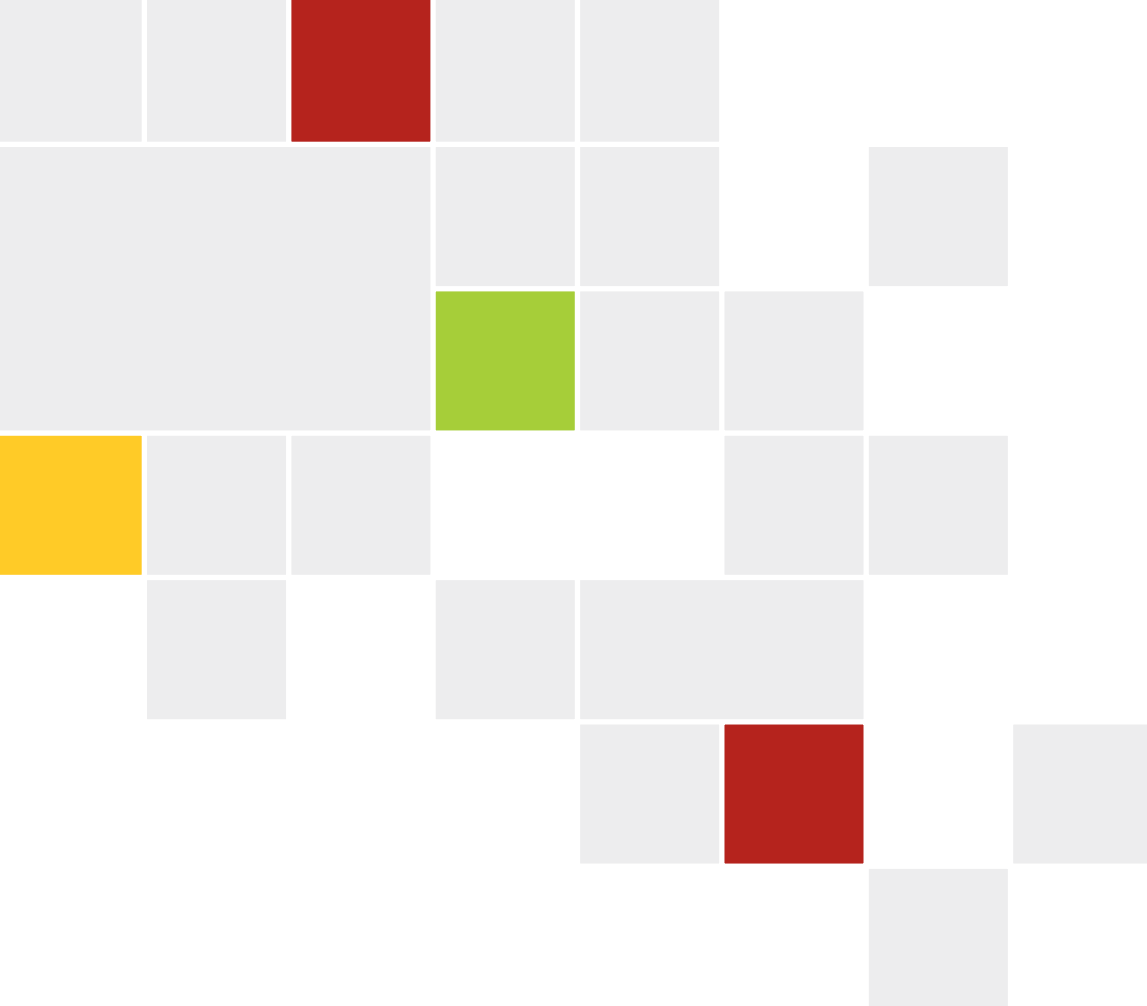
### ***Flood Risk Assessment***

- 6.45 The school is identified within the London Borough of Camden's Strategic Flood Risk Assessment as being within a Critical Drainage Area. Accordingly a full Flood Risk Assessment (FRA) by Elliot Wood accompanies this planning application.

6.46 The FRA states that the site has been assessed for all forms of flood risk and is considered to be at low risk. The FRA sets out that whilst various options to reduce surface water run-off have been considered, given the site's constrained nature and the implications with the site's TPO, it is proposed to maintain existing rates of surface water discharge from the development.

## 7. Conclusion

- 7.1 The principle of the redevelopment of the Hall School site is established by the planning permission granted in 2019.
- 7.2 In assessing the extant consented scheme, the Council's Officers concluded that:  
*"The scheme is a well-considered coherent response which carefully adapts; updates and optimises the constrained site in a manner consistent with its heritage value. The scheme is considered to preserve the character and appearance of the area. No harm is considered to be caused by the development."*
- 7.3 It is now proposed to make several amendments to the consented scheme. When viewed from ground floor level there are very few perceptible differences between the approved scheme and this amended scheme.
- 7.4 As was the case under the extant planning permission, there is no intention to increase the roll of pupils at the school, which will remain at 162.
- 7.5 The proposed amendments will ensure that the scheme's original design integrity will be retained. The proposed development will continue to provide greatly improved, modern and flexible teaching spaces, with level access throughout the entire building.
- 7.6 The proposed amendments will have no additional impact on residential amenity. Equally the Transport Statement and draft Travel Plan submitted with the application demonstrate that the proposals will not result in any additional impact on the local transport network.
- 7.7 Section 38(6) of the 2004 Act states that planning decisions must be made in accordance with the Development Plan unless material considerations indicate otherwise. This Statement has demonstrated that, the proposed amended scheme would be entirely consistent with national and local planning policy, effectively improving a historic school site to enable the provision of fully accessible facilities for a twenty first century education.
- 7.8 For these reasons, the planning application should be considered and approved without delay, in accordance with the NPPF.



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