

FOI request to the Greater London Authority submitted on 17 August 2016

#2684

CONSIDERATION BY THE MAYOR OF LONDON OF CAMDEN COUNCIL'S PLANNING APPLICATION AT CENTRAL SOMERS TOWN COVERING LAND AT POLYGON ROAD OPEN SPACE, EDITH NEVILLE PRIMARY SCHOOL 174 OSSULSTON STREET AND PURCHASE STREET OPEN SPACE LONDON NW1 – REF: NO. 2015/2704/P AND 2015/7168/L – APPLICATION UNDER THE ENVIRONMENTAL INFORMATION REGULATIONS 2004

I am writing to request the following information regarding the consideration by the Mayor of London of the planning application of the London Borough of Camden at Central Somers Town, covering land at Polygon Road open space, Edith Neville Primary School 174 Ossulston Street and Purchase Street open space London NW1 – ref: no. 2015/2704/P and 2015/7168/L.

I understand that this matter was referred to the Mayor's Office after the Planning Committee of the London Borough of Camden granted planning permission on 21st June 2016.

1. I wish to know the contents of the Mayor's decision in the above matter?
2. I also wish to know the contents of any representations made by the London Borough of Camden, Historical England and any other third party objectors.

(I require any copies of letters and representations etc. in PDF format.)

I make this application under regulation 5(1) of the Environmental Information Regulations 2004.

The Greater London Authority's response sent 12 September 2016

Thank you for your letter of 16 August 2016 which seeks "the contents of the Mayor's decision in the above matter", and "the contents of any representations made by the London Borough of Camden, Historical England and any other third party objectors".

You will find attached to this email a document that contains the Mayor's Stage II decision on the application, which includes the Stage II and Stage I recommendation reports. This addresses your first request.

In relation to your second query, I enclose all representations to the Mayor received by the Greater London Authority. For representations sent direct to the Council as the local planning authority, please see:

http://camdocs.camden.gov.uk/webdrawer/webdrawer.dll/webdrawer/search/rec&sm_ncontents=2015/2704/P&template=reclistplanning&rows=1000

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Your Ref 2015/2704/P

David Fowler
Regeneration and Planning
London Borough of Camden
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06 April 2016

Dear David

**CENTRAL SOMERS TOWN - APPLICATION REFERENCE 2015/2704/P
APPLICATION BY THE LONDON BOROUGH OF CAMDEN**

I refer to our letter of the 29th January 2016 on behalf of the Francis Crick Institute and to the correspondence dated 16th March 2016 from Turley responding to our clients objections to the proposals specifically for a Tower on Brill Place, associated with the wider proposals across Central Somers Town.

Following consideration of the additional information submitted on behalf of the Council, as applicant, in the context of our original concerns we respond as follows. For your assistance we have, after the Context section below, responded to each element raised by Turley in the same order.

CONTEXT

In considering the merits of the current proposals by the Council, it is important for the Planning Authority to have regard directly to adjoining land uses and the potential impacts on those both physically and in the strategic context. The Francis Crick Institute is a nationally significant project which has attracted some £650 million of investment; the largest contribution from HM Government. It is a project that was identified in the 2011 National Infrastructure Plan and is a direct response to the Government's Review into UK Health Research Funding carried out by Sir David Cooksey and which reported in December 2006.

The Crick sits at the centre of the UK's Medical Research activities and is a centre of national importance to the UK and centrepiece of London's Med City. London Plan Policy 3.17 and its supporting paragraphs sets out the importance of this sector to London. Indeed, the GLA has, last week, issued an updated Stage 1 Report (Updated planning report D&P/3418/P dated 30th March 2016) in respect to proposals in Whitechapel by Londonnewcastle. The updated Stage 1 Report states:

12 At initial consultation stage, concerns were raised over the new residential uses proposed in close proximity to existing (and potentially proposed) life science uses, in particular the Wingate Building, which is used for important research activities. In light of the representations made by QMU there was concern that neighbouring uses could give rise to amenity impacts on future residents of the scheme, by way of noise, vibration and air quality. Given the strategic priority to safeguard life science uses in Whitechapel and the unique nature of activities taking place in the Wingate Building, it would not be appropriate to simply impose conditions requiring mitigation measures to be approved. It is necessary to ensure, prior to determination of the application that the proposed residential uses are able to coexist with established research uses. It is understood that the applicant has been in discussions with QMU, but detailed modelling of potential mitigation measures have not progressed. This issue therefore remains outstanding.

That revised Report makes clear that the proposed residential accommodation must be wholly acceptable in terms of its coexistence alongside existing facilities before any permission is granted and that the use of conditions to ensure that is achieved is inappropriate.

In this case, we note that the application falls under the provisions of strategic application and must, therefore, be referred to the Mayor.

Additionally, given the context of the Crick as a National Infrastructure project the proposals have the potential to have a significant long-term impact on the economic growth (added to the call-in criteria on 12 October 2012) of the UK's Health & Medical Research activities that are expected to accrue from the Crick, given the standing objections and risks set out below. As such the application should also be referred to the Secretary of State.

CONSTRUCTION

We would comment that it is difficult to reach a conclusion on the potential impact of the basement and foundation methodology until such time as the design for the construction of the basement and foundations has been completed. We would also highlight that in the development of the Crick, our client became aware of a major steel gas main running along Brill Place which will also need to be factored into the construction methodology. (The Crick is able to share that information with the Council when they come to design the basement).

The Crick however welcomes the suggestion that this element should be controlled by way of a condition or a provision within a S106 agreement. Given the context of the Crick, the latter would be preferable as would ensure that engagement between the developer and the Crick occurred and would also ensure that agreement was reached on the overall methodology in the basement construction in order to minimise the risk. Accordingly, the relevant provisions should not just require the developer/owner to work with the Crick in developing the design of the basement but also that an appropriate methodology for its subsequent construction. This detail should be submitted for approval before the commencement of any works related to the Tower (including site clearance, site preparation etc.).

In addition, we would request that the Council as Planning Authority also imposes its standard condition preventing the use of impact piling.

OVERLOOKING

The analysis work undertaken by the applicants to assess the possible views into the research laboratories has only considered the horizontal plane and the potential impact at levels 1 - 4. It has not addressed the fact that views from floors in Brill Tower will look down, from height, into the Crick building.

In designing the laboratories the Crick was required to consider views looking upwards from the adjoining road network, public spaces and tangential views from Phoenix Court on Brill Place.

Contrary to the impression given in the analysis study that was undertaken by the Council, the windows within the southern elevation to Phoenix Court are high level and contain opaque glass, being related to the bathrooms of each of the three units. These are not windows that provide easy views and do not relate to habitable space (see Photos 1 & 2).

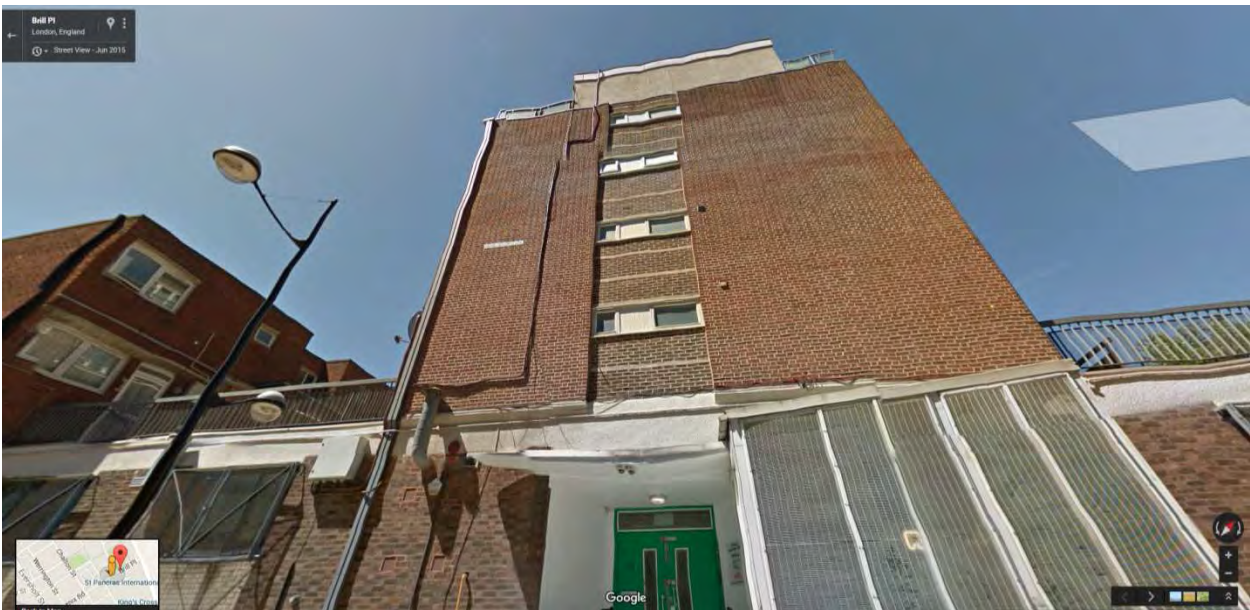
Further, with respect to the tangential views from the three windows on the south eastern corner of the Phoenix Court, there were concerns over whether these would have views into the sensitive parts of the Crick. Indeed the original case officer should recall visiting one of the units to assess actual sight lines and the conclusion reached was that there would only be, at worse, glimpses across Brill Place to the building. Notwithstanding that, the internal layout has been designed so as not to give sight lines to more sensitive areas. Indeed there are no laboratories in the visual plane from any existing building.

Photo 1 – Phoenix Court



Source: Streetview (Google)

Photo 2 – Phoenix Court (Southern elevation with opaque windows to the Crick)



Source: Streetview (Google)

The analysis that has been carried out has also only considered views based on standard residential dimensions of habitable room to habitable room. Given the downward plane and the nature of activities that will take place within the internal areas of the Crick building this standard is inappropriate for this assessment. There is no scenario where direct views into those internal areas would be acceptable.

The Council has suggested that the Crick's concerns can be overcome by the installation of 'slatted blinds to windows serving private areas'; the space between write up areas and inner laboratories. This approach conflicts with the very ethos of openness and collaboration that underpins the research of the Crick and which the Council sought in making research more transparent. It is at odds with the way in which the building has accordingly been designed and fitted out, a process which is now nearly complete.

If the Council wishes the Crick to consider this then they need to discuss this more fully with them. Having regard to the specification requirements of the building and its facilities, the Council should be aware that the specification of any blinds would need to meet those required of a research establishment such as this. It would not be for the Crick to provide this mitigation. This would be the responsibility of the developer who must mitigate the impact of his development in exactly the same way as developers install triple glazing to mitigate noisy development. Notwithstanding that, there is no practical planning powers that would enable the Planning Authority to require the Crick to use the blinds and, as such, mitigation through the use of blinds would not be enforceable. We question therefore how useful it is to pursue this suggestion further.

Accordingly, we do not consider that our concerns in this area have been adequately addressed for us to remove our objection. We continue to have considerable concern over the potential of views into the inner core of the building. This has a direct impact on the residential amenity of potential future occupants.

AIR QUALITY

Location and Height / Odour / Balconies & Winter Gardens

The comments within the Turley letter, in response to the updated information provided by the Crick are welcomed and noted. This relates specifically to the impacts to floor levels 15 upwards. On the basis of the information set out in the Turley letter and the additional modelling carried out the proposed approach to mitigation would seem to address the concerns raised originally.

It is noted that the change to winter gardens from Level 15 upwards has already been proposed through the submission of revised plans. Additionally, it is considered that mechanical ventilation would overcome the other odour issues. Whilst it is the Crick's preference that windows should be sealed to prevent any risk to their operations in future years, they would accept the proposal for mechanical ventilation subject to appropriate conditions relating to:

1. Confirming the specification provisions of the mechanical ventilation proposed and the carrying out of a subsequent test, prior to first occupation, to demonstrate that this standard has been achieved (as per the approach taken on the Council's application at Maiden Lane)
2. The maintenance of the system and replacement of the filters within the time frame recommended by the manufacturers. This maintenance requirement to be a Management responsibility (service charge requirement) not individual occupants (this will address buy-to-let, vacant occupation scenarios etc.)

Generators/Black Start Event

The comments made in respect to Black Start Events in Turley's letter are noted, but are not accepted. We remain concerned that the proposed Tower is being erected within an area where it is acknowledged that should a Black Start event occur, then the requisite air quality levels would rise significantly, regardless of the existing background levels. Given the manner in which the legislation is applied, this places the Crick at risk which is wholly unacceptable. Unless the Council, as applicant, can demonstrate that the Crick can continue to operate, including in a black start scenario, without any risk to their operations and activities their objection on this ground remains.

We also do not accept the comment that there is not a risk to the Crick from future power outages which would give rise to a black start situation and which could lead to a breach of the 18 hours/per annum threshold.

The Council have been aware for some time that developments, and existing occupants, of the area are reliant on UK Power Networks sub-station at King's Cross for its electrical power provision. There is currently no alternative supply should there be a failure anywhere within the King's Cross power grid and this represents a single point of failure.

Further, we are surprised by the comment that there is no evidence of issues associated with the capacity of the electrical grid given that hundreds of pages and links appear when the query is inputted into any internet search engine.

National Grid, for example, has commenced stakeholder engagement in respect to looking at Future Energy Scenarios (FES) to meet future demand, the Industry Regulator, Ofgem, annually produces a Report on the Security of Supply and, the UK Parliamentary Office for Science & Technology produces regular briefing notes for MPs and Members of the House of Lords. Indeed in their September 2015 Note (PostNote 503) the Parliamentary Research team indicate that the mix of generation sources beyond 2020 to deliver on demand is 'uncertain'. Moreover, these are only a few examples of the research and analysis that is undertaken annually into the UK's power and energy industries and activities.

The Institution of Mechanical Engineers, the relevant professional body, the CBI, and others also highlight that unless there is further expansion in the UK's generating capability then current commitments will unlikely meet demand post 2025; and this is before any issues that may arise from EU sources should the country decide to leave the EU, from which we draw additional capacity.

What is clear, from all sources, including UK Government and Parliamentary websites, is that if the current policies and proposals for expansion are not met, such as the delivery of the new nuclear generating stations, in the timelines proposed, then there will be issues associated with a guaranteed supply.

Given the legislative environment in which the Crick's emergency generators are required to operate, the siting of a residential tower block in such close proximity to the Crick, represents a significant risk to its operations and research. It would be the Crick's operations that would be materially impacted should it be necessary to use the generators, which includes inter-alia the risk of potential closure.

Accordingly, our client restates its objection on the basis that the Tower proposals do not mitigate against the potential reduction in air quality from the emergency generators sited at the Crick building; generators which if they are needed would exceed the threshold of 18 hours in any one year quickly. In simple terms, this represents a significant risk to the Crick and its operations which given the context and function of the Crick, as a national asset, whether slight or not, should be placed in such an uncontrolled situation.

PUBLIC OPEN SPACE

As Planning Authority, the Council has sought to protect and enhance designated open space areas identified within the statutory plan and prevent physical development on these. Numerous other objectors have made comment on the loss of green space for hard standing, the loss of mature trees and the inadequacy of their replacements. The scheme does not provide any additional area of open space to cater for the scale of new development proposed. It simply does not result in a net loss of existing space. This is a moot point when the addition of new pedestrian routes and hard landscaping reduces the overall amount of open/recreation space. It is a matter for the Planning Authority to determine whether the provisions of paragraph 31.5 should apply in this case. However we note that hitherto the Council has sought to ensure that the Council's own developments are policy compliant, and where not, that the justification is so robust that a precedence is not established.

In looking at the open space proposals, it is for the Planning Authority to determine what comprises the replacement and compensation for the impacts resulting from the development, such as the replacement of trees etc. and what constitutes the contributions to other policy requirements and wider improvements arising from the development. The two should not be confused.

OTHER MATERIAL CONSIDERATIONS

In reviewing this section, we believe that the original point that we made has been misunderstood. The Council, as applicant, is quite right in what they say. When the Crick's application was progressed the Crick ensured that its proposals could coexist with its established neighbours.

The design responded to this:

- Noise generating uses such as plant and emergency generators were sited away from existing residential accommodation so that they could operate without risk;
- flue outputs were sited having regard to the air modelling of the local environment, giving rise to extended flues above roof level and establishing extraction speed rates;
- open space provision was made at both ends of the building and additional compensatory contributions made (but still not yet spent) to public space improvements in accordance with policy;
- overlooking and sight lines into the building were all assessed in order that the design could 'turn on its head' on the historical approach to research building design resulting in a bright and open building. This approach sought to remove the secrecy that had hitherto been attached to such uses. Indeed, the Council, and its Design Officers, led on much of that work.

With the building now complete, and being commissioned, the Crick must for this application be considered as an existing use and facility. As such it is for the Council to show that its proposals can fulfil the same challenging brief that the Crick had to achieve when its proposals were coming forward. It is for the Council, as applicant, to now show how the Tower is able to coexist with all of its neighbouring land uses, whether these be existing residential, or as now, the Crick itself.

In order to assist the Council with this, the Crick has provided up to date and 'as completed' data and information to the Council rather than limiting them to that which had been placed in the public domain as part of its original application. However, as set out above, there are still a number of concerns that remain outstanding.

I trust that the above is self-explanatory but should you require any additional information or clarification on any of the points raised then please do not hesitate to contact me or my colleague Hannah Blunstone. We remain open to further discussions with the applicants but, as you will appreciate having regard to the context of the Crick as set out in the first section of this letter, our client cannot concede a scenario that could put its operations at risk.

Yours sincerely



PAUL WILLMOTT OBE
SENIOR DIRECTOR - PLANNING

16 March 2016

Delivered by email and post

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Regeneration and Planning
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Dear David

**CENTRAL SOMERS TOWN APPLICATION REFENCE – 2015/2740/P
RESPONSE TO REPRESENTATIONS FROM THE FRANCIS CRICK INSTITUTE**

We are writing on behalf of the Applicant, the London Borough of Camden, to respond to the representations made by the Francis Crick Institute (FCI) in a letter to David Fowler dated 29th January 2016 relating to planning application reference 2015/2740/P.

The letter notes that the Institute is concerned about the impacts of one part of the proposed development, the 25 storey tower on Brill Place, on their operations. They set out four areas of concern, each of which is addressed in turn below:

- The impact of the construction of the tower, specifically the basement;
- Overlooking from the tower into the Institute;
- Air quality impacts of emissions from their operations on the neighbouring residents; and
- Public open space provision.

Construction

An updated Basement Impact Assessment has been submitted to the Council which includes further ground investigations analysis. This report concludes that the basement for the Brill Place tower will have a negligible impact on the Crick's basement wall.

The single storey basement will be formed by excavating inside a secant bored pile perimeter wall which will retain the ground outside and provide an excellent water cut off. As an alternative it would be possible to install a continuous piled wall with a membrane and a reinforced concrete liner wall. The risk of significant vibration would be reduced further if this approach were adopted, however this approach has a greater risk of water ingress and so has not been selected as the preferred method.

The Charlotte Building
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The piled wall will be designed by a specialist piling contractor but it is anticipated that this will comprise 750mm diameter bored piles extending some 25-30m below the basement slab. The adoption of bored piles will be a 'quiet' method with minimal vibration. The main contractor will be required to carry out probing ahead of each pile set up to remove obstruction.

In order to provide further assurance it will be a condition that the developer will be required to appoint an acoustician or similar who would agree limiting vibration criteria (frequencies, accelerations etc) with the Institute. These criteria could then be included in the conditions placed on the eventual contractor that their construction activities must comply with the criteria set. The contractor would then be required to monitor vibrations throughout the construction process to ensure compliance.

Overlooking

We understand the Institute is concerned about the potential for residents of the tower to view into the inner laboratories in the building. The tower is located 16.5m from the external façade of the FCI and 18.5m from the internal glazed façade. This distance meets Camden Guidance relating to the minimum distance of two facing habitable rooms, and so it is not considered to result in harmful overlooking on to the site. It should be noted that Phoenix Court is just 12.5m from the outer façade of the FCI, which was obviously considered acceptable to the FCI at the time that the building was designed..

Notwithstanding the above, the tower has been designed to ensure the privacy of both residents and the users of the FCI is not compromised. A study has been prepared to demonstrate that sightlines into the Institute from the tower are generally limited to corridors/ circulation spaces. Any potential concerns regarding overlooking from the Institute could be overcome by installing slatted blinds to windows serving private areas. This option would maintain natural light to the write/up office space and the labs. This feature would address all forms of overlooking not only from Brill Place residents, but also the possibility of flying camera drones if anyone was particularly intent on seeing into the inner workings of the Institute.

Air Quality

Location and Height of Tower

The air quality assessment for the proposed development has predicted the likely impacts to air quality expected at the Tower and over the wider development arising from existing emissions sources including the FCI. Whilst the assessment concluded that the Tower would potentially introduce receptors into a location where air quality would exceed the annual mean nitrogen dioxide objective, suitable mitigation in the form of a filtered ventilation system, has been proposed to ensure that air quality within the residential units can be reduced to meet relevant air quality objectives. The introduction of new residential units in locations where air quality exceeds the annual mean objective is not exclusive to this development and it a regular occurrence throughout London. In the event that new residential development was not allowed where the annual mean air quality objective was exceeded, development would be excluded from much of central London.

The response from CBRE raises concerns that the location of the Brill Place Tower will be susceptible to increased air pollution as a result of rising background air quality levels and other proposed changes on the highway network, in particular Midland Road. Whilst air quality concentrations have not decreased to the extent predicted within the background pollution maps produced by the Department of Environment Food and Rural Affairs (Defra), there is no evidence to suggest that background air quality levels are actually rising. The results of recent monitoring data at the air quality monitoring sites closest to Somers Town and presented within our Air Quality Assessment indicate that there concentrations have remained fairly consistent over the last five years.

There are currently live consultations being run by Transport for London and LB Camden relating to the change of Midland Road from a one-way to a two-way street and the delivery of new segregated cycle lanes along Midland Road (respectively). While the proposals will allow two-way traffic along this route, the provision of new cycle lanes along with footpath widening will encourage sustainable transport choices in this location. It is understood that representatives from the FCI, HS1, the British Library and LB Camden met earlier this year to discuss proposals for Midland Road and the King's Cross Gyratory, with positive feedback given to LB Camden regarding the proposed changes to Midland Road itself.

Maintenance of Emergency Generators

The short term nitrogen dioxide objective and EU limit value is set at $200 \mu\text{g}/\text{m}^3$ as a one hour mean not to be exceeded for more than 18 hours per year. The allowable exceedances acknowledge that there may be occasions when there are infrequent high concentrations of pollutants either from road traffic or from intermittent industrial sources such as emergency generators.

Within the original air quality assessment for the Central Somers Town application the typical maintenance schedule of the emergency generators was modelled on the basis of information provided within the FCI Environmental Statement, where it was indicated that maintenance runs of the emergency generators were unlikely to exceed more than 48 hours per year.

New information has now been provided by the FCI indicating that the maintenance regime for the generators would require significantly more hours of operation with an estimate of between 152 and 248 hours of running each year.

To ensure that future residents within Brill Place Tower would not be exposed to high levels of pollutants as a result of this testing, additional air quality modelling has been undertaken, the full results of which are presented in Annex 1 to this note.

The increase in the hours the generators are likely to be run for maintenance purposes has resulted in an increase in the number of hours when residents may be exposed to high concentrations of pollutants on balconies and winter gardens without mitigation. As a result of this new information and modelling it is now proposed **that there would be no balconies on the 16th floor and above and that the winter gardens provided on these floors would be included within the ventilation strategy for these apartments and therefore supplied with filtered air.** Given that the potential for high concentrations would be limited to a relatively low number of hours it is not proposed to seal the winter gardens, but to provide residents with an alternative form of fresh air in the event of poor air quality.

On the 15th floor winter gardens with a filtered air supply would be provided for the apartment at the eastern corner, whilst either balconies or winter gardens without ventilation would be provided on the façade where predicted concentrations are lower.

At the 14th floor and below, air quality meets the relevant objectives and therefore for these locations open balconies are considered acceptable.

The amended plans taking account of the above changes are currently being prepared and will be submitted to the Council shortly.

Black Start Events

We acknowledge that the black start events can occur at any time, but consider this an unlikely event, a view which was shared by the FCI within its air quality assessment that was carried out as part of the Environmental Statement (ES) for the proposed development (Application Reference 2010/4721/P):

“The ‘black start’ situation is unlikely to occur except during complete power failure across this part of London, and it is therefore not anticipated that the generators would be operated in this manner for more than 3 hours in any given year.”

By their very nature, as high emitters of pollutants the operation of the FCI’s emergency generators would be limited to rare black start events and individual monthly maintenance checks as set out within the FCI ES. There is no evidence to suggest that the generators would be expected to be used with increasing frequency in the future as the National Grid is put under increasing pressure as suggested in the CBRE letter.

Odour

The air quality assessment carried out by Ramboll Environ predicted that there was the potential for an exceedance of the short term environmental assessment level and lower odour threshold in the event that a fumigation event occurred during the worst case meteorology for dispersion. The modelling was carried out assuming that the estimated odour release from a fumigation event occurred continuously throughout the year, an obvious over prediction of releases. As a result of this modelling it was predicted that at a maximum there could be 43 hours per year when meteorological concentrations persisted which would result in odour concentrations at the façade of the Brill Place Tower in excess of the guideline concentration for formaldehyde.

It should be noted that there is no statutory limit for formaldehyde concentrations in ambient air and that the 100 µg/m³ concentration is provided as a guideline.

Information contained within the FCI ES indicates:

“These BRF sources will comprise general animal odour (e.g. sweat, hay and food), as well as high concentrations of formaldehyde during fumigation events. The latter is anticipated to an infrequent event, likely to occur on a basis of less than once a year” [emphasis added].

Given the infrequency and short term nature of events, together with the marginal exceedance of the guideline concentration the need to further mitigate odour emissions from the FCI is not considered to be necessary.

Balconies and Winter Gardens

The annual mean NO₂ objective is applied at the façade of residential properties, but does not apply to gardens of residential properties, as residents are expected to spend less time in their gardens than in an apartment or house. Balconies and winter gardens would be classed as gardens to provide private outdoor recreational space. Whilst there is the potential for future residents to be exposed to air quality above relevant objectives when using these facilities, there will be significant periods when air quality is well within the objective. This is commonplace of many residential developments both existing and in the process of being constructed within London. It should be noted that the annual mean concentrations of NO₂ are broadly similar throughout the height of the tower and are not considerably higher than would occur at ground level.

Experience of proposed residential developments within other London boroughs has indicated that many Councils consider that the amenity benefits of a balcony or winter garden outweigh the possible negative impacts from occasional exposure to poor air quality. The approach has been to give the future residents the choice of whether to use a balcony or not, rather than requiring development to be built without such amenities. Information on periods of poor air quality is easily accessible and readily available to inform residents of when outdoor pollution levels would be expected to be elevated.

A similar argument is valid for sealed windows. Rather than sealing the windows it is proposed that each apartment would be provided with mechanical ventilation fitted with a filter to remove oxides of nitrogen and particulates from the incoming air. All new residents would be provided with a welcome pack, providing information on the filter system and how and where information on air quality can be obtained

Public Open Space

Camden planning policy (DC31) seeks an uplift in public open space as part of proposals for new residential development. Paragraph 31.5 does however state that in assessing the amount of public open space to be provided, the Council will take account of the development's contribution towards other policy aims and objectives. It is considered that the other community benefits associated with the scheme, namely, the new school, new community and play facilities and upgrades to the existing open space present special and extenuating circumstances that when weighed in the balance, outweigh the lack of additional public open space to be provided on site.

The proposal includes significant investment in improving the quality of the public open space that will enhance the experience of the space and improve its usability. There will be no net loss of public open space and the proposed enhancements to the open space include the provision of facilities that will be accessible by all.

All residential units will benefit from private amenity space and other forms of private open space are also provided as part of the development, including a new MUGA which will be available for general hire.

Taking all the above into account it is considered that the public open space provision will meet the needs of existing and future residents. It should also be noted that within the wider area there are a number of other open spaces that are easily accessible from the site, including St Pancras Gardens, Goldington Crescent, Oakley Square and Harrington Square Gardens.

Other Material Considerations

The FCI also notes the Mayor's support for MedCity, and makes reference to the recent Stage 1 Report relating to the proposed development on the Whitechapel Estate, between Varden Street and Ashfield Street (Reference PA/15/02959), which states:

"The proposal includes new residential in close proximity to existing (and potentially proposed) life science uses, many of which by their nature could give rise to amenity impacts on future residents of the scheme. Given the strategic priority to promote the life science cluster, the applicant should demonstrate that the proposed residential uses would be able to coexist with existing research and medical use in the surrounding area."

Camden is fully supportive of the location of a world leading medical institute in this location, and believes that it will have a long-term positive impact on the area. This case differs from the Whitechapel application referenced as the FCI was developed in an existing residential area, and as such, the proposal was required to include measures that were sympathetic to the needs of its residential neighbours. The

committee report for the application notes that the scheme responded well to the challenging brief and part of the reason for permitting the development was the appropriate response to integrating this scheme within a residential area.

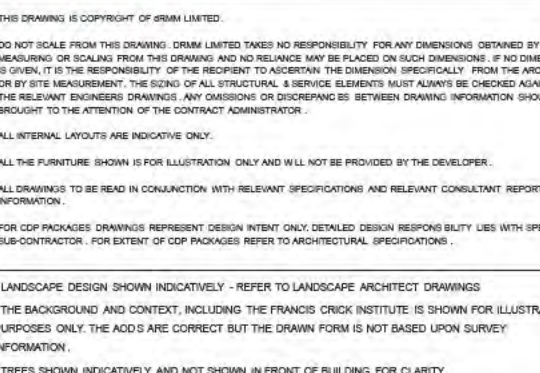
It is considered that the FCI has successfully addressed any concerns relating to the coexistence of this facility with neighbouring residential use through the design of its facility. As such, we understand that the FCI will employ 'best practical means to abate or minimise a nuisance when it occurs'

We hope this letter adequately addresses all concerns raised by the FCI, however should you require any further information please do not hesitate to contact me or Claire Newbury at this office.

Yours sincerely

[REDACTED]
[REDACTED]
[REDACTED]

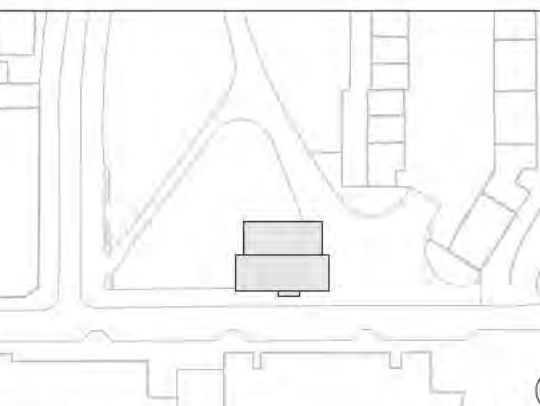
THE UNITARY DEVELOPMENT PLAN CONSIDERS 18M TO BE AN ACCEPTABLE DISTANCE BETWEEN HABITABLE SPACES IN ORDER TO PROVIDE PRIVACY.

[illegible]

REV	DESCRIPTION	BY	CHK	QA	DATE
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SITE PLAN - KEY



AUTHOR

HRMM ARCHITECTS

OVERLOOKING STUDY

PROJECT	SCALE	SIZE
	1:200	A1
BRILL PLACE	1:400	A3

372-SK-123 00

BRILL PLACE - OVERLOOKING STUDY FRANCIS CRICK INSTITUTE LEVEL 3

THE UNITARY DEVELOPMENT PLAN CONSIDERS 18M TO BE AN ACCEPTABLE DISTANCE BETWEEN HABITABLE SPACES IN ORDER TO PROVIDE PRIVACY.



REVISION NOTES

REV	DESCRIPTION	BY	CHK	Q/A	DATE
1	Initial design				

DRMM ARCHITECTS
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AUTHOR
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TITLE
OVERLOOKING STUDY

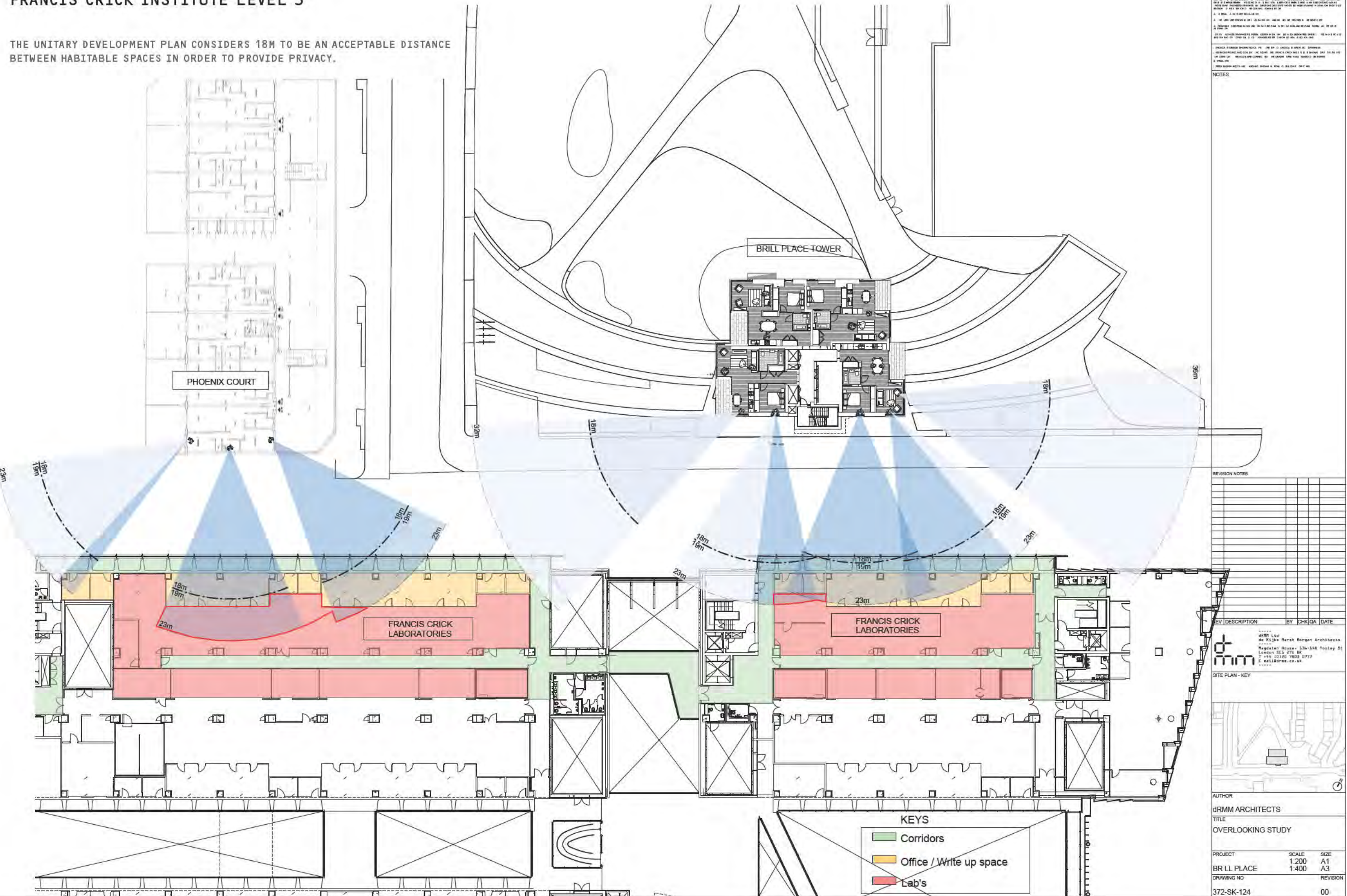
PROJECT
BRILL PLACE

SCALE
1:200
1:400

SIZE
A1
A3

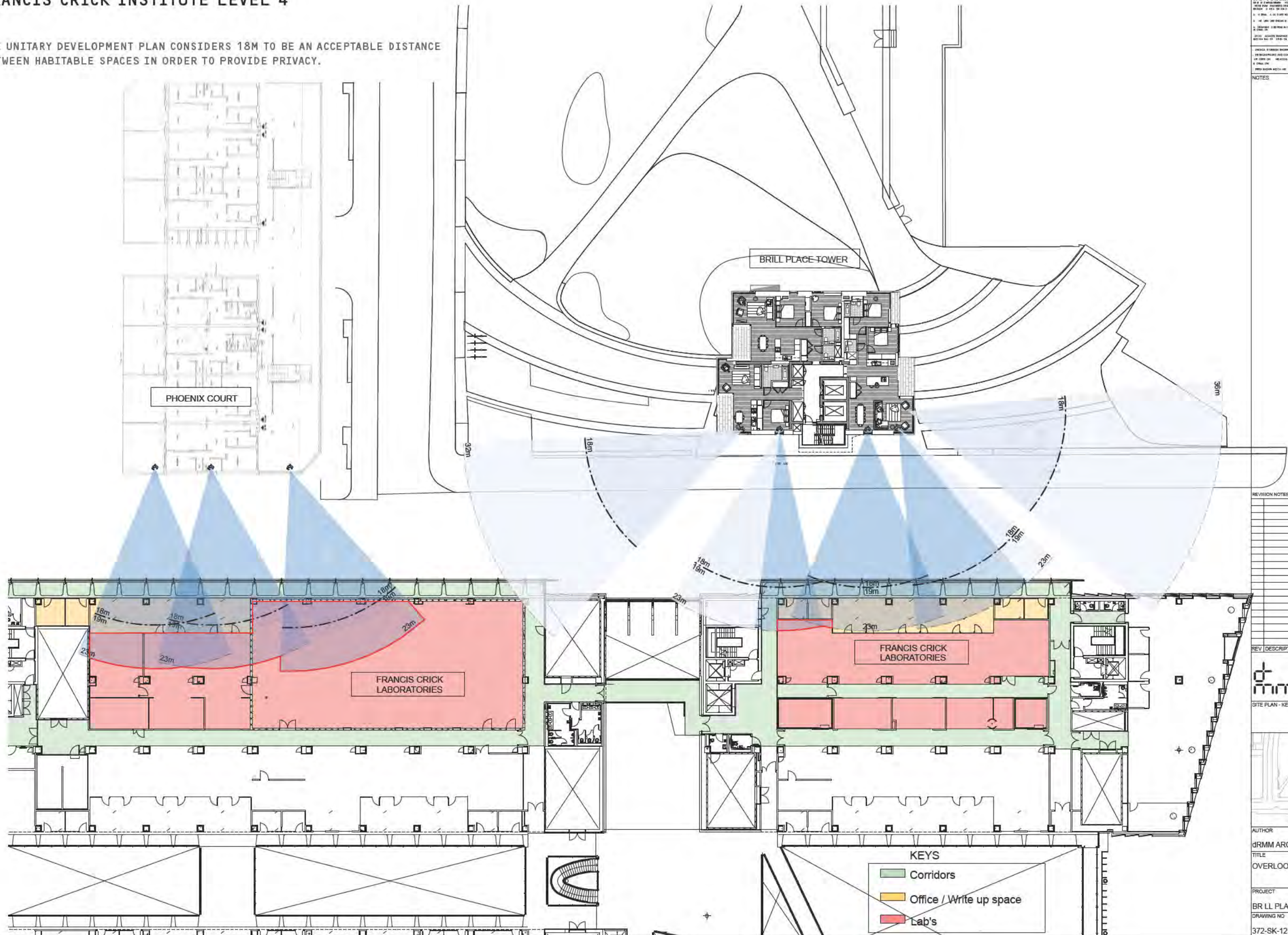
DRAWING NO
372-SK-124

REVISION
00



THE UNITARY DEVELOPMENT PLAN CONSIDERS 18M TO BE AN ACCEPTABLE DISTANCE BETWEEN HABITABLE SPACES IN ORDER TO PROVIDE PRIVACY.

