

CONSTRUCTION SKILLS CENTRE & SITE ACCOMMODATION AT FORMER MARIA FIDELIS SCHOOL SITE PLANNING STATEMENT

August 2021

1CP01-MDS_ARP-TP-REP-SS08_SL23-990005 - C01

Revision Key:

P = Preliminary Documents/Drawings – P01, P02, P02

C = Contractual Documents/Drawings - C01, C02, C03

- X = As Built Mark-Up Drawings X01, X02, X03
- Z = As Built Record Drawings Z01, Z02, Z03

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GLOSSARY

Term	Description
Construction Skills Centre (CSC)	Educational facility to provide construction skills training to the local borough.
HS2	HS2 (High Speed Two) is a new high speed railway linking up London, the Midlands, the North and Scotland serving over 25 stations, including eight of Britain's 10 largest cities and connecting around 30 million people.
HS2 Euston Station	HS2 Euston Station will be the London terminus and will be constructed as part of Phase One of HS2.
HS2 Ltd	HS2 Ltd was set up by the Government to develop, build and operate HS2. It is a non- departmental public body, wholly funded by the Secretary of State for Transport and sponsored by the Department for Transport.
London Borough of Camden	London Borough of Camden is the Local Planning Authority for the application site. The Council also have an interest in the Construction Skills Centre and would operate the facility.
Mace Dragados Joint Venture	Mace Dragados Joint Venture ('MDjv') is a joint venture between Mace Limited and Dragados SA. MDjv is the Construction Partner for HS2 Euston Station, working with HS2 Ltd.
Proposed Development	The Construction Skills Centre and Site Accommodation on the former Maria Fidelis School site.
Site Accommodation	Facility to accommodate approximately 2,500 site operatives and management staff, including office space, ancillary rooms, WCs, showers and changing rooms, and on-site catering.



ABBREVIATIONS LIST

Abbreviation	Meaning
СМР	Construction Management Plan
EAP	Euston Area Plan
HS2	High Speed Two
LBC	London Borough of Camden
LCR	London and Continental Railways
LPA	Local Planning Authority
MDjv	Mace Dragados Joint Venture
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
PTAL	Public Transport Accessibility Level
SDSC	Station Design Services Contractor
SPG	Supplementary Planning Guidance
TfL	Transport for London



1 Executive Summary

- 1.1.0 This Planning Statement has been produced by the Mace Dragados Joint Venture (MDjv) on behalf of High Speed 2 Ltd (HS2 Ltd), to support a full planning application for a Construction Skills Centre and Site Accommodation at the former Maria Fidelis school site (the 'Proposed Development').
- 1.1.1 The Proposed Development is required to facilitate the construction of HS2 Euston Station and to re-provide the Construction Skills Centre which was previously granted consent on the application site.
- 1.1.2 The addition of the building will provide a high-quality environment for users of both the Site Accommodation and Construction Skills Centre and will provide positive branding for the 'front door' of the HS2 Euston Station construction site. Other benefits of the Proposed Development include:
 - Making best use of available land to fulfil the project requirements;
 - Supporting the requirements of the local community and stakeholders, by reproviding the Construction Skills Centre;
 - Providing sustainable and re-usable solutions to reduce the carbon footprint of the project;
 - Providing best lifecycle value for HS2; and
 - Delivering construction skills training for the local borough and providing immediate access to construction opportunities on the HS2 Phase One and beyond.
- 1.1.3 The analysis set out within this Planning Statement demonstrates that the Proposed Development accords with the adopted development plan and that no other material considerations, including national policy and guidance, and supplementary planning documents and guidance, indicate that the application should be determined otherwise.



2 Introduction

2.1 Introduction

- 2.1.0 This Planning Statement has been produced by the Mace Dragados Joint Venture (MDjv) on behalf of High Speed 2 Ltd (HS2 Ltd), to support a full planning application for a Construction Skills Centre and Site Accommodation at the former Maria Fidelis School site (the 'Proposed Development'). The Proposed Development does not relate to the new Maria Fidelis Catholic School site, located at 1-39 Drummond Crescent.
- 2.1.1 The Proposed Development would provide:

• a Construction Skills Centre (CSC') on behalf of London Borough of Camden ('LBC'), for which a similar scheme was previously granted planning permission under LBC application reference 2019/3091/P; and

• a Site Accommodation facility to accommodate approximately 2,500 site operatives and management staff, including office space, ancillary rooms, WCs, showers and changing rooms, and on-site catering. This is required as part of the High Speed Two ('HS2') railway project and will facilitate the construction of HS2 Euston Station.

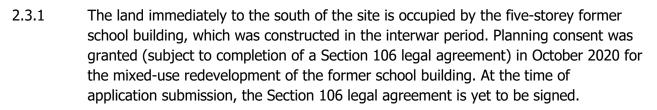
2.1.2 The Proposed Development is required for a temporary period of 10 years from occupation and will be removed following the construction of HS2 Euston Station.

2.2 The applicant

- 2.2.0 HS2 Ltd is the company responsible for developing, building and operating HS2. It is a non-departmental public body, wholly funded by the Secretary of State for Transport and sponsored by the Department for Transport.
- 2.2.1 This application is submitted by MDjv, acting as planning agent on behalf of HS2 Ltd. MDjv is a joint venture between Mace Limited and Dragados SA, and is the Construction Partner for HS2 Euston Station. MDjv is working with HS2 Ltd to coordinate the construction of the new station, including platforms, concourse and links to London Underground and other rail services.

2.3 Development site

2.3.0 The site is located in the northern part of the former Maria Fidelis Catholic School in the London Borough of Camden. The site is currently vacant. Part of the site was most recently used as outdoor play space associated with the school, and there is a two-storey ancillary school building, constructed in the 1990s, which remains onsite and is due to be demolished under a separate consent.



- 2.3.2 The surrounding area is a mix of residential and commercial uses, with Euston Station located to the north east. To the north of the site is the HS2 Euston Station construction site, which was formerly St. James's Gardens.
- 2.3.3 The site is accessed via North Gower Street to the west and via Cobourg Street to the east. Starcross Street is located to the south of the wider Maria Fidelis site and connects North Gower Street and Cobourg Street. Hampstead Road is located beyond North Gower Street to the west of the site. There are no Listed buildings onsite and the application site is not within a Conservation Area. The buildings on the eastern (no's 190-204) and western (no's 211-229) North Gower Street, located approximately 100 metres to the south of the site, are Grade II Listed. Number 108 Hampstead Road, located 20 metres to the north east of the application site, is Locally Listed.

2.4 Project background

- 2.4.0 The High Speed Rail (London West Midlands) 2017 Act ('HS2 Act') grants powers to construct and maintain works for Phase One of HS2.
- 2.4.1 The HS2 Euston Station project forms part of Phase One of HS2, which will provide dedicated high speed rail services between London, Birmingham and the West Midlands.
- 2.4.2 A range of temporary buildings and facilities are required for the construction of HS2 Euston Station including a Site Accommodation facility for construction operatives.
- 2.4.3 The site comprised of the former Maria Fidelis School grounds is within the Limit of Land to be Acquired or Used (LLAU) as determined in the HS2 Act. The land was acquired by HS2 under Schedule 16 powers of HS2 Act, to be temporarily used to facilitate the construction of HS2.
- 2.4.4 It is currently anticipated that HS2 will retain use of the site for approximately 10 years from occupation, after which it will be returned to the previous landowners LBC and London Continental Railway (LCR).
- 2.4.5 A planning application (LBC ref: 2019/3091/P) was submitted by LBC and LCR for the site in July 2019, which proposed the following:

Redevelopment of the site to include change of use of former school building (Class D1) to office use (Class B1a) with associated external alterations, use of

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existing ancillary gym building as multi-use community facility (Class D1/D2), erection of a two storey Construction Skills Centre (Class D1) and provision of public open space together with alterations to existing access arrangements, all as meanwhile uses for a period of 10 years.

- 2.4.6 The application was granted subject to the completion of a Section 106 agreement, however the need to provide for construction Site Accommodation on the site has prompted a redesign of the previously consented scheme.
- 2.4.7 The Proposed Development would incorporate the Construction Skills Centre as an integrated yet separate function of the Site Accommodation, on the site of the former Maria Fidelis school.
- 2.4.8 Combining the functions will offer benefits to both the project and local community through linking training to employment requirements on site for local people, upskilling the construction workforce, potential shared space for briefings and inductions, educational visits and shared viewing areas.
- 2.4.9 The project objectives are as follows:
 - Supporting the requirements of the local community and stakeholders, by including the Construction Skills Centre;
 - Protecting green space being delivered across the wider Maria Fidelis site (outside of the application boundary);
 - Providing sustainable and re-usable solutions to reduce the carbon footprint of the project;
 - Promoting positive branding of the Euston Station Project and HS2 by acting as the 'front door' to the project;
 - Providing best lifecycle value for HS2; and
 - Delivering construction skills training for the local borough and providing immediate access to construction opportunities on the HS2 Phase One and beyond.
- 2.4.10 Ordinarily approval for site accommodation and associated construction works would fall within the powers of the HS2 Act. However, the HS2 Act did not grant powers for the Construction Skills Centre, and because the application for the Site Accommodation is being combined with the application for the Construction Skills Centre (which is not a requirement for the HS2 project), HS2 Ltd and MDjv have agreed to seek approval for the Proposed Development under the Town and Country Planning Act 1990. This has involved extensive pre-application engagement with LBC and two rounds of public engagement.

2.5 Application documents and drawings

2.5.0 This planning application is comprised of the following documents and drawings:



Documents

Document	Reference Number
Planning Application Form	n/a
Cover Letter	1CP01-MDS_ARP-TP-NOT-SS08_SL23-990001
Planning Statement	1CP01-MDS_ARP-TP-REP-SS08_SL23-990005
Design and Access Statement	1CP01-MDS_FBM-AR-REP-SS03_SL22-000001
Flood Risk Assessment	1CP01-MDS_ARP-EV-REP-SS08_SL23-990007
Acoustic Assessment Report	1CP01-MDS_ARP-EV-REP-SS08_SL23-990008
Sustainability Report	1CP01-MDS_ARP-EV-REP-SS08_SL23-990009
Air Quality Report	1CP01-MDS_ARP-EV-REP-SS08_SL23-990010
Deliveries and Servicing	1CP01-MDS_ARP-OM-REP-SS08_SL23-990002
Management Plan	
Transport Assessment	1CP01-MDS_ARP-TM-REP-SS08_SL23-990010
Travel Plan	1CP01-MDS_ARP-TM-REP-SS08_SL23-990011
Contamination Report	1CP01-MDS_ARP-EV-REP-SS08_SL23-990006
Public Engagement Report	1CP01-MDS_ARP-SE-REP-SS08_SL23-990002
Landscape Report	1CP01-MDS_FBM-LS-REP-SS08_SL23-000001
Construction Management Plan	1CP01-MDS-CL-PLN-SS08_SL20_GF-000003
Energy Statement	1CP01-MDS_MFL-PL-REP-SS08_SL22-000002
Lighting Statement	1CP01-MDS_MFL-PL-REP-SS08_SL22-000001
Fire Statement	1CP01-MDS_LBA-FI-STA-SS08_SL23-000001
S106 Heads of Terms	1CP01-MDS_ARP-TP-REP-SS08_SL23-990007

Drawings

Drawing Title	Reference Number
Site Location Plan - Existing	1CP01-MDS_FBM-AR-DSP-SS08_SL23_GF-000002
Proposed Site Plan	1CP01-MDS_FBM-AR-DSP-SS08_SL23_GF-000004
Existing Site Plan	1CP01-MDS_FBM-AR-DSP-SS08_SL23_GF-000005
Proposed Ground Floor Plan	1CP01-MDS_FBM-AR-DGA-SS08_SL23-GF-000001
Proposed First Floor Plan	1CP01-MDS_FBM-AR-DGA-SS08_SL23-F1-000001
Proposed Second Floor Plan	1CP01-MDS_FBM-AR-DGA-SS08_SL23-F2-000001
Proposed Third Floor Plan	1CP01-MDS_FBM-AR-DGA-SS08_SL23-F3-000001
Proposed Fourth Floor Plan	1CP01-MDS_FBM-AR-DGA-SS08_SL23-F4-000001
Proposed Fifth Floor Plan	1CP01-MDS_FBM-AR-DGA-SS08_SL23-F5-000001
Proposed Roof Floor Plan	1CP01-MDS_FBM-AR-DGA-SS08_SL23-F6-000001
Proposed North Elevation	1CP01-MDS_FBM-AR-DEL-SS08_SL23-000001
Proposed West & East Elevations	1CP01-MDS_FBM-AR-DEL-SS08_SL23-000002

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Drawing Title	Reference Number
Proposed South Elevation	1CP01-MDS_FBM-AR-DEL-SS08_SL23-000003
Proposed East & West Context Elevations	1CP01-MDS_FBM-AR-DEL-SS08_SL23-000004
Proposed North & South	1CP01-MDS_FBM-AR-DEL-SS08_SL23-000005
Context Elevations	
Proposed Section 01	1CP01-MDS_FBM-AR-DSE-SS08_SL23-000003
Proposed Section 02	1CP01-MDS_FBM-AR-DSE-SS08_SL23-000002
Proposed Section 03	1CP01-MDS_FBM-AR-DSE-SS08_SL23-000005
Proposed Section 04	1CP01-MDS_FBM-AR-DSE-SS08_SL23-000004
Proposed Strip Section through CSC Entrance and Site Accommodation	1CP01-MDS_FBM-AR-DSE-SS08_SL23-000006
Proposed Enclosure, Fence & Gate Elevations Drawing 01	1CP01-MDS_FBM-AR-DDE-SS08_SL23-000017
Proposed Enclosure, Fence & Gate Elevations Drawing 02	1CP01-MDS_FBM-AR-DDE-SS08_SL23-000018
Proposed Typical Fencing and Gate Details	1CP01-MDS_FBM-AR-DDE-SS08_SL23-000019

2.5.1 An ecological assessment was carried out by ASW Ecology in December 2018 and was submitted to and approved by LBC through the previous application for the site (LBC ref: 2019/3091/P). The ecological assessment has been drawn upon for this application but is not re-submitted to LBC for approval with this application.



3 Proposed Development

3.1 Overview

3.1.0 The Proposed Development can be described as follows:

Erection of a six-storey combined Construction Skills Centre (Class F1(a) - Education) and Site Accommodation (Class E(g)(i) - Offices) to facilitate the construction of HS2 Euston station, as meanwhile uses for a period of up to 10 years from occupation.

The Proposed Development would provide 1,378sqm of CSC floorspace and 5,747sqm of Site Accommodation floorspace. The overall site area is 0.24ha. The maximum height of the building would be 22.4m and the building would be 77m wide and 18m deep.

The building would utilise modular construction, using modern methods of construction and assembly on-site to the form described above. The Proposed Development would include landscaping to the north western corner of the site and on the southern side of the Site Accommodation. Plant would be included at roof level to facilitate the operation of the building. Boundary treatments, in the form of weld-mesh fencing would be included along the southern boundary. Hoardings on the eastern boundary would be delivered under HS2 Act powers.

Vehicular access to the Site Accommodation would be delivered via a combination of the existing HS2 worksite to the north and Cobourg Street. Vehicular access arrangements for the Site Accommodation would change throughout the construction and operational period to accommodate wider HS2 works to the north of the site. Vehicular access for the Construction Skills Centre would remain as previously approved with infrequent servicing use of North Gower Street (consented under extant permission 2019/3091/P).

Pedestrian access to the Construction Skills Centre would be via the open space to the south of the building. Pedestrian access to the Site Accommodation would only be from Hampstead Road and through the existing HS2 worksite to the north.

3.2 Site Accommodation

3.2.0 Site Accommodation is the provision of facilities required to support the construction and management workforce and construction activity for the HS2 Station works. This plays a vital role in supporting the health, safety and wellbeing of the construction workforce and management staff.

- 3.2.1 The Site Accommodation element of the overall Proposed Development will comprise four storeys and will consist of workspaces to accommodate approximately 2,500 site operatives and management staff, including office space, ancillary rooms, WCs, showers and changing rooms, and on-site catering.
- 3.2.2 More information on the design features of the Site Accommodation can be found in the Design and Access Statement.

3.3 Construction Skills Centre

- 3.3.0 A Construction Skills Centre is proposed for the site to provide practical training for local people to work on local sites including HS2. Approximately 120 students and 30 staff would be based at the facility. The facility would be operated by LBC.
- 3.3.1 The Construction Skills Centre will see the continuation of educational uses on the site but in a purpose-built facility. It would have an external yard for teaching and a direct view of a major construction project in the form of HS2.
- 3.3.2 The ground floor would contain administration, interview and practical workshop training space, whilst the first floor would contain classrooms and additional workshop space. Part of the first floor would also include facilities for the Site Accommodation.
- 3.3.3 The design approach for the Construction Skills Centre is for the facility to be an integrated yet distinctive element of the overall Proposed Development, using colour, materiality design cues to distinguish the two separate uses. More information on the design approach for the Construction Skills Centre can be found in the Design and Access Statement.

3.4 Access

- 3.4.0 Vehicular access to the Site Accommodation would be via a combination of the existing HS2 worksite to the north and Cobourg Street. Vehicular access arrangements for the Site Accommodation would need to change throughout the construction and operational period, as the site is constrained by other HS2-related works to the north of the site such as utilities diversions.
- 3.4.1 Vehicular access for occasional servicing vehicles for the Construction Skills Centre would remain as previously approved with infrequent servicing use of North Gower Street (granted planning approval subject to the completion of S106 agreement under extant permission 2019/3091/P).
- 3.4.2 Pedestrian and cycle access to the Site Accommodation would only be from A400 Hampstead Road and through the existing HS2 worksite to the north. Pedestrian and cycle access to the Construction Skills Centre would be from Starcross Street and via

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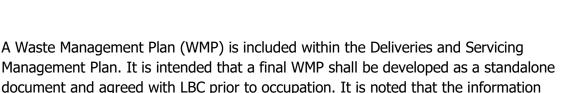


the open space to the south of the Proposed Development. Cycle parking would be provided separately for the Site Accommodation and Construction Skills Centre.

3.4.3 Further information on vehicular, pedestrian and cycle access to the Proposed Development can be found in the Transport Assessment. An outline Construction Management Plan (CMP) has also been submitted to support the planning application.

3.5 Operation and servicing

- 3.5.0 The proposed Site Accommodation will be accessible 24 hours a day, 7 days a week due to the nature of some of the project works. It is expected that staff will typically be working in the facilities from 7am to 7pm on weekdays, and 7am to 2pm on Saturdays. On weekdays, most staff are expected to arrive between 7am and 7.30am and depart between 5pm and 6pm.
- 3.5.1 The proposed Construction Skills Centre would be open Monday to Friday, 8am to 6pm. Occasional evening opening may also be required.
- 3.5.2 The Site Accommodation service yard will be open 24 hours a day, seven days a week, to cover engineering working hours in live stations and tunnelling shift patterns. Vehicular access to the Site Accommodation will be phased to accommodate HS2 construction works nearby.
- 3.5.3 The CSC yard will be open 11 hours a day, Monday to Friday. For the CSC, delivery vehicles will be able to pull into the service yard from North Gower Street and reverse within the service yard into their parking location. The dockmaster will assist with indicating the correct bay to the driver and co-ordinating the delivery receipt process.
- 3.5.4 During the first phase of operation, off-street loading areas will be provided within the HS2 worksite to the north of the development, to suit the HS2 construction sequencing and station delivery programme. During this phase, vehicles will use temporary roads to access designated loading areas. It is anticipated that loading bays will be relocated (within the site) over time to support interfacing construction activities and the safety of delivery drivers.
- 3.5.5 For the periods during building operation where access from the northern site area is unavailable and as construction activities around Cobourg Street allow, access for servicing vehicles will be via the designated temporary roads between otherwise approved site entrance gates and the northern elevation of the development; this will include but not be limited to the Cobourg Street gate.
- 3.5.6 In both phases a dockmaster will assist with indicating the correct bay to the driver and co-ordinating the delivery receipt process.



3.5.8 The Proposed Development requires two waste stores, a waste store for the site accommodation (including the canteen) and for the CSC, sized at 54.95m2 and 13.65m2 respectively. Waste stores have been sized to accommodate two days' storage of commercial waste. A waste store has been provided in the service area (outside of the application boundary but within the HS2 construction site) and adjacent to the CSC entrance in a back of house location.

provided in this WMP is based on currently known information.

3.5.9 More information on deliveries and servicing can be found in the Deliveries and Servicing Management Plan.

3.6 Construction

3.5.7

- 3.6.0 An outline Construction Management Plan (CMP) has been prepared separately to accompany this planning application, which covers the construction of building foundations, superstructure erection and subsequent fit out, and commissioning activities.
- 3.6.1 Subject to planning approval, construction is anticipated to commence in October 2021, with fit out, testing and commissioning taking place between January to May 2022.
- 3.6.2 The site will operate standard working hours for construction sites in Camden. Any deviations from these core hours will need to seek Section 61 dispensation approvals.
- 3.6.3 During construction, the main access will be via the HS2 worksite to the north of the site from Cardington Street. The Transport for London Road Network will be used to gain access to the A400 Hampstead Road and subsequently Cardington Street. Most vehicles are expected to be tippers, vans and skip lorries. Larger vehicles such as a hiab could be expected twice a day. Plant and crane deliveries are expected at the start of the project, and one delivery a day by an articulated vehicle could be expected during the main construction phase of the project. Further information is included in the CMP.
- 3.6.4 If for any reason the primary route cannot be used, vehicles may be required to enter the former Maria Fidelis school site from Cobourg Street. The route to the site would be from the A501 Euston Road and North Gower Street, and exit via Starcross Street and North Gower Street. Swept path analysis has been undertaken for the largest vehicles along these routes. This shows that should access be needed from the south, some on-street bays may require temporary suspension to facilitate these vehicles to the site. Restrictions would only be required for one day at a time to

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facilitate any special deliveries. Swept path drawings are available within the Transport Assessment. Vehicles will only be required to use Cobourg Street in particular safety related circumstances, such as access being blocked by crane lifting operations, short-term open excavations or whilst temporary construction roads within the site boundary are being modified or created.

3.6.5 It is currently envisaged that 11 vehicles could be expected a day during the construction phase, which equates to around one vehicle an hour (5.5 working days, 10 working hours on a weekday).



4 Planning Policy Context

4.1 Introduction

- 4.1.0 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of a planning application must be made in accordance with the adopted Development Plan unless material considerations indicate otherwise.
- 4.1.1 In reaching a decision on this planning application, the first consideration is therefore whether the proposal is in accordance with the Development Plan. Having done this it is then necessary to have regard to all other material planning considerations, which includes all relevant policy considerations contained in any emerging Development Plan document, supplementary planning documents, the National Planning Policy Framework (NPPF) as well as National Planning Policy Guidance (NPPG).
- 4.1.2 The Development Plan in this instance consists of:
 - London Plan (2021);
 - Camden Local Plan (2017);
 - Camden Policies Map (2017);
 - Camden Site Allocations Plan (2013); and
 - Euston Area Plan (2015).
- 4.1.3 In February and March 2020, LBC consulted on a draft Site Allocations Local Plan. Once adopted, this would replace policies in the 2013 Site Allocations Plan. Whilst not yet adopted, this would carry an amount of weight in the determination of any planning application.
- 4.1.4 As set out in the Town and Country Planning (Mayor of London) Order 2008, the Mayor of London has powers to 'call in' planning applications if certain thresholds are met. Following a review of the relevant thresholds, this application is not considered to trigger a call in by the Mayor.
- 4.1.5 This section provides an assessment of the relevant policies and demonstrates that the Proposed Development is in accordance with the adopted Development Plan.

4.2 Development Plan

London Plan (2021)

4.2.0 The London Plan 2021 is the spatial development strategy for Greater London, setting out a framework for how London will develop over the next 20-25 years. The Plan was adopted in March 2021. Relevant policies from the London Plan are set out and assessed in Table 1 below.



Table 1: Policy assessment of the Proposed Development against the London Plan 2021.

London Plan Chapter / Policy	Assessment
Chapter 1: Good Growth	
Policy GG2 states that sustainable mixed-use places should make the best use of land, by enabling the development of brownfield land in 'Opportunity Areas'.	The London Plan identifies Euston as an Opportunity Area. The Proposed Development would make the best use of brownfield land in an Opportunity Area. The application site is currently vacant and is directly adjacent to the HS2 construction site which the Site Accommodation will serve. The Proposed Development also maximises the use of land by combining with the CSC which was previously granted planning approval (subject to completion of Section 106 agreement) by LBC.
Policy GG6 states that development must help London become a more efficient and resilient city, for example through energy efficient design and taking an integrated and smart approach to the delivery of strategic and local infrastructure.	The Proposed Development would deliver an efficient solution using modular construction, modern methods of construction and assembly on-site. This would speed up the construction process and minimise adverse environmental impacts for nearby residents and businesses during the construction phase. The Site Accommodation would support the delivery of a nationally significant infrastructure project and the CSC would support the delivery of local education and skills infrastructure for the borough of Camden.