THE UNITARY DEVELOPMENT PLAN CONSIDERS 18M TO BE AN ACCEPTABLE DISTANCE BETWEEN HABITABLE SPACES IN ORDER TO PROVIDE PRIVACY.



- Corridors
- Office / Write up space
- Lab's

NOTES

[illegible]

REV	DESCRIPTION	BY	CHK	QA	DATE
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TE PLAN - KEY

AUTHOR

DMM ARCHITECTS

ADMINISTRATIVE EFFECTS

LOCKING STUDY

OVERLOOKING STUDY

PROJECT	SCALE	SIZE
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1.200	A1
1.400	A3

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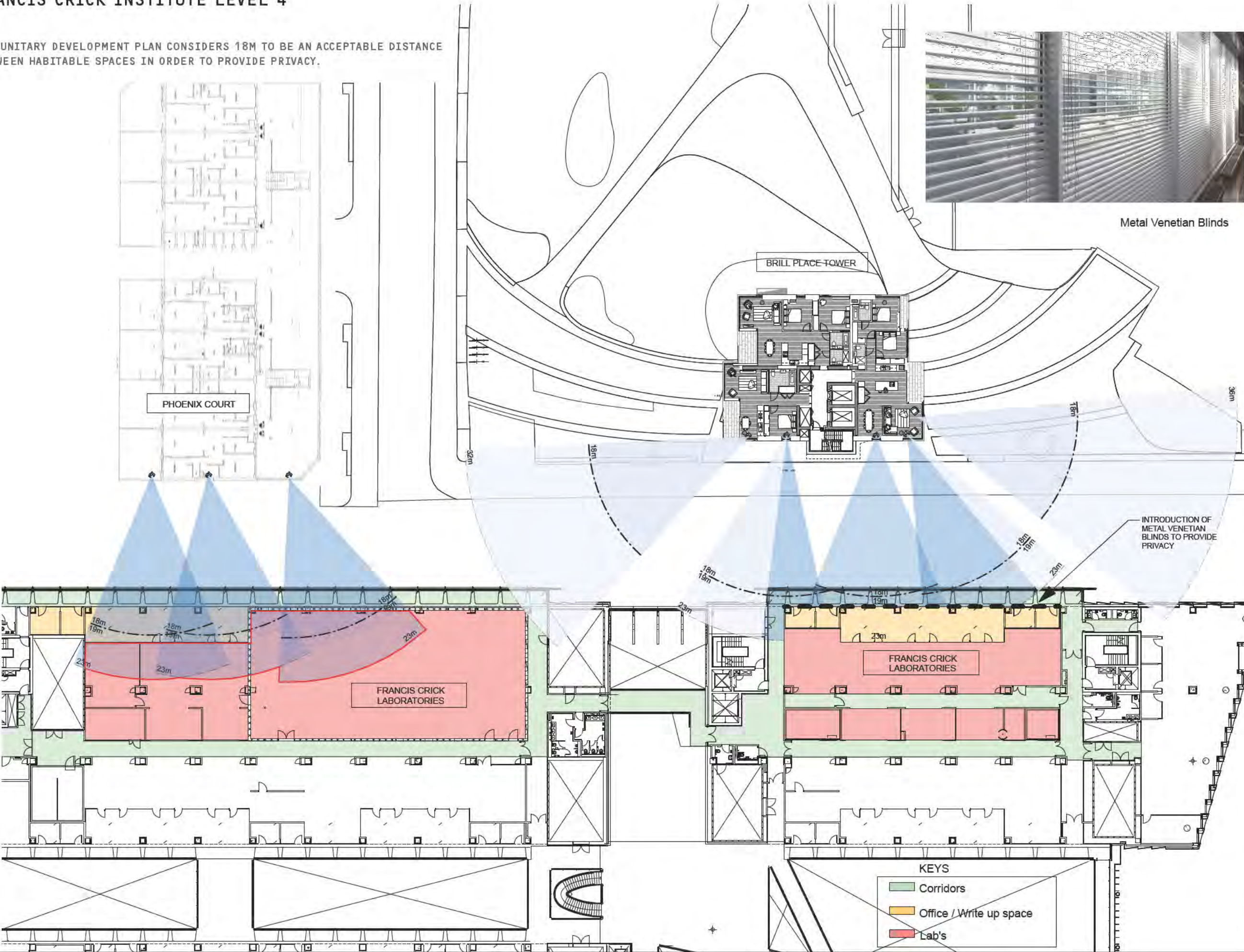
BRILL PLACE - OVERLOOKING STUDY
FRANCIS CRICK INSTITUTE LEVEL 4

THE UNITARY DEVELOPMENT PLAN CONSIDERS 18M TO BE AN ACCEPTABLE DISTANCE BETWEEN HABITABLE SPACES IN ORDER TO PROVIDE PRIVACY.



REVISION NOTES

REV	DESCRIPTION	BY	CHK	QA	DATE
1	Initial design	DRMM	DRMM	DRMM	10/10/2023
2	Revised design	DRMM	DRMM	DRMM	10/10/2023
3	Final design	DRMM	DRMM	DRMM	10/10/2023



NOTES

REVISION NOTES

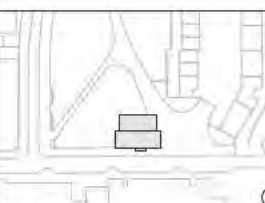
REV DESCRIPTION BY CHK QA DATE

1 Initial design DRMM DRMM DRMM 10/10/2023

2 Revised design DRMM DRMM DRMM 10/10/2023

3 Final design DRMM DRMM DRMM 10/10/2023

SITE PLAN - KEY



AUTHOR

DRMM ARCHITECTS

TITLE

OVERLOOKING STUDY

PROJECT SCALE SIZE

BR LL PLACE 1:200 A1

DRAWING NO 1:400 A3

372-SK-126 REVISION 00

TECHNICAL NOTE

To:	[REDACTED]				
Cc:	[REDACTED]				
From:	[REDACTED]				
Date	10/03/2016	File Ref:	TNUK11-22137	Issue:	3
Subject:	Central Somers Town – Emergency Generator Sensitivity Testing				

1. Introduction

Following comments from the Francis Crick Institute (FCI) on the air quality assessment carried out as part of the Central Somers Town (CST) planning submission, Ramboll Environ UK Ltd was commissioned to carry out additional dispersion modelling to provide sensitivity testing in relation to the potential impacts arising from the routine maintenance emissions of the emergency generators installed at the FCI.

To assist in this work additional information was requested from the FCI regarding its proposed maintenance schedule for the generators. Its response was as follows:

"i) Monthly, run each generator once a month for a period not exceeding 4hrs each, but not less than 2hrs each

ii) Quarterly specialist visit requiring function test run of approx. 1hr each generator

iii) ½ yearly generator service maintenance visit requiring function test run of approx. 2hrs each generator

iv) Annual generator service maintenance visit & load bank test for a period not exceeding 6hrs each

There are no plans to routinely test run all 3 generators at the same time for maintenance purposes."

This testing regime equates to between 152 and 248 hours of operation per year, which is significantly more than the 48 hours suggested within the air quality assessment carried out as part of the Environmental Statement for the FCI.

2. Previous Emergency Generator Maintenance Model Runs

The original CST assessment considered potential impacts from two emergency generator emission runs.

The first was a worst case scenario and considered impacts assuming that one generator ran continuously throughout the year. This demonstrated that no exceedance of the short term NO₂ objective would arise at façade locations at the 14th floor and below, and concluded that no adverse effects from the maintenance operation of the generators would arise at these locations. However, this model run indicated that some exceedance of the short term NO₂ objective was likely at receptors on the 15th floor and above.

The second model run assumed that one generator would be tested once per week, at 10 am on a Saturday. This equated to 52 hours operation a year. The results from this assessment indicated that whilst the one hour mean concentrations of NO₂ exceeded 200 µg/m³ at the façade of Brill Place Tower, the number of exceedances was not sufficient to result in an exceedance of the objective which allows 18 hours to exceed 200 µg/m³ each year. The maximum predicted number of exceedances was five generally arising at floors 18 to 19. On this basis it was concluded that the maintenance operation of the generators would not give rise to unacceptable impacts on air quality at Brill Place Tower.

3. Additional Runs

To respond to the comments raised by the FCI and the additional maintenance testing hours a number of additional maintenance scenarios have been runs as follows:

- Scenario 1 - One generator running 5 hours every Monday morning for the whole year between 9 am and 2 pm. This would equate to an annual operation of 260 hours;
- Scenario 2 - One generator running 5 hours every Thursday afternoon for the whole year between 12 am and 5 pm. This would equate to an annual operation of 260 hours;
- Scenario 3 - Rather than testing each week, it is assumed that all the routine testing is done on consecutive days one week per month. This scenario had one generator running from 9 am to 1 pm for the first four consecutive days in every month, and from 9 am to 2 pm on the fifth day of every month, equating to an annual operation of 252 hours.
- Scenario 4 - One generator running from 9 am to 1 pm Monday to Thursday in the third week of every month, and from 9 am to 2 pm on Friday of the third week of every month, equating to an annual operation of 252 hours..

The model set up and emissions data is fully documented within the Air Quality Assessment carried out for the CST submission. It should be noted that to ensure a conservative approach the modelling needs to consider the maximum number of hours the generators may operate.

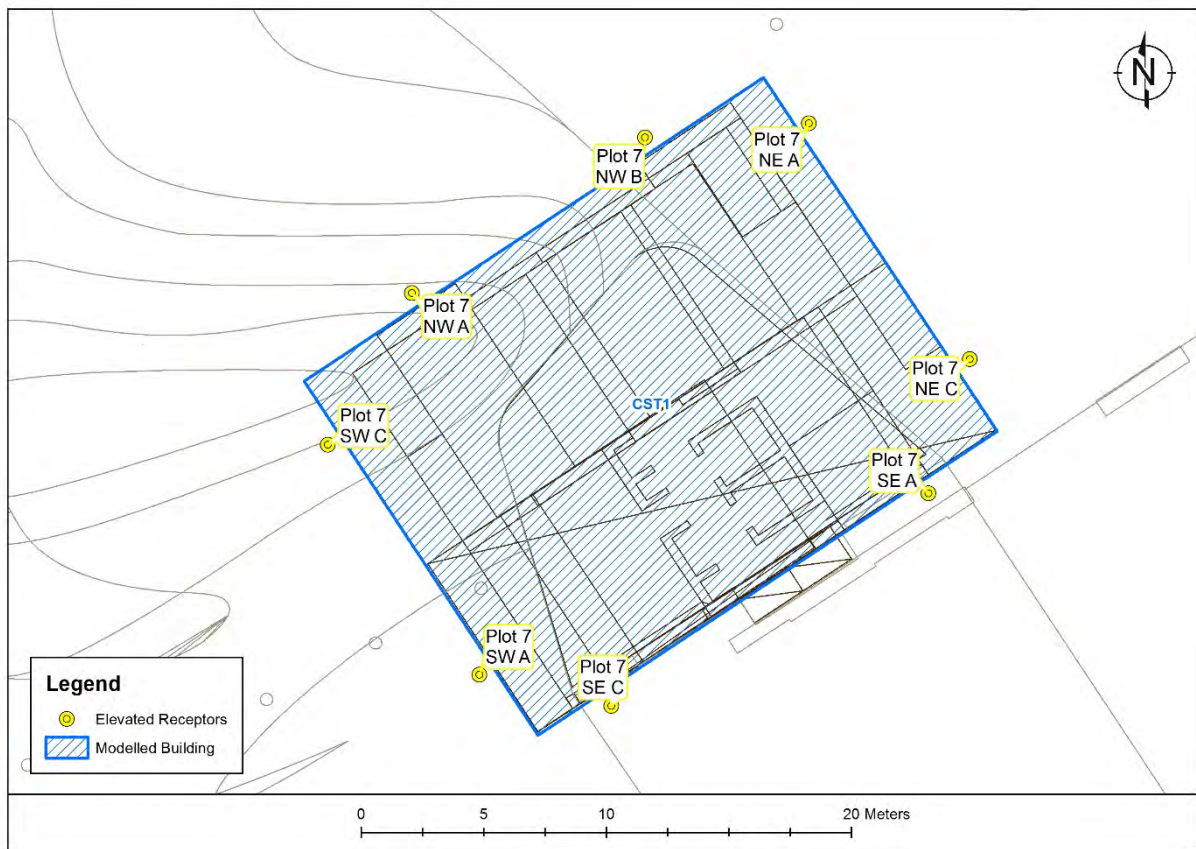
A summary of the results for floors 15 and above from these runs are presented in Table 1 below. The full results are presented in Appendix 1. The receptor locations are shown in Figure 1. No results have been presented for Plot 7 NW A and Plot 7 SW C as the building does not extend past floor 14 in this location.

Table 1: Predicted NO₂ Hourly Exceedences for Maintenance Operations of FCI Emergency Generators at Brill Place Tower (Floors 15 and above)					
Receptor	Height m	No Hours NO ₂ > 200 µg/m ³			
		Scenario 1	Scenario 2	Scenario 3	Scenario 4
Plot 7 NE A15	50.5	0	2	4	6
Plot 7 NE A16	53.6	11	12	16	14
Plot 7 NE A17	56.7	13	15	25	17
Plot 7 NE C15	50.5	12	7	18	17
Plot 7 NE C16	53.6	15	15	35	39
Plot 7 NE C17	56.7	17	20	50	41

Table 1: Predicted NO₂ Hourly Exceedences for Maintenance Operations of FCI Emergency Generators at Brill Place Tower (Floors 15 and above)

Receptor	Height m	No Hours NO ₂ > 200 µg/m ³			
		Scenario 1	Scenario 2	Scenario 3	Scenario 4
Plot 7 NE C18	59.8	18	24	60	44
Plot 7 NE C19	63.0	16	25	69	43
Plot 7 NE C20	66.3	16	24	66	36
Plot 7 NE C21	69.5	16	19	59	21
Plot 7 SE A15	50.5	6	8	19	18
Plot 7 SE A16	53.6	18	20	39	25
Plot 7 SE A17	56.7	18	21	53	27
Plot 7 SE A18	59.8	17	23	62	31
Plot 7 SE A19	63.0	16	22	65	29
Plot 7 SE C15	50.5	4	7	2	4
Plot 7 SE C16	53.6	13	16	27	12
Plot 7 SE C17	56.7	18	19	32	16
Plot 7 SE C18	59.8	23	20	48	20
Plot 7 SE C19	63.0	22	17	47	24
Plot 7 SE C20	66.3	19	14	48	20
Plot 7 SE C21	69.5	18	12	40	17
Plot 7 SW A15	50.5	3	3	0	2
Plot 7 SW A16	53.6	12	12	13	7
Plot 7 SW A17	56.7	15	12	28	14
Plot 7 NW B15	50.5	0	1	0	0
Plot 7 NW B16	53.6	3	7	13	12
Plot 7 NW B17	56.7	7	13	21	17

Bold: Air Quality Objective 200 µg/m³ exceeded more than 18 times a year.



4. Conclusions

The increase in the hours the generators are likely to be run for maintenance purposes has resulted in a significant increase in the number of hours where one hour mean NO_2 concentrations are likely to exceed $200 \mu\text{g}/\text{m}^3$ at the façade of the Brill Place Tower. The objective allows the one hour mean concentration of $200 \mu\text{g}/\text{m}^3$ to be exceeded on 18 occasions per year and applies to outdoor recreational spaces including balconies and winter gardens.

The results demonstrate that the short term objective is exceeded on all facades at floors 17 and above.

At floor 16 there are greater than 18 exceedances at receptors on the SE façade and at NE C. At the other receptor locations on the 16th floor the modelling has indicated that the maintenance testing could result in potentially 13 to 16 exceedances.

At floor 15 there are greater than 18 exceedances at the receptors located close to the eastern corner of the building NE C and SE A. At the other receptor locations the maximum number of exceedances at floor 15 from any of the operating scenarios was 7.

5. Recommendations

From the results of this modelling it is recommended that winter gardens instead of balconies are provided on floor 16 and above on all facades. To adequately protect residents using these amenity spaces mitigation should be provided through the provision of a mechanical ventilation system to

remove pollution from the incoming air. This would allow the residents to use these spaces during periods of high air pollution with the windows sealed. A similar solution should be provided on floor 15, for the winter garden in the eastern corner of the building. Given the short term, infrequent nature of the high pollution events it is not proposed to seal the winter gardens shut.

No mitigation is required for the remainder of the balconies or winter gardens on floor 15 or on floor 14 and below.

Prepared by:

 **Consultant**

 **Senior Manager**

Checked by:

 **Senior Manager**

APPENDIX 1

To:	[REDACTED]				
Cc:	[REDACTED]				
From:	[REDACTED]				
Date	10/03/2016	File Ref:	TNUK11-22137	Issue:	02
Subject:	Central Somers Town – Emergency Generators – Maintenance Hours Results				

1. Modelling Results

1.1 Scenario 1

One generator running five hours every Monday morning for the whole year between 9 am and 2 pm, equating to an annual operation of 260 hours.

Table 1-1: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 1 Maintenance Operations of FCI Emergency Generators at Brill Tower

Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 NE A15	50.5	300	114	40	126	0
Plot 7 NE A16	53.6	404	151	53	139	11
Plot 7 NE A17	56.7	678	174	61	147	13
Plot 7 NE C15	50.5	430	167	59	145	12
Plot 7 NE C16	53.6	545	218	76	162	15
Plot 7 NE C17	56.7	959	231	81	167	17
Plot 7 NE C18	59.8	1346	324	113	199	18
Plot 7 NE C19	63.0	1550	298	104	190	16
Plot 7 NE C20	66.3	1385	243	85	171	16
Plot 7 NE C21	69.5	1391	220	77	163	16
Plot 7 SE A15	50.5	457	153	53	139	6
Plot 7 SE A16	53.6	669	337	118	204	18
Plot 7 SE A17	56.7	1119	334	117	203	18
Plot 7 SE A18	59.8	1458	312	109	195	17
Plot 7 SE A19	63.0	1472	286	100	186	16
Plot 7 SE C15	50.5	394	156	54	140	4

Table 1-1: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 1 Maintenance Operations of FCI Emergency Generators at Brill Tower

Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 SE C16	53.6	533	232	81	167	13
Plot 7 SE C17	56.7	669	350	123	209	18
Plot 7 SE C18	59.8	935	396	139	225	23
Plot 7 SE C19	63.0	1343	400	140	226	22
Plot 7 SE C20	66.3	1453	336	118	204	19
Plot 7 SE C21	69.5	1184	318	111	197	18
Plot 7 SW A15	50.5	337	144	51	137	3
Plot 7 SW A16	53.6	451	205	72	158	12
Plot 7 SW A17	56.7	581	266	93	179	15
Plot 7 NW B15	50.5	275	128	45	131	0
Plot 7 NW B16	53.6	386	147	52	138	3
Plot 7 NW B17	56.7	583	155	54	140	7
Bold: Air Quality Objective 200 µg/m ³ exceeded more than 18 times a year Background assumed as twice the annual mean of 43 µg/m ³						

1.2 Scenario 2

One generator running five hours every Thursday afternoon for the whole year between 12 am and 5 pm, equating to an annual operation of 260 hours.

Table 1-2: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 2 Maintenance Operations of FCI Emergency Generators at Brill Tower

Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 NE A1	7.1	37	26	9	95	0
Plot 7 NE A2	10.2	37	26	9	95	0
Plot 7 NE A3	13.3	37	26	9	95	0
Plot 7 NE A4	16.4	37	26	9	95	0
Plot 7 NE A5	19.5	37	26	9	95	0

Table 1-2: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 2 Maintenance Operations of FCI Emergency Generators at Brill Tower

Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 NE A6	22.6	37	26	9	95	0
Plot 7 NE A15	50.5	351	168	59	145	2
Plot 7 NE A16	53.6	507	237	83	169	12
Plot 7 NE A17	56.7	720	290	101	187	15
Plot 7 NE C15	50.5	473	200	70	156	7
Plot 7 NE C16	53.6	712	291	102	188	15
Plot 7 NE C17	56.7	1055	376	131	217	20
Plot 7 NE C18	59.8	1480	408	143	229	24
Plot 7 NE C19	63.0	1603	423	148	234	25
Plot 7 NE C20	66.3	1286	391	137	223	24
Plot 7 NE C21	69.5	1119	325	114	200	19
Plot 7 SE A15	50.5	455	252	88	174	8
Plot 7 SE A16	53.6	720	352	123	209	20
Plot 7 SE A17	56.7	1069	450	157	243	21
Plot 7 SE A18	59.8	1493	459	161	247	23
Plot 7 SE A19	63.0	1610	460	161	247	22
Plot 7 SE C15	50.5	401	219	77	163	7
Plot 7 SE C16	53.6	611	273	95	181	16
Plot 7 SE C17	56.7	976	319	112	198	19
Plot 7 SE C18	59.8	1603	348	122	208	20
Plot 7 SE C19	63.0	1733	312	109	195	17
Plot 7 SE C20	66.3	1192	267	94	180	14
Plot 7 SE C21	69.5	1062	246	86	172	12
Plot 7 SW A15	50.5	349	193	67	153	3
Plot 7 SW A16	53.6	505	233	82	168	12
Plot 7 SW A17	56.7	761	268	94	180	12
Plot 7 NW B15	50.5	318	144	50	136	1
Plot 7 NW B16	53.6	431	167	59	145	7

Table 1-2: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 2 Maintenance Operations of FCI Emergency Generators at Brill Tower						
Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 NW B17	56.7	600	206	72	158	13
Bold: Air Quality Objective 200 µg/m ³ exceeded more than 18 times a year Background assumed as twice the annual mean of 43 µg/m ³						

1.3 Scenario 3

One generator running from 09:00 to 13:00 for the first four consecutive days in every month, and from 09:00 to 14:00 on the fifth day of every month, equating to an annual operation of 252 hours.

Table 1-3: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 3 Maintenance Operations of FCI Emergency Generators at Brill Tower						
Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 NE A15	50.5	328	231	81	167	4
Plot 7 NE A16	53.6	451	295	103	189	16
Plot 7 NE A17	56.7	606	366	128	214	25
Plot 7 NE C15	50.5	452	317	111	197	18
Plot 7 NE C16	53.6	659	462	162	248	35
Plot 7 NE C17	56.7	906	537	188	274	50
Plot 7 NE C18	59.8	1220	581	203	289	60
Plot 7 NE C19	63.0	1344	599	210	296	69
Plot 7 NE C20	66.3	1188	575	201	287	66
Plot 7 NE C21	69.5	1250	517	181	267	59
Plot 7 SE A15	50.5	466	320	112	198	19
Plot 7 SE A16	53.6	692	499	175	261	39
Plot 7 SE A17	56.7	912	623	218	304	53
Plot 7 SE A18	59.8	1230	631	221	307	62
Plot 7 SE A19	63.0	1694	628	220	306	65
Plot 7 SE C15	50.5	360	268	94	180	2

Table 1-3: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 3 Maintenance Operations of FCI Emergency Generators at Brill Tower

Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 SE C16	53.6	480	356	124	210	27
Plot 7 SE C17	56.7	680	421	147	233	32
Plot 7 SE C18	59.8	835	460	161	247	48
Plot 7 SE C19	63.0	1041	459	161	247	47
Plot 7 SE C20	66.3	1160	442	155	241	48
Plot 7 SE C21	69.5	1229	407	142	228	40
Plot 7 SW A15	50.5	313	236	83	169	0
Plot 7 SW A16	53.6	411	307	107	193	13
Plot 7 SW A17	56.7	566	346	121	207	28
Plot 7 NW B15	50.5	299	218	76	162	0
Plot 7 NW B16	53.6	405	295	103	189	13
Plot 7 NW B17	56.7	545	345	121	207	21
Bold: Air Quality Objective 200 µg/m ³ exceeded more than 18 times a year Background assumed as twice the annual mean of 43 µg/m ³						

1.4 Scenario 4

One generator running from 9 am to 1 pm Monday to Thursday in the third week of every month, and from 9 am to 2 pm on Friday of the third week of every month, equating to an annual operation of 252 hours.

Table 1-4: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 4 Maintenance Operations of FCI Emergency Generators at Brill Tower

Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 NE A15	50.5	330	212	74	160	6
Plot 7 NE A16	53.6	444	267	94	180	14
Plot 7 NE A17	56.7	652	300	105	191	17
Plot 7 NE C15	50.5	452	308	108	194	17
Plot 7 NE C16	53.6	652	429	150	236	39

Table 1-4: Predicted 99.8th Percentile 1 Hour NO₂ Concentrations from Scenario 4 Maintenance Operations of FCI Emergency Generators at Brill Tower

Receptor	Height m	Max 1 Hour Nox Process Contribution µg/m ³	99.8 %ile NO _x Process Contribution	99.8 %ile NO ₂ Process Contribution	99.8 %ile Total NO ₂ µg/m ³	No Hours NO ₂ > 200 µg/m ³
Plot 7 NE C17	56.7	955	482	169	255	41
Plot 7 NE C18	59.8	1389	477	167	253	44
Plot 7 NE C19	63.0	1702	466	163	249	43
Plot 7 NE C20	66.3	1608	437	153	239	36
Plot 7 NE C21	69.5	1485	362	127	213	21
Plot 7 SE A15	50.5	470	315	110	196	18
Plot 7 SE A16	53.6	683	460	161	247	25
Plot 7 SE A17	56.7	994	543	190	276	27
Plot 7 SE A18	59.8	1448	613	215	301	31
Plot 7 SE A19	63.0	1786	517	181	267	29
Plot 7 SE C15	50.5	412	164	57	143	4
Plot 7 SE C16	53.6	591	222	78	164	12
Plot 7 SE C17	56.7	772	279	98	184	16
Plot 7 SE C18	59.8	1081	339	119	205	20
Plot 7 SE C19	63.0	1503	357	125	211	24
Plot 7 SE C20	66.3	1491	336	118	204	20
Plot 7 SE C21	69.5	1184	311	109	195	17
Plot 7 SW A15	50.5	351	147	51	137	2
Plot 7 SW A16	53.6	497	194	68	154	7
Plot 7 SW A17	56.7	637	233	82	168	14
Plot 7 NW B15	50.5	302	206	72	158	0
Plot 7 NW B16	53.6	399	284	99	185	12
Plot 7 NW B17	56.7	545	303	106	192	17

Bold: Air Quality Objective 200 µg/m³ exceeded more than 18 times a year
Background assumed as twice the annual mean of 43 µg/m³

Martin Jones

From: Willmott, Paul @ London HH <paul.willmott@cbre.com>
Sent: 07 April 2016 08:46
To: Stewart Murray
Cc: Martin Jones; Blunstone, Hannah @ London HH
Subject: Francis Crick Institute & LB Camden's Central Somers Town Proposals
Attachments: 160406 - Response to LBC.pdf; Turley - Response to Francis Crick Institute Representations FINAL.pdf

Importance: High

Dear Stewart

Further to our conversation on Tuesday, please find attached a copy of our reply, as of today, to the LB Camden in respect to the Council's own proposals for Central Somers Town.

You will recall that we are the advisors to the Francis Crick Institute and we submitted representations on their behalf in respect to the proposals, the issues of which are broadly similar to those facing QMUL, who we also act for, in Whitechapel. As someone central to the position which the Mayor has adopted to the proposals in Whitechapel by Londonewcastle and the potential impact to QMUL's Wingate Building (Life Sciences Research Centre) and his Med City vision I am writing to flag that the situation here is almost identical. Sir Paul Nurse/the Crick is looking to engage with the Mayor over their concerns for the Crick arising from the Somers Town proposals and may use the event on the 16th April to bend his ear!

You will recall that as a result of the revised plans submitted by Londonewcastle in Whitechapel (and the Council as applicant has recently submitted additional plans here), Nick Ray (as the GLA PDU Case Officer) issued an updated Stage 1 Report on the 30th March 2016, which included the following paragraph:

12 At initial consultation stage, concerns were raised over the new residential uses proposed in close proximity to existing (and potentially proposed) life science uses, in particular the Wingate Building, which is used for important research activities. In light of the representations made by QMU there was concern that neighbouring uses could give rise to amenity impacts on future residents of the scheme, by way of noise, vibration and air quality. Given the strategic priority to safeguard life science uses in Whitechapel and the unique nature of activities taking place in the Wingate Building, it would not be appropriate to simply impose conditions requiring mitigation measures to be approved. It is necessary to ensure, prior to determination of the application that the proposed residential uses are able to coexist with established research uses. It is understood that the applicant has been in discussions with QMU, but detailed modelling of potential mitigation measures have not progressed. This issue therefore remains outstanding.

LB Camden, as applicant, has now submitted revisions to its proposals to address some of the concerns that we raised initially. I attach a copy of that document for your information. I am not sure if your Case Officer (Martin Jones – to whom I have copied this email) will have seen the original representation that we made, or the subsequent amendments that the Council submitted, but both are available on the Council's website and I can send copies if it would be helpful.

In light of the fact that the LB Camden proposals still, as is the case in Whitechapel, present a risk to the operation of the Crick as a life sciences research facility and therefore shares the same strategic priority within the London Plan in terms of safeguarding life sciences in the Euston Road corridor and the unique nature of activities that will take place later this year at the Crick, it would be appreciated if the GLA could revisit the potential implications of the scheme against the Crick itself and to advise Camden, as the Planning Authority, if it is the intent to adopt a similar position to that at Whitechapel.

Your assistance in this matter would be appreciated as I know that the Crick are contemplating whether they should raise their concerns direct with the Mayor, given his interest in the project, and I have been asked to draft a brief to the Minister of State for Research & Life Sciences at BIS with a view to him lobbying the Secretary of State for Communities and Local Government.

Kind regards

Paul

Paul Willmott OBE | Senior Director
Planning & Development
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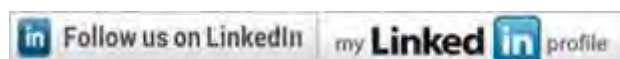
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Colin Wilson
City Hall
The Queen's Walk
More London
London
SE1 2AA

Tel 020 7974 4444
Fax 020 7974 1930
Textlink 020 7974 6866

Our Ref: **2015/2704/P**
Your ref: **D&P/3711/01/MJ**
Please ask for: David Fowler
Telephone: 020 7974 2123
23rd June 2016

Dear Colin,

**Re: Central Somers Town
Covering Land At Polygon Road Open Space, Edith Neville Primary School 174
Ossulston Street And Purchase Street Open Space
London
NW1**

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

- **Plot 1: Community uses at ground floor (Use Class D1) (approximately 1,554sq.m) to include a children's nursery and community play facility with 10no. residential units above;**
- **Plot 2: 35 residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 137sq.m);**
- **Plot 3: Extension of Grade II listed terrace to provide 3no. dwellings;**
- **Plot 4: Replacement school (Use Class D1) ;**
- **Plot 5: 20no. residential units over a replacement community hall (Use Class D1) (approximately 211sq.m);**
- **Plot 6: 14no. residential units; and**
- **Plot 7: 54no. residential units over flexible A1/A2/A3/D1 floorspace at ground level (approximately 70sq.m).**

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



Thank you for your letter dated 25th February 2016 and Stage 1 report regarding the redevelopment proposals in Central Somers Town. The application (2015/2704/P) was presented to the Council's Development Control Committee on 21st June 2016. The Committee resolved that planning permission be approved subject to conditions and a (shadow) section 106.

The Council is consulting the Mayor under Article 5 of the Order. Please find attached the following information:

- the officer's committee report
- draft decision notice
- supplementary agenda

I will forward you a copy of the relevant draft minutes from the committee once these have been produced and finalised (likely beginning of next week).

There have been 87 objections to the proposal, which can be viewed on the Council's web pages:

(<http://planningrecords.camden.gov.uk/Northgate/PlanningExplorer17/Generic/StdResults.aspx?PT=Planning%20Applications%20On-Line&SC=Application%20Number%20is%202015/2704/P%20and%20Date%20Validated%20is%20between%2001%20January%201926%20and%2031%20December%202016&FT=Planning%20Application%20Search%20Results&XMLSIDE=/Northgate/PlanningExplorer17/SiteFiles/Skins/Camden/Menu/PL.xml&XSLTemplate=/Northgate/PlanningExplorer17/SiteFiles/Skins/Camden/xslt/PL/PLResults.xslt&PS=10&XMLLoc=/Northgate/PlanningExplorer17/generic/XMLtemp/p34ph155xuci0kiuclo2b55/0414fbb0-5892-41a4-a607-249b271426e7.xml>). These have been summarised in the officer's report.

I trust this information is of assistance to you. Please do not hesitate to contact me on 0207 974 2123 if you require any further information.

Yours sincerely

David Fowler

Principal Planner
Regeneration and Planning
Culture and Environment
London Borough of Camden



Historic England

Mr Stewart Murray
Assistant Director
Development Enterprise and Environment
Greater London Authority
City Hall
London
SE1 2AA

Our ref: P/00492930
Your ref: D&P/377/01/MJ
Telephone 02079733488
Fax

27 June 2016

Dear Mr Murray

Re: Central Somers Town, covering land at Polygon Road Open Space 2015/2704/P

I refer to this application which I understand from the letter dated 25 February (comprising the Statement the Mayor is required to provide under Article 4(2) of the Order) was received by the Greater London Authority on 29 January 2016. I also understand from that letter that the full Stage 1 Report dated 25 February 2016 (ref D&P 3711/01/MJ) was considered by the Mayor on the same date.

Historic England was consulted on this proposal by Camden Council on 6 January 2016. We responded on the 11th January requesting that further assessment of additional views be provided in order to show the potential impact upon the setting of two Grade1 Designated Heritage Assets; Chester Terrace and Regents Park.

We received that additional information on 7 March and responded to Camden Council with our formal objections to the scheme on 29th March.

We note from the Stage 1 Report (pp9-10 paragraphs 46-49) which record the assessment of potential Historic Environment issues that neither Chester Terrace or Regents Park are included in the sites identified in paragraph 46 as being affected by the proposals. We note also that the report concludes at page 19 with the statement in relation to the Historic Environment:



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



“No harm will be caused to Designated Heritage Assets. The harm caused to non-designated heritage assets will be outweighed by the public benefits arising from increased pedestrian permeability and improved views into the new open space.

We are aware that notwithstanding our objection and in the knowledge that this case is being reported for advice from the Historic England London Advisory Committee on 30th June, Camden Council nevertheless resolved to grant approval for this scheme at their Committee on 21st June. In their report the council acknowledged that there was harm to the Chester Terrace and Regents Park.

It is clear from the Stage 1 report that the GLA has not considered any impact on these highly graded assets. In light of the referral of the application to the Mayor for the Stage 2 consideration we seek urgent clarification of how this important matter is going to be addressed in an appropriate manner that allows thorough consideration of the harm being caused to Designated Heritage Assets of the highest significance, as acknowledged by the local authority and any justification that has to clearly and convincingly outweigh it.