Chapter 2: Spatial Development Patterns

t The Proposed Development supports the wider
growth and regeneration aspirations for the
Euston Opportunity Area. The building would
be temporary and removed following the
completion of HS2 Euston Station construction
works, and the site would be returned to the
landowners LBC and LCR. Future proposals for
the site are not yet known, however the
Proposed Development would not preclude any
future redevelopment proposals brought
forward by LBC and LCR.

Chapter 3: Design

Policy D5 relates to inclusive design and states The Proposed Development would be fully *that development proposals should achieve the* accessible for all building users. For each *highest standards of accessible and inclusive* respective use, there would be no separation of

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design. This includes providing independent access with no separation or special treatment,	access according to the age or ability of individuals.
and being designed to allow safe and dignified emergency evacuation for all building users.	The fire strategy for the Proposed Development specifically considers London Plan Policy D5, which relates to fire safety provisions for disabled persons and the evacuation of disabled persons so as not to disadvantage any person with reduced mobility.
	The building has been designed to incorporate safe and dignified emergency evacuation for all building users. There are two lifts provided and both have been designed to meet the requirements for fire evacuation lifts, suitable to be used to evacuate people who require level access from the building. For more details refer to the Fire Statement.
Policy D9 sets out policy direction for tall buildings, defined according to local context and no less than 18 metres from ground to the floor level of the uppermost storey. Development proposals should consider a variety of impacts including visual impacts, legibility and wayfinding, architectural quality and materials, impact on heritage assets and settings, functional impacts and environmental impacts.	Under the London Plan definition, the Proposed Development would be classified as a tall building. The height, scale and massing of the Proposed Development are on the whole determined by of a number of essential requirements and constraints for the Site Accommodation. Opportunities have been taken to minimise the visual impact of the building where possible, for example by greening the building, by providing a positive aesthetic and by distinguishing the entrance to the CSC to break up the massing.
	Refer to Section 6.4 and 6.5 of this Planning Statement and the Design and Access Statement for more details on how the design of the building addressed potential impacts due to its scale and massing.
Policy D12 sets out guidance for fire safety, and notes that all major development proposals should be submitted with a Fire Statement	A Fire Statement and fire strategy have been developed for the Proposed Development in conjunction with London Plan Guidance for London Plan Policies D12 and D5(B5). The Proposed Development has been designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire, including appropriate fire alarm systems and passive fire safety measures. The Fire Statement demonstrates that fire safety and accessibility requirements

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	have been considered in the design from the earliest stage.
	The strategy has been developed using <i>BS9999: 2017 Fire safety in the design,</i> <i>management and use of buildings.</i> This design guide has been used to meet the requirements of Part B to Schedule 1 of the Building Regulations 2010 (as amended). Through the use of this design guide, the Fire Statement addresses the requirements of London Plan Policy D12 by providing the following:
	 Suitably positioned unobstructed outside space for fire appliances;
	 Areas appropriate for use as an evacuation assembly point;
	 Appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire;
	 Appropriate construction methods which minimise the risk of fire spread;
	 Suitable and convenient means of escape, along with an evacuation strategy for all building users; and
	 Suitable access and equipment for firefighting.
	For more details refer to the Fire Statement.
Policy D14 sets out policy direction to reduce, manage and mitigate noise impacts on local communities and environmental amenity.	Noise and vibration from the construction of the Proposed Development will be controlled through implementing suitable mitigation measures in accordance with the requirements of LBC and national guidance.
	Given the location of the site, noise from activities within the Site Accommodation and CSC will not be noticeable at the nearest noise- sensitive receptors to the Proposed Development.
	Further details on how any potential noise and

Policy S1 states that development proposals that seek to make best use of land should be The Site Accommodation would support the delivery of an infrastructure project of national

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encouraged, for example by the sharing of facilities and co-location of social infrastructure.	importance and the CSC would also support the delivery of local education and skills infrastructure for the borough of Camden. Through co-location of the CSC with the Site Accommodation there would be opportunities for the local borough to gain employment skills and training through the HS2 Euston Station construction works.
education facilities next to parks and green spaces where possible.	accessibility and strong pedestrian and cycle
Chapter 6: Economy	
Policies E1 and E2 set out policy guidance for development of new office and business space. This includes consideration of scope to provide a proportion of flexible workspace or units for small businesses.	As the Site Accommodation is a temporary building required specifically to facilitate the construction of HS2 Euston Station, no flexible workspaces or units for small businesses are provided within the Proposed Development.
Policy E11 states that development proposals should support employment, skills development, apprenticeships and other education and training opportunities during construction and operational phases.	The Site Accommodation will support HS2's employment commitments and requirements, which are governed by the Undertakings and Assurances held between HS2 Ltd and LBC. This includes targets for local apprenticeships and partnership arrangements with LBC. The CSC would support the provision of education and training opportunities for the borough and demonstrates HS2's commitment to partnership working with LBC.
Chapter 7: Heritage and Culture	
Policy HC3 sets out policy guidance for strategic and local views. Strategic views include significant buildings that help to define	The Proposed Development falls within a designated viewing corridor as set out in the London View Management Framework

London at a strategic level and are designated in the London Plan. Development proposals must be assessed for their impact on any designated views.

Policy HC4 sets out the principles for the designation and management of local views, and further detail is set out in the London View

Supplementary Planning Guidance. The Proposed Development would not have any impact on the viewing corridor. Refer to section 4.3 of this Planning Statement for details on how the potential impact on the designated viewing corridor has been assessed.



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Management Framework Supplementary Planning Guidance.

Chapter 8: Green Infrastructure and Natural Environment

Policy G5 relates to urban greening, and states that major development proposals should contribute to the greening of London by incorporating measures such as high-quality landscaping, green roofs, green walls, and nature-based sustainable drainage.	undertaken when developing proposals for the site which were consented under application reference 2019/3091/P (subject to Section 106 agreement). The application site is predominantly hardstanding or occupied by the ancillary school building (due to be demolished under a separate consent).
	An existing ecological pond and trees in the north west corner of the application site would be improved as part of the Proposed Development. The pond would be desilted and relined, with a varied profile to the edges and marginal aquatic planting to be incorporated, together with floating plants.
	Other ecological enhancements would be provided including bird / bat boxes, invertebrate boxes and planting.
	A range of evergreen and deciduous climbing plants are proposed to be attached to the southern façade of the building, using an automatic irrigation system together with suitable soil volume to support plant growth. Species would be typically self-twining and would clamber across the wire netting.
	For more details of greening proposals, refer to the Landscape Report submitted as part of this application.
Policy G6 relates to biodiversity and access to nature, and states that development proposals should manage impacts on biodiversity and aim to secure biodiversity net gain, informed by the best available ecological information and addressed from the start of the development process.	
	An existing ecological pond and trees in the north west corner of the application site would be improved as part of the Proposed Development. The pond would be desilted and

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ned, with a varied profile to the edges and ginal aquatic planting to be incorporated, ether with floating plants. er ecological enhancements would be vided including bird / bat boxes, ertebrate boxes and planting. inge of evergreen and deciduous climbing its are proposed to be attached to the
vided including bird / bat boxes, ertebrate boxes and planting. Inge of evergreen and deciduous climbing
thern façade of the building, using an omatic irrigation system together with able soil volume to support plant growth. cies would be typically self-twining and ild clamber across the wire netting.
more details of greening proposals, refer to Landscape Report submitted as part of this lication.
ting trees in the north west corner of the lication site would be retained and are not
s

Chapter 9: Sustainable Infrastructure

 Policy SI 1 sets out policy guidance for improving air quality, stating that development proposals should not lead to a further poor air quality, create any new areas that exceed air quality limits, or create unacceptable risk of high levels of exposure to poor air quality. The policy also states that development proposals must be at least Air Quality Neutral. An Air Quality Report has been provided as part of this application and gives and assessment of potential air quality and odour impacts associated with the Proposed Development. The construction dust assessment found a low dust risk overall without mitigation, therefore appropriate mitigation has been recommended. The assessment of construction and operational road traffic emissions found negligible impacts at all receptors assessed. The odour risk assessment identified a high impact risk, therefore an odour control system has been recommended to mitigate the risk, details of which can be agreed via planning condition. The Air Quality Neutral assessment found that building and transport emissions meet the London Plan requirements for air quality neutrality. 		
	improving air quality, stating that development proposals should not lead to a further poor air quality, create any new areas that exceed air quality limits, or create unacceptable risk of high levels of exposure to poor air quality. The policy also states that development proposals	part of this application and gives and assessment of potential air quality and odour impacts associated with the Proposed Development. The construction dust assessment found a low dust risk overall without mitigation, therefore appropriate mitigation has been recommended. The assessment of construction and operational road traffic emissions found negligible impacts at all receptors assessed. The odour risk assessment identified a high impact risk, therefore an odour control system has been recommended to mitigate the risk, details of which can be agreed via planning condition. The Air Quality Neutral assessment found that building and transport emissions meet the London Plan requirements for air quality neutrality.

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Policy SI 2 relates to minimising greenhouse	An Energy Statement has been provided as
gas emissions, and states that major	part of this application and confirms that the
development proposals should include a	Proposed Development meets the overall
detailed energy strategy to demonstrate how	carbon saving required by the London Plan of
the net zero-carbon target will be met, within	35% by a considerable margin. To achieve net
the framework of the energy hierarchy. The	zero carbon, the remaining annual carbon
policy also states that a minimum on-site	emissions associated with operational energy
reduction of at least 35% beyond building	will be offset, through a contribution of £95 per
regulations is required for major development,	tonne of carbon dioxide fund chosen by LBC.
and any shortfall should be provided through a	This will be payable throughout the lifespan of
cash in lieu contribution to the local borough's	the development, which has been agreed with
carbon offset fund.	LBC.
Policy SI 3 relates to energy infrastructure, and states that major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system, following a heating hierarchy which includes use of zero emission or local secondary heat sources.	 The application site falls within a Heat Network Priority Area as set out in the London Plan. Utilisation of a local district heating network has not been considered for the following reasons: The relatively short predicted lifespan of the new and existing buildings; Cost to extend the network; and Electric heat sources are preferred, considering the planned decarbonisation of the National Grid. Rather than investing in an extension to the network, the installation of a combined Variable Refrigerant Flow (VRF) heating and cooling system is proposed. The cost saved from not extending the network or installing a separate wet heating system can be spent on good quality, high efficiency VRF electric pumps which could be reused. The hot water for spaces with a large demand such as charging facilities and the commercial kitchen would be generated via a dedicated Air Source Heat Pump (ASHP) system. Further information on the heating hierarchy can be found in the Energy Statement.
Policy SI 4 relates to managing heat risk, and	The Proposed Development is well oriented
states that development proposals should	with its long elevations facing north and south.
minimise adverse impacts on the urban heat	Glazing areas are generally modest and have
island through design, layout, orientation,	been chosen to suit the modular construction
materials and the incorporation of green	while providing reasonable daylight levels. The
infrastructure. A cooling hierarchy is set out to	use of a coloured vinyl wrap would also assist



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reduce the potential for internal overheating and reliance on air conditioning systems.	 with minimising adverse impacts on the urban heat island. To reduce the demand for cooling and minimise the risk of overheating, a cooling hierarchy has been applied to the Proposed Development. This includes minimising internal heat generation through energy efficient design and reducing the amount of heat entering the building in summer. Mechanical ventilation and active cooling are required to maintain comfortable conditions for occupants during the summer and due to high levels of external construction noise from the HS2 worksite to the north of the application site. Further information on the cooling hierarchy can be found in the Energy Statement.
Policy SI 5 relates to water infrastructure and sets out policy guidance to minimise the use of mains water, water supplies and resources.	 To deliver a more water efficient design, the approach for the Proposed Development seeks to minimise demand and improve the ability to monitor and control the water supply. Water use reduction measures will be as follows: Specification of low flush and flow fittings sufficient to reduce water consumption; Water main to be provided with utility meters incorporating pulsed BMS (building management system) output and leak detection system; and Specification of flow control devices to regulate the water supply to each WC area or sanitary facility according to demand. Refer to the Sustainability Statement for more details on the water strategy for the Proposed Development.
Policy SI 12 states that development proposals should ensure flood risk is minimised and mitigated, and that residual risk is addressed.	The application site is located within EA Flood Zone 1. The site is at negligible or low risk of flooding from all identified sources, except for groundwater which may impact upon subsurface structures without suitable mitigation measures. Water attenuation is proposed to be provided within one or more cellular storage tanks located in the west of the site. Refer to the Flood Risk Assessment for



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	more details on how flood risk is being minimised and mitigated.
Policy SI 13 relates to sustainable drainage, and states that development proposals should aim to achieve greenfield run-off rates. The	The existing site is predominantly made up of hardstanding areas which are drained by an existing sewer network.
policy states there should be a preference for green over grey features in line with a drainage hierarchy, and that proposals for impermeable surfacing should be resisted unless they can be shown to be unavoidable.	decrease compared to the current situation, as
	The site will be drained via a new drainage network designed to modern standards, with all surface water ultimately directed into the proposed cellular storage tank. Water will be discharged at the 1.0 l/s (the closest feasible controlled rate to the corresponding QBAR greenfield runoff rate for the site) into the Thames Water combined sewer within the site.
	There may be potential to incorporate a blue roof within the Proposed Development, which would allow for a reduction in the size of the below ground attenuation tank. However, this is subject to the final roof design and review of allowable loadings atop the building.
	Areas of hardstanding across the site would utilise permeable SuDS paving.
	Refer to the Flood Risk Assessment, Drainage Report and Landscape Report for more details on the sustainable drainage approach.
Chapter 10: Transport	
Policy T1 relates to a strategic approach to transport and states that development proposals should support the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.	The Proposed Development is located close to walking and cycling routes, and is within walking distance to a range of bus, London Underground and National Rail services from nearby stations. The Proposed Development would be car-free.
	Refer to the Transport Assessment and Travel Plan for more details on how the Proposed Development support's the Mayor's strategic targets for transport.
Policy T2 relates to healthy streets and states	A high-level desktop assessment on Active

that development proposals should Travel Zones has been undertaken in

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demonstrate how they will deliver improvements that support the ten Healthy Streets indicators, in line with Transport for London (TfL) guidance. Proposals should also aim to reduce the dominance of vehicles and be accessible by sustainable transport modes.	accordance with Healthy Streets Principles. Refer to Appendix D of the Transport Assessment for more details. The Proposed Development would be car free and fully accessible by sustainable transport modes.
Policy T4 relates to assessing and mitigating transport impacts and provides guidance for how this should be included within transport assessments/statements submitted alongside development proposals.	A Transport Assessment has been undertaken for the Proposed Development, in accordance with London Plan / TfL guidance.
Policy T5 relates to cycling and states that appropriate levels of cycle parking should be provided in new developments, and should be fit for purpose, secure and well-located, and should accord with minimum standards. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards, including accommodating larger cycles such as adapted cycles.	Cycle parking would be provided for the Proposed Development in accordance with the London Plan requirements. For the Construction Skills Centre, access will be via Starcross Street and the cycle parking would be provided to the east of the building. For the Site Accommodation, access would be via the A400 Hampstead Road and cycle parking would be provided to the north of the site within the HS2 worksite (consented under HS2 Act powers).
	Long stay cycling parking would be secure and covered. Short stay cycle parking would be in the form of Sheffield stands. 5% of cycle parking spaces would be suitable for a larger accessible bike.
	Refer to the Transport Assessment for more details on provisions for cycling.
Policy T6 relates to car parking, and states that car-free development should be the starting point for all development proposals in places that are well-connected by public transport. Policy T6.5 provides guidance on non- residential disabled persons parking.	 The Proposed Development would be car free, except for occasional visits of dignitaries. Disabled parking would be provided on-street, which is the same approach as the previously consented application on site. On the surrounding streets, Blue Badge holders may park in resident permit parking, shared use permit bays and paid for parking bays. Blue Badge holders can also park for up to three hours on single or double yellow lines where there is no loading ban. Refer to the Transport Assessment for more details on car parking.

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Policy T7 relates to deliveries, servicing and construction, and states that development proposals should facilitate safe, clean and efficient deliveries and servicing. 'Construction Logistics Plans' and 'Delivery and Servicing Plans' are required and should be developed in accordance with TfL guidance.	The Proposed Development seek to ensure safe, clean and efficient deliveries and servicing, utilising the HS2 worksite to the north where possible.
	A Deliveries and Servicing Management Plan has been submitted as part of this application and includes:
	 details of initiatives to reduce delivery vehicles and emission, through smart procurement and vehicle reduction measures;
	 the type, number and nature of daily delivery vehicles;
	 the delivery and servicing strategy for the movement of goods within the development;
	 the waste management strategy; and
	• a produce for conducting an annual review.
	An outline Construction Management Plan have been submitted as part of this application, which provides details of proposed construction activities and how any impacts would be mitigated.
	Both documents have been developed in accordance with LBC and TfL guidance.

Camden Local Plan (2017)

- 4.2.1 The Camden Local Plan is the key strategic document in Camden's development plan. It sets out the vision for shaping the future of the Borough and contains policies for guiding planning decisions. The Local Plan was adopted in July 2017.
- 4.2.2 Relevant policies from the Camden Local Plan are set out and assessed in Table 2 below.
- Table 2: Policy assessment of the Proposed Development against the Camden Local Plan (2017)

Camden Local Plan Chapter / Policy Assessment

Chapter 2: Delivery and location of growth

Policy G1 identifies how the Council will deliver Although the Proposed Development is for *growth and in which locations. The Council will* meanwhile uses, it would support the wider *support development that makes best use of its*



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site, including a mix of uses where appropriate. The Euston area is identified as a growth area, and the Local Plan defers to the Euston Area Plan (adopted in January 2015) for area-based planning policy guidance.	growth and regeneration aspirations for the Euston Opportunity Area. The building would be temporary and removed following the completion of HS2 Euston Station construction works, and the site would be returned to the landowners LBC and LCR. Future proposals for the site are not yet known, however the Proposed Development would not preclude any future redevelopment proposals brought forward by LBC and LCR.

Chapter 4: Community, health and wellbeing

Policy C1 relates to health and wellbeing, and states that the Council will require development to positively contribute to creating high quality, active, safe and accessible places. The policy also notes that proposals for major development schemes should include a Health Impact Assessment	The design approach for the Proposed Development recognises the importance of promoting the health, wellbeing and safety of building users. Health and wellbeing credits will be sought through the BREEAM assessment and details can be found in the Sustainability Statement.
	Consideration has also been given to providing safe and healthy surroundings, with site-specific security measures and safe access for pedestrians and cyclists. The Proposed Development would be fully accessible for all users.
	A Health Impact Assessment has not been provided as it is not part of LBC's validation requirements, and the Proposed Development would provide less than 10,000 square metres of additional floorspace.
Policy C6 provides policy guidance in relation to accessibility and inclusivity.	The Proposed Development would be fully accessible for all building users. The Proposed Development is located close to walking and cycling routes and is within walking distance of a range of bus, London Underground and National Rail services from nearby stations. Spaces for adaptive cycles are included within the overall cycle parking provision.
	Disabled car parking would be provided on- street, which is the same approach as the previously consented application on-site. On the



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	surrounding streets, Blue Badge holders may park in resident permit parking, shared use permit bays and paid-for parking bays.
	For more details on accessibility refer to the Design and Access Statement and Transport Assessment.
Chapter 5: Economy and jobs	
Policy E1 relates to economic development and states that the Council will harness the benefits of economic growth for local residents and businesses.	The Proposed Development will support economic growth in the borough of Camden, through its contribution to the longer-term transformation of the Euston area. The provision of the CSC will ensure local residents can access employment and skills training opportunities, including those connected to the HS2 Euston Station construction works.
Policy E2 relates to encouraging the provision of employment sites and states that Camden support the higher intensity of redevelopment of employment sites.	The Proposed Development will deliver employment opportunities for local residents and provide training and apprenticeship options in the construction industry through the delivery of the CSC.
Chapter 6: Protecting amenity	
Policy A1 relates to managing the impact of development and states the Council will seek to protect the quality of life of occupiers and neighbours. The policy sets out a range of amenity factors which the Council will consider in the determination of planning applications.	The Proposed Development seeks to maximise the environmental performance of the building and minimise impacts on local amenity. This is in accordance with policies set out on the Development Plan and LBC's SPG. The potential for amenity impacts has been considered as part of the design development,
	including:
	 impacts due to noise and vibration;
	 impacts on sunlight, daylight and overshadowing;
	 impacts on the local highways network;
	 impacts during the construction phase;
	• the potential for contaminated land; and
	 impact upon water and wastewater infrastructure.



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	Refer to the relevant application documents and section 6.7 of this Planning Statement for details on how amenity impacts would be minimised or mitigated.
Policy A3 relates to biodiversity and sets out a range of measures through which the Council will seek to protect and enhance sites of nature conservation and biodiversity.	A Preliminary Ecological Appraisal was undertaken when developing proposals for the site which were consented under application reference 2019/3091/P (subject to Section 106 agreement). The application site is predominantly hardstanding or occupied by the ancillary school building (due to be demolished under a separate consent).
	An existing ecological pond and trees in the north west corner of the application site would be improved as part of the Proposed Development. The pond would be desilted and relined, with a varied profile to the edges and marginal aquatic planting to be incorporated, together with floating plants.
	Other ecological enhancements would be provided including bird / bat boxes, invertebrate boxes and planting.
	A range of evergreen and deciduous climbing plants are proposed to be attached to the southern façade of the building, using an automatic irrigation system together with suitable soil volume to support plant growth. Species would be typically self-twining and would clamber across the wire netting.
	For more details of greening proposals, refer to the Landscape Report submitted as part of this application.
Policy A4 relates to noise and vibration, and states that the Council will not grant planning permission for development likely to generate unacceptable noise and vibration impacts. Development should have regard to Camden's Noise and Vibration Thresholds, and developments should seek to minimise the impact on local amenity from deliveries, demolition and construction phases.	Noise and vibration from the construction of the Proposed Development will be controlled through implementing suitable mitigation measures in accordance with the requirements of LBC and national guidance.
	Given the location of the site, noise from activities within the Site Accommodation and CSC will not be noticeable at the nearest noise- sensitive receptors to the Proposed Development.

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	Further details on how any potential noise and vibration impacts have been assessed can be found in the Acoustics Assessment.
Chapter 7: Design and heritage	
Policy D1 sets out the Council's requirements to ensure high quality design in new development within the borough. The policy also sets out guidance for tall buildings and public art. Under the policy, tall buildings are considered to be those which are substantially taller than their neighbours or which significantly change the skyline.	have been explored to enhance the appearance, visual aspect and design quality of
	The Proposed Development would be six

storeys high, whereas the adjacent building of the former Maria Fidelis school is equivalent to five domestic storey heights. The Proposed Development is therefore not considered to be a 'tall building', however opportunities have been taken to minimise the visual impact of the building where possible, for example by greening the building, by providing a positive aesthetic and by distinguishing the entrance to the CSC to break up the massing. Parapets are also proposed following community feedback.

Any plant and building services equipment on the roof would be set back to the north of the building to improve the visual aspect.

More details on the design approach for the Proposed Development can be found in section 6.4 / 6.5 of this Planning Statement and in the Design and Access Statement.

Chapter 8: Sustainability and climate change

Policy CC1 relates to climate change mitigationThe Proposed Development would be largelyand sets out guidance for new development tocomprised of prefabricated modular units whichminimise the effects of climate change. Thehave been constructed using off-site



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Council will encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.	manufacture. The modules can be connected side-by-side, end-to-end or in multiple storeys to make buildings of any scale or layout. This enables the modules to be easily expanded, reduced, reconfigured or relocated to meet the changing needs, and it delivers a more efficient way to minimise the construction time and impacts of the project.
	A range of sustainability measures would be incorporated within the Proposed Development to minimise the effects of climate change, details of which can be found in the Sustainability Statement and Energy Statement. A summary of these measures can be found in section 6.7 of this Planning Statement.
Policy CC2 relates to resilience to climate change and sets out a range of climate change adaptation measures which should be adopted within new development. This includes a requirement for non-domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments.	The Proposed Development is being designed for a much shorter lifetime than industry standard, due to the temporary nature of the proposals. Potential hazards from climate change that were identified over the projected building lifespan include increased solar radiation and an increased variability of seasonal rainfall.
	A number of climate change adaption measures have been identified to mitigate against these hazards and are set out in the Sustainability Statement.
	Although the Camden Local Plan requires non- domestic developments of 500 sqm or above to achieve "excellent" in BREEAM assessments, LBC have agreed to apply a degradation and accept "very good" in the BREEAM assessment.
	A BREEAM pre-assessment has been undertaken and this shows that the Proposed Development would achieve BREEAM 'very good' using the 'Office' criteria under BREEAM 2018.