Yours sincerely



Nigel Barker
Planning Director London
E-mail: nigel.barker@HistoricEngland.org.uk

cc
Sadiq Khan Mayor of London
Tony Devenish Chair of London Assembly Planning Committee
Andrew Dismore London Assembly Constituency Member
National Planning Casework Unit DCLG
David Fowler Camden Council



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HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Dear Mayor Sadiq Khan,

Our open letter to you published in the Camden New Journal may already have reached you. Attached is a copy of the letter or the link to the website.

<http://www.camdennewjournal.com/somerstowntrees>

Please help us save our green spaces in Somers Town. They are under imminent threat by plans of Camden Council .

Camden Council is pushing through a planning application, that will be heard on 21 June. The planning officer recommends the application for approval.

Since starting our petition in January 1058 local people of Somers Town have signed our petition that now has been handed in.

We need all support.

Kind regards,

Geraldine (Ramphal)



NW1 1UG London

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To: Martin Jones – GLA
From: Cameron Wallace – TfL Borough Planning
Your Ref: 3711
Our Ref: 16/0431
Phone: 020 7126 4787
Date: 30 June 2016

Central Somers Town, Brill Place/ Polygon Road - TfL Stage 2 Comments

At Stage 1 TfL requested further information and alterations to cycle parking arrangements in accordance with London Plan requirements. This was subsequently undertaken. In addition, TfL requested increases to the provision of blue badge parking and that future residents (excluding blue badge permit holders) be restricted from obtaining on-street parking permits. There is a condition requiring the scheme to be car free and a provision excluding applications for a CPZ permit will be included within an undertaking made by the Council as applicant which is welcomed by TfL. No further amendments have been proposed at this stage to address the shortfall of blue badge parking required under London Plan standards which is disappointing.

Further issues identified at Stage 1 related to enhancements to address increased use of local pedestrian and cycling infrastructure. The undertaking will secure as yet unspecified contributions towards pedestrian and cycling improvements as part of a wider proposal of highway alterations. These improvements are strongly supported by TfL as they will be required to mitigate effects of the proposal and will support London Plan policies 6.9 and 6.10. Final details of these enhancements to local highways have yet to be developed. TfL considers it necessary that these proposals should also address the shortfall of blue badge parking and servicing issues identified with Plot 6 and for this reason would expect to be consulted further as part of this process.

Requests for a Travel Plan and a Construction Logistics Plan (CLP) to be secured by condition were also made and this has been obtained.

Overall, and subject to legal confirmation that the mechanisms resolved to be imposed are workable, TfL is satisfied that the majority of the issues previously raised have been satisfactorily addressed or will be by LB Camden in taking forward a scheme for alterations to the highways surrounding the application site. On balance the application can thus be considered to be in general accordance with the transport policies of the London Plan (2015).

REQUEST FROM SOMERS TOWN NEIGHBOURHOOD FORUM FOR LB CAMDEN PLANNING APPLICATION 2015/2704/P TO BE CALLED IN ON GROUNDS OF :- CONFLICT WITH NATIONAL POLICY REGARDING NEIGHBOURHOOD PLANNING.

1 NEIGHBOURHOOD PLAN

Somers Town Neighbourhood Forum (STNF) is the body constituted and approved by LB Camden to prepare a Neighbourhood Plan . Planning application LBC 2015/2704/P lies entirely within the Neighbourhood Plan boundary and, despite being a major departure from the adopted Development Plan, is being recommended for approval by the LB Camden Development Control Committee meeting on 21st June 2016.

The Vision and Aim of the Neighbourhood Plan is to provide " **a framework for a sustainable community development enabling the existing community to stay and get a slice of the action, through access to genuinely affordable housing, jobs and training, high quality health and education, and a cleaner, safer environment.**" Or , more succinctly, " **Avoid being squeezed out : get a slice of the action.**" A first draft of the Neighbourhood Plan , including this Vision, was sent to LB Camden in December 2014.

In accordance with the Neighbourhood Planning Regulations, and contrary to para 5.2 of the Planning Statement (Turley), and Section 7.7 of the Officer's Report to Committee, the Neighbourhood Plan is well advanced in preparation. The relevant Consultation bodies referred to in the Regulations have been consulted. The Plan has been available for inspection and comment online and at various local community venues. The 6 week time period for representations ended on February 19th 2016. LB Camden have decided that no SEA is required. The Basic Conditions Statement is still being considered by LB Camden. **Under these circumstances , the Neighbourhood Plan carries weight and should be a material consideration in determining this application.**

2 ISSUES OF NATIONAL SIGNIFICANCE

The implications of Planning Application 2015/2704/P are of much more than local significance . Important issues of national significance are raised relating to :-

- * Public respect for town planning and involvement in the planning process
- * Neighbourhood Planning in disadvantaged inner city areas
- * Promoting healthy communities / Environmental impact.
- * The future of London / compromising of regional planning strategy.
- * Funding and provision of Community Infrastructure
- * Conflicts of interest
- * National security

All of these issues are relevant to the preparation of the Somers Town Neighbourhood Plan

The Somers Town Neighbourhood Forum response to Planning application LBC 2015/2704/P. is attached as Appendix 1 in support of this Request.

3 PUBLIC RESPECT FOR / INVOLVEMENT IN TOWN PLANNING AND THE PLANNING PROCESS : OFFICER REPORT TO COMMITTEE

Apart from being itemised under Section 7.5 of the Officer Report to Committee, not a single reference is made in the whole 277 page Report to Policy CS4. Policy CS1, identifying Somers Town as an "Area of limited change" is mentioned at 10.3 and 12.1 , only to be completely ignored. Not only is this at best,

disingenuous, but at worst, denies Members of the Development Control Committee (elected Councillors) essential contextual information necessary for them to come to a decision on the proposed development. Justification for the scale of the proposed development at Central Somers Town appears to rely almost entirely upon an urban PTAL of 4 - 6 (Public transport accessibility level) . Table 3.2 (Sustainable residential quality density matrix) accompanying London Plan Policy 3.4 .suggests a density range for such a location of between 200 hrha and 700 hrha.

In justifying the scale and density of the proposed new housing, para 5.8 of the Planning Statement (Turley) erroneously states "the site benefits from ptal 6b and is within the central area and **so the highest densities would be expected on this site**". Later in the same section of the Planning Statement, at para 5.40 it is unequivocally stated that "**plot7 is within the central activity zone**". However, Section 12.3 of the Officer Report states : "The London Plan Density Matrix for a site in an 'urban' setting within PTAL 5 to 6b is 200-700 hr/ha". (Forum's underlining, officer's quotes). Section 12.3 of the Officer Report indicates that the density of the proposed development is 866 hrha. This is well in excess of the maximum set out for an urban location. However, Section 12.4 of the Report considers "The proposed density is not considered to be significantly above the density matrix guidelines." This may or may not be verbal sleight of hand to conceal a basic flaw in the original estimation of the holding capacity of the development site – which, it should be noted, is Public Open Space.

Para 3.28 supporting London Plan Policy 3.4, states :-

"It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local CONTEXT, design and transport capacity are particularly important"

St Pancras International was opened in 2007. **Central Somers Town was as well connected to public transport in 2010 as it is now. ie it had the same PTAL in 2010 as it has now.**, if not better (given increased use of public transport 2010 -2016). Policy CS1 (adopted 2010) sets out a very clear and logical policy / **CONTEXT** for the distribution of growth in Camden . In summary :-

1. Growth Areas such as Kings Cross / St Pancras and Euston
2. Other highly accessible areas :Para 1.15 of the Camden Core Strategy states :- "Beyond the Growth Areas there are a number of other parts of the Borough which are considered suitable locations for significant development as they are **highly accessible** by a range of means of transport. These are the **Central London area** outside of the Growth Areas, and the town centres of Camden Town, Finchley Road/ Swiss Cottage, Kilburn High Road, Kentish Town and West Hampstead."
3. Areas of more limited change elsewhere

Policy CS4 (adopted 2010) : **Area of more limited change , and paras 4.5 and 4.6 of the Core Strategy specifically and deliberately** sets out very clearly that Somers Town is to benefit from development in the closely adjoining Growth Areas eg by access to jobs and training , but that, other than in sites set out in the Camden Site Allocations document, and estate regeneration schemes, the area will "experience more limited development and change". In the context of Somers Town, para 4.5 explicitly states "Places adjacent to Camdens Growth Areas will be affected by the changes taking place in those Areas, **although they are not expected to experience major development themselves**".

In this context therefore, a density nearer 200 – 300 hrha would appear more appropriate for Central Somers Town. In Town Planning terms densities of 866hrha and 25 storey tower blocks should be guided toward Growth Areas / Opportunity Areas at Borough and Regional level.

No explanation or justification has been put forward in the Officers report, for the complete removal of Policy CS4 from analysis of the current planning application.

Policies CS1 and CS4 have formed the basic framework for the evolution of the Neighbourhood Plan over the last 5 years . They are valuable not only as a guide for development but also for the public understanding of the future in their area.. Without them, it is markedly more difficult for landowners, developers and residents alike, to differentiate between whether the character of an area, is going to broadly remain the same over the Plan period , or whether almost any part, particularly in the centre and south, of the Borough, is effectively a Growth Area of one kind or another. As such the proposed development runs the risk of undermining regional planning and distribution of Growth Areas / Opportunity Areas , to the point where they may well coalesce. Worse still, it undermines public confidence in the Planning process as a whole.

It is equally clear to most people in Somers Town (all of whom support rebuilding of Edith Neville School, Plot 10 and St Aloysious Nursery) that were such facilities to lie in more affluent parts of the Borough with valuable Council owned Public Open Space, an entirely different process and product would have emerged.

4 NEIGHBOURHOOD PLANNING IN DISADVANTAGED AREAS

Para 69 of the NPPF states :-

The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.

Participation and involvement of local community in Neighbourhood Planning

- Neighbourhood Planning is an essential element of the Localism Act November 2011. Localism is a crucially important national policy.
- The current planning application has taken no account whatsoever of any of the Representations, Recommendations or Policies contained in the Neighbourhood Plan, or of the Forum's response to the planning application. (Appendix 1)
- LBC Planning Application 2015/2704/P subverts and completely undermines a genuinely "bottom up" Neighbourhood Planning process and product created by Somers Town Neighbourhood Forum (STNF) over 5 years, starting in 2011
- Were it to go ahead all credibility / faith in the Neighbourhood Planning process - certainly in locations such as Somers Town, would be completely lost, and cynicism and distrust of the process compounded.
- The Neighbourhood Plan and the Vision , could not be modified because it is set firmly within adopted Core Strategy Policy CS4 and paras 1.8, 4.5 / 4.6 of the adopted Borough Plan. ie that Somers Town is an "Area of more limited change" with a disadvantaged community relying in part on the benefits of growth in adjoining Kings Cross and Euston (eg jobs and training) to help themselves out of disadvantage, rather than be "squeezed out" through gentrification leading to advantage imported : disadvantage exported.
- This Vision was made clear to Officers and Councillors as long ago as December 2014.
- At no point was it made clear to the Forum by LBC Planning Officers advising it, that Policies CS1 and CS4 were not a sound basis for Neighbourhood Planning.

5 PROMOTING HEALTHY COMMUNITIES / ENVIRONMENTAL IMPACT

Environmental Impact

The proposed new development sets a highly dangerous precedent : it deliberately underachieves on nationally agreed environmental planning standards eg in terms of provision / replacement Open Space, loss of daylight and sunlight by adjoining residents, overlooking of adjoining residents, microclimate (wind), deliberate location of a 25 storey tower block containing 54 residential units on a High Risk site which exceeds EU air quality limits at all levels.

Environmental Impact Assessment (EIA)

Although the proposed development amounts to less than 150 residential units, Somers Town/Kings Cross/St Pancras is environmentally sensitive in terms of poor air quality.

Government guidance on screening schedule 2 projects, states :- “ In certain cases, local designations which are not included in the definition of “sensitive areas”, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. In considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded.”

South Somers Town (close to the Euston Road) is one of the most polluted places in Britain, exceeding environmental standards on a daily basis. Within the site area, air quality on Brill Place also exceeds environmental standards. Indeed, the air quality is such that each apartment in the Brill Place tower will need its own mechanical ventilation unit to purify the air.

LB Camden may have recently received funding from TfL to explore how to improve the very poor air quality in Somers Town. Not only the Francis Crick Institute, but local residents in Somers Town are very concerned about how the proposed development would impact on the dispersal of pollutants from the Crick flues. Likewise, how an increased demand on the Phoenix Court CHP would impact on those living, working and playing within the emission zone (particularly those in sheltered accommodation and in the two nurseries).

Other considerations when screening would be the loss of dozens of trees, the loss of open space in an area deprived of open space and the cumulative impact of present and future developments such as HS2 and Crossrail 2.

An independently funded air quality report has modelled the impacts of the proposed development on air quality and has found substantial adverse impacts along construction traffic roads.

LB Camden has not considered the cumulative impact of HS2 and Crossrail2 works , both of which are scheduled to run concurrently in Somers Town with planning application 2015/2704/P.

6. FUNDING AND PROVISION OF COMMUNITY INFRASTRUCTURE / CONFLICTS OF INTEREST / FUTURE OF LONDON

Community Investment Programme (CIP)

1. London is a special case eg in terms of land and rental values; lack of access by necessary / key workers to genuinely affordable social rented housing; journeys to and from work - time and distances.

2. There is widespread evidence in inner London, that the conventional CIP method of providing community infrastructure on the back of luxury flat development has not only failed, but has perversely squeezed out the very community whose needs the infrastructure is meant to meet .
3. It is nearly inevitable that local communities will be able to come up with a cheaper, better alternative solution than a developer - be they public or private. In response to widespread community calls for a "do minimum" option, the Forum put forward an alternative first phase CIP development proposal to rebuild Edith Neville PS and Plot 10 on their existing sites (40 - 50 new housing units). This proposal was assessed by LBC's independent Property and Cost Consultants who concluded that it **"could generate sufficient value to build a new school and complete the enabling and infrastructure works associated with the new private housing and school"** This was one of many local representations made to the LBC Cabinet Committee December 16th 2015. The Committee was unyielding and within hours the current planning application was submitted .
4. No "Open Book". The proposed 1 FE+ Primary School would be bigger than a 2FE Primary School . It was designed as a School and Children's Centre, but lost its Children's Centre status prior to the application being submitted. It is therefore overdesigned, inappropriate and excessively expensive. Clearly , locating a 25 storey tower block on a High Risk site (air quality) has incurred considerable extra expense.
5. There is an obvious conflict of interest between LB Camden as landowner / developer and Planning Authority. We do not believe planning permission would be granted were this the realisation of a private sector developer's investment strategy..
6. The proposed development appears to seriously, even deliberately, undermine the Neighbourhood Planning process by allowing for massive overdevelopment in the pursuit of maximum land and rental values far in excess of what is really required / would command local support.
7. The Planning Application has taken no account whatsoever of any of the Forum's representations on the Community Investment Programme, its alternative first phase proposal, or recommendations / policies contained in the draft Neighbourhood Plan.

7 NATIONAL SECURITY

- Following the London bombings of 7 July 2005, Somers Town residents are in no doubt that St Pancras International Station and the newly completed Francis Crick Institute are both potential targets for terrorist attacks. The proximity of the proposed tower to these buildings therefore causes concern.
- No evidence has been submitted that it has been designed to meet 'Protecting Crowded Places : Design and Technical issues' 2012. As such it represents a massive potential threat to national security and the safety and well being of the immediately adjoining community in Somers Town / King's Cross - St Pancras.

8 DETAIL : HOW WILL THE PROPOSED DEVELOPMENT MAKE A BIG DIFFERENCE TO THE LIVES OF PEOPLE IN SOMERS TOWN

The proposed development represents massive and unnecessary overdevelopment inflicting unacceptable environmental and social impact upon adjoining residents and others. It would radically change the character of central Somers Town. When combined with HS2 and Crossrail 2 the whole Neighbourhood

faces a potential tsunami of construction / new development / redevelopment over the next decade and beyond . For further detail see Appendix 1

17th June 2016.









Somers Town, London
2015/2704/P

**Impact on
Local Air Quality of
Central Somers Town CIP, High Speed Two, Maria
Fidelis School Consolidation Projects and Crossrail 2
Construction Traffic Emissions**

Expert Evidence

June, 2016

Document control page

Status	Revision 1	Revision 2	Revision 3
Remarks	Draft Report for Internal Consultation	Draft Report for External Consultation	Final Report
Date	15/06/2016	18/06/2016	19/06/2016
Prepared by	Esther Lopes		
Reviewed by	Ana Grossinho	Ana Grossinho	Ana Grossinho
Signature			
Authorised by	Ana Grossinho (Director)	Ana Grossinho	Ana Grossinho
Signature			
Project number	2016/009/1506	2016/009/1506	2016/009/1506
Report number	001	002	003

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In preparing this report, Air Quality Experts Global Ltd has exercised all reasonable skill and care, taking into account the objectives and the agreed scope of works.

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Executive Summary

SCOPE

Air Quality Experts Global Ltd (AQEGlobal) were commissioned by Camden Town District Management Committee (CTDMC) to undertake an air quality assessment of the lorry traffic emissions associated with the construction period of the proposed Central Somers Town CIP development (application 2015/2704/P). The assessment considered the impact associated with the proposed development on its own and in combination with other concurrent construction phase developments, namely High Speed Two (HS2), Maria Fidelis school consolidation projects, and Crossrail 2, located in the Somers Town Ward, Camden, London.

This report presents the findings of the assessment, which addressed the potential air quality impacts during the construction phase of the proposed development resulting from heavy goods vehicle (HGV) emissions associated with the currently planned construction routes. The significance of potential impacts was estimated, and recommendations offered in relation to the current planning application.

METHODS

A quantitative assessment of construction-related impacts associated with oxides of nitrogen (NO_x) emissions from HGVs movements has been undertaken in line with professional best practise guidance, up-to-date assessment tools, and available data.

The assessment of the potential air quality impacts associated with the construction traffic of the proposed Central Somers Town CIP development was completed by AQEGlobal following Department of Environment, Food and Regional Affairs' (Defra) guidance on local air quality management (Defra, TG16) and the significance of impacts evaluated using London Councils' Air Quality and Planning Guidance (London Council's, 2007) and the UK Institute of Air Quality Management guidance (IAQM, 2015).

The main air quality pollutant of concern (nitrogen dioxide (NO₂)) in association with the construction of the Central Somers Town CIP development results from traffic emissions of HGVs circulating on the road network in the local area. Of particular concern are the construction traffic movements associated with other significant developments in the vicinity of the application site, given local congested road network associated with poor dispersion conditions due to a marked canyon street effect registered along specific roads, which may have significant adverse impacts on health of local residents, school children, hospitals, care homes, and commuters.

Detailed air quality dispersion modelling using ADMS Roads software was undertaken, taking into account the effects of additional 10, 50 and 100 Annual Average Daily Traffic (AADT) flows of HGV movements alongside the planned construction route during the demolition and construction period of the proposed development. In addition, the cumulative effect of HS2, Maria Fidelis school consolidation projects, and Crossrail 2 were also assessed, for several construction traffic scenarios using a matrix approach where additional 50, 100, 150, 200, 250, 300, 350 and 400 HGVs were deployed onto the road network during the construction phase of all the developments considered. Wherever possible, publicly available information was used to map the construction HGV routes for all the developments under scrutiny. Meteorology data were supplied by the Met Office for the Heathrow airport station, and were used in the model setup.

Local nitrogen dioxide (NO₂) annual mean levels were modelled using the London Atmospheric Emissions Inventory (LAEI) database predicted emissions as released in March 2016. The modelled results were compared with continuous monitoring data collected at continuous monitoring sites Bloomsbury (Russell Square Gardens), Euston Road (at junction with Dukes Road), Swiss Cottage (Corner of Finchley Road and College Crescent,) and Shaftesbury Avenue.

The methodology followed in this study applied current best practice, and used the most up to date tools and data released by Defra for air quality assessment undertakings.

FINDINGS

NO₂ Annual Average

Analysis of the modelled results revealed that the construction of the proposed development (Central Somers Town CIP) will result in significant changes in annual mean NO₂ concentrations at 67 of the 108 assessed receptors along the construction traffic routes with substantial adverse impacts at five locations and moderate adverse impacts at 62 locations.

In addition, analysis of the cumulative impacts of HGVs emission on public exposure associated with construction phases of significant developments concurrent to Central Somers Town CIP construction phase, indicated that there will be significant changes in annual mean NO₂ concentrations at 111 of the 108 assessed receptors along the planned construction traffic routes with substantial adverse impacts at 54 locations and moderate adverse impacts at 47 locations.

Assessment of the impact of HGVs emission on public exposure along the affected routes by the construction traffic of Central Somers Town CIP indicated that these will be local to the site, temporary in nature, long-term and of moderate to substantial adverse significance. The assessment of the cumulative impacts associated with construction traffic of Central Somers Town CIP, HS2, Maria Fidelis school consolidation projects and Crossrail 2, indicated that these will be local to the site, temporary in nature, long-term and of moderate to substantial adverse significance, exacerbating considerably the pollution levels predicted for the area.

NO₂ Hourly Average

The construction traffic emissions associated with Central Somers Town CIP in isolation and in combination with the construction of other key developments in the area are likely to also contribute to exceedences of the NO₂ hourly average limit value, which will affect commuters and children playground areas.

RECOMMENDATIONS

Based on the results presented in this assessment, it is recommended that prior to the commencement of construction works associated with the proposed development, a construction Low Emission Strategy is submitted to and approved in writing by the Local Authority. As a bare minimum, the Low Emission Strategy shall include:

- a) The requirement of non-road mobile machinery compliant with the Low Emission Zone (LEZ) engine emission standards as set out by the GLA in the Supplementary Planning Guidance: The Control of Dust and Emissions from Construction and Demolition;
- b) The requirement that all HGVs associated with the construction activities will be EURO VI compliant or above (as new emission standards are released by the European Commission);
- c) The construction routes are re-assessed to take into account the cumulative effect of HS2, Maria Fidelis school consolidation projects, and Crossrail 2 works and associated traffic diversions;
- d) Green walls are designed and implemented along the roads of the school locations affected by the construction works of the developments considered in this study;
- e) A suitable dust, PM₁₀, PM_{2.5} and NO₂ monitoring program is designed and implemented during the full length of the construction period of the proposed development. For the pollutant NO₂, diffusion tubes are to be deployed at relevant exposure location for both commuter, schools, and resident exposure locations.

In addition, the London Borough of Camden may wish to consider extending the existing GLA Focus Areas to include Eversholt Road, which will be severely impacted by the construction phases of the developments considered in this study and would benefit from concerted measures tailored to minimise emissions and safeguard human health.

In the instance the recommendations above are not fully implemented and enforced, the proposed development would not comply with European, National, regional and local air quality policy and legislation.

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Appendix A - Glossary of Terms

Appendix B - Air Quality Objectives (AQO) (NO₂) for the Protection of Human Health

Appendix C - Summary of the Traffic Data and Pollutant Emission Factors Used in the Assessment

Appendix D - Wind Rose

Appendix E – Modelled Results

1 Introduction

1.1 Objectives

- 1.1.1 Air Quality Experts Global Ltd (AQEGlobal) has been commissioned by Camden Town District Management Committee (CTDMC) to carry out an assessment of the potential air quality impacts arising from the heavy goods vehicle (HGV) movements associated with the construction phase of the proposed Central Somers Town CIP development (planning application 2015/2704/P), Camden, London, hereafter referred to as the 'Proposed Development'.
- 1.1.2 The development site (hereof referred as the 'Application Site') covers approximately 22000 m² and is located to the west of St Pancras Station (see Figure 1.1 and Figure 1.2), with the current following land uses: school, community facilities, residential units and greenspace.
- 1.1.3 The Proposed Development aims to refurbish the majority of these facilities and increase the number of residential units at the expense of green areas.
- 1.1.4 The Application Site falls within the London Borough of Camden (LBC) Air Quality Management Area (AQMA) which was declared borough wide given the extremely high levels of the pollutant nitrogen dioxide (NO₂), exceeding limit values. Figure 1.3 puts the Application Site in the context of the Greater London Authority Air Quality Focus Areas which are delineated and agreed with Camden to be tackled with measures to reduce air pollution.
- 1.1.5 The Application Site also falls in the vicinity of other significant proposed developments with construction phases likely to be concurrent with the construction of the Central Somers Town CIP development, namely High Speed Two (HS2), Maria Fidelis School consolidation projects and Crossrail. These are presented in Figure 1.4.
- 1.1.6 This report presents the findings of an assessment of the potential air quality impacts of the proposed development on local residents during its construction phase associated with nitrogen oxides (NO_x) emissions resulting from the HGVs traffic movements from the required activities. Whereas the construction phase will also have an impact on local levels of particulate matter (PM₁₀ and PM_{2.5}), given the lack of site specific traffic construction data, this study will evaluate the likely impacts on local air quality using the pollutant nitrogen dioxide (NO₂) as an indicator of the magnitude of the problem.
- 1.1.7 For NO_x emissions, the magnitude and significance of potential impacts are identified, and the measures that should be employed to remove these presented.
- 1.1.8 The potential effects of the construction of the proposed development on local air quality will be assessed using advanced dispersion modelling software (ADMS-Roads), undertaken in the context of

relevant UK and European and national air quality limit values and objectives for the protection of human health, current policy and guidance (described in Section 2).

1.1.9 A glossary of terms used is provided in Appendix A.

1.2 Air Pollution Associated with Construction Sites in Urban Areas

- 1.2.1 Construction traffic emissions associated with large development sites have the potential to significantly affect local air pollution, specially in large cities like London. Due to the urban nature of their location, the construction routes will be likely to include narrow roads and roads subject to canyon street effects, which prevent the dispersion of pollutants to the atmosphere, creating hot spot locations.
- 1.2.2 The impact of construction traffic on local roads is likely to be a particular concern for residents who live or work near the construction site routes. It is therefore important to estimate the magnitude and significance of these impacts so they can be avoided, and or minimised as far as reasonably practicable.
- 1.2.3 Construction traffic consists of the delivery of equipment and materials, and the movement of demolished and excavated materials. Along the construction route, the majority of construction traffic movements will be due to the movement of the quantities of demolished and excavated materials arising from earthworks and then due to the movement of construction materials to the Application Site.
- 1.2.4 As well as the movement of construction materials, construction traffic will include the movement of workers to and from worksites as well as the functioning of any other services related with the daily activities of the site.
- 1.2.5 In addition, general traffic diversion schemes to allow the construction activities may also contribute to the creation or exacerbation of congested roads in the local network, which usually adds considerably to the problem.
- 1.2.6 Finally, it is also extremely important to estimate the cumulative impact on local air quality of all the construction activities associated with other significant construction sites which may be already present of planned in the vicinity of the Application Site, which may have overlapping construction periods.

1.3 Air Pollution, Health and the Planning System

- 1.3.1 Scientific evidence has demonstrated that hazardous levels of air pollution pose tangible threats for human health. Nitrogen dioxide (NO₂) has been linked to adverse effects on hospital admissions for various diagnoses; decrements in lung function; lung function growth; respiratory symptoms; asthma prevalence and incidence; cancer incidence; and, birth outcomes (US EPA, 2008; WHO, 2006).
- 1.3.2 A recent report (Kings College, 2015) estimates that there were 5,900 deaths in London associated with long-term exposure to NO₂ in 2010, and 3,500 deaths associated with fine particulate matter (PM_{2.5}) that year, bringing the overall figure to just under 9,500 premature mortalities.
- 1.3.3 Recent evidence from the Committee on the Medical Effects of Air Pollutants (COMEAP) suggests that air pollution is responsible for over 50,000 early deaths in Britain each year. Long-term exposure to air pollution is estimated to cause 29,000 premature deaths due to particulate matter (PM) and 23,500 premature deaths due to NO₂, each year in the UK, at an average loss of life expectancy of 6 months. It has been estimated that removing air pollution would have a bigger impact on life expectancy in the UK than eliminating passive smoking, alcoholism and road traffic accidents combined. The economic cost from the impacts of air pollution in the UK whereas currently estimated at £9-19 billion every year, is believed to be significantly underestimated.
- 1.3.4 The effects are particularly “distressing” for people who live in urban areas where pollution spurs the development of lung and heart diseases. Population in urban areas in general, and specifically children and the elderly, as well as people with existing conditions, including asthma and cardio-vascular disease are particularly at risk.
- 1.3.5 The planning system has a key role in protecting people from unacceptable risks to their health and in providing adequate protection to the amenity value of land. Whereas these considerations must be balanced against other aims of the planning system, protecting human health is one of the priority aspects of Local Authorities’ policy.

1.4 Structure

- 1.4.1 Chapter 2 presents the legislative, policy and guidance context of the assessment undertaken. Section 3 describes the methodology followed to assess the local air quality impacts associated with the movements of HGVs during the construction period of the Proposed Development and the significance criteria applied. Section 4 presents baseline conditions in the study area and Section 5 presents the results of the modelling exercise. Finally, Section 6 presents the conclusions and recommendations of the study.

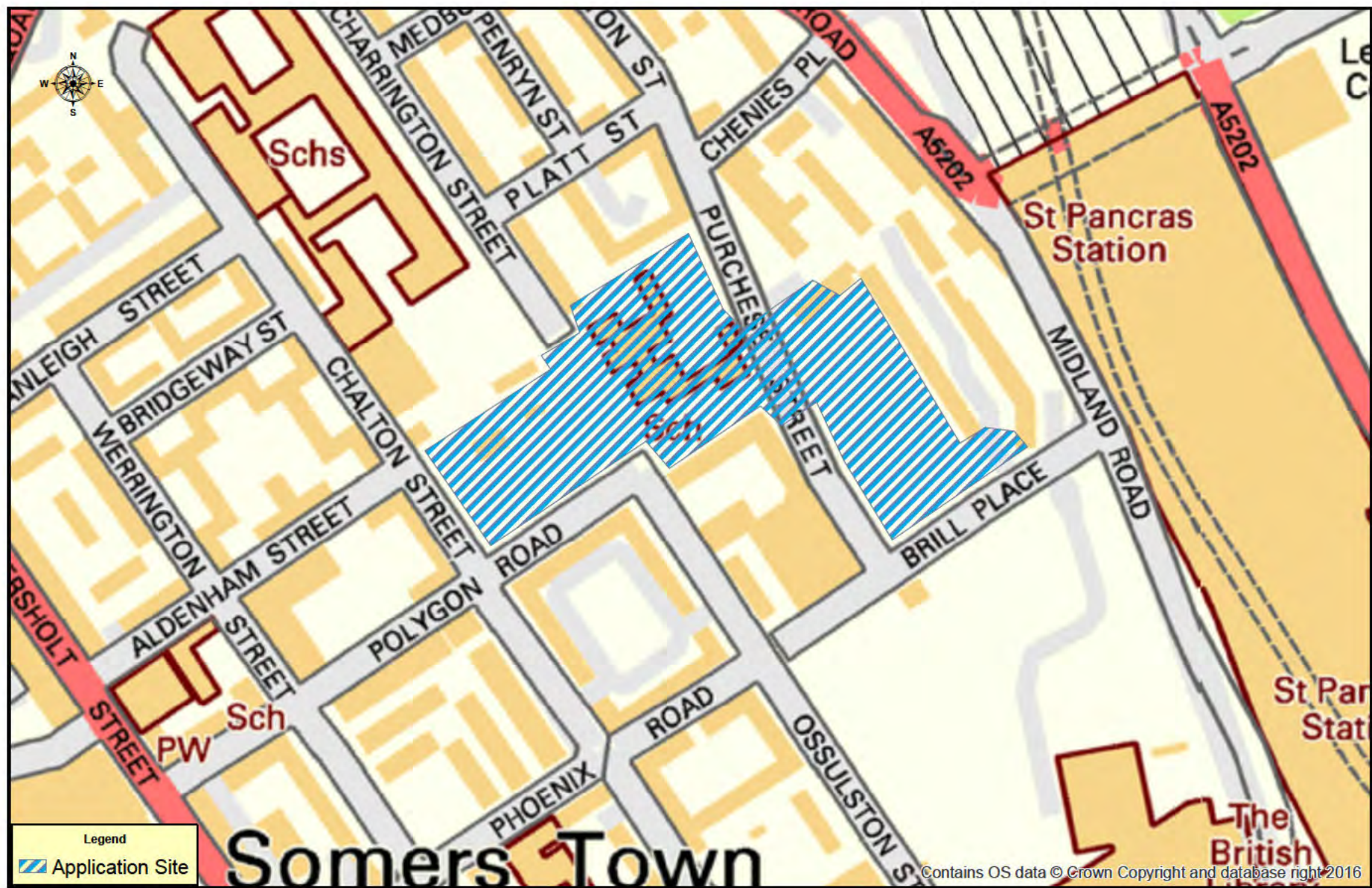
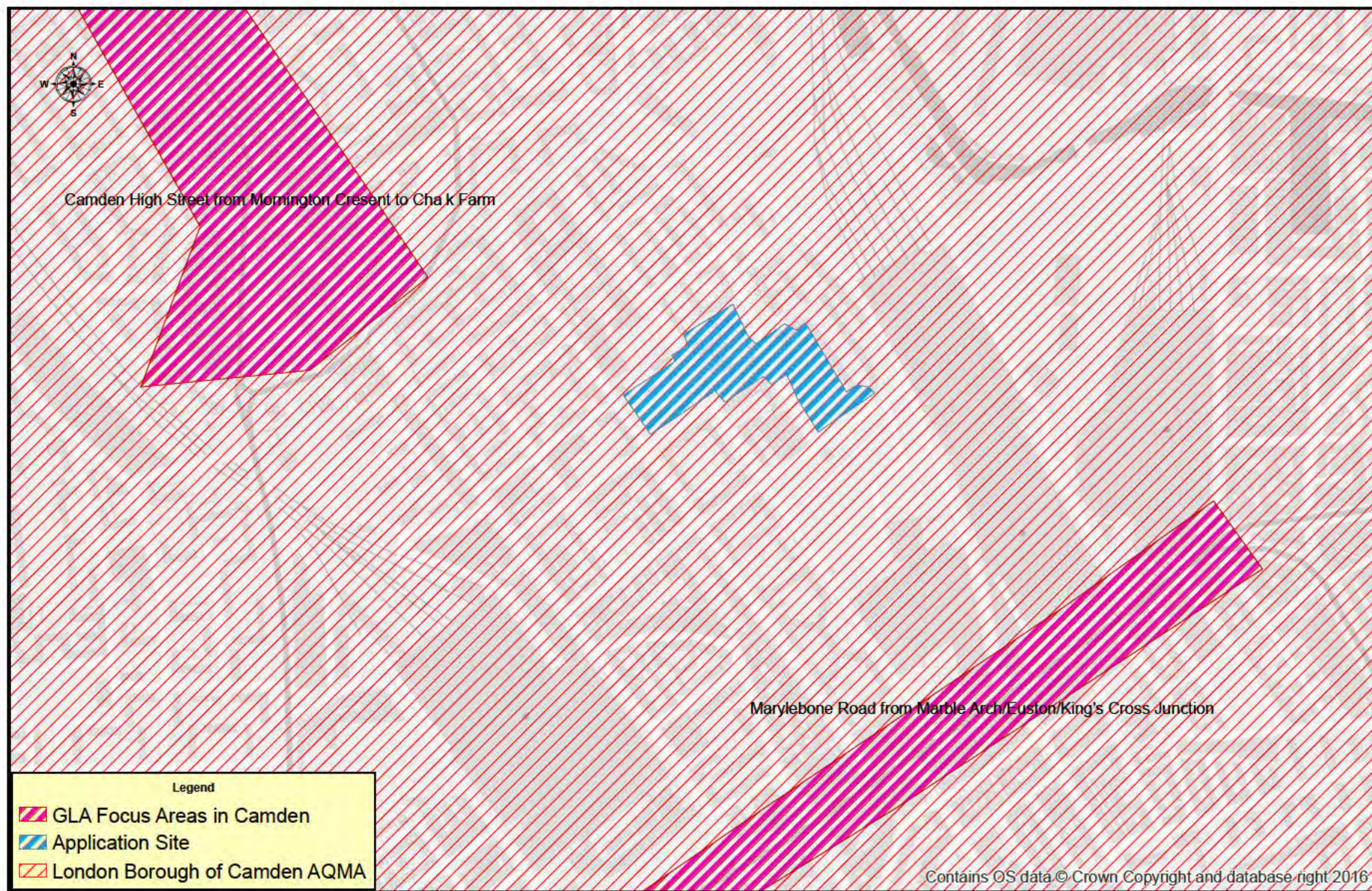


Figure 1.1 Location of the Application Site



Figure 1.2 Application Site Boundary



**Figure 1.3 Location of the Application Site
in the context of GLA and Camden Focus Areas**

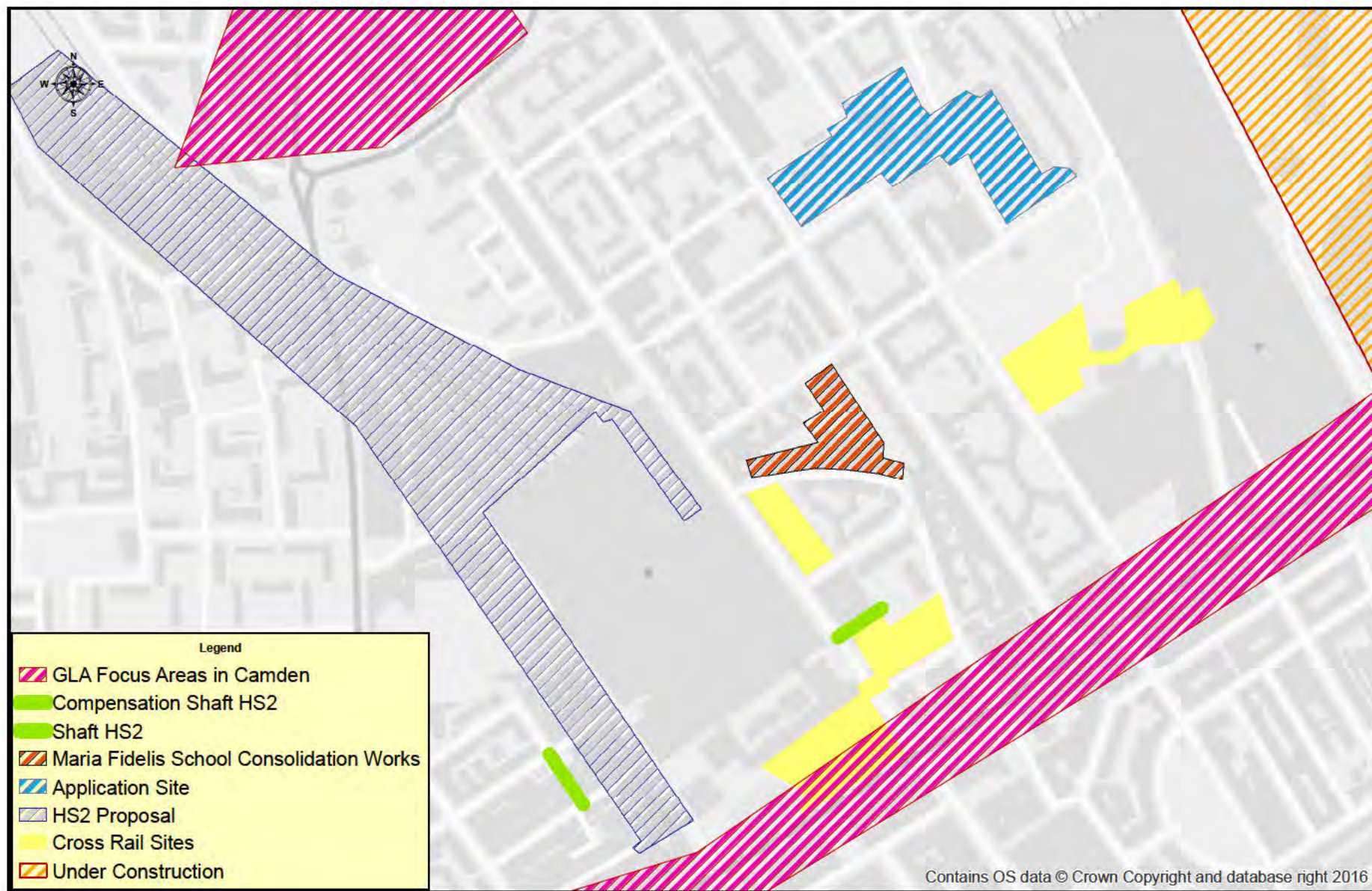


Figure 1.4 Location of other significant developments in the vicinity of the Application Site with likely concurrent construction phases

2 Statutory, Policy and Guidance Context

2.1 Legislation

The Environment Act 1995, the Air Quality Strategy, The Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002, Local Air Quality Management and Local Action Plans

2.1.1 The Environment Act 1995 established the requirement for the Government and the devolved administrations to produce a National Air Quality Strategy (AQS) for improving ambient air quality. The first UK AQS was published in 1997 and has been revised several times since, with the latest edition published in 2007.