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	Further details can be found in the Sustainability Statement.
Policy CC3 relates to water and flooding and sets out the Council's requirements to ensure that development does not increase flood risk and reduces the risk of flooding where possible.	The application site is located within EA Flood Zone 1. The site is at negligible or low risk of flooding from all identified sources, except for groundwater which may impact upon subsurface structures without suitable mitigation measures. Water attenuation is proposed to be provided within one or more cellular storage tanks located in the west of the site. Refer to the Flood Risk Assessment for more details on how flood risk is being minimised and mitigated.
Policy CC4 relates to air quality and sets out policy guidance to mitigate the impact of development on air quality and ensure that exposure to poor air quality is reduced in the borough.	An Air Quality Report has been provided as part of this application and gives an assessment of potential air quality and odour impacts associated with the Proposed Development. The construction dust assessment found a low dust risk overall without mitigation, therefore appropriate mitigation has been recommended. The assessment of construction and operational road traffic emissions found negligible impacts at all receptors assessed. The odour risk assessment identified a high impact risk, therefore an odour control system has been recommended to mitigate the risk, details of which can be agreed via planning condition. The Air Quality Neutral assessment found that building and transport emissions meet the London Plan requirements for air quality neutrality.
	Overall, air quality is not a barrier to the Proposed Development.

Chapter 10: Transport

	Underground and National Rail services from
out guidance to improve the pedestrian	
environment, to ensure a safe and accessible	nearby stations.

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environment for cyclists and to safeguard / promote the provision of public transport.	Refer to the Transport Assessment and Travel Plan for more details.
Policy T2 relates to parking and requires all new developments in the borough to be car-free and imposes limits for on-site parking to spaces designated for disabled people and/or essential operational or servicing needs.	
Policy T3 relates to transport infrastructure and states that the Council will protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance.	The Proposed Development would protect existing and proposed transport infrastructure, including routes and facilities for walking, cycling and public transport.
Policy T4 relates to the sustainable movement of goods and materials, and states that developments over 2,500sqm will be expected minimise the impact of freight movement via road, accommodate goods vehicles on site and provide further detail in Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.	 The Proposed Development seeks to ensure safe, clean and efficient deliveries and servicing, utilising the HS2 worksite to the north where possible. A Deliveries / Servicing Strategy has been submitted as part of this application and includes: details of initiatives to reduce delivery vehicles and emission, through smart procurement and vehicle reduction measures; the type, number and nature of daily delivery vehicles; the delivery and servicing strategy for the movement of goods within the development; the waste management strategy; and

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	• a produce for conducting an annual review.
	A Construction Management Plan have been submitted as part of this application, which provides details of proposed construction activities and how any impacts would be mitigated.
	Both documents have been developed in accordance with LBC and TfL guidance.

Camden Policies Map (2017)

4.2.3 The Camden Policies Map (2017) displays the areas covered by different policies in Camden. An extract from the Policies Map is shown in Figure 1 below. The red-dashed line indicates that that site falls within a designated viewing corridor.

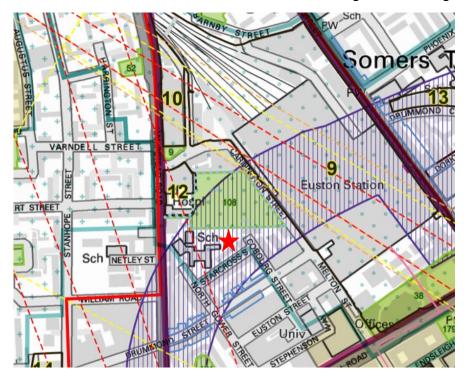


Figure 1: Extract from Camden Policies Map (2017). The application site is indicated by the red star.

Camden Site Allocations Plan (2013)

4.2.4 The Camden Site Allocations Plan was adopted in 2013 and sets out the Council's approach to future development on key sites across the borough. The application site for the Proposed Development is not allocated for development. The Plan was produced when plans for HS2 were at an early stage and notes that the Maria Fidelis

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school was developing plans for relocation from the site on Starcross Street, in partnership with HS2.

4.2.5 The Council are currently reviewing the Site Allocations Plan. The application site is not included within the draft Site Allocations Plan however the document explains that the site is already identified in the adopted Euston Area Plan.

Euston Area Plan (2015)

Euston Area Plan – Strategic /

- 4.2.6 The Euston Area Plan (EAP) was adopted in 2015 and has been prepared to guide the transformational change of Euston station and the surrounding area. The EAP was prepared jointly by LBC, the Greater London Authority and TfL, to guide development up until 2031. A partial update to the Plan is currently being undertaken.
- 4.2.7 Relevant strategic principles and development principles from the EAP are set out and assessed in Table 3 below.

Table 3: Policy assessment of the Proposed Development against the Euston Area Plan (2015)

Assessment

Development Principles	
Strategic Principle EAP1, part F, relates to meanwhile uses and states that flexibility will be applied on proposals for appropriate temporary alternative uses if current uses are no longer viable as a result of HS2 and construction works. The policy also states that support will be given to temporary uses that enhance the vibrancy and vitality of the area, promote existing businesses, and support the development of a knowledge-based cluster in the Euston area.	The Proposed Development is for meanwhile uses and would support the wider growth and regeneration aspirations as set out in the Euston Area Plan. This would make use of land that is currently vacant in connection with HS2 and construction works. This Proposed Development would also support the establishment of a CSC and contribute to the desired knowledge-based cluster in the Euston area.
	The building would be temporary and removed following the completion of HS2 Euston Station construction works, and the site would be returned to the landowners LBC and LCR.
 Strategic Principle EAP2 relates to design, and sets out key urban design principles including: Improving connectivity; Transforming the public realm; Providing active frontages; 	The design approach for the Proposed Development seeks to follow good urban design principles. The CSC will provide a positive, active frontage to the public open space. The scale and massing of the building are
Ensuring development is of the highest architectural quality and designed to be accessible to all; and	driven by the functional requirements of the Site Accommodation, however as part of the



Euston Area Plan – Strategic / Development Principles	Assessment
Responding to the viewing corridors, scale and character of existing buildings.	design process, opportunities have been explored to enhance the appearance, visual aspect and design quality of the Proposed Development, taking into account comments made by LBC and the community during pre- application engagement. The Proposed Development will be the 'front door' of the HS2 Euston station project, and thus needs to be of a higher design quality than standard modular portacabins which are often used for major construction projects. The Proposed Development would be six storeys high, whereas the adjacent building of the former Maria Fidelis school is equivalent to five domestic storey heights. Opportunities have been explored to minimise the visual impact of the building where possible, for example by greening the building, by providing a positive aesthetic and by distinguishing the entrance to the CSC to break up the massing. Parapets are also proposed following community feedback.
	There is not considered to be any impact on the viewing corridor, as detailed in section 4.3 of this Planning Statement.
Strategic Principle EAP4 relates to the environment and open space and provides policy guidance on surface water flood risk and sustainable urban drainage, water consumption and decentralised energy networks. The policy states that an enhanced green infrastructure network will be developed, through measures including retention of existing trees where possible, green streets with extensive tree planting green roofs and walls.	connection to a decentralised energy network is not deemed feasible due to the relatively short predicted lifespan of the building and the prohibitive cost of connecting to the existing network. Sustainable urban drainage would be provided,
	and the Proposed Development would retain existing trees on site. A greening of the building façade is proposed using climbing planters, supporting Strategic Principle EAP4.
Development Principle EAP 4 states that development proposals in the Drummond Street and Hampstead Road area (the area in which	The Proposed Development would be a the meanwhile use required as part of the HS2 Euston Station construction works. The design



Euston Area Plan – Strategic / Development Principles	Assessment
the application site lies) will protect and build upon the existing character of the area and heritage assets, and take opportunities to enhance connections, the public realm and building frontages where appropriate. Key priorities include the provision of a replacement public open space in the area and the protection and enhancement of the Drummond Street area as a unique, successful and characterful neighbourhood centre.	approach for the building has sought to protect the existing character of the area and does not affect any heritage assets. The building is set back from the main public vantage points of North Gower Street and Starcross Street, and opportunities have been explored to break up the massing and scale of the building. The proposed open space would not be affected by the proposals and will be delivered under the existing consent.
	The Proposed Development seeks to ensure safe, clean and efficient deliveries and servicing, utilising the HS2 worksite to the north where possible, thereby minimising impacts on the Drummond Street neighbourhood centre.

4.2.8 The EAP also provides spatial direction and land use strategies for the Euston area. Figure 2 below shows the overall land use strategy for Euston which should be followed for any form of station development (Figure 3.2 of the EAP). The long-term aspiration for the site of the former Maria Fidelis school is shown as residential led mixed use, including the re-provision of lost public open space from St James's Gardens.



Figure 2: Overall land use strategy for Euston for any station redevelopment. Source: Euston Area Plan (2015). The application site is indicated by the red star.

- 4.2.9 The EAP provides an illustrative masterplan to show potential general building heights and Protected Vistas, although it notes these are indicative only. Strategic Principle EAP2 also notes that while the strategic viewing corridors will limit development heights in the Euston area there may be some opportunities for taller buildings subject to design, heritage and policy considerations.
- 4.2.10 Figure 3 below shows the indicative building heights for the Maria Fidelis site (shown annotated with red star) as 5-6 storeys (15-18 metres).

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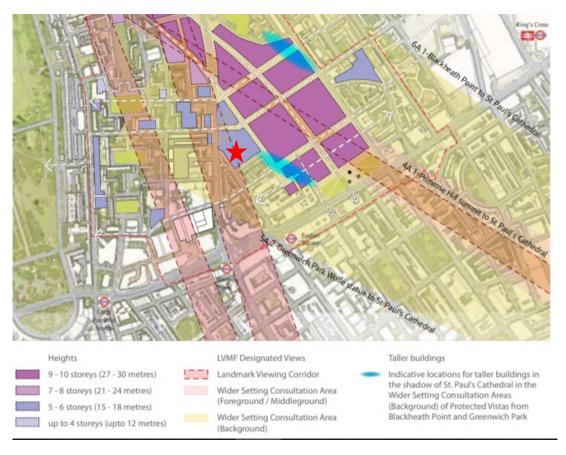


Figure 3: Illustrative masterplan showing to show potential general building heights and Protected Vistas – these are indicative only and assume average storey heights from an average ground level. Source: Euston Area Plan (2015). The application site is indicated by the red star.

- 4.2.11 Appendix 3 of the Euston Area Plan Background Report¹ states that when testing the impacts of tall buildings on strategic and local views (in the context of the Euston Area Plan), any building that is above 10-12 storeys is considered to be a 'tall building' for the purposes of the Euston Area Plan. As the Proposed Development is for a six-storey building, this confirms the building is not classed as a 'tall building' in this context.
- 4.2.12 The EAP sets out proposals for seven 'character areas'. For each area an overarching 'development principle' is set out to guide proposals in the area, along with an illustrative masterplan and potential requirements in terms of land uses, design, transport, public realm and the environment. The Maria Fidelis site falls within the 'Drummond Street and Hampstead Road' character area.
- 4.2.13 The EAP notes that properties immediately west of the HS2 Euston Station footprint are likely to be affected by construction works and by proximity to the station

¹ <u>https://www.eustonareaplan.info/wp-content/uploads/2012/09/Background-Report-final-for-adoption-jan15.pdf</u> SECURITY CLASSIFICATION - Official UNCONTROLLED WHEN PRINTED Mace Dragados | HS2 July 2020 Template Ref: 1CP01-MDS-IM-TEM-SS06-000005 Rev: P02



building. Flexibility will therefore be applied in considering proposals for 'meanwhile' uses for development if the current use is not viable as a result of construction work associated with HS2.

4.2.14 The EAP offers three design options, two of which show the Maria Fidelis site as potential re-provided open space. The third option shows a new development block on the site of the former Maria Fidelis school, fronting St James's Gardens and open space, which could be delivered in the long term. The three design options are shown in Figure 4 below. None of the proposed options would be affected by the Proposed Development, as it would comprise of meanwhile uses for a temporary period to facilitate the construction of HS2 Euston Station.



Figure 4: Future design options for the site of the former Maria Fidelis school. Source: Euston Area Plan (2015).

4.3 Other material considerations

National Planning Policy Framework

- 4.3.0 The revised NPPF was published on 20th July 2021 and sets out the Government's planning policies for England and how these are expected to be applied. The Framework sets out the Government's key objectives for the delivery of sustainable development through three key pillars:
 - **Economic** to build a responsive economy through ensuring sufficient land is available in the right places and to support growth, innovation, improved productivity and the provision of infrastructure.



- Social supporting the development of vibrant communities including providing a sufficient number and range of homes to meet the needs of present and future generations.
- **Environmental** to protect and enhance the built, historic and natural environment, making the effective use of land whilst improving biodiversity, minimising waste and pollution, mitigating and adapting to climate change.
- 4.3.1 Paragraph 11 requires that for decision makers, this means:
 - Approving development proposals that accord with the development plan without delay, and
 - Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, or
 - The application of specific policies in this Framework that protect areas or assets of particular importance indicate development should be restricted
- 4.3.2 Paragraph 119 explains the need for planning policies and decisions to promote an effective use of land, in a way that makes as much use as possible of previously developed or 'brownfield land'.
- 4.3.3 Paragraph 126 confirms that the creation of high-quality buildings and places is fundamental to the planning and development process, as is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

National Planning Policy Guidance

- 4.3.4 In 2014 the Government launched the planning practice guidance web-based resource, which replaces previous planning practice guidance documents, and covers a number of topic areas which are relevant to the determination of this application, including:
 - Air quality;
 - Climate change;
 - Noise;
 - Planning obligations; and
 - Travel Plans, Transport Assessments and Statements.

London View Management Framework Supplementary Planning Guidance

4.3.5 Policies 7.11 and 7.12 of the London Plan establish the London View Management Framework, which seeks to designate, protect and manage views of London and some of its major landmarks.

- 4.3.6 The Supplementary Planning Guidance (SPG) to the London Plan should be taken into account when London boroughs, statutory authorities and other stakeholders review and respond to applications for planning permission.
- 4.3.7 Planning applications that could affect a Designated View should be accompanied by an analysis that explains, evaluates and justifies any visual impact on the view. The analysis should consider the likely significance, scale and magnitude of effect caused by the proposal's size, shape or design with reference to the London Plan, the guidance contained in this document and other relevant considerations such as local planning policies. The assessment should be contained within the Design and Access Statement of the planning application.
- 4.3.8 Part of the application site for the Proposed Development falls within the viewing corridor for Designated View 2B-1, Parliament Hill to the Palace of Westminster. The viewing corridor is shown in darker shading in Figure 5 below, and straddles the western edge of the application side for the Proposed Development.

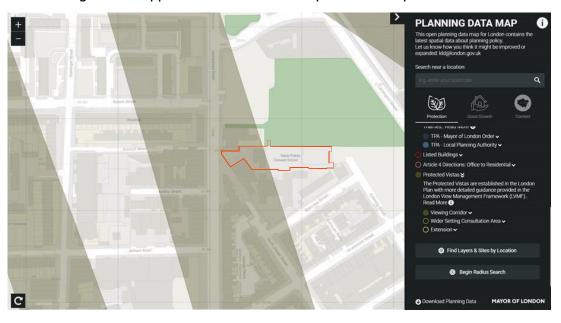


Figure 5: Extract from the Mayor of London Planning Data Map, showing the viewing corridor for Designated View 2B-1. Source: <u>https://maps.london.gov.uk/planning/</u> (2021). The application site boundary is shown in red (not to scale).

- 4.3.9 Paragraph 109 of the SPG states 'the viewer's ability to perceive the visual relationship between the Clock Tower, the Central Tower and the Victoria Tower should be maintained or enhanced... any development proposals that would undermine this relationship should be refused'.
- 4.3.10 As highlighted on Figure 5, the application site falls within a Designated View corridor, and this therefore forms part of the policy context for the Proposed Development.

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4.3.11 The potential for impact on the viewing corridor has been assessed. There are taller buildings located off Hampstead Road to the north west of the site which are within the viewing corridor, and since the Proposed Development is for a temporary building which would be lower or similar in height to those buildings, the taller buildings would effectively shield the new six storey building from the protected viewing corridor. The Proposed Development would therefore not have any impact on the viewing corridor. The taller buildings to the north west of the application site are shown in Figures 6 and 7 below.



Figure 6: Aerial photograph showing taller buildings located to the north west of the application site, which would shield any views of the Proposed Development from Parliament Hill to the Palace of Westminster. Source: Google Earth, 2021. The application site is indicated by the red star.

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Figure 7: Building heights in the Euston area, showing taller buildings located to the north west of the Proposed Development, which would shield any views of the Proposed Development from Parliament Hill to the Palace of Westminster. Source: Euston Area Plan Background Report, 2015. The application site is indicated by the red star.

Camden Supplementary Planning Guidance

- 4.3.12 A number of London Borough of Camden's SPG relevant to the Proposed Development. The relevant Camden Planning Guidance documents are listed below, have been used to inform the design approach for the Proposed Development, and are referenced in the accompanying planning application documents where appropriate:
 - Camden Planning Guidance, Access for all (2019);
 - Camden Planning Guidance, Air Quality (2021);



- Camden Planning Guidance, Amenity (2021);
- Camden Planning Guidance, Biodiversity (2018);
- Camden Planning Guidance, Design (2021);
- Camden Planning Guidance, Energy efficiency and adaptation (2021);
- Camden Planning Guidance, Planning for health and wellbeing (2021);
- Camden Planning Guidance, Transport (2021); and
- Camden Planning Guidance, Water and flooding (2019).

5 Pre-application engagement

5.1 **Pre-application engagement with London Borough of Camden**

5.1.0 Extensive pre-application engagement has been held with LBC's planning officers and other technical officers to seek feedback on the proposals, to discuss planning matters and to ensure the Proposed Development meets the relevant policy requirements. All meetings were held remotely via MS Teams due to restrictions resulting from the Covid-19 pandemic. The table below provides details of each meeting held and on the key topics and outcomes.

Date	Meeting	Attendees	Topics and outcomes
26 th November 2020	Planning r programme meeting #1	LBC, Regeneration and Planning LBC, Developer HS2, Town Planning MDjv, Town Planning	 Design approach and intention to use artistic cladding Confirmed town planning approach under TCPA rather than HS2 Act Approach to consultation and engagement Access options and constraints Validation requirements, planning conditions and obligations
1 st February 2021	Planning programme meeting #2	LBC, Regeneration and Planning LBC, Developer HS2, Town Planning MDjv, Town Planning	 Design update Access options during construction and operation Sustainability / BREEAM Discussion validation requirements, planning conditions and obligations
18 th February 2021	Pre- application meeting #1	LBC, Regeneration and Planning LBC, Urban Design	 Need for the scheme Scheme design Architectural design approach Transport and highways

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Date	Meeting	Attendees	Topics	and outcomes
		LBC, Developer HS2, Town Planning HS2, Architecture MDjv, Town Planning MDjv, Project Management FBM, Architecture	•	Consultation and engagement CIL – LBC confirmed the development is not CIL- liable as it is a temporary building <i>LBC provided written comments following the</i> <i>meeting in relation to the design approach</i>
8 th April 2021	Planning programme meeting #3	LBC, Regeneration and Planning MDjv, Town Planning HS2, Town Planning	•	Scope of application – LBC confirmed a Daylight and Sunlight report is not required and confirmed the list of application documents was appropriate. No further comments were received on the application documents following the meeting Planning conditions and obligations
23 rd April	Sustainability meeting #1	LBC, Regeneration and Planning LBC, Sustainability MDjv, Town Planning MDjv, Sustainability		Proposed sustainability measures including energy strategy; health and wellbeing; management, materials and pollution' waste and water LBC advised achievement of BREEAM 'very good' would be required

Document Title: CONSTRUCTION SKILLS CENTRE & SITE ACCOMMODATION AT
FORMER MARIA FIDELIS SCHOOL SITE PLANNING STATEMENT
Document no.: 1CP01-MDS_ARP-TP-REP-SS08_SL23-990005
Revision: C01

Date	Meeting	Attendees	Topics and outcomes
		Max Fordham, Energy	
14 th May 2021	Sustainability meeting #2	LBC, Sustainability HS2, Town Planning HS2, Sustainability MDjv, Town Planning MDjv, Sustainability Max Fordham, Energy	 Update on proposed sustainability measures LBC confirmed achievement of BREEAM 'very good' is required Agreement on the approach to carbon offsetting payments – payments will be made throughout the lifespan of the building (10 years) rather than the full 30 years required by policy
18 th June 2021	Pre- application meeting 2	LBC, Regeneration and Planning LBC, Developer HS2, Town Planning MDjv, Town Planning FBM, Architecture	 Update on engagement activities and subsequent design changes Update on latest design proposals for the Proposed Development Discussion on planning matters including description of development and red line boundary Discussion on S106 Heads of Terms

Community engagement 5.2

Introduction

5.2.0 This section provides a summary of engagement with the local community and comments received on the Proposed Development. It also gives an overview on the

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approach to engagement, who was engaged, and the various activities held during the engagement period.

- 5.2.1 The purpose of the engagement was to understand the views and obtain feedback from the local community on the plans for the Proposed Development.
- 5.2.2 The engagement also sought to obtain ideas of how MDjv can work with the local community throughout construction and beyond to respond to opportunities and concerns.
- 5.2.3 The feedback received was intended to help enhance the plans for the Proposed Development ahead of the planning application submission to LBC.
- 5.2.4 A Public Engagement Report has been submitted as part of this planning application which provides more details.

Summary of engagement activities

- 5.2.5 There were two key phases of engagement.
- 5.2.6 The first phase of engagement was three weeks, between 12 April to 2 May 2021, and included the following key activities:
 - Two online engagement events held on 19 and 26 April 2021. These were hosted by the design and project teams.
 - Informal engagement meetings with the following local stakeholders: owner of 106 Hampstead Road and the Camden Community Liaison Group held on 15 April and 19 April 2021 respectively.
 - An opportunity for the community to review the initial design and respond to a survey question on a dedicated engagement page on HS2 Commonplace website from 12 April to 2 May 2021.
- 5.2.7 The second phase of engagement was held in response to the feedback obtained from the community during the first phase. It engaged the community on an alternative treatment to the external façade of the Proposed Development.
- 5.2.8 The second phase of engagement was held between 17 May and 10 June 2021 and included the following key activities:
 - Focus group sessions with local residents on 17 and 27 May 2021;
 - Briefing session with local residents on 10 June 2021; and
 - An opportunity for the community to review the revised design and respond to a survey questionnaire on a dedicated engagement page on HS2 Commonplace website from 27 May to 4 June 2021.
- 5.2.9 The engagement was open to a wide range of stakeholders including residents, employees and business owners that were likely to have an interest in the Proposed Development.



Summary of feedback

- 5.2.10 Overall, the responses to the first round of engagement were not supportive of the plans for the CSC and Site Accommodation, the initial design of the façade, and the development plans for the former Maria Fidelis site as a whole.
- 5.2.11 Respondents thought that the building was unnecessarily large and obtrusive, and despite some positive comments regarding the educational opportunities of the Construction Skills Centre, felt that an increase in footfall would lead to overcrowding and disruption to the local area.
- 5.2.12 With regard to the design of the building specifically, feedback from the first round of engagement was largely negative, with respondents commenting on the brightness and colour of the design as 'garish' and out of touch.
- 5.2.13 Respondents also felt that the development as a whole sacrificed too much open space that could have been utilised for recreation or greenery/flora.
- 5.2.14 It was noted that more community involvement was required in the design approach for the facades of the building.
- 5.2.15 Feedback during the second phase of engagement included acknowledgement that the project team had listened and responded to community concerns regarding the proposed artistic cladding of the building. However, concerns remained over the massing and height of the building, how the site was selected, and how the building will be maintained throughout its lifespan.
- 5.2.16 A final wrap up engagement session was held on 10 June 2021, where concerns were voiced regarding the pitching of rooves and their purpose, the location of plant and lift overruns, and the pattern of the building. In response some additional design changes were implemented, including the amendment of the proposed pitched rooves which were deemed to accentuate the height of the building.