2.1.2 The Strategy sets UK air quality standards and objectives for eight key pollutants and recognises that action at national, regional and local level may be needed, depending on the scale and nature of the air quality problem. There is no legal requirement to meet objectives set within the UK AQS except where equivalent limit values are set within the EU Directives and associated transpositions.

2.1.3 The air quality standards are concentration limits which represent negligible or zero risk to health, based on medical and scientific evidence reviewed by the Expert Panel on Air Quality Standards (EPAQS) and the World Health Organisation (WHO). Above these limits sensitive members of the public (e.g. children, the elderly and the unwell) might experience adverse health effects.

2.1.4 The objectives set out the extent to which the UK Government and EU expect the standards to be achieved by a certain date and maintained thereafter. They take account of the costs, benefits, feasibility and practicality of achieving the standards. Air Quality Objectives (AQO) which are relevant to the current study (NO₂) for the protection of human health are outlined in Appendix B.

2.1.5 Many of the objectives in the AQS have been made statutory in England with the Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002 for the purpose of Local Air Quality Management (LAQM). These set a series of air quality standards and air quality objectives with the aim of protecting human health.

2.1.6 The Regulations require that likely exceedences of Air Quality Objectives are assessed in relation to:

“...the quality of the air at locations which are situated outside of buildings or other natural or man-made structures, above or below ground, and where members of the public are regularly present...”
(Stationery Office, 2000 and 2002)

2.1.7 The AQO apply only where members of the public are likely to be regularly present for the averaging time of the objectives (i.e. where people will be exposed to pollutants). The annual mean objectives apply to all locations where members of the public might be regularly exposed; these include building

façades of residential properties, schools, hospitals, care homes etc. The 24 Hour Mean Objectives apply to all locations where the annual mean objective would apply, together with hotels and gardens of residential properties. The 1 Hour Mean Objectives also apply at these locations as well as at any outdoor location where a member of the public might reasonably be expected to stay for 1 hour or more, such as shopping streets, parks and sports grounds, as well as bus stations and railway stations that are not fully enclosed.

2.1.8 These periods reflect the varying effects on health of differing exposures to pollutants, for example temporary exposure on the pavement adjacent to a busy road, compared with the exposure of residential properties adjacent to a road.

2.1.9 The 1995 Environment Act also established the UK system of Local Air Quality Management (LAQM), that requires local authorities go through a process of review and assessment of air quality in their areas of jurisdiction, identifying places where objectives are not likely to be met.

2.1.10 Where any of the prescribed objectives are not achieved within any part of a local authority's area, the authority concerned will have to designate that part of its area as an Air Quality Management Area (AQMA) (section 83(1) of the 1995 Act). An action plan covering the designated area will then have to be prepared setting out how the authority intends to exercise its powers in relation to the designated area in pursuit of the achievement of the prescribed objectives (section 84(2) of the 1995 Act).

2.1.11 Draft Camden Local Plan 2015 - The Camden Local Plan 2015 will replace the Council's current Core Strategy and Development Policies (adopted in 2010). The Local Plan will cover the period from 2016-2031 and has the following policies in regards to air quality:

- a) *Policy CC2 Adapting to Climate Change – London Borough of Camden (LBC) will require developments to be resilient to climate change, ensuring that schemes include appropriate climate change adaptation measures and promote sustainable design and construction to reduce potential impacts on air quality.*
- b) *Policy CC4 Air Quality – LBC will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of a development on air quality. Consideration must be taken to the actions identified in the Council's AQAP.*
- c) *Policy T1 Prioritising walking, cycling and public transport – LBC will promote sustainable transport by prioritising walking and cycling and public transport in the borough, with the aim of relieving transport congestion, deteriorating air quality and emissions, particularly in the context of a growing population. The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of*

occupants to air pollution and the effect of a development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan. Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless mitigation measures are adopted to reduce the impact to acceptable levels. Similarly, developments in locations of poor air quality will not be acceptable unless designed to mitigate the impact to within acceptable limits. Development which involves significant demolition, construction or earthworks will also be required to assess the risk of impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan. The Council will only grant planning permission for development in Camden's Clear Zone region that significantly increases travel demand where it considers that appropriate measures to minimise the transport impact of development are incorporated.

2.1.12 These plans contribute, at local level, to the achievement of 2008/50/EC limit values.

Air Quality Directive 2008/50/EC

2.1.13 The Air Quality Directive 2008/50/EC came into force on the 11th June 2008. It sets air quality limit values, target values, and critical levels for a number of air pollutants established by the European Parliament and Council for the protection of human health, vegetation and ecosystems. These are sulphur dioxide (SO₂), nitrogen dioxide (NO₂), oxides of nitrogen (NO_x), particulate matter smaller than 10µm in aerodynamic diameter (PM₁₀ and PM_{2.5}), lead (Pb), benzene (C₆H₆), carbon monoxide (CO) and ozone (O₃). These have been transposed into UK legislation by the 2010 Regulations.

2.1.14 It also sets new standards and target dates for reducing concentrations of fine particles. Under the Directive Member States (MS) are required to reduce exposure to PM_{2.5} in urban areas by an average of 20% by 2020 based on 2010 levels. The magnitude of the required reduction depends on national average concentrations between 2009 and 2011. For the UK, from the 47 PM_{2.5} stations used in a study by DEFRA in 2011, it is likely that average PM_{2.5} concentrations for 2009-2011 will be between 13-14µg/m³. This would require the UK to comply with a 15% reduction target for 2020, equating to a required reduction in average concentrations of around 2.0µg/m³. The directive also obliges MS to meet a Limit Value of 25µg/m³ by 2015 and a Limit Value of 20µg/m³ by 2020.

2010 Regulations

2.1.15 These Regulations transpose 2008/50/EC into the UK legislation and also incorporate the 4th air quality daughter directive (2004/107/EC) that sets targets for levels in outdoor air of certain toxic heavy metals

(Arsenic (Ar), Cadmium (Cd), Nickel (Ni), Mercury (Hg)), Benzo(a)pyrene and other polycyclic aromatic hydrocarbons (PAHs).

2.2 Policy

National Policies

NPPF

2.2.1 The National Planning Policy Framework (NPPF) was published in March 2012. This sets out the Government's planning policies for England and how they are expected to be applied. In relation to conserving and enhancing the natural environment, paragraph 109 states that:

"The planning system should contribute to and enhance the natural and local environment by.... preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability."

2.2.2 Paragraph 124, also states that:

"Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan."

2.2.3 Paragraph 203 goes on to say:

"Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition."

2.2.4 National Planning Practice Guidance (NPPG) was published in March 2014 to support the NPPF. Paragraph 001, Reference 32-001-20 of the NPPG provides a summary as to why air quality is a consideration for planning:

"...Defra carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with EU Limit Values. It is important that the potential impact of new development on air quality is taken into account in planning where the national assessment indicates that relevant limits have been exceeded or are near the limit....The local air quality management (LAQM) regime requires every district and unitary authority to regularly review and assess air quality in their area. These reviews identify whether national objectives have been, or will be, achieved at relevant locations, by an

applicable date....If national objectives are not met, or at risk of not being met, the local authority concerned must declare an air quality management area and prepare an air quality action plan.....Air quality can also affect biodiversity and may therefore impact on our international obligations under the Habitats Directive.....Odour and dust can also be a planning concern, for example, because of the effect on local amenity.”

2.2.5 Paragraph 002, Reference 32-002-20140306, of the NPPG concerns the role of Local Plans with regard to air quality:

“....Drawing on the review of air quality carried out for the local air quality management regime, the Local Plan may need to consider:

- d) the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments;*
- e) the impact of point sources of air pollution...; and ways in which new development would be appropriate in locations where air quality is or likely to be a concern and not give rise to unacceptable risks from pollution. This could be through, for example, identifying measures for offsetting the impact on air quality arising from new development including supporting measures in an air quality action plan or low emissions strategy where applicable.”*

2.2.6 Paragraph 005, Reference 32-005-20140306, of the NPPG identifies when air quality could be relevant for a planning decision:

“...When deciding whether air quality is relevant to a planning application, considerations could include whether the development would:

- a) Significantly affect traffic in the immediate vicinity of the proposed development site or further afield. This could be by generating or increasing traffic congestion; significantly changing traffic volumes, vehicle speed or both; or significantly altering the traffic composition on local roads. Other matters to consider include whether the proposal involves the development of a bus station, coach or lorry park; adds to turnover in a large car park; or result in construction sites that would generate large Heavy Goods Vehicle flows over a period of a year or more.*
- b) Introduce new point sources of air pollution. This could include furnaces which require prior notification to local authorities; or extraction systems (including chimneys) which require approval under pollution control legislation or biomass boilers or biomass-fuelled CHP plant; centralised boilers or CHP plant burning other fuels within or close to an air quality management area or introduce relevant combustion within a Smoke Control Area;*

- c) *Expose people to existing sources of air pollutants. This could be by building new homes, workplaces or other development in places with poor air quality.*
- d) *Give rise to potentially unacceptable impact (such as dust) during construction for nearby sensitive locations.*
- e) *Affect biodiversity. In particular, is it likely to result in deposition or concentration of pollutants that significantly affect a European-designated wildlife site, and is not directly connected with or necessary to the management of the site, or does it otherwise affect biodiversity, particularly designated wildlife sites.”*

2.2.7 Paragraph 007, Reference 32-007-20140306, of the NPPG provides guidance on how detailed an assessment needs to be:

“Assessments should be proportionate to the nature and scale of development proposed and the level of concern about air quality, and because of this are likely to be locationally specific.”

2.2.8 Paragraph 008, Reference 32-008-20140306, of the NPPG provides guidance on how an impact on air quality can be mitigated:

“Mitigation options where necessary will be locationally specific, will depend on the proposed development and should be proportionate to the likely impact....Examples of mitigation include:

- a) *the design and layout of development to increase separation distances from sources of air pollution;*
- b) *using green infrastructure, in particular trees, to absorb dust and other pollutants;*
- c) *means of ventilation;*
- d) *promoting infrastructure to promote modes of transport with low impact on air quality;*
- e) *controlling dust and emissions from construction, operation and demolition; and*
- f) *contributing funding to measures, including those identified in air quality action plans and low emission strategies, designed to offset the impact on air quality arising from new development.”*

2.2.9 2.3.9 Paragraph 009, Reference 32-009-20140306, of the NPPG provides guidance on how considerations about air quality fit into the development management process by means of a flowchart. The final two stages in the process deal with the results of the assessment:

“Will the proposed development (including mitigation) lead to an unacceptable risk from air pollution, prevent sustained compliance with EU limit values or national objectives for pollutants or fail to comply with the requirements of the Habitats Regulations.” If Yes:

“Consider how proposal could be amended to make it acceptable or, where not practicable, consider whether planning permission should be refused.”

Regional Policies

The London Plan

2.2.10 The London Plan (GLA, 2015) sets out the spatial development strategy for London consolidated with alterations made to the original plan since 2011. It brings together all relevant strategies, including those relating to air quality.

2.2.11 Policy 7.14, ‘Improving Air Quality’, addresses the spatial implications of the Mayor’s Air Quality Strategy and how development and land use can help achieve its objectives. It recognises that Boroughs should have policies in place to reduce pollutant concentrations, having regard to the Mayor’s Air Quality Strategy.

2.2.12 Policy 7.14B(c), requires that development proposals should be “at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as designated Air Quality Management Areas (AQMAs)).

The Mayor’s Air Quality Strategy

2.2.13 The revised Mayor’s Air Quality Strategy (MAQS) was published in December 2010 (GLA, 2010). The overarching aim of the Strategy is to reduce pollution concentrations in London to achieve compliance with the EU limit values as soon as possible. The Strategy commits to the continuation of measures identified in the 2002 MAQS, and sets out a series of additional measures including a Low Emission Zone.

2.2.14 The MAQS also addresses the issue of ‘air quality neutral’ and states that “GLA will work with boroughs to assist in the development of methodologies that will allow an accurate assessment of the impacts of the emissions of new developments” (Para 5.3.19).

GLA SPG: Sustainable Design and Construction

2.2.15 The GLA's SPG on Sustainable Design and Construction (GLA, 2014a) provides details on delivering some of the priorities in the London Plan. Section 4.3 covers Air Pollution. It defines when developers will be required to submit an air quality assessment, explains how location and transport measures can minimise emissions to air. It also sets out, for the first time, guidance on how Policy 7.14B(c) of the London Plan relating to 'air quality neutral' should be implemented.

GLA SPG: The Control of Dust and Emissions During Construction and Demolition

2.2.16 The GLA's SPG on The Control of Dust and Emissions During Construction and Demolition (GLA, 2014b) outlines a risk assessment based approach to considering the potential for dust generation from a construction site, and sets out what mitigation measures should be implemented to minimise the risk of construction dust impacts, dependent on the outcomes of the risk assessment. This guidance is largely based on the Institute of Air Quality Management's (IAQM) 2014 guidance on the Assessment of dust from demolition and construction (Institute of Air Quality Management, 2014), and it states that "the latest version of the IAQM Guidance should be used".

Local Policies

Camden Development Policies 2010-2025

2.2.17 Camden Development Policies highlight the need to promote higher standards of air quality within the borough. It is recognised that parts of Camden have some of the poorest air quality levels in London and consequently the whole of the borough has been declared an Air Quality Management Area. The Council has produced an Air Quality Action Plan that identifies actions and mitigating measures necessary to improve air quality in the borough.

2.2.18 A key challenge therefore is to make Camden local environment better by reducing air pollution. This underpins many of the Core Strategy policies, including CS9 – Achieving a successful Central London, CS11 – Promoting sustainable and efficient travel, CS13 – Tackling climate change through promoting higher environmental standards and CS16 – Improving Camden's health and well-being.

2.2.19 The designation of Central London as a Clear Zone region is a key way to reduce congestion and promote walking and cycling as a way of improving the borough's air quality.

2.2.20 DP32 policy states that

“The Council will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality”.

“The Council will also only grant planning permission for development in the Clear Zone region that significantly increases travel demand where it considers that appropriate measures to minimise the transport impact of development are incorporated. We will use planning conditions and legal agreements to secure Clear Zone measures to avoid, remedy or mitigate the impacts of development schemes in the Central London Area”.

2.3 Guidance

2.3.1 The following guidance documents and publications have been used in this assessment:

Local Air Quality Management Review and Assessment Technical Guidance LAQM.TG(09) (DEFRA, February 2009)

2.3.2 The Department for Environment, Food and Rural Affairs (DEFRA) has published technical guidance for use by local authorities in their review and assessment work. This guidance, referred to in this document as LAQM.TG(09), has been used where appropriate in the assessment presented herein. This guidance contains a table (Box 1.4) providing examples of where the air quality objectives should/should not apply.

Local Air Quality Management Review and Assessment Policy Guidance LAQM.PG(09) (DEFRA, February 2009)

2.3.3 This Policy Guidance is principally for local authorities in England to have regard to in carrying out their local air quality management under Part IV of the Environment Act 1995. The Environment Act 1995 introduced the Local Air Quality Management (LAQM) process to deal with localised ‘hotspots’ of poor air quality. A principle of LAQM is for local authorities to integrate air quality considerations with other policy areas, such as planning. LAQM.PG(09) states that ‘any consideration of the quality of land, air or water and potential impacts arising from development, possible leading to impacts on health, is a material planning consideration where it arises from or affects land use.

Land-Use Planning & Development Control: Planning For Air Quality, April 2015

2.3.4 There is no official guidance in the UK on how to describe air quality impacts, nor how to assess their significance. The approach developed jointly by Environmental Protection UK (EPUK) and the Institute

of Air Quality Management (IAQM) (EPUK & IAQM, 2015) has therefore been used. This includes defining descriptors of the impacts at individual receptors, which take account of the percentage change in concentrations relative to the relevant air quality objective, rounded to the nearest whole number, and the absolute concentration relative to the objective.

2.3.5 The overall significance of the air quality impacts is determined using professional judgement, taking account of the impact descriptors. Full details of the EPUK/IAQM approach are provided in Section 3.

Institute of Air Quality Management: Guidance on the Assessment of Dust from Demolition and Construction (February 2014)

2.3.6 This document was produced to provide guidance to developers, consultants and environmental health practitioners on how to undertake a construction impact assessment. The emphasis of the guidance is on classifying the risk of dust impacts from a site which then allow mitigation measures commensurate with that risk to be identified.

London Councils' Air Quality and Planning Guidance (January 2007)

2.3.7 The London Councils have published guidance for undertaking air quality assessments in the London Boroughs, the majority of which have declared AQMAs. The guidance sets out suggested methods for undertaking such an assessment within the London area and provides a methodology to assist in determining the impacts of a development proposal on air quality. The main message of the document is that the factor of greatest importance will generally be the difference in air quality as a result of the proposed redevelopment.

3 Methodology

3.1 Scope

3.1.1 The scope of the assessment has been determined in the following way:

- a) Desk review of the air quality assessment report submitted to support the Central Somers Town CIP planning application (2015/2704/P);
- b) Desk review of the transport assessment report submitted to support the Central Somers Town CIP planning application;
- c) Desk Review of the Central Somers Town Construction Management Plan;
- d) Desk review of the HS2 Environmental Statement for the study area;
- e) Desk review of available information regarding construction traffic flows and routes for HS2, Maria Fidelis School consolidation projects and Crossrail 2;
- f) Review of air quality data for the area surrounding the site, including data from Camden, DEFRA¹ and the London Air websites²;
- g) Desk study to confirm the location of nearby relevant receptors that may be sensitive to changes in local air quality;
- h) Review of the of the London Atmospheric Emissions Inventory (LAEI) database for the modelled concentrations of NO₂ in 2013 and 2014 in the study area;
- i) Analysis of the available construction traffic plans associated with the Proposed Development; and,
- j) Analysis of alternative routes that would minimise the impacts of HGVs on local residents due to construction traffic movements.

3.1.2 The agreed scope of the current assessment is detailed below. It includes the assessment of the effects resulting from increases in pollutant concentrations (namely NO₂) as a result of exhaust emissions arising from construction traffic on local air quality at existing public exposure sensitive locations.

3.1.3 Traffic associated with the works for site preparation, earthworks and construction activities of the proposed development will contribute to traffic levels on the surrounding road network. The greatest potential for effects on air quality from traffic associated with these activities will be in the areas immediately adjacent to the principal means of site access for construction traffic and along the construction routes..

¹ <http://laqm.defra.gov.uk/>

² <http://www.londonair.org.uk/london/asp/datadownload.asp>

3.2 Methods

Model set up

- 3.2.1 The traffic generated by the construction of the proposed development is likely to have an effect on local air quality concentrations, around the application site and along the planned construction routes. The main pollutants of concern for road traffic are generally considered to be NO₂, PM₁₀, carbon monoxide (CO) and Benzene (C₆H₆). Of these pollutants, emissions of NO_x are most likely to result in exceedences of the relevant air quality standards or objectives in urban areas. This air quality assessment will therefore only consider this pollutant.
- 3.2.2 A summary of the traffic data and pollutant emission factors used in the assessment can be found in Appendix C. It includes details of HGV Annual Average Daily Traffic flows (AADT) considered and vehicle speeds (kph) for the local road network during the construction of the Proposed Development.
- 3.2.3 The air pollutant dispersion model ADMS Roads has been used to predict the effect of emissions arising from the construction HGVs on the surrounding environment. ADMS is an advanced dispersion model for calculating concentrations of pollutants emitted from point, line, volume and area sources and is approved by the Department of Environment, Food, and Regional Affairs (DEFRA) as an acceptable dispersion model in regulatory and planning applications.
- 3.2.4 This model uses detailed information regarding traffic emissions and local meteorological conditions to predict pollution concentrations at specific locations selected by the user. Meteorological data, such as wind speed and direction, are used by the model to determine pollutant transportation and levels of dilution by the wind. Meteorological data used for ADMS-Roads were obtained from the Met Office observing station at Heathrow airport. This station is considered to provide data representative of the conditions at the application site. Analysis of the last ten years of meteorological data was undertaken to select the worst-case scenario in terms of dispersal conditions. The meteorological data used for this assessment were from 2010 which is considered a conservative year. A wind rose is provided in Appendix D.
- 3.2.5 Emissions were calculated using the most recently released Emission Factor Toolkit (EFT) v6.0.2, which utilises NO_x emission factors taken from the European Environment Agency COPERT 4 (v10) emission tool. The traffic data were entered into the EFT, along with speed data to provide combined emission rates for each of the road links entered into the model. In order to provide a worst-case assessment, and to remove uncertainty relating to future year vehicle emission factors, 2015 traffic data have been combined with 2013 emissions and background concentrations.
- 3.2.6 Given the lack of detail in regards to construction traffic data, a matrix of possible HGV traffic flow combinations was built to estimate a range of potential impacts across the study area. Therefore the

dispersion modelling undertaken considered several scenarios, taking into account the effects of additional 10, 50 and 100 Annual Average Daily Traffic (AADT) flows of HGV movements alongside the planned construction route during the demolition and construction period of the proposed development. In addition, the cumulative effect of HS2, Maria Fidelis school consolidation projects, and Crossrail 2 were also assessed, for several construction traffic scenarios using the same matrix approach where additional 50, 100, 150, 200, 250, 300, 350 and 400 HGvs were deployed onto the road network along each respective construction during the construction phase of all the developments considered. Wherever possible, publicly available information was used to map the construction HGV routes for all the developments under scrutiny.

Monitoring and Modelling data

3.2.7 Local nitrogen dioxide (NO₂) annual mean levels were modelled using the London Atmospheric Emissions Inventory (LAEI) database predicted emissions for 2013 and 2014. The modelled results were compared with continuous monitoring data collected at the monitoring sites Bloomsbury (Russell Square Gardens), Euston Road (at junction with Dukes Road), Swiss Cottage (Corner of Finchley Road and College Crescent), and Shaftsbury Avenue.

Significance Criteria

3.2.8 The impacts of the construction of the proposed development on local air quality have been evaluated against the significance criteria published by IAQM/EPUK, taking into account the London Council's Planning Guidance.

3.2.9 The approach to determining the sensitivity for air quality assessments outlined in the IAQM EPUK guidance considers the change in pollutant concentration (magnitude of impact) and the overall pollutant concentrations in the area when compared to the relevant standard. There is no distinction in the sensitivity of different human receptors to air quality. Guidance provided by the IAQM recommends that all population exposure receptors i.e. dwellings, hospitals or schools should all be considered to be of equal sensitivity to air pollution.

3.2.10 The magnitude of impact is determined quantitatively by establishing the change in pollutant concentration at each receptor as predicted by the detailed modelling. The definitions for the magnitude of impact categories for each pollutant are defined by the size of the change in pollutant concentration in relation to the objective level and are presented in Table 3.1.

Table 3.1 - Significance of Effects Matrix

Long-Term average concentration at receptor In assessment year	%Change in concentration relative to Air Quality Assessment Level (AQAL)			
	1	2-5	6-10	>10
75% or less of AQAL	Negligible	Negligible	Slight	Moderate
76-94% or less of AQAL	Negligible	Slight	Moderate	Moderate
95-102% or less of AQAL	Slight	Moderate	Moderate	Substantial
103-109% or less of AQAL	Moderate	Moderate	Substantial	Substantial
110% or more of AQAL	Moderate	Substantial	Substantial	Substantial

1. AQAL = Air Quality Assessment Level, which refers the EU limit in this instance.

2. The Table is intended to be used by rounding the change in percentage pollutant concentration to whole numbers, which then makes it clearer which cell the impact falls within. The user is encouraged to treat the numbers with recognition of their likely accuracy and not assume a false level of precision. Changes of 0%, i.e. less than 0.5% will be described as Negligible.

3. The Table is only designed to be used with annual mean concentrations.

4. Descriptors for individual receptors only; the overall significance is determined using professional judgement. For example, a 'moderate' adverse impact at one receptor may not mean that the overall impact has a significant effect. Other factors need to be considered.

5. When defining the concentration as a percentage of the AQAL, use the 'without scheme' concentration where there is a decrease in pollutant concentration and the 'with scheme,' concentration for an increase.

6. The total concentration categories reflect the degree of potential harm by reference to the AQAL value. At exposure less than 75% of this value, i.e. well below, the degree of harm is likely to be small. As the exposure approaches and exceeds the AQAL, the degree of harm increases. This change naturally becomes more important when the result is an exposure that is approximately equal to, or greater than the AQAL.

7. It is unwise to ascribe too much accuracy to incremental changes or background concentrations, and this is especially important when total concentrations are close to the AQAL. For a given year in the future, it is impossible to define the new total concentration without recognising the inherent uncertainty, which is why there is a category that has a range around the AQAL, rather than being exactly equal to it.

3.2.11 In determining both the significance of exposure to air pollution and the levels of mitigation required, consideration was also given to the Air Pollution Exposure Criteria (APEC) given in Table 3.2. The results of the significance assessment are presented using $38\mu\text{g}/\text{m}^3$ as the value above which air quality becomes a material consideration.

Table 3.2 - London Councils Air Pollution Exposure Criteria

APEC Level	Applicable Range Annual average NO ₂	Applicable Range PM ₁₀	Recommendation
A	> 5% below national objective	Annual Mean > 5% below national objective 24 hour mean > 1 day less than the national objective	No air quality grounds for refusal; however mitigation of any emissions should be considered.
B	Between 5% below or above national objective	Annual Mean Between 5% below or above national objective 24 hour mean Between 1 day above or below the national objective	May not be sufficient air quality grounds for refusal, however appropriate mitigation must be considered e.g., maximise distance from pollution source, proven ventilation systems, parking considerations, winter gardens, internal layout considered and internal pollutant emissions minimised.
C	> 5% above national objective	Annual Mean > 5% above national objective 24 hour mean > 1 day more than the national objective	Refusal on air quality grounds should be anticipated, unless the Local Authority has a specific policy enabling such land use and ensure best endeavours to reduce exposure are incorporated. Worker exposure in commercial/industrial land uses should be considered further. Mitigation measures must be presented with air quality assessment, detailing anticipated outcomes of mitigation measures.

3.2.12 LAQM.TG(16) does not provide a method for the conversion of annual mean NO₂ concentrations to 1 hour mean NO₂ concentrations. However, research carried out in 2003 (Laxen & Marner, 2013), determined that exceedences of the 1 hour mean objective were unlikely to occur where annual mean concentrations were below 60µg/m³. Further research carried out in 2008 (Cook, 2008) generally supported this relationship and as a result this criterion has been adopted in the current assessment.

Selection of Sensitive Receptors

3.2.13 Sensitive locations are those where the public may be exposed to pollutants from the proposed development. These will include locations sensitive to an increase in dust deposition as a result of on-site construction activities, or exposure to gaseous pollutants from exhaust emissions from construction site traffic.

3.2.14 In terms of locations that are sensitive to gaseous pollutants emitted from engine exhausts, these will include places where sensitive members of the public are likely to be regularly present and are likely to

be exposed to air pollution over the relevant period of time prescribed in current legislation and in the UK Air Quality Objectives (AQO) specified in the UK Air Quality Strategy (AQS). Examples of areas representative of public exposure in terms of sensitivity to NO₂ resulting from exhaust emissions from construction site traffic, over the relevant averaging periods for these pollutants, are shown in Table 3.3.

3.2.15 A number of locations were selected to represent relevant public exposure receptors at which pollution concentrations were predicted. The locations of the assessment receptors are shown in Figure 3.1. They include locations adjacent or near to the construction routes that are likely to experience the greatest change in traffic volume as a result of the construction phase of the Proposed Development and the construction of HS2 components, Maria Fidelis school consolidation projects, and Crossrail 2. The receptors locations selected include receptors modelled in the HS2 Environmental Statement. The routes where the construction phase of HS2 is predicted to produce moderate and substantial adverse impacts on public exposure are highlighted in Figure 3.1.

3.2.16 The relevant receptors were selected from Ordnance Survey (OS) Address Layer Two and moved to represent the location of the façade of the building they would represent, which was the nearest to the road sources modelled.

Table 3.3 - Examples of Relevant Public Exposure Sensitive Locations

Averaging Period	Relevant Public Exposure Locations
Annual mean	All locations where members of the public might be regularly exposed. Building facades of residential properties, schools, hospitals, care homes etc.
24-hour mean	All locations where the annual mean objective would apply, together with hotels. Gardens of residential properties.
1-hour mean	All locations where the annual mean and 24 -hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets) Those parts of car parks, bus stations and railway stations etc. which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more. Any outdoor locations where members of the public might reasonably expected to spend one hour or longer.

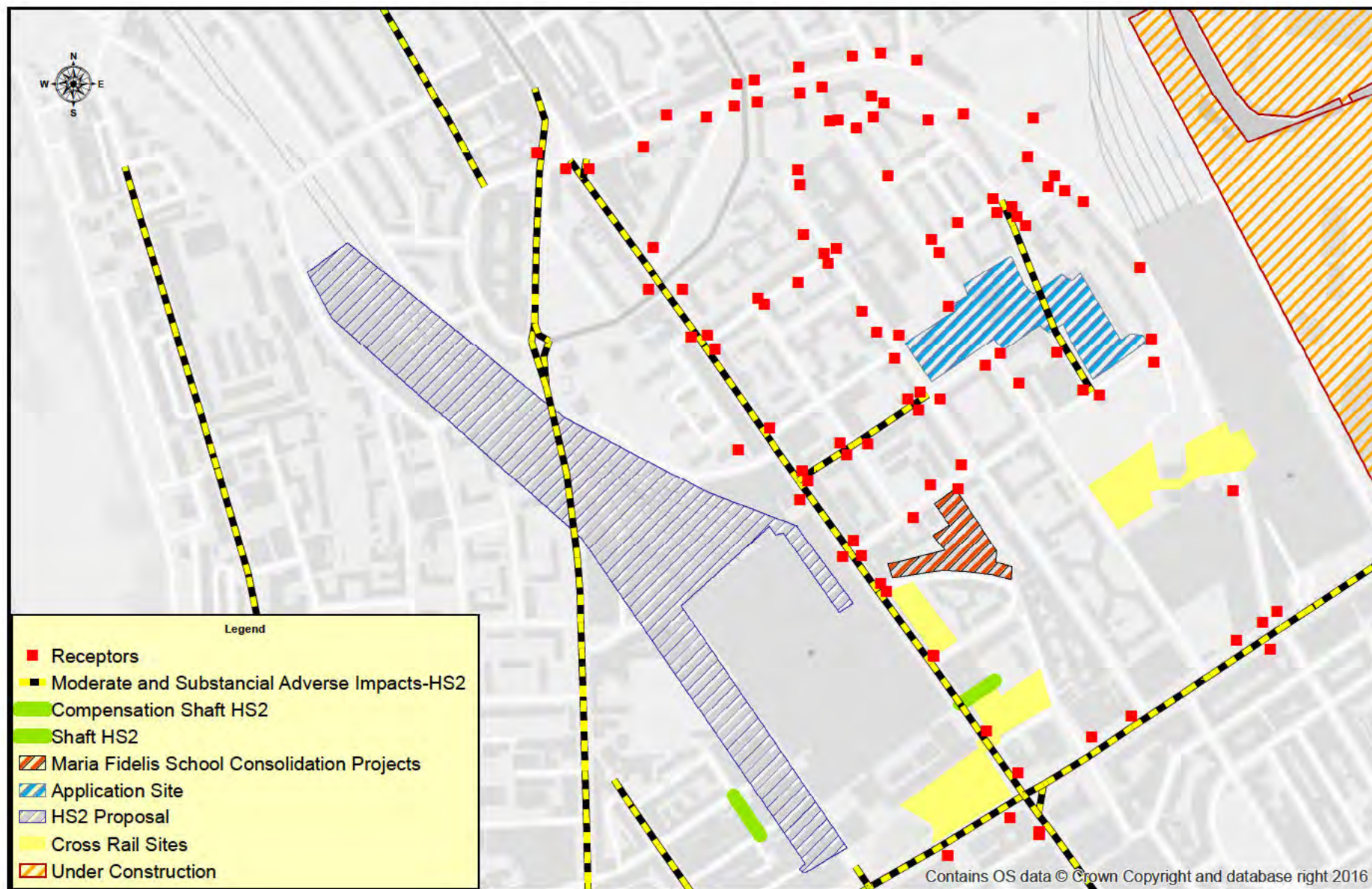


Figure 3.1 Location of Receptors Modelled

4 Baseline Conditions

4.1 Continuous Monitoring Data

4.1.1 Table 4.1 presents the monitored and modelled results at each monitoring location considered for 2013 and 2014. Whereas it is observed a reasonable improvement in annual mean monitored concentrations of NO₂ from 2013 to 2014 at Euston Road and Shaftesbury Avenue continuous monitoring stations, the NO₂ annual mean limit value to protect human health is exceeded both years at all locations.

Table 4.1 – Monitored and modelled NO₂ annual mean values at each monitoring station (2013, 2014)

Station	Type	Annual Mean Concentration – NO ₂ (µg/m ³)		
		Monitored (2013)	Monitored (2014)	Modelled (2013/2014)
Corner of Finchley Road and College Crescent, Swiss Cottage	Kerbside	63.0	66.0	61.7
Euston Road at junction with Dukes Road	Roadside	106.0	98.0	69.6
Shaftesbury Avenue	Roadside	74.0	69.0	85.9
Russell Square Gardens, London Bloomsbury	Urban Background	44.0	45.0	46.6

4.2 Modelling Data

4.2.1 Figures 4.1 and 4.2 present the LAEI annual mean NO₂ modelled results across the study area for 2013. Modelling results indicate the study area is predicted to be above the annual mean limit value for this pollutant in 2013. Dispersion modelling results using 2014 emissions indicate very similar results to the LAEI 2013 concentrations, which is just one year apart of the baseline year considered in the air quality assessment under scrutiny. Figure 4.3 presents monitoring data and Defra mapped background concentrations.