Conclusion

- 5.2.17 While the Proposed Development would be temporary in nature, it would be a prominent feature in the local area and thus requires engagement with the local community and stakeholders.
- 5.2.18 The revision of the scheme design acknowledges feedback received on the proposed artistic cladding and demonstrates good practice in planning and engagement for the Proposed Development.
- 5.2.19 Due to the functional requirements of the Proposed Development, it has not been possible to accommodate all of the feedback received from the local community and stakeholders, such as those relating to the scale and massing of the building.



6 Assessment of the Proposed Development

6.1 Introduction

- 6.1.0 From an assessment of the Development Plan and other material considerations, and from pre-application engagement with LBC planning and technical officers, local community groups and stakeholders, it is considered that the main issues for consideration in assessing the Proposed Development are as follows:
 - Location of development and site selection;
 - Need for the scheme;
 - Design and layout;
 - Justification for height, scale, and massing;
 - Designated viewing corridor;
 - Transport and access;
 - Environmental and local amenity considerations;
 - Maintenance;
 - Security and safety; and
 - Regeneration benefits.
- 6.1.1 The following sections consider the main planning issues in turn.

6.2 Location of development and site selection

- 6.2.0 Several options were considered for the location of the Proposed Development and these were assessed against the requirements for the Site Accommodation facility. Requirements for the Site Accommodation include:
 - Welfare and canteen for peak labour of 2,500 operatives;
 - Site office with 500 desks;
 - Availability for the full duration of the project;
 - No increase in health and safety risks to operatives and members of the public;
 - Mitigation of nuisances (e.g., noise, labour, light, traffic);
 - Existing green / open spaces maintained; and
 - Within 5 minutes' walk of the main site.
- 6.2.1 Before selecting the former Maria Fidelis school site, MDjv carried out a detailed review of potential alternative locations, including at Euston Square Gardens, to the front of Euston railway station, on the HS2 construction site, and at a number of points along Hampstead Road.
- 6.2.2 These options did not meet the requirements or had significant constraints (such as extensive basement works on the HS2 site) and so were discounted, with the former Maria Fidelis School site emerging as the most suitable choice. The site met all



requirements of the project, whereas no other proposed sites met all the requirements.

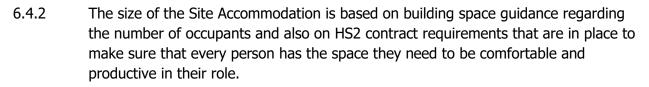
- 6.2.3 It is also considered that the site location makes best use of available land. The site is currently vacant and is directly adjacent to the HS2 construction site. The Proposed Development also maximises the use of land by combining with the Construction Skills Centre which was previously consented by LBC. This supports Policy GG2 of the London Plan and Policy G1 of the Camden Local Plan.
- 6.2.4 By being located directly adjacent to the HS2 construction site, the site location will also reduce the number of staff walking through the local area from the office to site throughout the working day, thus minimising impacts on the surrounding area.
- 6.2.5 More information on the location of development and site selection can be found in the Design and Access Statement.

6.3 Need for the scheme

- 6.3.0 The Proposed Development is needed to satisfy the requirements of the HS2 project, namely, to provide a temporary site office and welfare facility to support the construction of HS2 Euston Station.
- 6.3.1 Ordinarily, approval for site accommodation and associated constructions works would fall within the powers of the HS2 Act. However, the HS2 Act did not grant powers for the Construction Skills Centre (which is not a requirement for the HS2 project). As such, approval for the Proposed Development is sought under the Town and Country Planning Act 1990. The inclusion of the Construction Skills Centre within the Proposed Development demonstrates HS2's commitment to partnership working with London Borough of Camden and supporting the needs of the local borough by providing education and skills training.
- 6.3.2 The proposed CSC would provide employment and training opportunities for local residents. The CSC would provide an educational facility tailored to deliver opportunities for those seeking a career, or to advance their skills, in the construction sector. This would accord with adopted London Plan Policy S3 and E11, as well as LBC's Policy E1 and E2.

6.4 Design and layout

- 6.4.0 The building design, in terms of its size and shape, has been developed to ensure both the Site Accommodation and CSC can be built on the site and make the best use of the available space.
- 6.4.1 There are benefits to having the two facilities located so closely together and so it was important to develop a design that allowed for these to be realised. The proposed design offers a co-located, split-level option.



- 6.4.3 Similarly, the size of the CSC is largely determined by the number of students that will use the facility and their space needs, which remains consistent with the previously approved facility. The CSC is being constructed by MDjv for use by LBC who will manage and operate the facility. It will be built to all statutory design requirements including specific educational design standards such as Building Bulletins to ensure it provides a high quality learning environment.
- 6.4.4 As part of the design process, opportunities have been explored to enhance the appearance, visual aspect and design quality of the Proposed Development, taking into account comments made by LBC and the community during pre-application engagement. The Proposed Development will be the 'front door' of the HS2 Euston station project, and thus needs to be of a higher design quality than standard modular portacabins which are often used for major construction projects.
- 6.4.5 In terms of the design aesthetic and appearance, a colourful artistic cladding was originally proposed, which was developed through collaborative working with a London-based artist. This sought to break up the form of the building, provide some visual interest and make use of colour to distinguish between the different building uses.
- 6.4.6 Following limited support received through the public engagement activities and subsequent feedback received, a revised design was developed for the building's exterior. This sought to:
 - Minimise the visual impact of the building;
 - Enhance and integrate planting and greenery;
 - Break up the form of the building;
 - Integrate the design into its surroundings; and
 - Respect the local area and its history.
- 6.4.7 The design and layout of the Proposed Development has sought to minimise impacts on surrounding land uses and proposals. The Proposed Development does not impact the main building of the former Maria Fidelis school, nor does it impact on the multiuse community hall and proposed green space which were consented under planning application reference 2019/3091/P.
- 6.4.8 The entrances to the Site Accommodation and CSC are separate, with access to the Site Accommodation via the north and access to the CSC via the south. This seeks to minimise conflict in terms of pedestrian flows, as students and staff would be able to enter the building through the proposed open space, whereas construction site

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operatives and management staff would access the Site Accommodation from Hampstead Road and through the existing HS2 construction site. Vehicular accesses for deliveries and servicing are also separated to minimise conflicts.

- 6.4.9 In terms of the built form of the building, this has been designed to ensure sustainability and reuse, providing the best lifecycle value to HS2. The use of modular portacabins allows off-site construction and on-site assembly, which would speed up the construction process, reduce carbon emissions, help reduce the number of lorry movements required for construction, and minimise the amount of on-site construction activity.
- 6.4.10 The use of a prefabricated solution means that the building can, for the most part, be deconstructed when it is no longer required. This ensures the building can be easily removed and does not preclude future development of the site.
- 6.4.11 The proposed development would include the enhancement of the existing Ecology Area to the north western corner of the site, climbing plants on the southern elevation and brown roofs to protect and enhance biodiversity onsite in accordance with Policies A3, G5 and G6. Further details of the species of plants, the proposed brown roof and ecological interventions can be found in the Landscape Report.
- 6.4.12 More information on the design and layout of the Proposed Development can be found in the Design and Access Statement, with information on the sustainability approach provided in the Sustainability Statement.

6.5 Justification for height, scale, and massing

- 6.5.0 The height, scale and massing of buildings are key features in achieving good urban design, as stated in Strategic Principle EAP2 of the Euston Area Plan. This has also been a key theme which arose through engagement with the local community.
- 6.5.1 The site's immediate context varies in height and character, an example being the three-storey Public House (The Exmouth Arms) to the east of the site. To the south is four storey post-war terraced housing. The main school building is three storeys with high floor to ceiling heights, it is equivalent to five domestic storey heights.
- 6.5.2 The Proposed Development would be would 22.4m high. This would be taller than the surrounding buildings, and slightly taller than the indicative building heights and storeys as set out in the Euston Area Plan (although the Plan notes that these are illustrative only). It must also be noted that the Proposed Development will be a temporary building, whereas the Euston Area Plan seeks to guide development over the long term.
- 6.5.3 The height, scale and massing of the Proposed Development are on the whole determined by of a number of essential requirements and constraints for the Site Accommodation. Opportunities have been explored to minimise the visual impact of



the building where possible, for example by greening the façade, by providing a positive aesthetic and by distinguishing the entrance to the Construction Skills Centre to break up the massing, and by incorporating parapets at the roof which were included following community feedback.

6.5.4 As the Proposed Development is set back from Starcross St and North Gower Street, where the nearest residential receptors are located, there would not be any impacts on daylight and rights of light. Sun lighting drawings are provided in the Design and Access Statement to demonstrate any shadowing from the Proposed Development.

6.6 Transport and access

- 6.6.0 The application site benefits from good accessibility in terms of public transport, walking and cycling routes and the strategic highways network. It is located close to walking and cycling routes, and within walking distance to a range of bus services as well as London Underground and National Rail services from a number of nearby stations. The site has the highest achievable Public Transport Accessibility Level (PTAL) of 6b.
- 6.6.1 Cycle parking would be provided separately for both the CSC and Site Accommodation. A total of 98 cycle spaces would be provided as a mix of Sheffield stands and tiered stacking spaces for the Site Accommodation. 38 cycle spaces would be provided for the CSC and a further two visitor spaces would be provided. All cycle parking would be covered and the number of stands proposed exceeds London Plan standards. The cycle store for the Site Accommodation would be located to the north of the site by the site entrance within the HS2 Euston Station construction site. The CSC cycle parking would be located immediately to the south of the proposed building and to the east of the CSC main entrance. Further details of the type and the location of cycle parking is included in the Design and Access Statement.
- 6.6.2 To minimise impacts on local amenity and support local planning policies, opportunities to make use of the HS2 construction site to the north have been explored. This includes access for deliveries and servicing vehicles for the Site Accommodation through the HS2 construction site (accessed via Cobourg Street).
- 6.6.3 The Proposed Development would be car-free, in line with Policy T2 of the Camden Local Plan. There may be occasional visits from dignitaries via car, however no car parking spaces would be provided. Disabled parking would be on-street, which is consistent with the approach for the previously consented application.
- 6.6.4 Multi-modal trip generation has been undertaken for the Proposed Development and shows that that the peak periods are likely to be 06:30 to 07:30 and 17:00 to 18:00 when Site Accommodation staff arrive and leave the site.

- 6.6.5 The proposed trips are expected to dissipate quickly across the transport network and make use of the wide range of highly frequent public transport services available. No significant impacts are expected on the capacity of the local transport network, and in terms of deliveries and servicing, no perceptible changes are expected to the local highway network.
- 6.6.6 Measures to encourage sustainable and active travel patterns will be implemented as part of the Travel Plan. These include issuing welcome packs and providing notice boards to inform CSC and Site Accommodation users of sustainable transport options, providing measures to facilitate walking and cycling such as showers and changing facilities, and the appointment of a Travel Plan co-ordinator. A range of other measures for consideration are included in the submitted Travel Plan and these will be considered for implementation upon occupation of the development.
- 6.6.7 Deliveries and servicing will be controlled via the Deliveries / Servicing Strategy, while construction traffic will be controlled by the Construction Management Plan. Details of construction arrangements as they emerge will be communicated to local residents via a Construction Working Group established by MDjv.
- 6.6.8 Further details on transport and access can be found in the Transport Statement.

6.7 Environmental and local amenity considerations

- 6.7.0 The Proposed Development seeks to maximise the environmental performance of the building and minimise impacts on local amenity. This is in accordance with policies set out in the Development Plan and LBC's Supplementary Planning Guidance and supports HS2's guiding principle of being a good neighbour.
- 6.7.1 Following consultation with LBC's sustainability officer, it has been confirmed that the Proposed Development needs to align with LBC's Local Plan policy requirement for major development to undertake a BREEAM Assessment; although Policy CC2 of the Camden Local Plan requires non-domestic developments of 500 sqm or above to achieve "excellent" in BREEAM assessments, LBC have agreed to accept "very good" in the BREEAM assessment.
- 6.7.2 A BREEAM pre-assessment has been undertaken and this shows that the Proposed Development would achieve BREEAM 'very good' using the 'Office' criteria under BREEAM 2018. This approach has been agreed with the Building Research Establishment ('BRE'). Further details can be found in the Sustainability Statement and Energy Statement.
- 6.7.3 The use of prefabricated modules would support efficient construction and deconstruction, allowing for the reuse and recycling of materials. A range of sustainability measures have been incorporated in the Proposed Development and





are detailed in the Sustainability Statement and Energy Statement. These measures ensure that the building meets local policy requirements.

- 6.7.4 The energy strategy seeks to maximise the environmental performance of the building, although this is somewhat constrained by using prefabricated modules and the inability to make significant structural changes to accommodate measures such as greywater recycling.
- 6.7.5 Noise and vibration from the construction of the Proposed Development will be controlled through implementing suitable mitigation measures in accordance with the requirements of LBC and national guidance. This includes limiting the hours of construction work and submitted Section 61 applications to LBC where there is the potential for works to occur outside of these hours.
- 6.7.6 Noise emission limits for building services noise from the Proposed Development have been set at the nearest noise sensitive receptors, following the requirements of LBC and with consideration of the requirements of the HS2 Environmental Minimum Requirements². Given the location of the site, noise from activities within the Site Accommodation and Construction Skills Centre will not be noticeable at the nearest noise-sensitive receptors to the Proposed Development.
- 6.7.7 Noise attenuation, in the form of an acoustic barrier, has been included around the roof level plant area to ensure compliance with the noise emission limits.
- 6.7.8 Further details on how any potential noise and vibration impacts have been assessed can be found in the Acoustics Assessment.
- 6.7.9 The three proposed roof terraces, located at second, third and fourth floor levels, would be relatively small and located away from residential receptors. As a result, there would be no issue of harm to residential amenity through overlooking, noise or disturbance. The main roof would be accessed for maintenance purposes and occasional use by dignitaries only. There would be no impacts on residential amenity arising from use of the roof space.
- 6.7.10 The potential for air quality and odour impacts from the Proposed Development have been assessed, following the relevant national, regional and local policy and guidance. A kitchen extraction system is proposed to mitigate potential odour impacts, details of which can be agreed via planning condition. Where any risks have been increased, appropriate mitigation has been included, and overall air quality is not considered to be a barrier to the Proposed Development.
- 6.7.11 Further details on how any potential air quality and odour impacts have been assessed can be found in the Air Quality Report.

² https://www.gov.uk/government/publications/environmental-minimum-requirements SECURITY CLASSIFICATION – Official UNCONTROLLED WHEN PRINTED

- 6.7.12 A Flood Risk Assessment has been undertaken to assess sources of flooding within the site and its surroundings. The site is within Flood Zone 1, which means that the site is at a lower than 1 in 1,000 annual probability of river or sea flooding. The site is situated at an approximate average level of 25mAOD which is significantly higher than any potential tidal flood level. Based on this, it is considered that the site is at a low risk of fluvial and tidal flooding. The Flood Risk Assessment also sets out that the site is at very low risk of flooding from surface water, sewer and groundwater sources.
- 6.7.13 A Drainage Strategy has been developed which incorporates SuDS features such as permeable paving, with the primary means of surface water attenuation being provided in the form of a cellular storage tank beneath the ground. These features have been designed to be in accordance with LLFA guidance and Thames Water requirements.
- 6.7.14 External lighting will be designed to meet Institute of Lighting Professionals Guidance and light spill will be limited through careful design and selecting directional fittings. Further details are provided in the Lighting Statement. It is considered that there would be no harm to residential amenity as a result of the proposed external lighting.

6.8 Security and safety

- 6.8.0 The design of the Proposed Development has been carefully considered to maintain the security and safety of its occupants and also members of the public in the local area.
- 6.8.1 Engagement has been undertaken with the local Designing Out Crime officer at an early stage in the design process, with the aim to achieve Secured By Design accreditation for the Proposed Development.
- 6.8.2 The application site is sited in an area in which anti-social behaviour has been a considerable issue. A number of recommendations have been adopted to prevent crime through design, including:
 - Compartmentalisation of the Site Accommodation and CSC to minimise crossover between users of the CSC and construction workers;
 - Highly visible security on entering the building and access points from the street, to maintain access and control visitors or potential trespassers;
 - Highly visible security patrols of the site;
 - Provision of natural surveillance and security gates for cycle parking, with key fob / student card access provided;
 - All hoarding and areas of the site boundary which suffer from insufficient natural surveillance to be bolstered with CCTV; and

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- Security gates for bin stores and refuse areas for the CSC; a condition may be required to agree the detailed design of this enclosure.
- 6.8.3 Although the public open space is not included within this application, open space adjacent to the Proposed Development was consented under application reference 2019/3091/P and will be accessible to the public, including students and staff from the Construction Skills Centre. It is understood that the public open space will be secured at night by locked gate, and this therefore forms an important security consideration in context of the Proposed Development.
- 6.8.4 All staff working on HS2 Euston Station are expected to report to the Site Accommodation at the start of their shift. Once site operatives enter the site perimeter to access the Site Accommodation, they will stay within the hoarding to move to their work areas. Recreational areas will be provided within the main HS2 construction site, including smoking areas. It is natural that construction staff may leave the site on lunch breaks to visit local shops, cafes etc.
- 6.8.5 Some works will be external to the site, e.g. utilities, so there will be some staff movements along local streets to carry out these works. Management staff will generally stay within the site confines once they enter at the start of the shift.
- 6.8.6 All staff and visitors will need to access through a card activated turnstile and a security check point will be manned 24 hours a day.
- 6.8.7 Access to the roof would be limited to occasional use by dignitaries and for maintenance purposes. No alcohol will be served during any use of the roof terrace.
- 6.8.8 During pre-application engagement with the local community, concerns were raised regarding the current incidence of anti-social behaviour in the local area. It is considered that an increase in pedestrian footfall in the area as a result of the Proposed Development will increase passive surveillance in the area and potentially help reduce anti-social behaviour issues. Measures have been adopted to minimise the potential for and deter anti-social behaviour as a result of the Proposed Development, as reported above.

6.9 Maintenance

- 6.9.0 During pre-application engagement with the local community, queries were raised regarding maintenance of the building and the cleaning regime / lifespan for the vinyl wrap.
- 6.9.1 In terms of ongoing maintenance, building facades will be maintained and this includes washing in accordance with the building supplier's recommendations. A cleaning system is proposed but is not yet finalised, as access varies depending on the elevation and nearby construction activities.

6.9.2 In terms of the lifespan of the vinyl wrap, the supplier has provided a warranty of eight years from the point of application. However, the durability of the vinyl wrap is influenced by other factors. The south elevation would be most susceptible to fading, but some of this elevation is often in the shade and parts have greenery covering the pattern. In addition, colours would fade at different rates, and the proposed pattern and colouring has avoided colours that are particularly susceptible to fading to maintain maximum longevity. The proposed vinyl wrap is a high quality product that is not susceptible to peeling or delamination, and coupled with regular cleaning and maintenance as per the supplier's specifications, it is expected the vinyl wrap would last for up to 10 years.

6.10 **Regeneration benefits**

- 6.10.0 LBC's local area requirements for planning applications (2018) states that a regeneration statement should accompany major applications for proposed development, including:
 - Details of any new jobs that might be created or supported;
 - The relative floorspace total for each proposed use;
 - Any community benefits; and
 - Reference to any regeneration strategies that might lie behind or be supported by the proposal.
- 6.10.1 It is currently anticipated that the Proposed Development would support 350 jobs during the construction phase. In operation the Proposed Development would support approximately 2530 jobs, although this would change throughout various construction phases of HS2 Euston Station. It is however noted that many of these jobs are likely to already exist in current supply chains for both the HS2 Euston station project and LBC's education and skills programmes, therefore may not be classified as 'new jobs'.
- 6.10.2 The Proposed Development would provide 1,378sqm of Construction Skills Centre floorspace and 5,670sqm of Site Accommodation floorspace.
- 6.10.3 In terms of community benefits, the Proposed Development would re-provide the previously consented Construction Skills Centre for London Borough of Camden. This will provide an important educational facility for residents of the borough and maximise employment opportunities presented by the HS2 project.
- 6.10.4 The Proposed Development is in itself not a regeneration proposal however it will play an enabling role in a much wider regeneration strategy for the Euston area, with HS2 as one of the main catalysts.

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6.11 Summary

- 6.11.0 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, this application must be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 6.11.1 The presumption in favour of sustainable development is set out in the NPPF, which states that where proposals accord with an up-to-date development plan, they should be approved 'without delay'.
- 6.11.2 This section of the Planning Statement has assessed the key planning issues and provided commentary on other material considerations which may be relevant to the determination of the scheme. The analysis set out above has demonstrated that the Proposed Development is in accordance with the development plan and that there are no material considerations which indicate the application should be refused.
- 6.11.3 The Proposed Development should therefore be approved subject to appropriate planning conditions and obligations.



7 Planning Conditions and Section 106 Obligations

- 7.1.0 It is recognised that the Proposed Development will be subject to a series of planning conditions to ensure it is acceptable in planning terms. Due to the tight timescales for construction, extensive pre-application engagement has been undertaken with LBC to avoid the need for pre-commencement planning conditions where possible.
- 7.1.1 The application will also be subject to a Section 106 Agreement to secure necessary planning obligations which cannot be controlled via planning conditions.
- 7.1.2 This section provides comments on prospective planning conditions and proposed Heads of Terms for a Section 106 Agreement.

7.2 Planning Conditions

- 7.2.0 Paragraph 56 of the NPPF states that planning conditions should only be imposed where they are:
 - i. Necessary
 - ii. Relevant to planning
 - iii. Relevant to the development to be permitted
 - iv. Enforceable
 - v. Precise, and
 - vi. Reasonable in all other aspects
- 7.2.1 It is recognised that some conditions will be attached to any grant of planning permission, where details cannot be provided up front or where compliance is required. It is anticipated that conditions may be required to address the following items:
 - Compliance with the approved plans and drawings;
 - Temporary permission for a period of 10 years from occupation and removal of the building;
 - Details of cycle parking arrangements;
 - Materials samples;
 - Compliance condition to secure delivery of the building's vinyl wrap, which is anticipated to be applied circa 6 months from occupation;
 - Drainage design;
 - Details of CCTV and control points;
 - Details of the façade greening / biodiversity enhancements and a plan for ongoing management;
 - Details of odour control and mitigation, through the use of a kitchen extraction system;
 - Details of enclosure for the CSC refuse area (within the application site)



- Compliance conditions with regards to tree protection, non-road mobile machinery, and noise thresholds for plant and equipment.
- 7.2.2 MDjv and HS2 Ltd would welcome further discussion with LBC regarding conditions to be applied to any grant of planning permission, to ensure the commencement of construction and delivery of the Proposed Development is not delayed.

7.3 Section 106 Obligations

- 7.3.0 Paragraph 57 of the NPPF states that planning obligations should only be sought where they meet all of the following tests:
 - a) Necessary to make the development acceptable in planning terms;
 - b) Directly related to the development; and
 - c) Fairly and reasonably related in scale and kind to the development.
- 7.3.1 Following pre-application discussions with LBC it is envisaged that the Heads of Terms for the Section 106 Agreement will include the following:
 - Site Management Plan;
 - Construction Management Plan and Construction Working Group;
 - Travel Plans for F1(a)(Education) and E(g)(i)(Offices) land uses;
 - Car free (except occasional visit of dignitaries);
- 7.3.2 A draft Heads of Terms document has been provided as part of the planning application submission.



8 Conclusion

- 8.1.0 This Planning Statement has been submitted in support of a full planning application for a Construction Skills Centre and Site Accommodation at the former Maria Fidelis School site. The Proposed Development is required to facilitate the construction of HS2 Euston Station and to re-provide the Construction Skills Centre which was previously granted approval (subject to completion of a Section 106 agreement) on the application site.
- 8.1.1 The addition of the building will provide a high-quality environment for users of both the Site Accommodation and Construction Skills Centre, and will provide positive branding for the 'front door' of the HS2 Euston Station construction site. Other benefits of the Proposed Development include:
 - Making best use of available land to fulfil the project requirements;
 - Supporting the requirements of the local community and stakeholders, by reproviding the Construction Skills Centre;
 - Providing sustainable and re-usable solutions to reduce the carbon footprint of the project;
 - Providing best lifecycle value for HS2; and
 - Delivering construction skills training for the local borough and providing immediate access to construction opportunities on the HS2 Phase One and beyond.
- 8.1.2 The analysis set out in section 6 of this Planning Statement has demonstrated that the Proposed Development accords with the adopted development plan and that no other material considerations, including national policy and guidance, and supplementary planning document and guidance, indicate that the application should be determined otherwise.