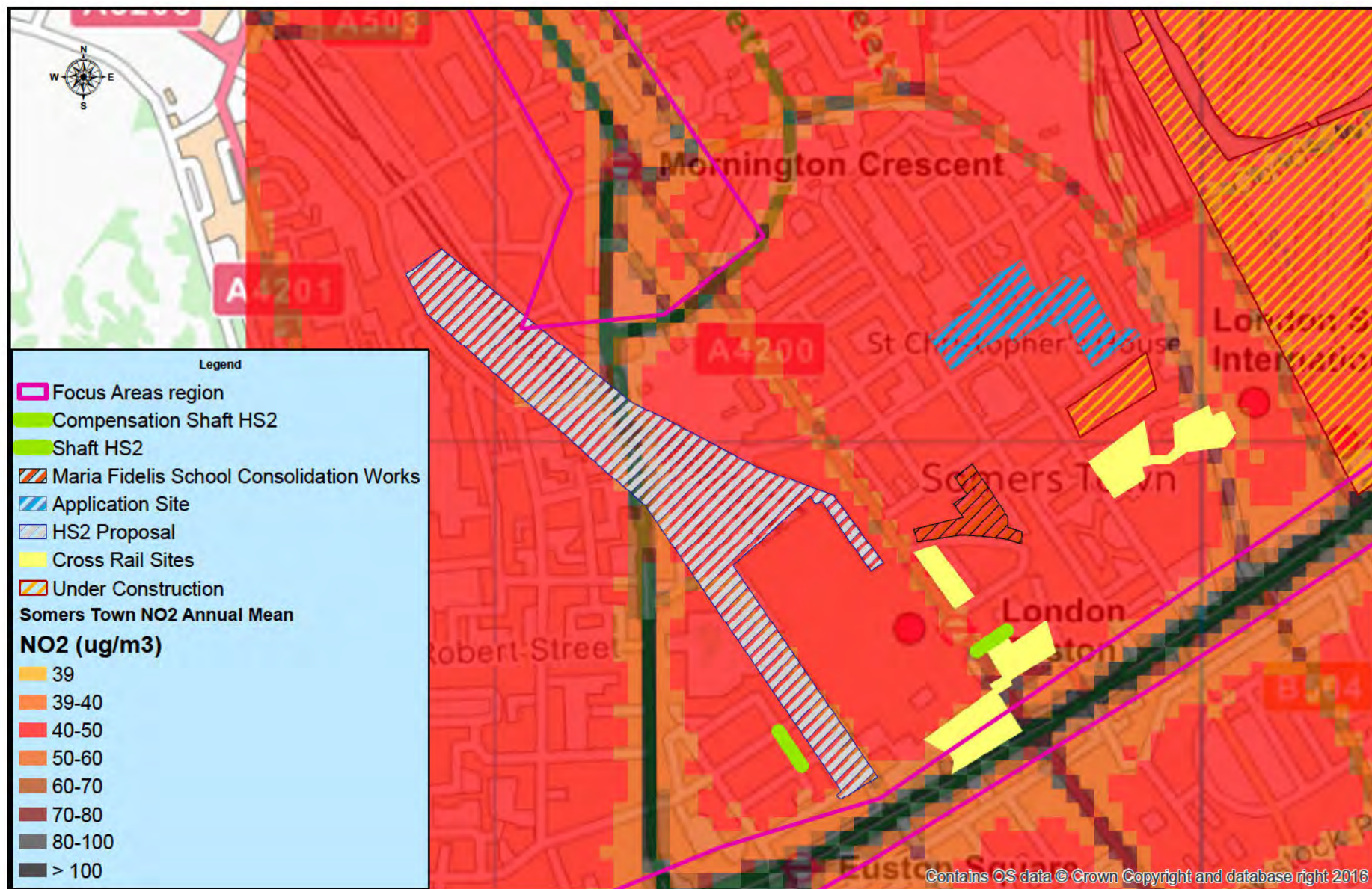


Figure 4.1 Map of Modelled NO2 Annual Mean Concentrations for 2013/2014 at Public Exposure Locations within the study area (Grid)

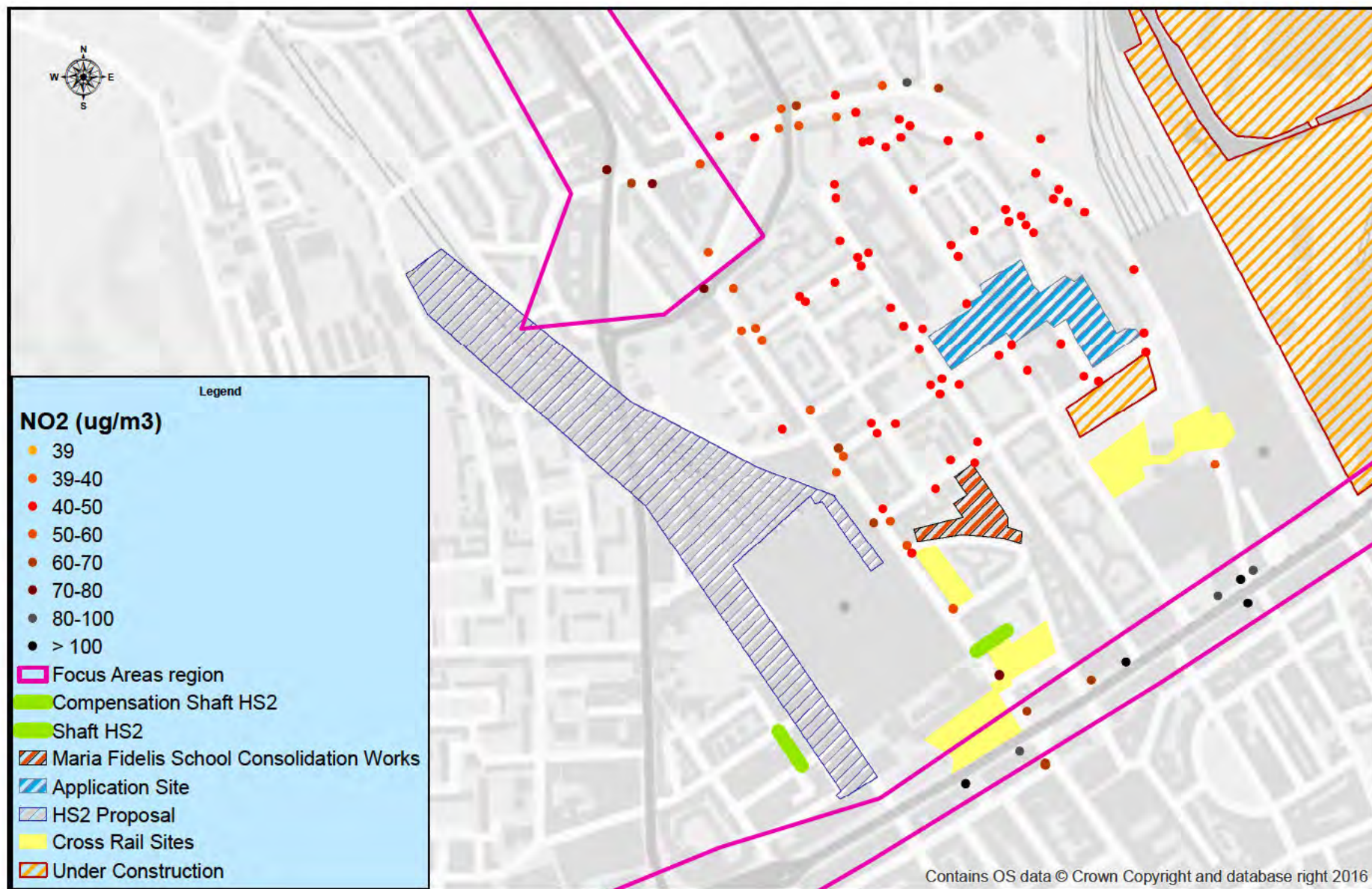


Figure 4.2 Map of Modelled NO2 Annual Mean Concentrations for 2013/2014 at Public Exposure Locations within the study area (Point)

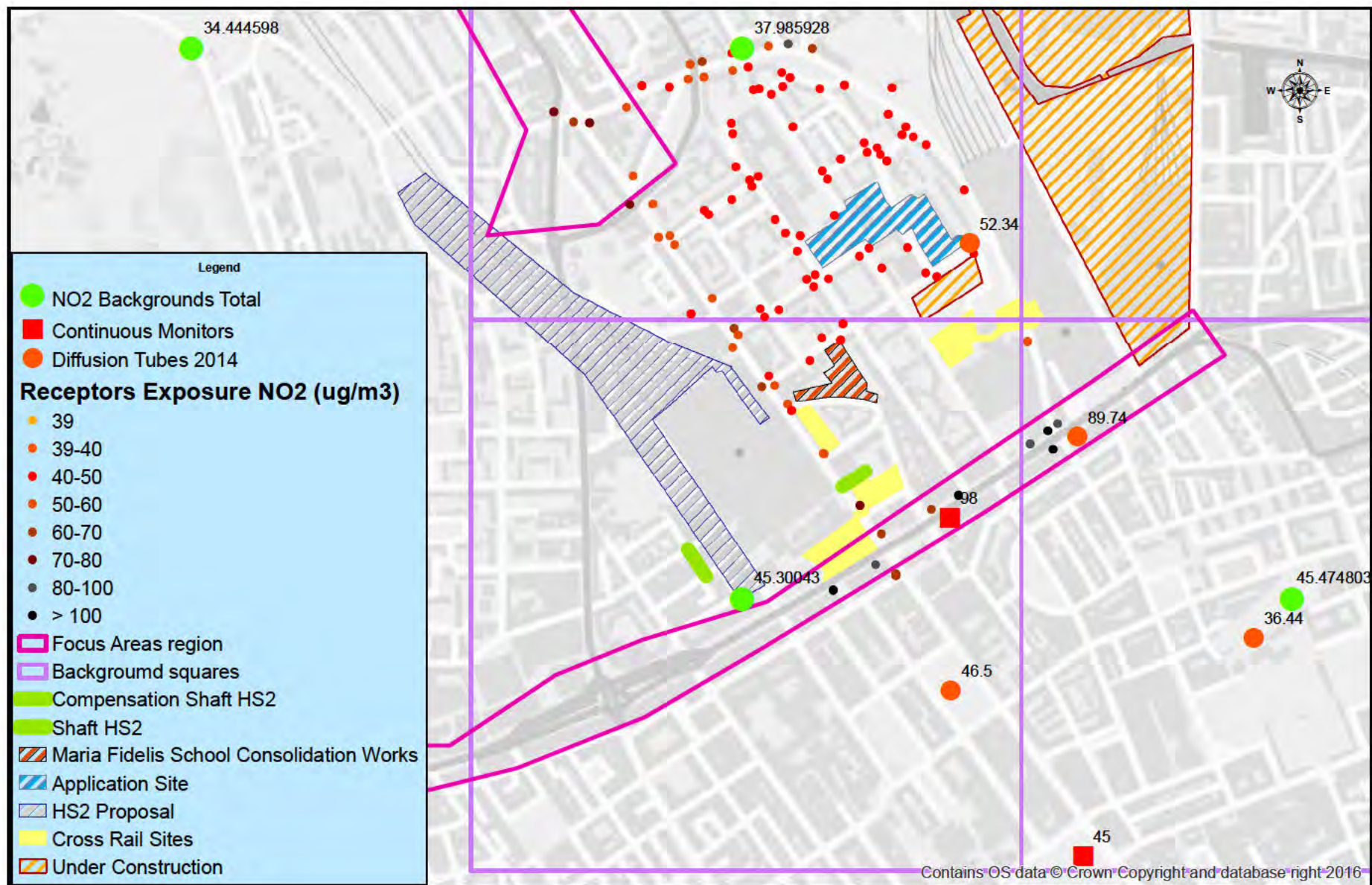


Figure 4.3 Monitoring Data and Defra Mapped NO2 Background Concentrations within the study area

5 Assessment Results

- 5.1.1 Tables 5.1-5.4 in Appendix E summarise the modelled predictions of annual mean NO₂ concentrations at relevant public exposure locations in the study area and the contributions of construction traffic considering a variety of traffic flow combinations.
- 5.1.2 Whereas traffic emissions were calculated for both 50 HGVs and 100 HGVs scenarios to understand the range of potential impacts on local air quality associated with the construction phase of the proposed development, it was considered that 100 HGV AADT were the most representative construction traffic flows for Central Somers Town CIP development when considering the cumulative effects. Therefore, emphasis is on these results and the conclusions of this report are drawn upon them.
- 5.1.3 It is noted that a full set of results for each matrix combination of the cumulative assessment is available upon request. Given the large dataset of results obtained, only the lowest and the highest impacts are presented in this report. The offered results however, are suffice to estimate the impacts of the construction traffic associated with the Proposed Development in isolation and combined with other significant developments in the study area which construction phases are likely to be concurrent.

5.1 Construction Traffic Impacts on NO₂ Annual Mean Concentrations for the Proposed Development

- 5.1.4 Figures 5.1 and 5.2 present the impact significance per receptor when considering the construction traffic impacts associated with the Proposed Development on its own, considering 50 HGVs and 100 HGVs, respectively.
- 5.1.5 Table 5.1 in Appendix E highlights in orange the locations where a moderate adverse impact on public exposure is predicted considering construction traffic movements of 50 AADT HGVs.
- 5.1.6 Table 5.2 in Appendix E highlights in orange the locations where a moderate adverse impact on public exposure is predicted and in red the locations where a substantial adverse impact on public exposure is predicted considering construction traffic movements of 100 AADT HGVs.
- 5.1.7 Analysis of the results indicate that the construction impacts associated with the Proposed Development are moderate adverse at ten locations when considering 50 HGVs and range from moderate adverse at 62 locations to substantial adverse at five locations, when considering 100 HGVs (out of 109 receptors modelled).
- 5.1.8 Overall assessment of the HGVs emission impacts on public exposure along the affected routes by the construction traffic of Central Somers Town CIP indicated that these will be local to the site, temporary in nature, long-term and of moderate to substantial adverse significance.

5.2 Construction Traffic Impacts on NO₂ Annual Mean Concentrations for the Cumulative Scenarios

- 5.2.1 Figures 5.3 and 5.4 present the impact significance per receptor when considering the cumulative construction traffic impacts associated with the Proposed Development and HS2, Maria Fidelis school consolidation projects, and Crossrail 2.
- 5.2.2 Table 5.3 in Appendix E highlights in orange the locations where a moderate adverse impact on public exposure is predicted and in red the locations where a substantial adverse impact on public exposure is predicted considering construction traffic movements of 50 AADT HGVs for each proposed development along the affected routes considered for each site.
- 5.2.3 Table 5.4 in Appendix E highlights in orange the locations where a moderate adverse impact on public exposure is predicted and in red the locations where a substantial adverse impact on public exposure is predicted considering construction traffic movements of 100 AADT HGVs for each proposed development along the affected routes considered for each site.
- 5.2.4 Analysis of the results indicate that the cumulative construction impacts associated with the Proposed Development and HS2, Maria Fidelis school consolidation projects, and Crossrail 2, range from
- a) moderate adverse at 61 locations to substantial adverse at eight locations when considering 50 HGVs per site; and range from
 - b) moderate adverse at 47 locations to substantial adverse at 54 locations, when considering 100 HGVs per site (out of 109 receptors modelled).
- 5.1.9 Overall assessment of the cumulative impacts associated with construction traffic of Central Somers Town CIP, HS2, Maria Fidelis school consolidation projects and Crossrail 2, indicated that these will be local to the site, temporary in nature, long-term and of moderate to substantial adverse significance, exacerbating considerably the pollution levels predicted for the area.

5.3 Construction Traffic Impacts on NO₂ Hourly Average

- 5.3.1 The objective for hourly mean NO₂ concentrations is a concentration of 200µg/m³ as the 99.8th percentile of hourly mean concentrations meant to be achieved by the end of 2005 and every year thereafter.
- 5.3.2 The annual mean NO₂ concentrations predicted by the model were above 60µg/m³ at 28 out of the 108 receptors modelled, and therefore exceedences of the hourly mean NO₂ concentration objective are likely to occur within the study area.

5.3.3 Therefore construction traffic emissions associated with Central Somers Town CIP in isolation and in combination with the construction of other key developments in the area are likely to also contribute to exceedences of the NO₂ hourly average limit value, which will affect commuters and children playground areas.

6 Conclusions and Recommendations

6.1 Conclusions

- 6.1.1 A set of construction traffic flow combinations was analysed using a matrix approach to estimate the construction traffic impacts on local air quality and public exposure associated with the Proposed Development on its own and in combination with likely concurrent construction phases of other significant developments in the vicinity of the Application Site.
- 6.1.2 The analysis of the results produced by this study indicated that the movement of both 50 HGV AADT and 100 HGV AADT on the local network associated with the construction phase of the Proposed Development has a significant impact on human health, ranging from moderate to substantial adverse.
- 6.1.3 The study therefore concludes that the impacts of HGVs emission on public exposure along the affected routes by the construction traffic of Central Somers Town CIP, are local to the site, temporary in nature, long-term and of moderate to substantial adverse significance.
- 6.1.4 The study also concludes that the cumulative impacts associated with construction traffic of Central Somers Town CIP, HS2, Maria Fidelis school consolidation projects and Crossrail 2, are local to the site, temporary in nature, long-term and of moderate to substantial adverse significance.
- 6.1.5 When the cumulative impacts associated with the construction phases of the Proposed Developed, HS2, Maria Fidelis School consolidation projects and Crossrail 2 were considered, the effects on local air quality and relevant public exposure were significantly exacerbated.
- 6.1.6 Given the number of receptor locations exposed to NO₂ Annual mean concentrations above 60µg/m³ with substantial adverse impacts registered, it is likely that the construction phase of the Proposed Development in isolation and in combination with other major developments in its vicinity will contribute to exceedances of the NO₂ hourly mean limit value

6.2 Recommendations

6.2.1 Based on the results presented in this assessment, it is recommended that prior to the commencement of construction works associated with the proposed development, a construction Low Emission Strategy is submitted to and approved in writing by the Local Authority. As a bare minimum, the Low Emission Strategy shall include:

- a) The requirement of non-road mobile machinery compliant with the Low Emission Zone (LEZ) engine emission standards as set out by the GLA in the Supplementary Planning Guidance: The Control of Dust and Emissions from Construction and Demolition;
- b) The requirement that all HGVs associated with the construction activities will be EURO VI compliant or above (as new emission standards are released by the European Commission);
- c) The construction routes are re-assessed to take into account the cumulative effect of HS2, Maria Fidelis school consolidation projects, and Crossrail 2 works and associated traffic diversions;
- d) Green walls are designed and implemented along the roads of the school locations affected by the construction works of the developments considered in this study;
- e) A suitable dust, PM₁₀, PM_{2.5} and NO₂ monitoring program is designed and implemented during the full length of the construction period of the proposed development. For the pollutant NO₂, diffusion tubes are to be deployed at relevant exposure location for both commuter, schools, and resident exposure locations.

6.2.2 Given the long-term nature of the construction phase of the proposed development and of other significant developments planned in the study area, the London Borough of Camden may wish to consider extending the current Focus Areas to include Eversholt Road. This road will be severely impacted by the combined construction traffic of the Proposed Development, HS2, Maria Fidelis School consolidation projects, and Crossrail 2.

6.2.3 By including this road in the GLA Focus Areas, additional measures can be tailored to alleviate pollution problems resulting from the construction phase of the developments listed above.

6.2.4 In the instance the recommendations above are not fully implemented and enforced, the proposed development would not comply with European, National, regional and local air quality policy and legislation.

7 References

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Appendices

Appendix A: Glossary of Terms

Term	Definition
AADF/T Annual Average Daily Flow/Total	A daily total traffic flow (24 hrs), expressed as a mean daily flow across all 365 days of the year.
Adjustment	Application of a correction factor to modeled results to account for uncertainties in the model
Accuracy	A measure of how well a set of data fits the true value.
Air quality objective	Policy target generally expressed as a maximum ambient concentration to be achieved, either without exception or with a permitted number of exceedences within a specific timescale (see also air quality standard).
Air quality standard	The concentrations of pollutants in the atmosphere which can broadly be taken to achieve a certain level of environmental quality. The standards are based on the assessment of the effects of each pollutant on human health including the effects on sensitive sub groups (see also air quality objective).
Ambient air	Outdoor air in the troposphere, excluding workplace air.
Annual mean	The average (mean) of the concentrations measured for each pollutant for one year. Usually this is for a calendar year, but some species are reported for the period April to March, known as a pollution year. This period avoids splitting winter season between 2 years, which is useful for pollutants that have higher concentrations during the winter months.
AQMA	Air Quality Management Area.
AURN	Automatic Urban and Rural (air quality monitoring) Network, managed by contractors on behalf of DEFRA and the Devolved Administrations.
Conservative	Tending to over-predict the impact rather than under-predict.
Data capture	The percentage of all the possible measurements for a given period that were validly measured.
DEFRA	Department for Environment, Food and Rural Affairs.
DfT	Department for Transport.
Emission rate	The quantity of a pollutant released from a source over a given period of time.
Exceedence	A period of time where the concentrations of a pollutant is greater than, or equal to, the appropriate air quality standard.
HDV/HGV	Heavy Duty Vehicle/Heavy Goods Vehicle.
LAQM	Local Air Quality Management.
Minor roads	Non A roads of Motorways.

Model adjustment	Following model verification, the process by which modelled results are amended. This corrects for systematic error.
NO₂	Nitrogen dioxide.
NO_x	Nitrogen oxides.
Percentile	The percentage of results below a given value.
PM₁₀	Particulate matter with an aerodynamic diameter of less than 10 micrometres.
Ratification (Monitoring)	Involves a critical review of all information relating to a data set, in order to amend or reject the data. When the data have been ratified they represent the final data to be used (see also validation).
Road link	A length of road which is considered to have the same flow of traffic along it. Usually, a link is the road from one junction to the next.
µg/m³ microgrammes per cubic metre	A measure of concentration in terms of mass per unit volume. A concentration of 1µg/m ³ means that one cubic metre of air contains one microgram (millionth of a gram) of pollutant.
Uncertainty	A measure, associated with the result of a measurement, which characterizes the range of values within which the true value is expected to lie. Uncertainty is usually expressed as the range within which the true value is expected to lie with a 95% probability, where standard statistical and other procedures have been used to evaluate this figure. Uncertainty is more clearly defined than the closely related parameter 'accuracy', and has replaced it on recent European legislation.
Validation (modelling)	Refers to the general comparison of modelled results against monitoring data carried out by model developers.
Verification (modelling)	Comparison of modelled results versus any local monitoring data at relevant locations.

Appendix B: Air Quality Objectives (AQO) (NO₂) for the protection of human health

Pollutant	Applies to	Standard		Objective		2008/50/EC
		Concentration	Measured as	Annual exceedences allowed	Target date	
Nitrogen dioxide (NO ₂)	All UK	200µg/m ³	1 hour mean	18	31.12.2005	01.01.2010
	All UK	40µg/m ³	annual mean		31.12.2005	

Explanation

µg/m³ = microgram per cubic metre;

- 1 Measured using the European gravimetric transfer sampler or equivalent.

The Air Quality Strategy states that further review and assessment and consultation in relation to air quality will be a rolling process, with additional revisions to the objectives for selected pollutants as appropriate, or where there is new evidence in relation to the effects of pollutants on health or ecosystems. New pollutants may be introduced through future reviews.

Appendix C: Construction Traffic Data

The scenarios discussed in this study are:

- Scenario A – Proposed Development only, 50 HGVs
- Scenario B – Proposed Development only, 100 HGVs
- Scenario C – Cumulative Construction, 50 HGVs per site
- Scenario D – Cumulative Construction, 100 HGVs per site

Please note: given the large number of scenario combinations, only one of the scenarios is provided here for illustration. The remaining combinations can be provided upon request.

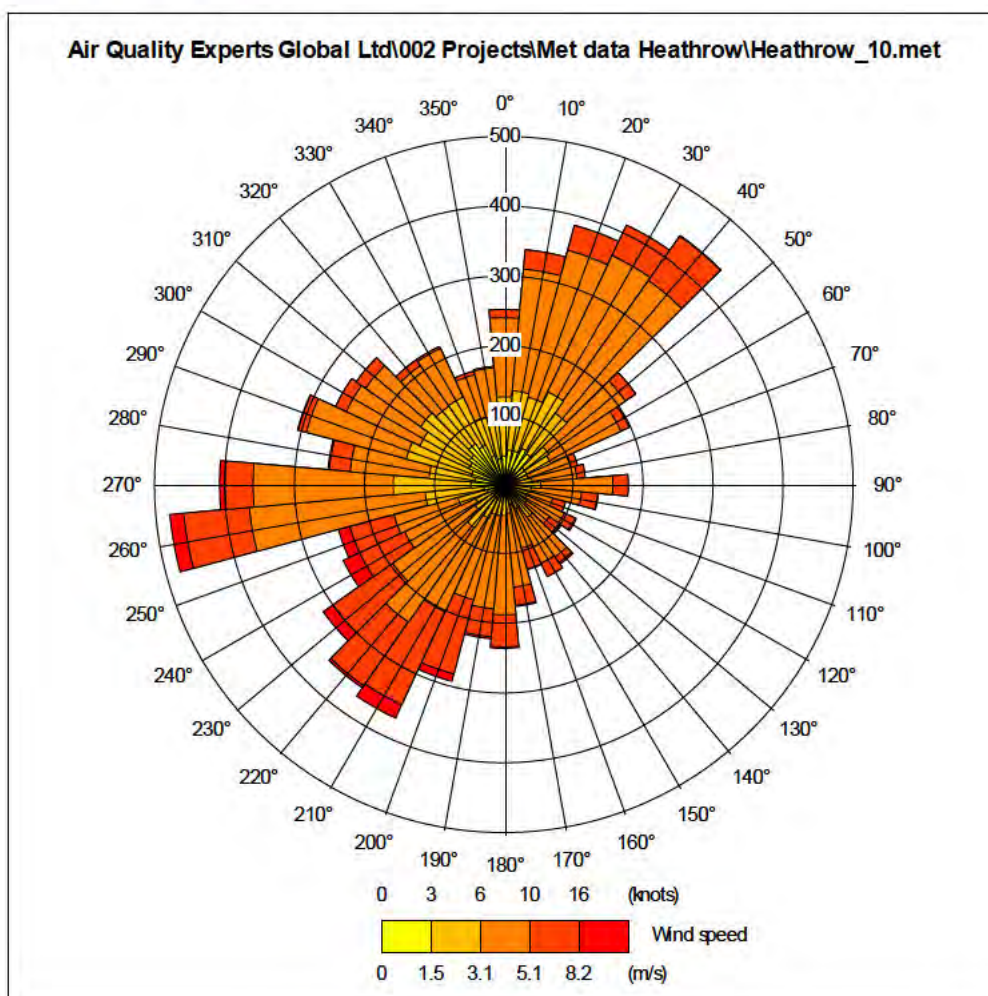
Table C1 - Scenario D – Cumulative Construction, 100 HGVs per site

Road Name	SourceID	Traffic Flow	%HDV	Speed(kph)	All HDV (g/km/s)
Midland Road	0	300	100	10	0.027289523
Purchase Street	1	300	100	10	0.027289523
Eversholt Street	2	300	100	5	0.027289523
Oakley Square	3	300	100	10	0.027289523
Camden Street	4	300	100	10	0.027289523
Oakley Square	5	100	100	10	0.009096508
Polygon Road	6	100	100	10	0.009096508
Pancras Road	7	100	100	10	0.009096508
Euston Road	8	100	100	10	0.009096508
Euston Road	9	100	100	10	0.009096508
Euston Road	10	100	100	10	0.009096508
Euston Road	11	100	100	10	0.009096508
Eversholt Street	12	100	100	10	0.009096508
Euston Road	13	100	100	10	0.009096508
Brill Place	14	100	100	10	0.009096508
Chalton Street	15	100	100	10	0.009096508
Midland Road	16	100	100	10	0.009096508
Euston Road	17	100	100	10	0.009096508
Charrington Street	18	100	100	10	0.009096508
Eversholt Street	19	100	100	10	0.009096508
Charrington Street	20	100	100	10	0.009096508
Crowndale Road	21	300	100	10	0.027289523
Crowndale Road	22	300	100	10	0.027289523
Phoenix Road	23	300	100	10	0.027289523
Chenies Place	24	300	100	10	0.027289523
Chalton Street	25	300	100	10	0.027289523
Chalton Street	26	300	100	10	0.027289523
Cranleigh Street	27	300	100	10	0.027289523
Eversholt Street	28	300	100	10	0.027289523

Eversholt Street	29	300	100	5	0.027289523
Charrington Street	30	400	100	5	0.036386032
Pancras Road	31	400	100	10	0.036386032
Platt Street	32	400	100	10	0.036386032
Platt Street	33	400	100	10	0.036386032
Eversholt Street	34	400	100	5	0.036386032
Polygon Road	35	400	100	10	0.036386032
Eversholt Street	36	400	100	5	0.036386032
Crowndale Road	37	400	100	5	0.036386032
Euston Square	38	400	100	5	0.036386032
Eversholt Street	39	400	100	10	0.036386032
Euston Road	40	400	100	10	0.036386032
Cranleigh Street	41	400	100	5	0.036386032
Chalton Street	42	400	100	10	0.036386032
Drummond Crescent	43	400	100	5	0.036386032
Crowndale Road	44	400	100	10	0.036386032
Pancras Road	45	400	100	10	0.036386032
Royal College Street	46	400	100	10	0.036386032
Eversholt Street	47	400	100	5	0.036386032
Phoenix Road	48	400	100	5	0.036386032
Polygon Road	49	400	100	5	0.036386032
Chalton Street	50	400	100	10	0.036386032
Eversholt Street	51	400	100	5	0.036386032
Crowndale Road	52	400	100	5	0.036386032
Crowndale Road	53	400	100	10	0.036386032
Phoenix Road	54	400	100	10	0.036386032
Phoenix Road	55	400	100	10	0.036386032
Eversholt Street	56	400	100	10	0.036386032
Eversholt Street	57	300	100	10	0.027289523
Purchase Street	58	300	100	5	0.027289523
Euston Road	59	300	100	10	0.027289523
Chalton Street	60	300	100	10	0.027289523
Crowndale Road	61	100	100	10	0.009096508
Brill Place	62	100	100	5	0.009096508
Midland Road	63	300	100	5	0.027289523
Brill Place	64	300	100	10	0.027289523
Crowndale Road	65	300	100	10	0.027289523
Pancras Road	66	300	100	10	0.027289523
Euston Road	67	300	100	10	0.027289523
Euston Road	68	300	100	10	0.027289523
Brill Place	69	300	100	10	0.027289523
Euston Road	70	300	100	10	0.027289523
Brill Place	71	100	100	5	0.009096508

Eversholt Street	72	100	100	10	0.009096508
Euston Road	73	100	100	10	0.009096508
Midland Road	74	100	100	5	0.009096508
Camden Street	75	100	100	5	0.009096508
Cranleigh Street	76	100	100	10	0.009096508
Chenies Place	77	100	100	5	0.009096508
Purchase Street	78	100	100	5	0.009096508
Eversholt Street	79	100	100	5	0.009096508

Appendix D: Wind rose



Appendix E: Modelled Results

Table 5.1 – Modelled Results at each Relevant Receptor in the Study Area (LAEI, 2013) – Central Somers Town Construction Traffic 50 HGVs

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
1	529,159	183,385	78.9	0.21	207.7	Slight Adverse
2	529,195	183,366	66.6	0.13	175.3	Slight Adverse
3	529,223	183,365	72.9	0.18	191.7	Slight Adverse
4	529,297	183,216	70.1	0.23	184.5	Slight Adverse
5	529,303	183,268	53.0	0.31	139.5	Slight Adverse
6	529,291	183,393	52.1	0.35	137.2	Moderate Adverse
7	529,319	183,432	46.8	0.13	123.1	Slight Adverse
8	529,349	183,157	58.5	0.16	153.8	Slight Adverse
9	529,339	183,217	52.1	0.28	137.2	Slight Adverse
10	529,370	183,160	57.9	0.31	152.4	Slight Adverse
11	529,369	183,430	46.7	0.14	123.0	Slight Adverse
12	529,379	183,143	56.7	0.16	149.3	Slight Adverse
13	529,408	183,018	44.2	0.14	116.2	Slight Adverse
14	529,403	183,443	50.6	0.13	133.3	Slight Adverse
15	529,406	183,471	50.4	0.17	132.6	Slight Adverse
16	529,428	183,476	65.4	0.23	172.2	Slight Adverse
17	529,447	183,045	56.1	0.22	147.7	Slight Adverse
18	529,432	183,205	44.4	0.27	116.8	Slight Adverse
19	529,440	183,198	44.4	0.14	116.8	Slight Adverse
20	529,431	183,447	50.2	0.11	132.2	Slight Adverse
21	529,484	182,956	54.3	0.1	142.9	Slight Adverse
22	529,487	182,991	63.1	0.15	166.1	Slight Adverse
23	529,487	182,991	63.1	0.2	166.1	Slight Adverse
24	529,482	183,225	42.7	0.3	112.3	Slight Adverse
25	529,489	183,284	43.1	0.32	113.4	Slight Adverse
26	529,484	183,345	43.2	0.42	113.7	Moderate Adverse
27	529,482	183,364	43.4	0.28	114.3	Slight Adverse
28	529,484	183,459	53.1	0.2	139.7	Slight Adverse
29	529,483	183,491	47.4	0.31	124.8	Slight Adverse
30	529,494	182,979	55.5	0.29	146.0	Slight Adverse
31	529,519	183,249	42.0	0.21	110.6	Slight Adverse
32	529,514	183,261	43.4	0.38	114.1	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
33	529,530	183,267	43.4	0.13	114.1	Slight Adverse
34	529,521	183,424	44.2	0.31	116.3	Slight Adverse
35	529,512	183,466	48.3	0.42	127.1	Moderate Adverse
36	529,537	182,885	63.1	0.09	166.0	Slight Adverse
37	529,542	183,012	43.9	0.17	115.6	Slight Adverse
38	529,534	183,026	43.9	0.17	115.6	Slight Adverse
39	529,532	183,426	45.4	0.18	119.5	Slight Adverse
40	529,549	183,504	58.1	0.21	152.8	Slight Adverse
41	529,560	182,887	55.7	0.22	146.6	Slight Adverse
42	529,550	182,905	49.3	0.21	129.7	Slight Adverse
43	529,568	183,025	43.4	0.21	114.1	Slight Adverse
44	529,561	183,189	41.4	0.26	109.1	Slight Adverse
45	529,554	183,416	43.9	0.12	115.5	Slight Adverse
46	529,584	182,853	56.2	0.14	147.8	Slight Adverse
47	529,579	183,164	41.6	0.18	109.4	Slight Adverse
48	529,588	183,447	45.8	0.21	120.6	Slight Adverse
49	529,575	183,430	45.8	0.28	120.6	Slight Adverse
50	529,573	183,456	46.8	0.23	123.2	Slight Adverse
51	529,584	183,508	94.8	0.14	249.5	Slight Adverse
52	529,591	182,842	47.5	0.2	125.1	Slight Adverse
53	529,601	183,131	42.7	0.2	112.3	Slight Adverse
54	529,607	183,159	42.0	0.2	110.6	Slight Adverse
55	529,593	183,357	42.5	0.21	111.7	Slight Adverse
56	529,624	182,933	44.3	0.32	116.7	Slight Adverse
57	529,618	183,080	42.1	0.31	110.9	Slight Adverse
58	529,629	183,500	65.1	0.22	171.4	Slight Adverse
59	529,650	182,763	57.6	0.19	151.6	Slight Adverse
60	529,649	182,764	57.6	0.67	151.6	Moderate Adverse
61	529,646	182,974	42.0	0.36	110.4	Moderate Adverse
62	529,631	183,067	41.7	0.37	109.7	Moderate Adverse
63	529,633	183,089	43.7	0.25	115.0	Slight Adverse
64	529,647	183,278	42.3	0.17	111.2	Slight Adverse
65	529,642	183,426	43.4	0.2	114.3	Slight Adverse
66	529,667	182,516	109.2	0.18	287.5	Slight Adverse
67	529,667	182,516	109.2	0.51	287.5	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
68	529,658	183,081	41.7	0.33	109.8	Slight Adverse
69	529,668	183,196	41.0	0.14	107.8	Slight Adverse
70	529,656	183,263	41.6	0.17	109.6	Slight Adverse
71	529,680	182,970	41.9	0.22	110.4	Slight Adverse
72	529,684	183,000	41.9	0.13	110.2	Slight Adverse
73	529,680	183,299	42.0	0.18	110.6	Slight Adverse
74	529,686	183,433	48.4	0.08	127.3	Slight Adverse
75	529,715	182,669	71.5	0.16	188.2	Slight Adverse
76	529,715	182,670	71.5	0.03	188.2	Slight Adverse
77	529,714	183,122	41.1	0.41	108.1	Moderate Adverse
78	529,723	183,329	42.6	0.07	112.0	Slight Adverse
79	529,728	183,311	42.6	0.14	112.0	Slight Adverse
80	529,744	182,562	91.0	0.13	239.4	Slight Adverse
81	529,732	183,137	41.0	0.25	107.8	Slight Adverse
82	529,746	183,319	42.4	0.19	111.5	Slight Adverse
83	529,754	182,618	65.0	0.08	171.0	Slight Adverse
84	529,755	183,101	41.3	0.19	108.7	Slight Adverse
85	529,753	183,306	42.6	0.14	112.0	Slight Adverse
86	529,763	183,296	42.6	0.26	112.0	Slight Adverse
87	529,766	183,380	44.9	0.14	118.3	Slight Adverse
88	529,780	182,542	63.6	0.07	167.3	Slight Adverse
89	529,780	182,545	63.6	0.07	167.3	Slight Adverse
90	529,780	182,542	63.6	0.16	167.3	Slight Adverse
91	529,773	183,428	43.5	0.18	114.4	Slight Adverse
92	529,802	183,138	41.6	0.18	109.4	Slight Adverse
93	529,791	183,343	45.1	0.13	118.6	Slight Adverse
94	529,799	183,357	49.0	0.1	129.0	Slight Adverse
95	529,812	183,339	46.8	0.2	123.2	Slight Adverse
96	529,845	182,662	66.2	0.18	174.3	Slight Adverse
97	529,835	183,092	42.9	0.38	112.8	Moderate Adverse
98	529,835	183,325	49.8	0.27	131.0	Slight Adverse
99	529,855	183,085	42.1	0.32	110.9	Slight Adverse
100	529,894	182,688	118.2	0.26	311.0	Slight Adverse
101	529,894	182,688	118.2	0.21	311.0	Slight Adverse
102	529,905	183,243	47.4	0.47	124.6	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
103	529,922	183,127	44.2	0.24	116.2	Slight Adverse
104	529,919	183,154	45.2	0.2	118.9	Slight Adverse
105	530,024	182,781	92.1	0.24	242.3	Slight Adverse
106	530,020	182,967	58.8	0.3	154.6	Slight Adverse
107	530,066	182,771	123.8	0.16	325.8	Slight Adverse
108	530,056	182,805	108.1	0.08	284.5	Slight Adverse
109	530,074	182,818	98.1	0.07	258.2	Slight Adverse

Table 5.2 – Modelled Results at each Relevant Receptor in the Study Area (LAEI, 2013) – Central Somers Town Construction Traffic 100 HGVs

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
1	529,159	183,385	78.9	0.42	207.7	Moderate Adverse
2	529,195	183,366	66.6	0.27	175.3	Slight Adverse
3	529,223	183,365	72.9	0.35	191.7	Moderate Adverse
4	529,297	183,216	70.1	0.45	184.5	Moderate Adverse
5	529,303	183,268	53.0	0.58	139.5	Moderate Adverse
6	529,291	183,393	52.1	0.6	137.2	Moderate Adverse
7	529,319	183,432	46.8	0.25	123.1	Slight Adverse
8	529,349	183,157	58.5	0.32	153.8	Slight Adverse
9	529,339	183,217	52.1	0.52	137.2	Moderate Adverse
10	529,370	183,160	57.9	0.55	152.4	Moderate Adverse
11	529,369	183,430	46.7	0.27	123.0	Slight Adverse
12	529,379	183,143	56.7	0.31	149.3	Slight Adverse
13	529,408	183,018	44.2	0.28	116.2	Slight Adverse
14	529,403	183,443	50.6	0.27	133.3	Slight Adverse
15	529,406	183,471	50.4	0.33	132.6	Slight Adverse
16	529,428	183,476	65.4	0.45	172.2	Moderate Adverse
17	529,447	183,045	56.1	0.43	147.7	Moderate Adverse
18	529,432	183,205	44.4	0.53	116.8	Moderate Adverse
19	529,440	183,198	44.4	0.27	116.8	Slight Adverse
20	529,431	183,447	50.2	0.22	132.2	Slight Adverse
21	529,484	182,956	54.3	0.19	142.9	Slight Adverse
22	529,487	182,991	63.1	0.3	166.1	Slight Adverse
23	529,487	182,991	63.1	0.39	166.1	Moderate Adverse
24	529,482	183,225	42.7	0.51	112.3	Moderate Adverse
25	529,489	183,284	43.1	0.55	113.4	Moderate Adverse
26	529,484	183,345	43.2	0.77	113.7	Substantial Adverse
27	529,482	183,364	43.4	0.54	114.3	Moderate Adverse
28	529,484	183,459	53.1	0.38	139.7	Moderate Adverse
29	529,483	183,491	47.4	0.62	124.8	Moderate Adverse
30	529,494	182,979	55.5	0.57	146.0	Moderate Adverse
31	529,519	183,249	42.0	0.42	110.6	Moderate Adverse
32	529,514	183,261	43.4	0.67	114.1	Moderate Adverse
33	529,530	183,267	43.4	0.25	114.1	Slight Adverse
34	529,521	183,424	44.2	0.59	116.3	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
35	529,512	183,466	48.3	0.67	127.1	Moderate Adverse
36	529,537	182,885	63.1	0.18	166.0	Slight Adverse
37	529,542	183,012	43.9	0.34	115.6	Slight Adverse
38	529,534	183,026	43.9	0.33	115.6	Slight Adverse
39	529,532	183,426	45.4	0.37	119.5	Moderate Adverse
40	529,549	183,504	58.1	0.42	152.8	Moderate Adverse
41	529,560	182,887	55.7	0.44	146.6	Moderate Adverse
42	529,550	182,905	49.3	0.43	129.7	Moderate Adverse
43	529,568	183,025	43.4	0.41	114.1	Moderate Adverse
44	529,561	183,189	41.4	0.42	109.1	Moderate Adverse
45	529,554	183,416	43.9	0.22	115.5	Slight Adverse
46	529,584	182,853	56.2	0.27	147.8	Slight Adverse
47	529,579	183,164	41.6	0.36	109.4	Moderate Adverse
48	529,588	183,447	45.8	0.42	120.6	Moderate Adverse
49	529,575	183,430	45.8	0.56	120.6	Moderate Adverse
50	529,573	183,456	46.8	0.46	123.2	Moderate Adverse
51	529,584	183,508	94.8	0.28	249.5	Slight Adverse
52	529,591	182,842	47.5	0.4	125.1	Moderate Adverse
53	529,601	183,131	42.7	0.39	112.3	Moderate Adverse
54	529,607	183,159	42.0	0.4	110.6	Moderate Adverse
55	529,593	183,357	42.5	0.41	111.7	Moderate Adverse
56	529,624	182,933	44.3	0.6	116.7	Moderate Adverse
57	529,618	183,080	42.1	0.6	110.9	Moderate Adverse
58	529,629	183,500	65.1	0.43	171.4	Moderate Adverse
59	529,650	182,763	57.6	0.37	151.6	Moderate Adverse
60	529,649	182,764	57.6	1.03	151.6	Substantial Adverse
61	529,646	182,974	42.0	0.69	110.4	Moderate Adverse
62	529,631	183,067	41.7	0.73	109.7	Moderate Adverse
63	529,633	183,089	43.7	0.48	115.0	Moderate Adverse
64	529,647	183,278	42.3	0.35	111.2	Moderate Adverse
65	529,642	183,426	43.4	0.4	114.3	Moderate Adverse
66	529,667	182,516	109.2	0.35	287.5	Moderate Adverse
67	529,667	182,516	109.2	0.83	287.5	Substantial Adverse
68	529,658	183,081	41.7	0.59	109.8	Moderate Adverse
69	529,668	183,196	41.0	0.28	107.8	Slight Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
70	529,656	183,263	41.6	0.34	109.6	Slight Adverse
71	529,680	182,970	41.9	0.41	110.4	Moderate Adverse
72	529,684	183,000	41.9	0.26	110.2	Slight Adverse
73	529,680	183,299	42.0	0.36	110.6	Moderate Adverse
74	529,686	183,433	48.4	0.15	127.3	Slight Adverse
75	529,715	182,669	71.5	0.32	188.2	Slight Adverse
76	529,715	182,670	71.5	0.05	188.2	Slight Adverse
77	529,714	183,122	41.1	0.63	108.1	Moderate Adverse
78	529,723	183,329	42.6	0.13	112.0	Slight Adverse
79	529,728	183,311	42.6	0.29	112.0	Slight Adverse
80	529,744	182,562	91.0	0.26	239.4	Slight Adverse
81	529,732	183,137	41.0	0.5	107.8	Moderate Adverse
82	529,746	183,319	42.4	0.38	111.5	Moderate Adverse
83	529,754	182,618	65.0	0.15	171.0	Slight Adverse
84	529,755	183,101	41.3	0.38	108.7	Moderate Adverse
85	529,753	183,306	42.6	0.27	112.0	Slight Adverse
86	529,763	183,296	42.6	0.52	112.0	Moderate Adverse
87	529,766	183,380	44.9	0.29	118.3	Slight Adverse
88	529,780	182,542	63.6	0.14	167.3	Slight Adverse
89	529,780	182,545	63.6	0.13	167.3	Slight Adverse
90	529,780	182,542	63.6	0.33	167.3	Slight Adverse
91	529,773	183,428	43.5	0.37	114.4	Moderate Adverse
92	529,802	183,138	41.6	0.37	109.4	Moderate Adverse
93	529,791	183,343	45.1	0.26	118.6	Slight Adverse
94	529,799	183,357	49.0	0.19	129.0	Slight Adverse
95	529,812	183,339	46.8	0.37	123.2	Moderate Adverse
96	529,845	182,662	66.2	0.37	174.3	Moderate Adverse
97	529,835	183,092	42.9	0.76	112.8	Substantial Adverse
98	529,835	183,325	49.8	0.53	131.0	Moderate Adverse
99	529,855	183,085	42.1	0.63	110.9	Moderate Adverse
100	529,894	182,688	118.2	0.52	311.0	Moderate Adverse
101	529,894	182,688	118.2	0.41	311.0	Moderate Adverse
102	529,905	183,243	47.4	0.76	124.6	Substantial Adverse
103	529,922	183,127	44.2	0.47	116.2	Moderate Adverse
104	529,919	183,154	45.2	0.4	118.9	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
105	530,024	182,781	92.1	0.47	242.3	Moderate Adverse
106	530,020	182,967	58.8	0.58	154.6	Moderate Adverse
107	530,066	182,771	123.8	0.32	325.8	Slight Adverse
108	530,056	182,805	108.1	0.15	284.5	Slight Adverse
109	530,074	182,818	98.1	0.14	258.2	Slight Adverse

Table 5.3 – Modelled Results at each Relevant Receptor in the Study Area (LAEI, 2013) – Cumulative Construction Traffic - 50 HGVs per site

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
1	529,159	183,385	78.9	0.7	207.7	Moderate Adverse
2	529,195	183,366	66.6	0.45	175.3	Moderate Adverse
3	529,223	183,365	72.9	0.5	191.7	Moderate Adverse
4	529,297	183,216	70.1	0.59	184.5	Moderate Adverse
5	529,303	183,268	53.0	0.6	139.5	Moderate Adverse
6	529,291	183,393	52.1	0.45	137.2	Moderate Adverse
7	529,319	183,432	46.8	0.34	123.1	Slight Adverse
8	529,349	183,157	58.5	0.39	153.8	Moderate Adverse
9	529,339	183,217	52.1	0.48	137.2	Moderate Adverse
10	529,370	183,160	57.9	0.47	152.4	Moderate Adverse
11	529,369	183,430	46.7	0.34	123.0	Slight Adverse
12	529,379	183,143	56.7	0.39	149.3	Moderate Adverse
13	529,408	183,018	44.2	0.36	116.2	Moderate Adverse
14	529,403	183,443	50.6	0.35	133.3	Moderate Adverse
15	529,406	183,471	50.4	0.29	132.6	Slight Adverse
16	529,428	183,476	65.4	0.33	172.2	Slight Adverse
17	529,447	183,045	56.1	0.3	147.7	Slight Adverse
18	529,432	183,205	44.4	0.34	116.8	Slight Adverse
19	529,440	183,198	44.4	0.22	116.8	Slight Adverse
20	529,431	183,447	50.2	0.2	132.2	Slight Adverse
21	529,484	182,956	54.3	0.19	142.9	Slight Adverse
22	529,487	182,991	63.1	0.39	166.1	Moderate Adverse
23	529,487	182,991	63.1	0.25	166.1	Slight Adverse
24	529,482	183,225	42.7	0.45	112.3	Moderate Adverse
25	529,489	183,284	43.1	0.37	113.4	Moderate Adverse
26	529,484	183,345	43.2	0.42	113.7	Moderate Adverse
27	529,482	183,364	43.4	0.33	114.3	Slight Adverse
28	529,484	183,459	53.1	0.25	139.7	Slight Adverse
29	529,483	183,491	47.4	0.36	124.8	Moderate Adverse
30	529,494	182,979	55.5	0.33	146.0	Slight Adverse
31	529,519	183,249	42.0	0.26	110.6	Slight Adverse
32	529,514	183,261	43.4	0.36	114.1	Moderate Adverse
33	529,530	183,267	43.4	0.17	114.1	Slight Adverse
34	529,521	183,424	44.2	0.35	116.3	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
35	529,512	183,466	48.3	0.44	127.1	Moderate Adverse
36	529,537	182,885	63.1	0.21	166.0	Slight Adverse
37	529,542	183,012	43.9	0.41	115.6	Moderate Adverse
38	529,534	183,026	43.9	0.22	115.6	Slight Adverse
39	529,532	183,426	45.4	0.5	119.5	Moderate Adverse
40	529,549	183,504	58.1	0.35	152.8	Moderate Adverse
41	529,560	182,887	55.7	0.51	146.6	Moderate Adverse
42	529,550	182,905	49.3	0.59	129.7	Moderate Adverse
43	529,568	183,025	43.4	0.6	114.1	Moderate Adverse
44	529,561	183,189	41.4	0.53	109.1	Moderate Adverse
45	529,554	183,416	43.9	0.37	115.5	Moderate Adverse
46	529,584	182,853	56.2	0.19	147.8	Slight Adverse
47	529,579	183,164	41.6	0.48	109.4	Moderate Adverse
48	529,588	183,447	45.8	0.6	120.6	Moderate Adverse
49	529,575	183,430	45.8	0.94	120.6	Substantial Adverse
50	529,573	183,456	46.8	0.77	123.2	Substantial Adverse
51	529,584	183,508	94.8	0.38	249.5	Moderate Adverse
52	529,591	182,842	47.5	0.25	125.1	Slight Adverse
53	529,601	183,131	42.7	0.25	112.3	Slight Adverse
54	529,607	183,159	42.0	0.25	110.6	Slight Adverse
55	529,593	183,357	42.5	0.25	111.7	Slight Adverse
56	529,624	182,933	44.3	0.7	116.7	Moderate Adverse
57	529,618	183,080	42.1	0.35	110.9	Moderate Adverse
58	529,629	183,500	65.1	0.3	171.4	Slight Adverse
59	529,650	182,763	57.6	0.46	151.6	Moderate Adverse
60	529,649	182,764	57.6	0.41	151.6	Moderate Adverse
61	529,646	182,974	42.0	0.39	110.4	Moderate Adverse
62	529,631	183,067	41.7	0.44	109.7	Moderate Adverse
63	529,633	183,089	43.7	0.75	115.0	Substantial Adverse
64	529,647	183,278	42.3	0.54	111.2	Moderate Adverse
65	529,642	183,426	43.4	0.68	114.3	Moderate Adverse
66	529,667	182,516	109.2	0.22	287.5	Slight Adverse
67	529,667	182,516	109.2	0.37	287.5	Moderate Adverse
68	529,658	183,081	41.7	0.31	109.8	Slight Adverse
69	529,668	183,196	41.0	0.2	107.8	Slight Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
70	529,656	183,263	41.6	0.23	109.6	Slight Adverse
71	529,680	182,970	41.9	0.45	110.4	Moderate Adverse
72	529,684	183,000	41.9	0.49	110.2	Moderate Adverse
73	529,680	183,299	42.0	0.68	110.6	Moderate Adverse
74	529,686	183,433	48.4	0.23	127.3	Slight Adverse
75	529,715	182,669	71.5	0.47	188.2	Moderate Adverse
76	529,715	182,670	71.5	0.07	188.2	Slight Adverse
77	529,714	183,122	41.1	0.71	108.1	Moderate Adverse
78	529,723	183,329	42.6	0.24	112.0	Slight Adverse
79	529,728	183,311	42.6	0.56	112.0	Moderate Adverse
80	529,744	182,562	91.0	0.25	239.4	Slight Adverse
81	529,732	183,137	41.0	0.7	107.8	Moderate Adverse
82	529,746	183,319	42.4	0.74	111.5	Substantial Adverse
83	529,754	182,618	65.0	0.13	171.0	Slight Adverse
84	529,755	183,101	41.3	0.53	108.7	Moderate Adverse
85	529,753	183,306	42.6	0.41	112.0	Moderate Adverse
86	529,763	183,296	42.6	0.68	112.0	Moderate Adverse
87	529,766	183,380	44.9	0.56	118.3	Moderate Adverse
88	529,780	182,542	63.6	0.26	167.3	Slight Adverse
89	529,780	182,545	63.6	0.24	167.3	Slight Adverse
90	529,780	182,542	63.6	0.64	167.3	Moderate Adverse
91	529,773	183,428	43.5	0.71	114.4	Moderate Adverse
92	529,802	183,138	41.6	0.71	109.4	Moderate Adverse
93	529,791	183,343	45.1	0.49	118.6	Moderate Adverse
94	529,799	183,357	49.0	0.36	129.0	Moderate Adverse
95	529,812	183,339	46.8	0.64	123.2	Moderate Adverse
96	529,845	182,662	66.2	0.69	174.3	Moderate Adverse
97	529,835	183,092	42.9	1.26	112.8	Substantial Adverse
98	529,835	183,325	49.8	0.91	131.0	Substantial Adverse
99	529,855	183,085	42.1	0.77	110.9	Substantial Adverse
100	529,894	182,688	118.2	0.68	311.0	Moderate Adverse
101	529,894	182,688	118.2	0.71	311.0	Moderate Adverse
102	529,905	183,243	47.4	0.78	124.6	Substantial Adverse
103	529,922	183,127	44.2	0.29	116.2	Slight Adverse
104	529,919	183,154	45.2	0.26	118.9	Slight Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
105	530,024	182,781	92.1	0.32	242.3	Slight Adverse
106	530,020	182,967	58.8	0.4	154.6	Moderate Adverse
107	530,066	182,771	123.8	0.28	325.8	Slight Adverse
108	530,056	182,805	108.1	0.13	284.5	Slight Adverse
109	530,074	182,818	98.1	0.13	258.2	Slight Adverse

Table 5.4 – Modelled Results at each Relevant Receptor in the Study Area (LAEI, 2013) – Cumulative Construction Traffic - 100 HGVs per site

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
1	529,159	183,385	78.9	1.17	207.7	Substantial Adverse
2	529,195	183,366	66.6	0.75	175.3	Substantial Adverse
3	529,223	183,365	72.9	0.84	191.7	Substantial Adverse
4	529,297	183,216	70.1	1	184.5	Substantial Adverse
5	529,303	183,268	53.0	1.07	139.5	Substantial Adverse
6	529,291	183,393	52.1	0.9	137.2	Substantial Adverse
7	529,319	183,432	46.8	0.57	123.1	Moderate Adverse
8	529,349	183,157	58.5	0.67	153.8	Moderate Adverse
9	529,339	183,217	52.1	0.89	137.2	Substantial Adverse
10	529,370	183,160	57.9	0.9	152.4	Substantial Adverse
11	529,369	183,430	46.7	0.58	123.0	Moderate Adverse
12	529,379	183,143	56.7	0.66	149.3	Moderate Adverse
13	529,408	183,018	44.2	0.61	116.2	Moderate Adverse
14	529,403	183,443	50.6	0.58	133.3	Moderate Adverse
15	529,406	183,471	50.4	0.52	132.6	Moderate Adverse
16	529,428	183,476	65.4	0.61	172.2	Moderate Adverse
17	529,447	183,045	56.1	0.56	147.7	Moderate Adverse
18	529,432	183,205	44.4	0.65	116.8	Moderate Adverse
19	529,440	183,198	44.4	0.4	116.8	Moderate Adverse
20	529,431	183,447	50.2	0.36	132.2	Moderate Adverse
21	529,484	182,956	54.3	0.34	142.9	Slight Adverse
22	529,487	182,991	63.1	0.66	166.1	Moderate Adverse
23	529,487	182,991	63.1	0.47	166.1	Moderate Adverse
24	529,482	183,225	42.7	0.86	112.3	Substantial Adverse
25	529,489	183,284	43.1	0.77	113.4	Substantial Adverse
26	529,484	183,345	43.2	0.88	113.7	Substantial Adverse
27	529,482	183,364	43.4	0.64	114.3	Moderate Adverse
28	529,484	183,459	53.1	0.48	139.7	Moderate Adverse
29	529,483	183,491	47.4	0.69	124.8	Moderate Adverse
30	529,494	182,979	55.5	0.64	146.0	Moderate Adverse
31	529,519	183,249	42.0	0.5	110.6	Moderate Adverse
32	529,514	183,261	43.4	0.77	114.1	Substantial Adverse
33	529,530	183,267	43.4	0.32	114.1	Slight Adverse
34	529,521	183,424	44.2	0.69	116.3	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
35	529,512	183,466	48.3	0.95	127.1	Substantial Adverse
36	529,537	182,885	63.1	0.37	166.0	Moderate Adverse
37	529,542	183,012	43.9	0.71	115.6	Moderate Adverse
38	529,534	183,026	43.9	0.43	115.6	Moderate Adverse
39	529,532	183,426	45.4	0.84	119.5	Substantial Adverse
40	529,549	183,504	58.1	0.63	152.8	Moderate Adverse
41	529,560	182,887	55.7	0.87	146.6	Substantial Adverse
42	529,550	182,905	49.3	0.99	129.7	Substantial Adverse
43	529,568	183,025	43.4	1	114.1	Substantial Adverse
44	529,561	183,189	41.4	0.99	109.1	Substantial Adverse
45	529,554	183,416	43.9	0.64	115.5	Moderate Adverse
46	529,584	182,853	56.2	0.37	147.8	Moderate Adverse
47	529,579	183,164	41.6	0.81	109.4	Substantial Adverse
48	529,588	183,447	45.8	1.01	120.6	Substantial Adverse
49	529,575	183,430	45.8	1.57	120.6	Substantial Adverse
50	529,573	183,456	46.8	1.29	123.2	Substantial Adverse
51	529,584	183,508	94.8	0.64	249.5	Moderate Adverse
52	529,591	182,842	47.5	0.48	125.1	Moderate Adverse
53	529,601	183,131	42.7	0.47	112.3	Moderate Adverse
54	529,607	183,159	42.0	0.48	110.6	Moderate Adverse
55	529,593	183,357	42.5	0.49	111.7	Moderate Adverse
56	529,624	182,933	44.3	1.24	116.7	Substantial Adverse
57	529,618	183,080	42.1	0.7	110.9	Moderate Adverse
58	529,629	183,500	65.1	0.56	171.4	Moderate Adverse
59	529,650	182,763	57.6	0.8	151.6	Substantial Adverse
60	529,649	182,764	57.6	1.11	151.6	Substantial Adverse
61	529,646	182,974	42.0	0.79	110.4	Substantial Adverse
62	529,631	183,067	41.7	0.85	109.7	Substantial Adverse
63	529,633	183,089	43.7	1.28	115.0	Substantial Adverse
64	529,647	183,278	42.3	0.91	111.2	Substantial Adverse
65	529,642	183,426	43.4	1.14	114.3	Substantial Adverse
66	529,667	182,516	109.2	0.43	287.5	Moderate Adverse
67	529,667	182,516	109.2	0.91	287.5	Substantial Adverse
68	529,658	183,081	41.7	0.67	109.8	Moderate Adverse
69	529,668	183,196	41.0	0.37	107.8	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
70	529,656	183,263	41.6	0.43	109.6	Moderate Adverse
71	529,680	182,970	41.9	0.8	110.4	Substantial Adverse
72	529,684	183,000	41.9	0.81	110.2	Substantial Adverse
73	529,680	183,299	42.0	1.12	110.6	Substantial Adverse
74	529,686	183,433	48.4	0.39	127.3	Moderate Adverse
75	529,715	182,669	71.5	0.8	188.2	Substantial Adverse
76	529,715	182,670	71.5	0.13	188.2	Slight Adverse
77	529,714	183,122	41.1	1.37	108.1	Slight Adverse
78	529,723	183,329	42.6	0.41	112.0	Moderate Adverse
79	529,728	183,311	42.6	0.92	112.0	Substantial Adverse
80	529,744	182,562	91.0	0.45	239.4	Moderate Adverse
81	529,732	183,137	41.0	1.17	107.8	Slight Adverse
82	529,746	183,319	42.4	1.23	111.5	Substantial Adverse
83	529,754	182,618	65.0	0.23	171.0	Slight Adverse
84	529,755	183,101	41.3	0.89	108.7	Slight Adverse
85	529,753	183,306	42.6	0.7	112.0	Moderate Adverse
86	529,763	183,296	42.6	1.17	112.0	Substantial Adverse
87	529,766	183,380	44.9	0.92	118.3	Substantial Adverse
88	529,780	182,542	63.6	0.43	167.3	Moderate Adverse
89	529,780	182,545	63.6	0.41	167.3	Moderate Adverse
90	529,780	182,542	63.6	1.05	167.3	Substantial Adverse
91	529,773	183,428	43.5	1.17	114.4	Substantial Adverse
92	529,802	183,138	41.6	1.17	109.4	Substantial Adverse
93	529,791	183,343	45.1	0.81	118.6	Substantial Adverse
94	529,799	183,357	49.0	0.6	129.0	Moderate Adverse
95	529,812	183,339	46.8	1.08	123.2	Substantial Adverse
96	529,845	182,662	66.2	1.14	174.3	Substantial Adverse
97	529,835	183,092	42.9	2.09	112.8	Slight Adverse
98	529,835	183,325	49.8	1.52	131.0	Substantial Adverse
99	529,855	183,085	42.1	1.33	110.9	Substantial Adverse
100	529,894	182,688	118.2	1.17	311.0	Substantial Adverse
101	529,894	182,688	118.2	1.2	311.0	Substantial Adverse
102	529,905	183,243	47.4	1.52	124.6	Substantial Adverse
103	529,922	183,127	44.2	0.57	116.2	Moderate Adverse
104	529,919	183,154	45.2	0.5	118.9	Moderate Adverse

Receptor	X	Y	NO ₂ Annual Mean Concentration (µg/m ³)	HGV contribution to total NO ₂ Annual Mean	% of Air Quality Assessment Level (AQAL)	Impact Significance
105	530,024	182,781	92.1	0.61	242.3	Moderate Adverse
106	530,020	182,967	58.8	0.76	154.6	Substantial Adverse
107	530,066	182,771	123.8	0.49	325.8	Moderate Adverse
108	530,056	182,805	108.1	0.24	284.5	Slight Adverse
109	530,074	182,818	98.1	0.23	258.2	Slight Adverse

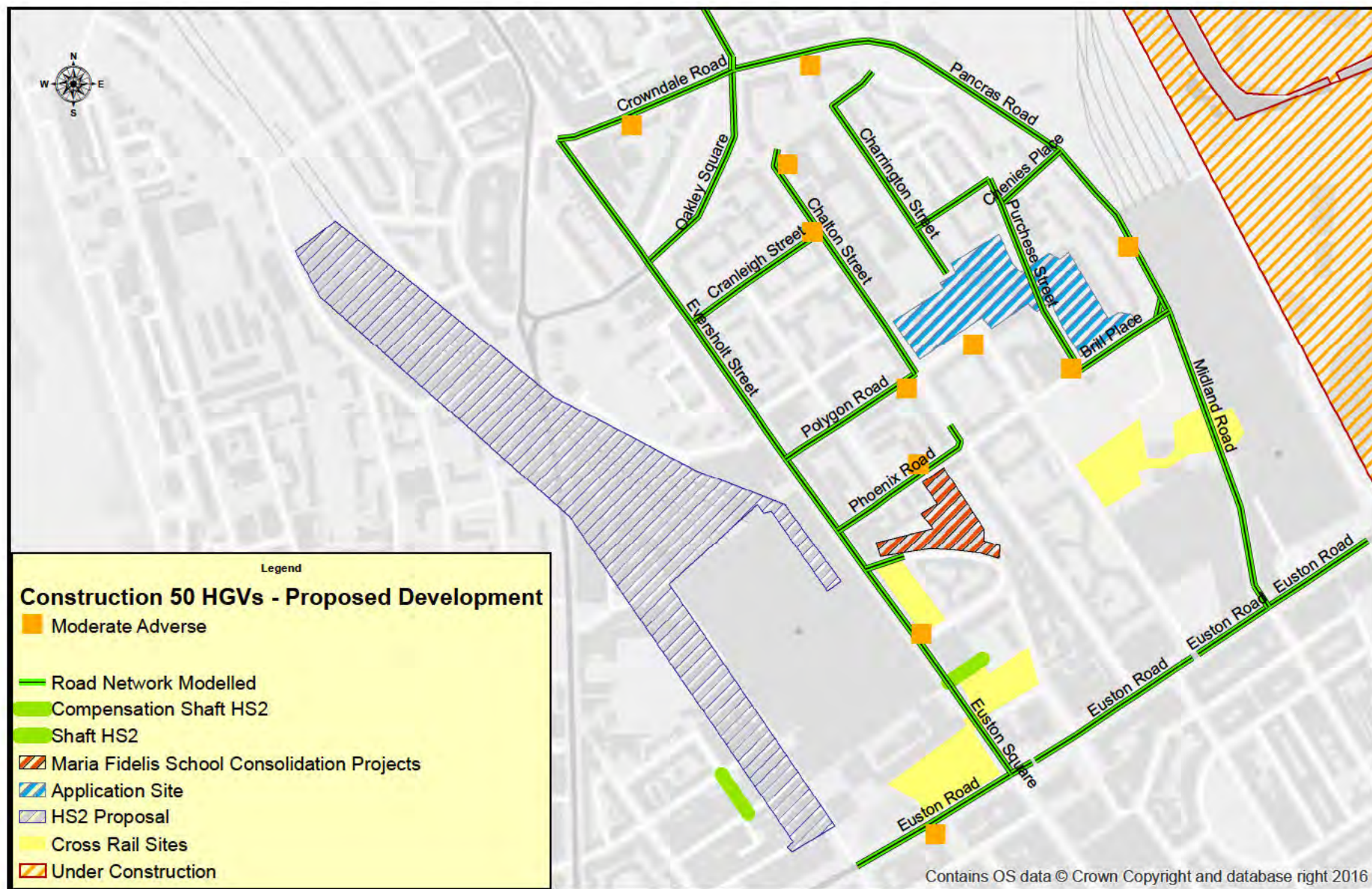


Figure 5.1 Construction Impact Significance per receptor for the Proposed Development on its own considering 50 HGVs

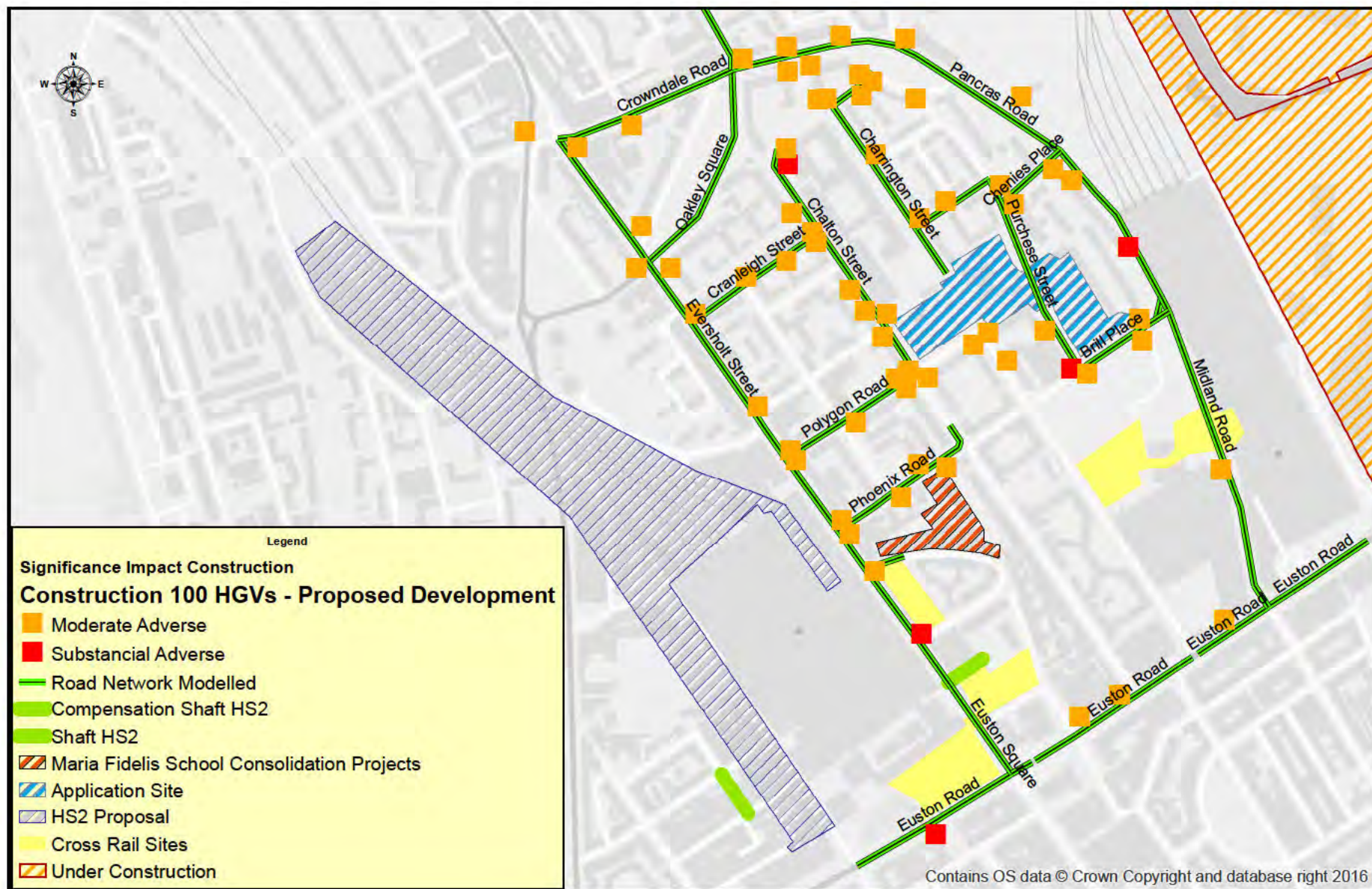


Figure 5.2 Construction Impact Significance per receptor for the Proposed Development on its own considering 100 HGVs

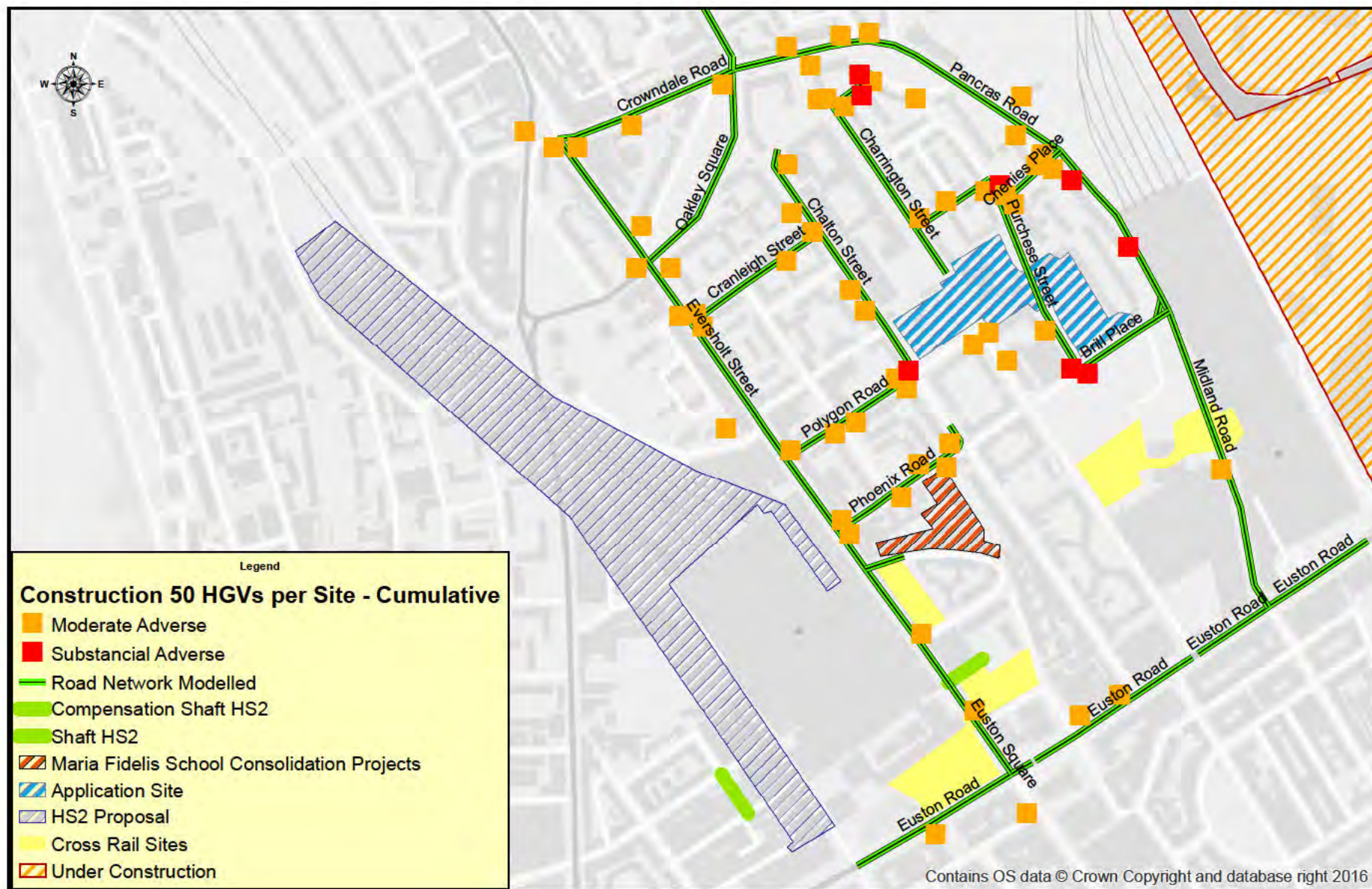


Figure 5.3 Construction Impact Significance per receptor for the Cumulative Scenario considering 50 HGVs per site

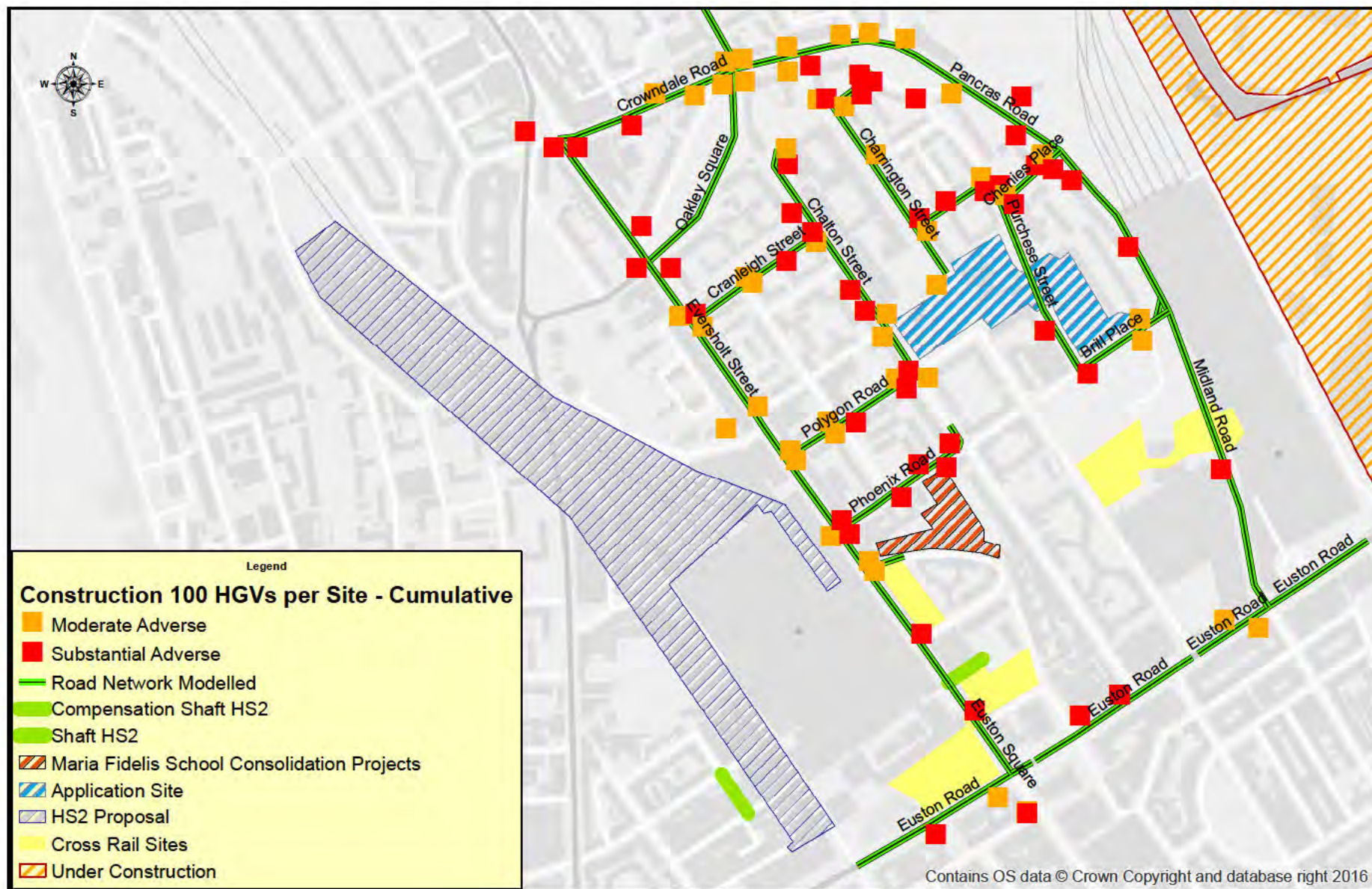


Figure 5.4 Construction Impact Significance per receptor for the Cumulative Scenario considering 100 HGVs per site









**Peer Review of Air Quality Assessment
Report submitted to support Planning
Application Central Somers Town CIP
Development (2015/2704/P)**

Expert Evidence

June, 2016

Document control page

Status	Revision 1	Revision 2	Revision 3
Remarks	Draft Report for Internal Consultation	Edited Report	Final Report
Date	17/06/2016	18/06/2016	19/06/2016
Prepared by	Esther Lopes	Ana Grossinho	Ana Grossinho
Reviewed by	Ana Grossinho	Ana Grossinho	Ana Grossinho
Signature			
Authorised by	Ana Grossinho (Director)	Ana Grossinho (Director)	Ana Grossinho (Director)
Signature			
Project number	2016/010/1706	2016/010/1706	2016/010/1706
Report number	001	002	003

Disclaimer

This report has been prepared by Air Quality Experts Global Ltd on behalf of the Client, taking into account the agreed scope of works.

In preparing this report, Air Quality Experts Global Ltd has exercised all reasonable skill and care, taking into account the objectives and the agreed scope of works.

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Executive Summary

SCOPE

Air Quality Experts Global Ltd (AQEGlobal) were commissioned by Camden Town District Management Committee (CTDMC) to undertake a peer review of the air quality assessment submitted to support the proposed Central Somers Town CIP planning application (2015/2704/P).

The peer review focused primarily on the technical aspects of the report and considered the following:

- a) input data used,
- b) model set up,
- c) data processing,
- d) reporting content, and
- e) report conclusions and recommendations.

This report presents the findings of the peer review exercise, and offers recommendations in the light of the implications to the current planning application.

METHODS

The peer review of the air quality assessment report addressed the content, methodology, reporting and conclusions of the document and was completed by AQEGlobal following Department of Environment, Food and Regional Affairs' (Defra) guidance on local air quality management, the Department for Transport TAG Unit M1.2 Data Sources and Surveys, the National Planning Policy Framework (NPPF), the London Plan, Mayor's Air Quality Strategy (MAQS), the Greater London Authority (GLA) Local Authorities' Supplementary Planning Guidance (SPG) on Sustainable Design and Construction, GLA's SPG on The Control of Dust and Emissions from Construction and Demolition, Camden Local Policies, Camden Local Action Plan, London Councils' Air Quality and Planning Guidance, the UK Institute of Air Quality Management guidance.

Detailed air quality dispersion modelling using ADMS Roads software was undertaken, using the London Atmospheric Emissions Inventory (LAEI) recently released (March, 2016) 2013 traffic emissions. Meteorology data were supplied by the Met Office for the Heathrow airport station, and were used in the model setup.

Results were also compared with the nitrogen dioxide (NO₂) concentration levels across the study area for 2013 as recently published by GLA.

The methodology followed in this study applied current best practice, and used the most up to date tools and data released by Defra for air quality assessment undertakings.

FINDINGS

Input Data

The traffic survey used to support the planning application was undertaken in July 2015, after some schools in Somers Town had broken up for Summer holidays. This is a non-neutral month and therefore is likely to underestimate the traffic flows in the area.

Reproducing the model verification exercise submitted in the air quality report under scrutiny, it was observed that the receptor at Brill Place was significantly underestimating NO₂ concentrations at this location when compared to local monitoring data. In addition, when testing the model verification exercise, a scenario including total nitrogen oxide (NO_x) background concentrations which included all roads in the study area, also underestimated the NO₂ levels at that receptor. It is therefore concluded that the traffic input data used in the model were inadequate to represent baseline conditions and the results yielded are therefore inaccurate.

Model set up

When testing the modelled results there were discrepancies observed which are believed to be due to model set up procedures. No data are provided on the height of the canyon street effect observed across the network modelled. When modelling NO₂ concentrations for the receptors considered at street level, much lower concentrations were predicted by the air quality report supporting the planning application at specific locations where the presence of poor dispersion conditions is observed due to narrow roads and relatively high buildings. This indicates that the model is significantly underestimating NO₂ concentrations in the study area at particular locations.

Data Processing

According to data processing procedures described in the report under scrutiny, a decision was made to increase the background value at Brill Place. This practice is considered incorrect and not acceptable. When the model root mean square error (RMSE) is unacceptable, the first step is to correct model input data and model set up procedures; in this instance update traffic data and consider addition of canyon street effects, to mention a few options. By further increasing the background value at this location, the traffic contribution at this location was minimised in the verification exercise as opposed to corrected, and the underestimation of NO₂ concentration levels exacerbated.

Reporting Content

The following issues were identified in the report

- 1) The air quality assessment report submitted to support the planning application did not include a quantitative assessment of the construction traffic emissions for Central Somers Town CIP development. For a development of this size and duration (over six months), the emissions of Heavy Duty Vehicles (HGVs) associated with the construction period will have a significant impact on local air pollution levels at relevant public exposure locations.
- 2) In addition, the assessment did not consider the impact associated with the proposed development on its own and in combination with other concurrent construction phase developments, namely High Speed Two (HS2), Maria Fidelis school consolidation projects, and Crossrail 2, located in the Somers Town Ward, Camden, London.
- 3) No Root Mean Square Error (RMSE) values associated with before and after model verification results were presented in the report. Therefore it was not possible to see the uncertainty associated with the model results prior to adjustment of results, and after, once the results were adjusted. It is important to report this as the level of uncertainty on baseline NO₂ concentrations needs to be taken into consideration. For instance, if the RMSE is 5, the baseline concentrations could be +/- 5µg/m³. Equally if the RMSE would be above 10, we would not have a usable model at the outset.

The testing of the verification exercise indicated that the RMSE of the model is likely to be between 15 and 20 which deems model input data and/or the model set up used unacceptable and the achieved results highly uncertain.

- 4) In London Plan Policy 7.14 on improving air quality, the Mayor requires that planning decisions should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people). In the light of the above, the traffic emissions and resulting concentrations were significantly underestimated and we currently have no evidence to base decisions on emission reductions required.
- 5) In addition, the Plan requires that developments should be at least 'air quality neutral' and not

lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

Given the extremely high levels of pollution observed in the study area, where levels are twice or more above the concentration value set to protect human health, the neutral assessment methodology using option four of current guidance should be used so we can work towards compliance and safeguard public health. When following guidance, professional judgement needs to be applied and the due diligence principle observed. Therefore, in this particular location of London, the Local Authority in exercising its duty to manage local air quality to achieve compliance is entitled to implement more stringent measures to protect human health and option four would have been more appropriate.

Report Conclusions and Recommendations

In the light of the above, the conclusions and recommendations of the report have to be read in the light of a very high level of uncertainty and care needs to be taken to minimise the impact of the proposed development on local air quality and safeguard human health.

RECOMMENDATIONS

Based on the results of the peer review undertaken which highlighted issues of inaccuracy and the great level of uncertainty associated with the results of the air quality assessment supporting the planning application, it is recommended that the planning decision associated with the proposed development takes into consideration the following:

- a) The need to impose sealed windows at least at street level and lower floors in order to safeguard human health. Accurate modelling needs to be undertaken to estimate height influenced by traffic emissions and hence deploy mechanical ventilation system at right locations;
- b) The need to require that a mechanical ventilation system with 97% or above efficiency in NOx removal is applied at street level floors and all floors where exceedences are predicted;
- c) Assessment of construction traffic emissions is considered (in isolation and cumulative with HS2, Maria Fidelis school consolidation works, and Crossrail 2) and weight given to their corresponding impacts on local NO₂ concentrations and public exposure.

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Appendix A - Glossary of Terms

Appendix B - Air Quality Objectives (AQO) (NO₂) for the protection of human health

Appendix C – Expert Profile

1 Introduction

1.1 Objectives

- 1.1.1 Air Quality Experts Global Ltd (AQEGlobal) has been commissioned by Camden Town District Management Committee (CTDMC) to undertake a peer review of the air quality assessment submitted to support the proposed Central Somers Town CIP planning application (2015/2704/P).
- 1.1.2 The peer review focused primarily on the technical aspects of the report and considered the following items:
 - a) Input data used,
 - b) model set up,
 - c) data processing,
 - d) reporting content, and
 - e) report conclusions and recommendations.
- 1.1.3 This report presents the findings of the peer review exercise, and offers recommendations in the light of the implications to the current planning application.
- 1.1.4 A glossary of terms used is provided in Appendix A.

1.2 Air Pollution, Health and the Planning System

- 1.2.1 Scientific evidence has demonstrated that hazardous levels of air pollution pose tangible threats for human health. Nitrogen dioxide (NO₂) has been linked to adverse effects on hospital admissions for various diagnoses; decrements in lung function; lung function growth; respiratory symptoms; asthma prevalence and incidence; cancer incidence; and, birth outcomes (US EPA, 2008; WHO, 2006).
- 1.2.2 A recent report (Kings College, 2015) estimates that there were 5,900 deaths in London associated with long-term exposure to NO₂ in 2010, and 3,500 deaths associated with fine particulate matter (PM_{2.5}) that year, bringing the overall figure to just under 9,500 premature mortalities.
- 1.2.3 Recent evidence from the Committee on the Medical Effects of Air Pollutants (COMEAP) suggests that air pollution is responsible for over 50,000 early deaths in Britain each year. Long-term exposure to air pollution is estimated to cause 29,000 premature deaths due to particulate matter (PM) and 23,500 premature deaths due to NO₂, each year in the UK, at an average loss of life expectancy of 6 months. It has been estimated that removing air pollution would have a bigger impact on life expectancy in the UK than eliminating passive smoking, alcoholism and road traffic accidents combined. The economic cost

from the impacts of air pollution in the UK whereas currently estimated at £9-19 billion every year, is believed to be significantly underestimated.

- 1.2.4 The effects are particularly “distressing” for people who live in urban areas where pollution spurs the development of lung and heart diseases. Population in urban areas in general, and specifically children and the elderly, as well as people with existing conditions, including asthma and cardio-vascular disease are particularly at risk.
- 1.2.5 The planning system has a key role in protecting people from unacceptable risks to their health and in providing adequate protection to the amenity value of land. Whereas these considerations must be balanced against other aims of the planning system, protecting human health is one of the priority aspects of Local Authorities’ policy.

1.3 Structure

- 1.3.1 Chapter 2 presents the legislative, policy and guidance context of the peer review assessment undertaken. Section 3 describes the methodology followed in testing the report results. Section 4 presents baseline conditions in the study area and Section 5 presents the results of the peer review exercise. Finally, Section 6 presents the conclusions and recommendations of the study.

2 Statutory, Policy and Guidance Context

2.1 Legislation

The Environment Act 1995, the Air Quality Strategy, The Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002, Local Air Quality Management and Local Action Plans

- 2.1.1 The Environment Act 1995 established the requirement for the Government and the devolved administrations to produce a National Air Quality Strategy (AQS) for improving ambient air quality. The first UK AQS was published in 1997 and has been revised several times since, with the latest edition published in 2007.
- 2.1.2 The Strategy sets UK air quality standards and objectives for eight key pollutants and recognises that action at national, regional and local level may be needed, depending on the scale and nature of the air quality problem. There is no legal requirement to meet objectives set within the UK AQS except where equivalent limit values are set within the EU Directives and associated transpositions.
- 2.1.3 The air quality standards are concentration limits which represent negligible or zero risk to health, based on medical and scientific evidence reviewed by the Expert Panel on Air Quality Standards (EPAQS) and the World Health Organisation (WHO). Above these limits sensitive members of the public (e.g. children, the elderly and the unwell) might experience adverse health effects.
- 2.1.4 The objectives set out the extent to which the UK Government and EU expect the standards to be achieved by a certain date and maintained thereafter. They take account of the costs, benefits, feasibility and practicality of achieving the standards. Air Quality Objectives (AQO) which are relevant to the current study (NO₂) for the protection of human health are outlined in Appendix B.
- 2.1.5 Many of the objectives in the AQS have been made statutory in England with the Air Quality (England) Regulations 2000 and the Air Quality (England) (Amendment) Regulations 2002 for the purpose of Local Air Quality Management (LAQM). These set a series of air quality standards and air quality objectives with the aim of protecting human health.
- 2.1.6 The Regulations require that likely exceedences of Air Quality Objectives are assessed in relation to:

“...the quality of the air at locations which are situated outside of buildings or other natural or man-made structures, above or below ground, and where members of the public are regularly present...”
(Stationery Office, 2000 and 2002)

- 2.1.7 The AQO apply only where members of the public are likely to be regularly present for the averaging time of the objectives (i.e. where people will be exposed to pollutants). The annual mean objectives apply to all locations where members of the public might be regularly exposed; these include building façades of residential properties, schools, hospitals, care homes etc. The 24 Hour Mean Objectives

apply to all locations where the annual mean objective would apply, together with hotels and gardens of residential properties. The 1 Hour Mean Objectives also apply at these locations as well as at any outdoor location where a member of the public might reasonably be expected to stay for 1 hour or more, such as shopping streets, parks and sports grounds, as well as bus stations and railway stations that are not fully enclosed.

2.1.8 These periods reflect the varying effects on health of differing exposures to pollutants, for example temporary exposure on the pavement adjacent to a busy road, compared with the exposure of residential properties adjacent to a road.

2.1.9 The 1995 Environment Act also established the UK system of Local Air Quality Management (LAQM), that requires local authorities go through a process of review and assessment of air quality in their areas of jurisdiction, identifying places where objectives are not likely to be met.

2.1.10 Where any of the prescribed objectives are not achieved within any part of a local authority's area, the authority concerned will have to designate that part of its area as an Air Quality Management Area (AQMA) (section 83(1) of the 1995 Act). An action plan covering the designated area will then have to be prepared setting out how the authority intends to exercise its powers in relation to the designated area in pursuit of the achievement of the prescribed objectives (section 84(2) of the 1995 Act).

2.1.11 Camden has produced its most recent Air Quality Action Plan in 2013 which includes a range of actions grouped under the following themes:

- i. Reducing transport emissions;
- ii. Reducing emissions associated with new development;
- iii. Reducing emissions from gas boilers and industrial processes;
- iv. Air quality awareness-raising initiatives; and
- v. Lobbying and partnership working.

2.1.12 These plans contribute, at local level, to the achievement of 2008/50/EC limit values. To account for the next phase of actions to reduce air pollution throughout its jurisdiction, Camden are currently consulting on Camden's next Clean Air Action Plan 2016-18 which sets out the air quality issues and opportunities in Camden, and includes a range of actions grouped under the following themes:

Air Quality Directive 2008/50/EC

2.1.13 The Air Quality Directive 2008/50/EC came into force on the 11th June 2008. It sets air quality limit values, target values, and critical levels for a number of air pollutants established by the European Parliament and Council for the protection of human health, vegetation and ecosystems. These are sulphur dioxide (SO₂), nitrogen dioxide (NO₂), oxides of nitrogen (NO_x), particulate matter smaller than 10µm in aerodynamic diameter (PM₁₀ and PM_{2.5}), lead (Pb), benzene (C₆H₆), carbon monoxide (CO) and ozone (O₃). These have been transposed into UK legislation by the 2010 Regulations.

2.1.14 It also sets new standards and target dates for reducing concentrations of fine particles. Under the Directive Member States (MS) are required to reduce exposure to PM_{2.5} in urban areas by an average of 20% by 2020 based on 2010 levels. The magnitude of the required reduction depends on national average concentrations between 2009 and 2011. For the UK, from the 47 PM_{2.5} stations used in a study by DEFRA in 2011, it is likely that average PM_{2.5} concentrations for 2009-2011 will be between 13-14µg/m³. This would require the UK to comply with a 15% reduction target for 2020, equating to a required reduction in average concentrations of around 2.0µg/m³. The directive also obliges MS to meet a Limit Value of 25µg/m³ by 2015 and a Limit Value of 20µg/m³ by 2020.

2010 Regulations

2.1.15 These Regulations transpose 2008/50/EC into the UK legislation and also incorporate the 4th air quality daughter directive (2004/107/EC) that sets targets for levels in outdoor air of certain toxic heavy metals (Arsenic (As), Cadmium (Cd), Nickel (Ni), Mercury (Hg)), Benzo(a)pyrene and other polycyclic aromatic hydrocarbons (PAHs).

2.2 Policy

National Policies

NPPF

2.2.1 The National Planning Policy Framework (NPPF) (2012) sets out planning policy for England. It places a general presumption in favour of sustainable development, stressing the importance of local development plans, and states that the planning system should perform an environmental role to minimise pollution.

2.2.2 Sustainable development is defined as:

'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs'

2.2.3 One of the twelve core planning principles notes that planning should "contribute to reducing pollution". To prevent unacceptable risks from air pollution, planning decisions should ensure that new development is appropriate for its location.

2.2.4 The NPPF states that the effects of pollution on health and the sensitivity of the area and the development should be taken into account. More specifically the NPPF makes clear that:

- *'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan';*
- *'The planning system should contribute to and enhance the natural and local environment by:...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soils, air, water, or noise pollution..';*
- *'In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity values, where consistent with other policies in this Framework.'*
- *'...local planning authorities should focus on whether the development itself is an acceptable use of the land, and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. Local planning authorities should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities'; and*
- *'Local Planning authorities should consider where otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning*

Obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.'

2.2.5 The NPPF is supported by Planning Practice Guidance (PPG) (DCLG, 2014), which includes guiding principles on how planning can take account of the impacts of new development on air quality. The PPG states that

"Defra carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with EU Limit Values" and "It is important that the potential impact of new development on air quality is taken into account where the national assessment indicates that relevant limits have been exceeded or are near the limit".

2.2.6 The role of the local authorities is covered by the LAQM regime, with the PPG stating that local authority Air Quality Action Plans *"identify measures that will be introduced in pursuit of the objectives"*.

2.2.7 The PPG also includes that "dust can also be a planning concern, for example, because of the effect on local amenity". The PPG states that:

"Whether or not air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to generate air quality impact in an area where air quality is known to be poor. They could also arise where the development is likely to adversely impact upon the implementation of air quality strategies and action plans and/or, in particular, lead to a breach of EU legislation".

2.2.8 The PPG sets out the information that may be required in an air quality assessment, making clear that "Assessments should be proportional to the nature and scale of development proposed and the level of concern about air quality". It also provides guidance on options for mitigating air quality impacts, as well as examples of the types of measures to be considered. It makes clear that:

"Mitigation options where necessary, will depend on the proposed development and should be proportionate to the likely impact".

Regional Policies

The London Plan

2.2.9 The London Plan (GLA, 2015) sets out the spatial development strategy for London consolidated with alterations made to the original plan since 2011. It brings together all relevant strategies, including those relating to air quality.

2.2.10 Policy 7.14, 'Improving Air Quality', addresses the spatial implications of the Mayor's Air Quality Strategy and how development and land use can help achieve its objectives. It recognises that Boroughs should have policies in place to reduce pollutant concentrations, having regard to the Mayor's Air Quality Strategy.

2.2.11 Policy 7.14B(c), requires that development proposals should be "at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as designated Air Quality Management Areas (AQMAs)).

The Mayor's Air Quality Strategy

2.2.12 The revised Mayor's Air Quality Strategy (MAQS) was published in December 2010 (GLA, 2010). The overarching aim of the Strategy is to reduce pollution concentrations in London to achieve compliance with the EU limit values as soon as possible. The Strategy commits to the continuation of measures identified in the 2002 MAQS, and sets out a series of additional measures including a Low Emission Zone.

2.2.13 The MAQS also addresses the issue of 'air quality neutral' and states that "GLA will work with boroughs to assist in the development of methodologies that will allow an accurate assessment of the impacts of the emissions of new developments" (Para 5.3.19).

Local Policies

Camden Development Policies 2010-2025

2.2.14 Camden Development Policies highlight the need to promote higher standards of air quality within the borough. It is recognised that parts of Camden have some of the poorest air quality levels in London and consequently the whole of the borough has been declared an Air Quality Management Area. The Council has produced an Air Quality Action Plan that identifies actions and mitigating measures necessary to improve air quality in the borough.

2.2.15 A key challenge therefore is to make Camden local environment better by reducing air pollution. This underpins many of the Core Strategy policies, including CS9 – Achieving a successful Central London,

CS11 – Promoting sustainable and efficient travel, CS13 – Tackling climate change through promoting higher environmental standards and CS16 – Improving Camden’s health and well-being.

2.2.16 The designation of Central London as a Clear Zone region is a key way to reduce congestion and promote walking and cycling as a way of improving the borough’s air quality.

2.2.17 DP32 policy states that

“The Council will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality”.

“The Council will also only grant planning permission for development in the Clear Zone region that significantly increases travel demand where it considers that appropriate measures to minimise the transport impact of development are incorporated. We will use planning conditions and legal agreements to secure Clear Zone measures to avoid, remedy or mitigate the impacts of development schemes in the Central London Area”.

2.3 Guidance

2.3.1 The following guidance documents and publications have been used in this assessment:

London Local Air Quality Management Review and Assessment Policy Guidance (LLAQM.PG(16)) (GLA, 2016) and London Local Air Quality Management Review and Assessment Technical Guidance (LLAQM.TG(16)) (GLA, 2016)

2.3.2 The legal basis for the LLAQM system is Part IV of the 1995 Act, which sets out the London authorities' local air quality management functions, together with the Mayor's responsibilities and statutory guidance from the Secretary of State for the Environment, Food and Rural Affairs.

2.3.3 The LLAQM Policy Guidance and accompanying Technical Guidance LLAQM.TG(16) have been developed in close consultation with the boroughs and Defra. LLAQM.TG(16) is based on the national Defra guidance, but with a number of London-specific amendments and information.

2.3.4 2.06. All local authorities in England must have regard to the Secretary of State's guidance when discharging their Part IV functions. National guidance (Policy Guidance LAQM.PG(16)) has been issued by the Secretary of State covering the remainder of England except London. However, this statutory guidance states the following in relation to London (see paragraph 1.5):

"Supervision of the LAQM system in Greater London has been devolved to the Mayor of London, to whom powers to intervene and direct boroughs have been given under Part IV of the Environment Act 1995. The Secretary of State expects London boroughs to participate in the Mayor's London LAQM framework and have regard to any advice or guidance issued by the Mayor of London as to the performance of their functions under LAQM."

2.3.5 This Policy Guidance and its accompanying Technical Guidance LLAQM.TG(16) are therefore documents to which London's 32 boroughs and the City of London must have regard.

2.3.6 The establishment of the LLAQM system reflects the fact that the Mayor has broad powers of intervention under section 85 of the 1995 Act. These include conducting an air quality review in any borough's area to identify any part where air quality standards and objectives are not being met, as well as the power to issue directions to require an authority to take action to address the issue (see section 85(3) and (4)). Specifically, under section 85(5), the Mayor may give directions to boroughs requiring them to take such steps specified in the directions as he considers appropriate for the implementation of any European Union air quality obligations (e.g. under relevant EU directives).

- 2.3.7 This is particularly relevant in the context of the current breach of NO₂ air quality objectives and limit values under the EU Ambient Air Quality Directive (2008/ 50/ EC) in parts of London.
- 2.3.8 However, the Mayor regards his powers as being “reserve powers” in nature. He recognises London boroughs have the primary responsibility for LAQM and are best placed to exercise these functions in light of local circumstances and their local expertise.
- 2.3.9 Therefore the Mayor’s view is that his powers should only to be used in exceptional circumstances and after consultation, in accordance with the 1995 Act. The very purpose of the new LLAQM system is to put in place a framework that gives confidence to boroughs and the Secretary of State that they are properly fulfilling their Part IV duties.
- 2.3.10 Proper participation in the LLAQM system and compliance with the relevant Mayoral advice and guidance should render statutory intervention by the Mayor unnecessary.
- 2.3.11 Development and construction are very significant contributors to air pollution in London. Boroughs have a vital role to play in reducing this through their Planning and Development Control processes. Within the Sustainable Design and Construction and Control of Dust and Emissions SPGs, the Mayor has outlined requirements and guidance to reduce air pollution impacts in order to ensure that boroughs have an adequate policy framework to enable them to address this pollution source through the planning process.
- 2.3.12 The planning process is a key tool that boroughs have to reduce pollution, and one of the aims of the LLAQM system is ensuring that the importance of this role is highlighted.

GLA SPG: Sustainable Design and Construction

- 2.3.13 The GLA’s SPG on Sustainable Design and Construction (GLA, 2014a) provides details on delivering some of the priorities in the London Plan. Section 4.3 covers Air Pollution. It defines when developers will be required to submit an air quality assessment, explains how location and transport measures can minimise emissions to air. It also sets out, for the first time, guidance on how Policy 7.14B(c) of the London Plan relating to ‘air quality neutral’ should be implemented.

GLA SPG: The Control of Dust and Emissions During Construction and Demolition

- 2.3.14 The GLA’s SPG on The Control of Dust and Emissions During Construction and Demolition (GLA, 2014b) outlines a risk assessment based approach to considering the potential for dust generation from a construction site, and sets out what mitigation measures should be implemented to minimise

the risk of construction dust impacts, dependent on the outcomes of the risk assessment. This guidance is largely based on the Institute of Air Quality Management's (IAQM) 2014 guidance on the Assessment of dust from demolition and construction (Institute of Air Quality Management, 2014), and it states that "the latest version of the IAQM Guidance should be used".

Land-Use Planning & Development Control: Planning For Air Quality, April 2015

2.3.15 There is no official guidance in the UK on how to describe air quality impacts, nor how to assess their significance. The approach developed jointly by Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) (EPUK & IAQM, 2015) has therefore been used. This includes defining descriptors of the impacts at individual receptors, which take account of the percentage change in concentrations relative to the relevant air quality objective, rounded to the nearest whole number, and the absolute concentration relative to the objective.

Institute of Air Quality Management: Guidance on the Assessment of Dust from Demolition and Construction (February 2014)

2.3.16 This document was produced to provide guidance to developers, consultants and environmental health practitioners on how to undertake a construction impact assessment. The emphasis of the guidance is on classifying the risk of dust impacts from a site which then allow mitigation measures commensurate with that risk to be identified.

London Councils' Air Quality and Planning Guidance (January 2007)

2.3.17 The London Councils have published guidance for undertaking air quality assessments in the London Boroughs, the majority of which have declared AQMAs. The guidance sets out suggested methods for undertaking such an assessment within the London area and provides a methodology to assist in determining the impacts of a development proposal on air quality. The main message of the document is that the factor of greatest importance will generally be the difference in air quality as a result of the proposed redevelopment.

3 Methodology

3.1.1 The peer review of the air quality assessment report supporting the Central Somers Town CIP application addressed the content, methodology, reporting and conclusions of the document and was completed by AQEGlobal following:

- b) Department of Environment, Food and Regional Affairs' (Defra) guidance on local air quality management; this included supplementary notes;
- c) the Department for Transport TAG Unit M1.2 Data Sources and Surveys,
- d) the National Planning Policy Framework (NPPF),
- e) the London Plan,
- f) Mayor's Air Quality Strategy (MAQS),
- g) the Greater London Authority (GLA) Local Authorities' Supplementary Planning Guidance (SPG) on Sustainable Design and Construction,
- h) GLA's SPG on The Control of Dust and Emissions from Construction and Demolition,
- i) Camden Local Policies,
- j) Camden Local Action Plan,
- k) The London Local Air Quality Management guidance (both technical and policy),
- l) London Councils' Air Quality and Planning Guidance, and
- m) the UK Institute of Air Quality Management guidance.

3.1.2 To test suitability of input data used, model set up and data processing procedures, detailed air quality dispersion modelling using ADMS Roads software was undertaken, using both the London Atmospheric Emissions Inventory (LAEI) recently released (March, 2016) 2013 traffic emissions and Civil Engineers traffic survey dated July 2005, as used in the air quality report under scrutiny. Meteorology data were supplied by the Met Office for the Heathrow airport station, and were used in the model setup.

3.1.3 Results were also compared with the nitrogen dioxide (NO₂) concentration levels across the study area for 2013 as published by GLA.

3.1.4 The methodology followed in this study applied current best practice, and used the most up to date tools and data released by Defra for air quality assessment undertakings.

3.1.5 Sections below address the elements in the air quality assessment which the peer review has identified as weak and contributed to the uncertainties observed in the results reported.

3.1 Evaluation of model input data

3.1.1 Evaluating the quality and representativeness of model input data is key for robust model results. Errors in dispersion modelling commonly arise at all stages of the dispersion modelling process, and are usually associated with the following elements:

- a)** Emissions activity data;
- b)** Emissions factors;
- c)** Meteorological data;
- d)** Assumptions on background contributions;
- e)** Dispersion model parameters;
- f)** Road geometry;
- g)** Atmospheric chemistry (e.g. conversion of NO_x to NO₂);
- h)** Receptor locations.

3.1.2 The analysis within this document is focused towards dispersion modelling of road both point and traffic emissions, as these are the principal emission sources associated with the current planning application.

3.1.3 In general terms, various studies have concluded that the most important parameters that influence the outcome of modelling results are:

- a) The selection of background pollutant concentrations;
- b) The accuracy of the emissions data;
- c) The NO_x:NO₂ chemistry assumptions (in the case of NO₂).

3.1.4 Where practicable, practitioners are encouraged to test the sensitivity of their assumptions to see if this improves the model performance. In order to reduce model run times, such sensitivity tests may be performed with a reduced number of emissions sources and/or a limited number of receptor points.

3.1.5 The traffic generated by the both the construction and operation phases of the proposed development is likely to have an effect on local air quality concentrations, within and around the application site.

3.1.6 To address the emissions activity data, an evaluation of the traffic data and pollutant emissions which included details of total Annual Average Daily Traffic flows (AADT) considered and vehicle speeds (kph) for the local road network was undertaken.

3.2 Model Set Up (street canyons)

- 3.2.1 The prediction of pollutant concentrations in street canyons is subject to considerable uncertainty. In particular, the local wind field within the canyon is unlikely to be well represented by the meteorological dataset measured at an open site.
- 3.2.2 Never the less, canyon street effects need to be suitably accounted for in the model set up to account for the trapping of pollution and poor dispersion conditions that occur in these environments, which can significantly increase public exposure to elevated pollution levels.
- 3.2.3 To account or street canyon effects, the peer review exercise undertaken undertook sensitivity tests using two model set up strategies – with and without canyon street effects – and compared the observed results.

3.3 Data Processing (background contributions)

- 3.3.1 Dispersion models will only predict pollutant concentrations arising from the local emissions sources that have been input to them. In most cases, it will also be necessary to take into account the impact of sources from outside the 'model area' i.e. the background contribution.
- 3.3.2 In the case of some pollutants and locations, the background contribution may be substantial, and the assumptions are critical to outcome of the study. The assumptions on background concentrations may be derived using a variety of approaches. These may include use of the UK background pollution maps, local measured data, or predictions based on rural monitoring data outside of the study area.
- 3.3.3 Wherever possible, a verification of the background concentrations should be carried out so that overall model results can be relied upon. For example, where reliance is placed upon the UK background pollution maps or independently modelled data, these should be compared with local measured data, including continuous monitoring sites and validated diffusion tube results.

3.4 Reporting Content

- 3.4.1 The content of the report under scrutiny was evaluated in the light of crucial information to inform the current planning application.

3.5 Report Conclusions and Recommendations

- 3.5.1 The report's conclusions and recommendations were evaluated in the light of the peer review undertaken.

4 Baseline Conditions

4.1 Monitoring Data

4.1.1 Table 4.1 presents the monitored and modelled results at each monitoring location for 2013 and 2014 (base years considered in the peer review exercise). Whereas it is observed a reasonable improvement in annual mean monitored concentrations of NO₂ from 2013 to 2014 at Euston Road and Shaftesbury Avenue continuous monitoring stations, the NO₂ annual mean limit value to protect human health is exceeded both years at all locations.

Table 4.1 – Monitored and modelled NO₂ annual mean values at each monitoring station (2013, 2014)

Station	Annual Mean Concentration – NO ₂ (µg/m ³)		
	Monitored (2013)	Monitored (2014)	Modelled (2013/2014)
Corner of Finchley Road and College Crescent, Swiss Cottage	63.0	66.0	61.7
Euston Road at junction with Dukes Road	106.0	98.0	69.6
Shaftesbury Avenue	74.0	69.0	85.9
Russell Square Gardens, London Bloomsbury	44.0	45.0	46.6

4.2 Modelling Data

4.2.1 Figures 4.1 and 4.2 present the LAEI annual mean NO₂ modelled results across the study area for 2013. Modelling results indicate the study area is predicted to be above the annual mean limit value for this pollutant in 2013. Dispersion modelling results using 2014 emissions indicate very similar results to the LAEI 2013 concentrations, which is just one year apart of the baseline year considered in the air quality assessment under scrutiny. Figure 4.3 presents monitoring data and Defra mapped background concentrations.

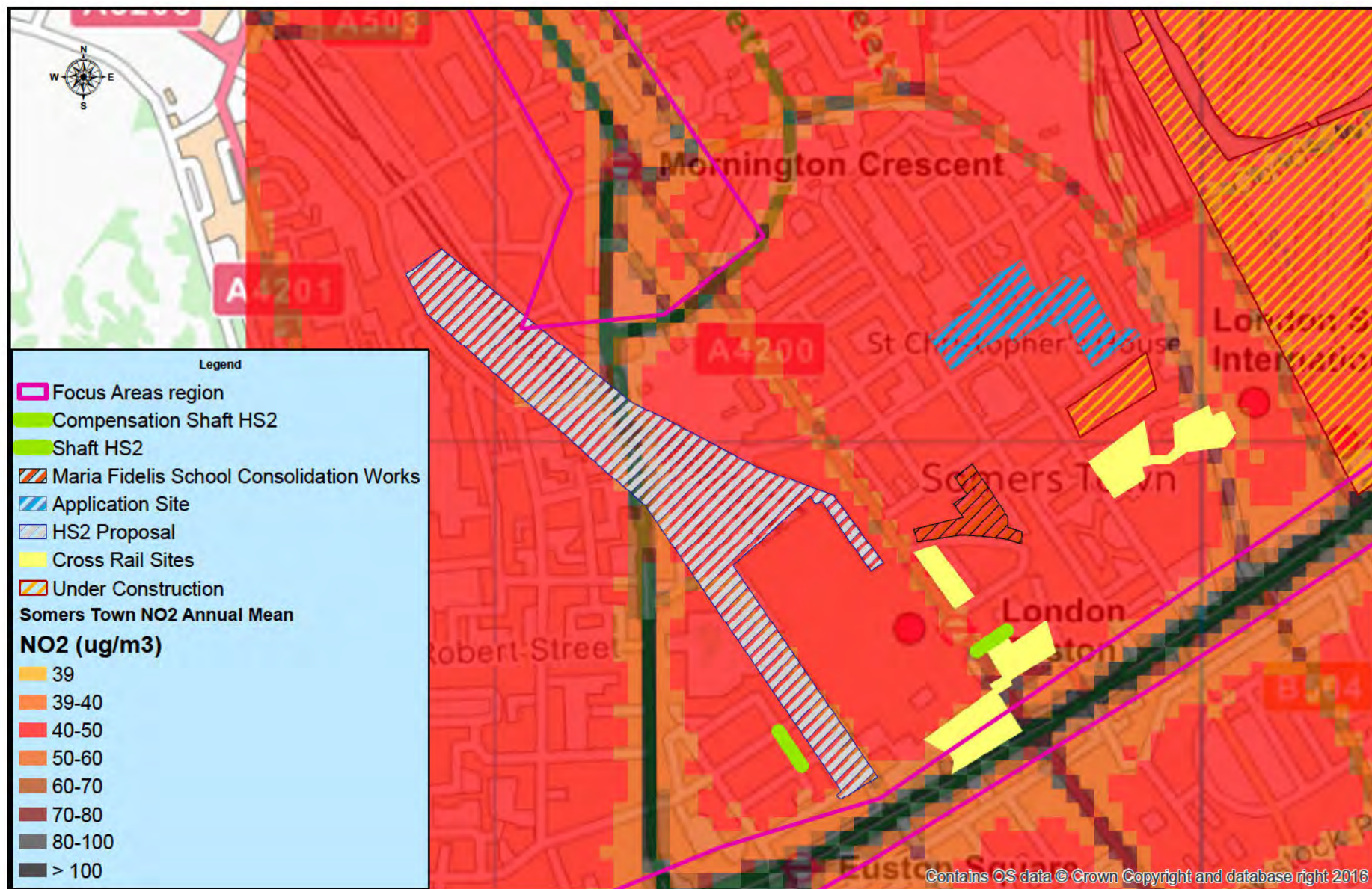


Figure 4.1 Map of Modelled NO2 Annual Mean Concentrations for 2013/2014 at Public Exposure Locations within the study area (Grid)

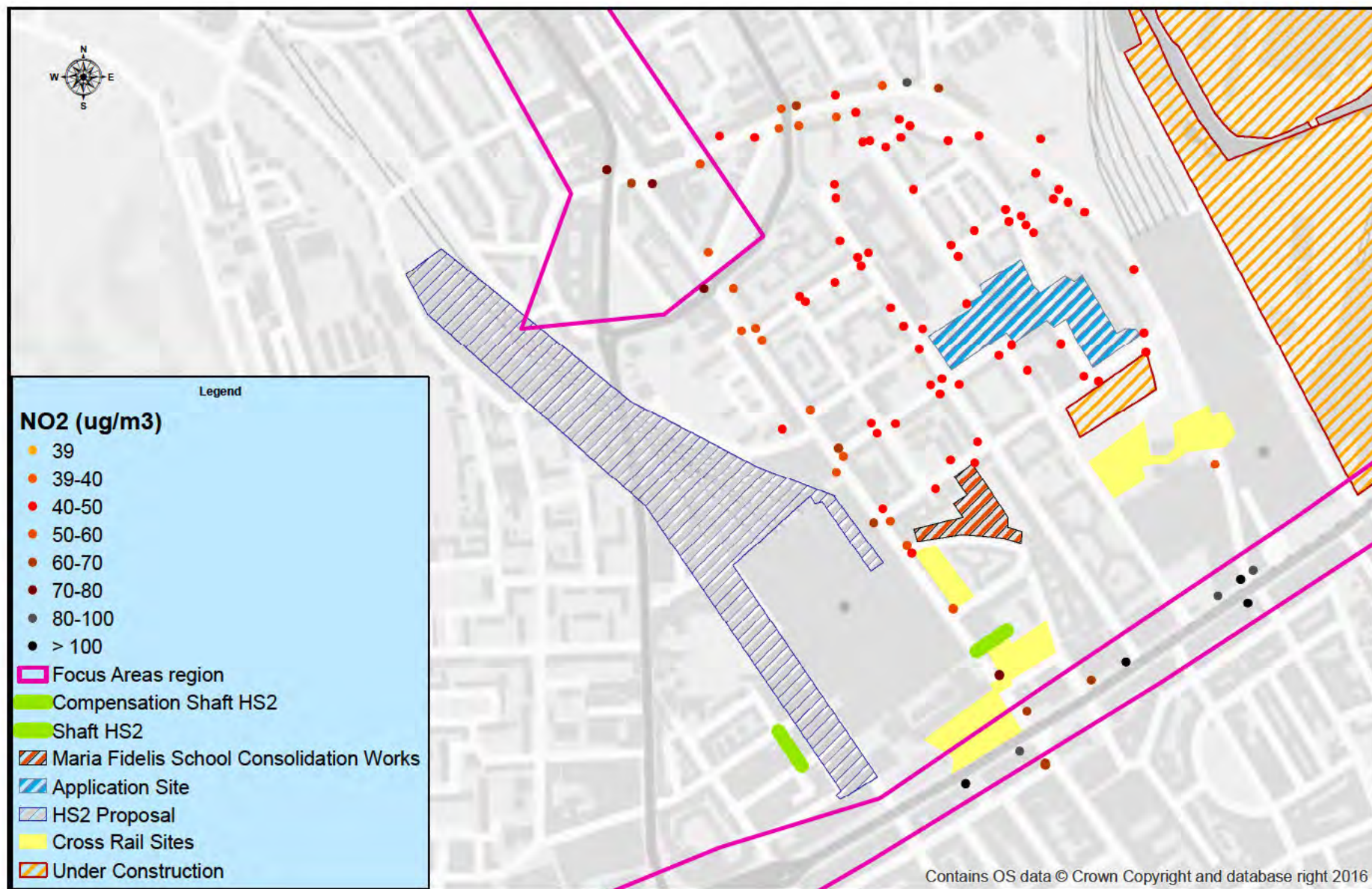


Figure 4.2 Map of Modelled NO2 Annual Mean Concentrations for 2013/2014 at Public Exposure Locations within the study area (Point)

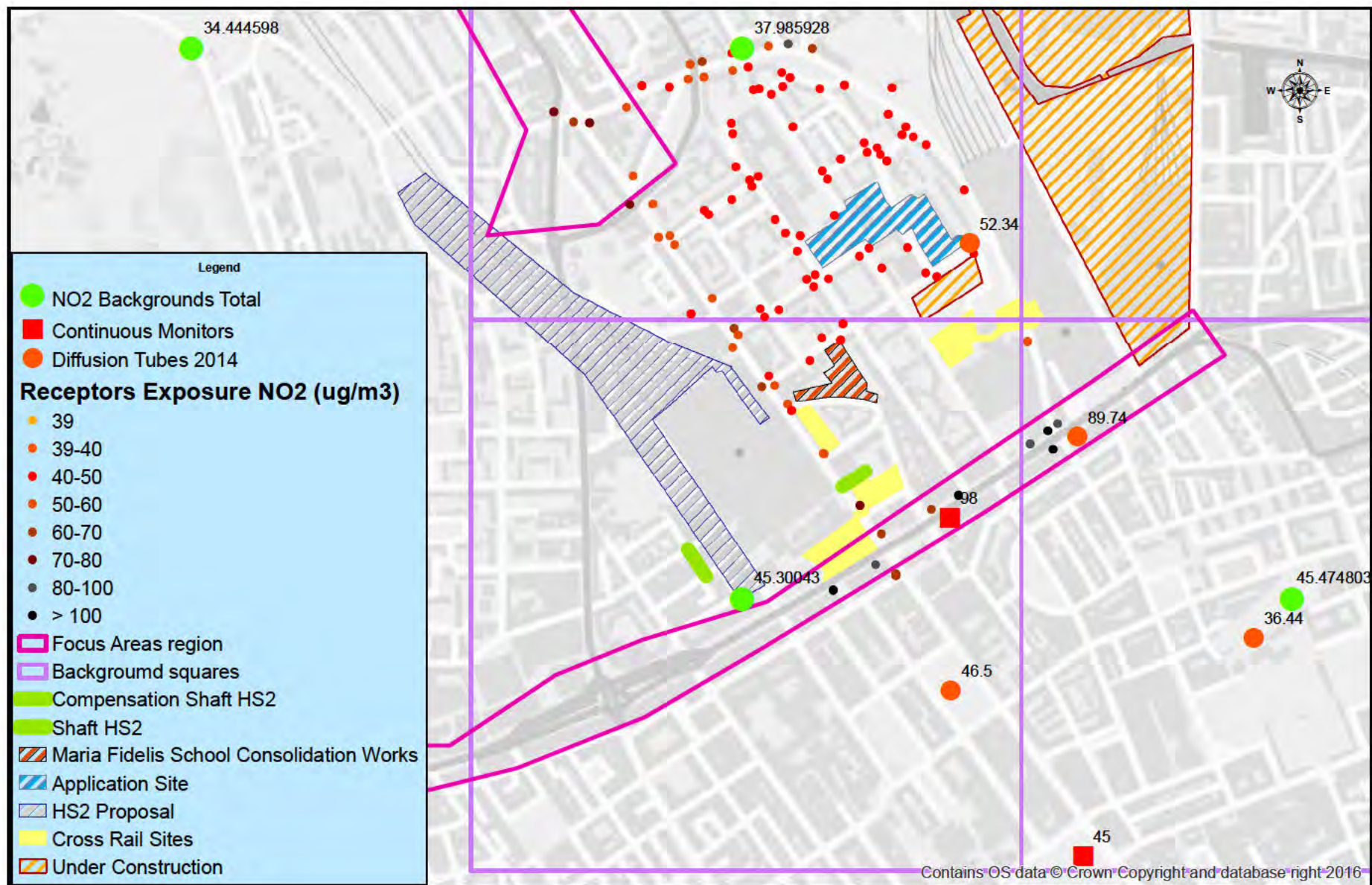


Figure 4.3 Monitoring Data and Defra Mapped NO2 Background Concentrations within the study area

5 Peer Review

- 5.1.1 The sections below present each of the items analysed in the peer review work undertaken. The review of the report has indicated that the point sources were all suitably modelled and no issues were found either with input data nor model set up procedures. Therefore, only the results for the traffic modelling work are addressed in turn below.

5.1 Input Data Used

Traffic Data

- 5.1.2 The traffic survey used to support the planning application was undertaken in July 2015, after some schools in Somers Town had broken up for Summer holidays. This is a non-neutral month and therefore is likely to underestimate the traffic flows in the area.
- 5.1.3 According to DfT TAG Unit 1.2, surveys should be carried out during a 'neutral', or representative, month avoiding main and local holiday periods, local school holidays and half terms, and other abnormal traffic periods. National experience is that the following Monday to Thursdays can be neutral:
- late March and April – excluding the weeks before and after Easter;
 - May - excluding the Thursday before and all of the week of each Bank Holiday;
 - June;
 - September – excluding school holidays or return to school weeks;
 - all of October; and
 - all of November – provided adequate lighting is available.
- 5.1.4 Reproducing the model verification exercise submitted in the air quality report under scrutiny, it was observed that the receptor at Brill Place was significantly underestimating NO₂ concentrations at this location when compared to local monitoring data.
- 5.1.5 In addition, when testing the model verification exercise, a scenario including total nitrogen oxide (NO_x) background concentrations in the calculations (which included emissions from all roads in the study area), was also considered. The results of this scenario still significantly underestimated the NO₂ levels at that receptor which indicates that traffic input data were significantly underestimating emissions in the study area. These results are presented in table 5.1.
- 5.1.6 It is cosequently concluded that the traffic input data used in the model were inadequate to represent baseline conditions and the results yielded are therefore inaccurate.

Table 5.1 – Scenario including total nitrogen oxide (NO_x) background concentrations in the verification calculations

Monitor	% Difference in NO ₂ after adjustment	
	Applicant's report	Peer review results (with Total NO _x Backgrounds)
DT Brill Place	-24.5	-15.9
DT Euston Road	-0.3	0.3
CM Euston Road	-10.3	-0.4
DT Tavistock Gardens	-6.8	-2.9

5.2 Model Set Up

- 5.2.1 When testing the modelled results there were discrepancies observed which are believed to be due to model set up procedures.
- 5.2.2 No data are provided on the height of the canyon street effect observed across the network modelled in the version of the report submitted. Therefore the full network was scrutinised and heights of the canyon street effect included in the model set up as part of the peer review exercise.
- 5.2.3 When modelling NO₂ concentrations for the receptors considered at street level, much lower concentrations were predicted by the air quality report supporting the planning application at specific locations where the presence of poor dispersion conditions is observed due to narrow roads and relatively high buildings. This indicates that the model is significantly underestimating NO₂ concentrations in the study area at particular locations.

5.3 Data Processing

- 5.3.1 According to data processing procedures described in the report under scrutiny, due to the model results being significantly lower than the monitoring data, a decision was made to increase the background value at Brill Place.
- 5.3.2 This practice is considered incorrect and not adequate. When the model root mean square error (RMSE) is unacceptable, the first step is to correct model input data and model set up procedures; in this instance update traffic data and consider addition of canyon street effects, to mention a few options.
- 5.3.3 By further increasing the background value at this location, the traffic contribution at this location was minimised in the verification exercise as opposed to corrected, and the underestimation of NO₂ concentration levels produced by traffic emissions exacerbated.
- 5.3.4 In addition, there is a tight relationship between NO₂ and NO_x which without proper monitoring we cannot estimate. By changing one we need to know how to change the other. By increasing the background value NO₂ at Brill Place, the model verification was altered; the higher the background value, the smaller the road traffic contribution considered by the model which leads to an incorrect adjustment of the model.
- 5.3.5 A comparison of NO₂ monitored background values against Defra NO₂ background levels was undertaken by the peer review exercise. Table 5.2 presents the comparison results.
- 5.3.6 It can be concluded that there is no reason to believe that NO₂ backgrounds would be different in the study area as there is a reasonable match between NO₂ background monitoring data and Defra estimated NO₂ background maps.

Table 5.2 –Comparison of NO₂ monitored background values against Defra NO₂ background map levels

Monitor/	Annual Mean Concentration – NO ₂ (µg/m ³) (2014)	
	Background Monitored value	Defra estimated background maps
CM, London Bloomsbury	45.0	45.5
DT, Tavistock Gardens	46.5	45.3

CM = continuous monitors

DT = diffusion tubes

5.4 Reporting Content

5.4.1 It is important that relevant information is presented in air quality reports to support planning applications. The peer review of the air quality report submitted to support Central Somers Town CIP planning application has indicated that there were two pieces of crucial information missing. These are the a) Impacts on local air quality associated with construction traffic emissions and b) the uncertainty of the modelled results associated with baseline traffic emissions. In addition, best practice would have used a more stringent approach in determining the neutral nature of the proposed development.

5.4.2 These are addressed in turn below.

Impacts on local air quality associated with construction traffic emissions

5.4.3 The air quality assessment report submitted to support the planning application did not include a quantitative assessment of the construction traffic emissions for Central Somers Town CIP development.

5.4.4 For a development of this size and duration (over six months), the emissions of Heavy Duty Vehicles (HGVs) associated with the construction period will have a significant impact on local air pollution levels at relevant public exposure locations and need to be considered in the planning decision process.

5.4.5 A separate study was undertaken by Air Quality Experts Global which indicated that the impacts associated with the construction phase of the proposed development ranged from moderate to substantial adverse at certain locations, being considerably increased by the cumulative effect of other significant construction works concurrent with the application site (HS2, Maria Fidelis school consolidation works, and Crossrail 2).

Uncertainty of the modelled results associated with baseline traffic emissions

5.4.6 There are essentially two main types of error or uncertainty with dispersion models. Systematic errors occur when the model shows the same trend at all times e.g. the model consistently under-predicts concentrations when compared against the true value, for a given application. This introduces a bias to the modelling predictions. The systematic error may be considered synonymous with the accuracy of the model predictions, i.e. how close the predicted value is to the true value.

5.4.7 There are also likely to be random errors in addition. These random errors may be considered synonymous with the precision of the model i.e. how wide is the scatter or residual variability of the predicted values compared with the true value, once the bias has been allowed for.

- 5.4.8 There are a variety of approaches that can be used to estimate the residual uncertainty of the dispersion modelling results. Any estimate of residual uncertainty should always take place after any corrections for bias have been made.
- 5.4.9 In evaluating planning applications, Local Authorities may find it useful to estimate the residual uncertainty of any dispersion modelling results submitted; this will assist them in understanding the level of confidence they can attribute to the outcome of the modelling results.
- 5.4.10A principal objective of understanding the uncertainties are so that practitioners can seek to minimise the errors at each stage of the modelling process.
- 5.4.11 The model uncertainty could be defined as margin of error around the prediction. It results from the uncertainties associated with the model formulation, input data and measured data. Model verification is the process to evaluate the model performance and examine and reduce the above uncertainties. This is achieved by comparing predicted and measured concentrations. Where there is a disparity between the predicted and measured value, the first step should always be to check the various input data and model parameters, in order to reduce or eliminate the errors.
- 5.4.12 To reduce the disparity between modelled and measured data, if required, a second step may still be applied, where the predicted results are adjusted to account for the systematic bias. It should be noted that even after the model has been verified and adjusted, there will be a residual uncertainty that remains.
- 5.4.13 A number of simple statistical methods such as correlation coefficient, fractional bias and Root Mean Square Error (RMSE) can be used to assess model uncertainty. The values of the above statistic provide an estimate and in some cases direction (under- or over-prediction) of uncertainty associated with model predictions and in turn the confidence that can be bestowed to model results.
- 5.4.14 The peer review exercise indicated that the air quality assessment report under scrutiny did not report the Root Mean Square Error (RMSE) values associated with before and after model verification results as presented in the report.
- 5.4.15 Therefore it was not possible to see the uncertainty associated with the model results prior to adjustment of results, and after, once the results were adjusted. It is important to report this information as the level of uncertainty on baseline NO₂ concentrations needs to be taken into consideration. For instance, if the model RMSE is 5, the baseline concentrations could be +/- 5µg/m³. Equally if the RMSE would be above 10, we would not have a usable model at the outset and the input data and model set up would have to be revisited.
- 5.4.16 The testing of the verification exercise indicated that the RMSE of the model without adjustment is likely to be between 15 and 20 which deems model input data and/or the model

set up used unacceptable and the achieved results highly uncertain.

5.4.174 In London Plan Policy 7.14 on improving air quality, the Mayor requires that planning decisions should minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) and where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people).

5.4.18 In the light of the above, the traffic emissions and resulting concentrations were significantly underestimated and we currently have no evidence to base decisions on emission reductions required.

Neutral Assessment Methodology

5.4.195 In addition, the Plan requires that developments should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

5.4.20 Given the extremely high levels of pollution observed in the study area, where levels are twice or more above the concentration value set to protect human health, the neutral assessment methodology using option four of current guidance should be used so we can work towards compliance and safeguard public health.

5.4.21 When following guidance, professional judgement needs to be applied and the due diligence principle observed. Therefore, in this particular location of London, the Local Authority in exercising its duty to manage local air quality to achieve compliance is entitled to implement more stringent measures to protect human health and option four would have been more appropriate

5.5 Conclusions and Recommendations

5.5.1 In the light of the above, the conclusions of the report have to be read in the light of a very high level of uncertainty and care needs to be taken to minimise the impact of the proposed development on local air quality and safeguard human health.

6 Conclusions and Recommendations

6.1 Conclusions

- 6.1.1 A peer review of the air quality report submitted to support Central Somers Town CIP planning application was undertaken. The report was evaluated for content, methodology and validity of results addressing the following main elements: input data, model set up, processing of data, content of report, and report conclusions and recommendations.
- 6.1.2 The results of the peer review work indicated the following key issues:
- a) Model input – the traffic data used in the air quality assessment proved to be inadequate to describe vehicular emission both at the application site and the road network in its vicinity. The number of vehicles is considerably under estimated which results in incorrect prediction of road contributions to local air quality and inappropriate characterization of baseline conditions. This is clearly supported by GLA's predicted NO₂ concentrations for 2013, just one year apart from the year used in the study to describe baseline (2014), using 2013 emission data as released March 2016.
 - b) Model set up – advanced dispersion modelling was used to test predicted road contributions at selected receptors as per air quality report under scrutiny assessing the canyon street effect model set up scenario. Results indicated few discrepancies where observed along areas with a marked canyon street effect which may indicate that poor dispersion conditions due to urban trapping effect (high buildings along relatively narrow roads) may not have been taken into account in the model set up. Therefore it is very likely that the results presented are significantly underestimated along these locations.
 - c) Processing of data – the evaluation of the report indicated that a decision was made to alter the background value mapped by Defra along Bill Place. This was due to the observation that the model was significantly under-predicting results along this location. This practice is incorrect and unacceptable. The unacceptability of this approach is twofold i) There is a tight relationship between NO₂ and NO_x which without proper monitoring we cannot estimate. By changing one we need to know how to change the other; ii) by increasing the background value NO₂ at Brill Place, the model verification was tampered; the higher the background value, the smaller the road traffic contribution considered by the model which leads to an incorrect adjustment of the model. A comparison between monitored backgrounds and Defra estimated backgrounds for the study area shows da good match indicating no need to alter background values in that

location. The correct step would have been looking at input traffic data and model set up instead.

- d) Report content – It is important to present relevant and key information on air quality assessment reports that support planning applications so that policy is correctly exercised and sustainable decisions made. The peer review of the report indicated that there are missing elements, namely

- i) the assessment of impact on local air quality of construction traffic emissions associated with both Central Somers Town CIP works in isolation and the cumulative assessment with other significant constructions works likely to be concurrent with the current proposed development, namely HS2, Maria Fidelis School consolidation projects and Crossrail 2;
- ii) the estimation and inclusion of the model Root Square Mean Error which indicates whether the model is a valid model or not and the degree of error associated with the modelled results.

In addition, the methodology used to evaluate whether the proposed development was at least neutral as per Mayors' and Camden requirements used the standard approach which is not considered to be suitable for the area of the application site. Option four of current guidance should have been used given the extremely high pollution levels observed and the requirement to both safeguard public health and meet compliance.

- e) Report conclusions and recommendations: given the above it is considered that the traffic related results of the assessment are highly uncertain throughout the study area assessed, incomplete and unreliable at certain locations where the canyon street effect is marked.

- 6.1.3 In the light of the above it is considered that the traffic related results of the assessment are highly uncertain throughout the study area assessed, incomplete and unreliable at certain locations where the canyon street effect is marked.

6.2 Recommendations

- 6.2.1 Based on the results of the peer review undertaken which highlighted issues of inaccuracy and the great level of uncertainty associated with the results of the air quality assessment supporting the planning application, it is recommended that the planning decision associated with the proposed development takes into consideration the following:

- a) The need to impose sealed windows at least at street level and lower floors in order to safeguard human health. Accurate modelling needs to be undertaken to estimate height influenced by traffic emissions and hence deploy mechanical ventilation system at right

locations;

- b) The need to require that a mechanical ventilation system with 97% or above efficiency in NO_x removal is applied at street level floors and all floors where exceedences are predicted;
- c) Assessment of construction traffic emissions is considered (in isolation and cumulative with HS2, Maria Fidelis school consolidation works, and Crossrail 2) and weight given to their corresponding impacts on local NO₂ concentrations and public exposure.

7 References

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Appendices

Appendix A: Glossary of Terms

Term	Definition
AADF/T Annual Average Daily Flow/Total	A daily total traffic flow (24 hrs), expressed as a mean daily flow across all 365 days of the year.
Adjustment	Application of a correction factor to modeled results to account for uncertainties in the model
Accuracy	A measure of how well a set of data fits the true value.
Air quality objective	Policy target generally expressed as a maximum ambient concentration to be achieved, either without exception or with a permitted number of exceedences within a specific timescale (see also air quality standard).
Air quality standard	The concentrations of pollutants in the atmosphere which can broadly be taken to achieve a certain level of environmental quality. The standards are based on the assessment of the effects of each pollutant on human health including the effects on sensitive sub groups (see also air quality objective).
Ambient air	Outdoor air in the troposphere, excluding workplace air.
Annual mean	The average (mean) of the concentrations measured for each pollutant for one year. Usually this is for a calendar year, but some species are reported for the period April to March, known as a pollution year. This period avoids splitting winter season between 2 years, which is useful for pollutants that have higher concentrations during the winter months.
AQMA	Air Quality Management Area.
AURN	Automatic Urban and Rural (air quality monitoring) Network, managed by contractors on behalf of DEFRA and the Devolved Administrations.
Conservative	Tending to over-predict the impact rather than under-predict.
Data capture	The percentage of all the possible measurements for a given period that were validly measured.
DEFRA	Department for Environment, Food and Rural Affairs.
DfT	Department for Transport.
Emission rate	The quantity of a pollutant released from a source over a given period of time.
Exceedence	A period of time where the concentrations of a pollutant is greater than, or equal to, the appropriate air quality standard.
HDV/HGV	Heavy Duty Vehicle/Heavy Goods Vehicle.
LAQM	Local Air Quality Management.
Minor roads	Non A roads of Motorways.

Model adjustment	Following model verification, the process by which modelled results are amended. This corrects for systematic error.
NO₂	Nitrogen dioxide.
NO_x	Nitrogen oxides.
Percentile	The percentage of results below a given value.
PM₁₀	Particulate matter with an aerodynamic diameter of less than 10 micrometres.
Ratification (Monitoring)	Involves a critical review of all information relating to a data set, in order to amend or reject the data. When the data have been ratified they represent the final data to be used (see also validation).
Road link	A length of road which is considered to have the same flow of traffic along it. Usually, a link is the road from one junction to the next.
µg/m³ microgrammes per cubic metre	A measure of concentration in terms of mass per unit volume. A concentration of 1µg/m ³ means that one cubic metre of air contains one microgram (millionth of a gram) of pollutant.
Uncertainty	A measure, associated with the result of a measurement, which characterizes the range of values within which the true value is expected to lie. Uncertainty is usually expressed as the range within which the true value is expected to lie with a 95% probability, where standard statistical and other procedures have been used to evaluate this figure. Uncertainty is more clearly defined than the closely related parameter 'accuracy', and has replaced it on recent European legislation.
Validation (modelling)	Refers to the general comparison of modelled results against monitoring data carried out by model developers.
Verification (modelling)	Comparison of modelled results versus any local monitoring data at relevant locations.

Appendix B: Air Quality Objectives (AQO) (NO₂) for the protection of human health

Pollutant	Applies to	Standard		Objective		2008/50/EC
		Concentration	Measured as	Annual exceedences allowed	Target date	
Nitrogen dioxide (NO ₂)	All UK	200µg/m ³	1 hour mean	18	31.12.2005	01.01.2010
	All UK	40µg/m ³	annual mean		31.12.2005	

Explanation

µg/m³ = microgram per cubic metre;

- 1 Measured using the European gravimetric transfer sampler or equivalent.

The Air Quality Strategy states that further review and assessment and consultation in relation to air quality will be a rolling process, with additional revisions to the objectives for selected pollutants as appropriate, or where there is new evidence in relation to the effects of pollutants on health or ecosystems. New pollutants may be introduced through future reviews.

Appendix C: Expert Profile



Expert Professional Credentials and Experience

Dr Grossinho, BSc (Hons), MSc, PhD, DIC, MIEEnvSc, FIAQM

Dr Grossinho is a Senior Technical Director with Air Quality Experts Global and has over 25 years' experience in the field of air quality assessment, management and reporting, with particular experience in Epidemiological studies and Public Health. She has extensive working experience in both the public and private sectors, both in the United Kingdom and overseas.

Ana is an internationally recognised specialist in the air quality field being an invited expert to the European Commission, DG ENV, and the European Environment Agency to provide advice on air quality technical and policy matters.

Ana gained her international recognition via her Air Quality Expert advisory role at the European Commission Air Quality Working Group drafting the 2008/50/EC directive implementing provisions to which she had been actively contributing since 1996. She has vast experience in policy delineation and analysis of legal documents leading to legislative instruments both at EU and national levels.

Ana graduated in Environmental Engineering in 1988 at the New University of Lisbon, Science and Technology Faculty, having specialised in environmental impact assessment and air quality. She studied at Imperial College where she obtained an MSc on Environmental Technology, a PhD on Applied Physics (co-funded by NASA and the University of New Hampshire, USA) and a pos-doc on effects of co-incinerator emissions on health, funded by the European Commission.

After her academic training she spent eight years doing research, consultancy and teaching at Imperial College on the impacts of air quality on public exposure, health, ecosystems and climate change, having supervised and revised various MSc and PhD thesis on these subjects. In 2004 she was invited to join Defra's Air Quality Division (UK Ministry of the Environment) where she served as a Senior Scientific Policy Advisor negotiating the Euro 5/V and 6/VI at the national and European levels, writing air quality related project specifications, managing contractor's delivery, and providing advice to ministers on request. Examples of achievements include reaching successful pan-governmental agreement on Euro standards and the specification of various joint projects between the Environment and Transport departments.

Ana has been responsible for air quality assessments of road schemes, rail schemes, power stations, waste incinerators, commercial developments and residential developments in the UK and abroad. She has extensive experience of using detailed dispersion models, as well as contributing to the development of modelling best practices and guidance on air quality and the planning system (2015, IAQM). She is a Fellow of the Institute of Air Quality Management and a Chartered Engineer.

SOMERS TOWN NEIGHBOURHOOD FORUM RESPONSE TO -

LB CAMDEN APPLICATION REF :- 2015/2704/P FOR FULL PLANNING PERMISSION AND LISTED BUILDING CONSENT FOR THE REDEVELOPMENT OF CENTRAL SOMERS TOWN AS FOLLOWS :-

Demolition of existing buildings and the provision of :-

- Approximately 2190 sqm replacement school (D1)
- Approximately 1765 sqm community facilities (D1)
- Approximately 207 sqm of flexible Use Class A1/A2/A3/D1 floorspace
- 136 residential units (C3) over 7 buildings from 3 to 25 storeys comprising :-
 1. Plot 1 : Community uses at ground floor (approx 1554 sqm) to include children's nursery and community play facility with 10 residential units above
 2. Plot 2 : Flexible A1/A2/A3/D1 floorspace (approx 137 sqm) with 35 residential units above
 3. Plot 3 : Extension of Grade II Listed terrace to provide 3 dwellings
 4. Plot 4 : Replacement school
 5. Plot 5 : Replacement Community Hall (approx 211 sqm) with 20 residential units above.
 6. Plot 6 : 14 residential units
 7. Plot 7 : Flexible A1/A2/A3/D1 floorspace (approx 70 sqm) with 54 residential units above.
- Provision of 11,765 sqm of public open space along with associated highways works and landscaping

1 INTRODUCTION

1.1 NEIGHBOURHOOD PLAN (NP) <http://somerstownplan.info/>

Somers Town Neighbourhood Forum (STNF) is the body constituted and approved by LB Camden to prepare a Neighbourhood Plan . The current Planning Application lies entirely within the Neighbourhood Plan boundary.

The Vision and Aim of the Plan is to provide "**a framework for a sustainable community development enabling the existing community to stay and get a slice of the action, through access to genuinely affordable housing, jobs and training, high quality health and education, and a cleaner, safer environment.**" Or , more succinctly, "**Avoid being squeezed out : get a slice of the action.**" A first draft of the NP , including this Vision, was sent to LB Camden in December 2014.

In accordance with the Neighbourhood Planning Regulations, and contrary to para 5.2 of the Planning Statement (Turley), the Neighbourhood Plan has now been sent to LB Camden. The relevant Consultation bodies referred to in the Regulations have been consulted. The Plan has been available for inspection and comment online and at various local community venues. The 6 week time period for representations ended on February 19th 2016.

The Plan was highly commended by the 2015 Past President of the RTPI : -

This plan is truly innovative in its approach and it is very different to any other neighbourhood plan I have ever read. It combines the aspirations and hopes of local residents and local businesses in an area of London which is one of the most sought after areas for gentrification. It

is under attack from investors wanting to capture potential land values from inappropriate high rise housing which would drive local people out – just as has happened in other parts of London. It is hoped that the plan will be adopted and that Camden will use all its powers to implement it and meet the ambitions of the Neighbourhood Forum to maintain this area for local housing and local business. The plan itself is beautifully designed, clear and easy to read, stating the facts and offering some solutions for the community.

1.2 STRUCTURE AND CONTENT OF RESPONSE

Each element of this Response is informed by reference to a number of key Policy documents , principally :-

- + NPPF
- + London Plan
- + LB Camden Core Strategy and Development Plan policies , Policies Map.
- + Emerging Neighbourhood Plan
- + Supplementary Planning Guidance, Camden Planning Guidance.
- + Other documents as appropriate

The Response deals with the following Topics in order and as follows :-

2 Planning Application and the Neighbourhood Plan

2a Basis of STNF Response

- 3 Overdevelopment
- 4 Environmental impact
- 5 Public open space / Green space
- 6 Housing / Deliverability
- 7 Jobs and training
- 8 Community facilities
- 9 Heritage and Conservation

1.3 VIABILITY ASSESSMENT

The only document accompanying the Planning application which is not publicly accessible is the Viability Assessment . Although there is total support within the Neighbourhood, for rebuilding of Edith Neville Primary School and Plot 10 on their existing sites , most of the remaining elements of the proposed development are far more controversial. There could very well be a **cheaper, better , more deliverable solution** to the local needs that the proposed development purports to meet . But without access to the Viability Assessment, this is excruciatingly difficult to evaluate. If scarce, valuable public assets are to be sold off to improve and transform public services, then there is a very strong case for an Open Book Policy.

2 PLANNING APPLICATION AND THE NEIGHBOURHOOD PLAN

The current planning application is the final expression of a Community Investment Programme (CIP) which LB Camden (LBC) has evolved over several years for Central Somers Town. LBC is a major landowner and CIP is intended to "improve and transform services by realising assets and thus bridging a critical funding gap."

Initially focussed on the urgent and locally agreed need to rebuild Edith Neville Primary School (Plot 4) and a Nursery and Play facility (Plot 1), the scale of proposed new CIP development grew with each successive round of consultation . Local opposition grew in due proportion.

Although officers did occasionally attend the Forum , partnership working did not , and has not occurred. It is nearly inevitable that local people will be able to come up with cheaper, better alternatives than a developer - be they public or private , and STNF views expressed along these lines, in Key points 23.04.2015 (Appendix 1) were totally ignored.

This was all the more perplexing given that the Forum had suggested a phased way out of the impasse . In response to widespread community calls for a first phase "do minimum" investment option (concentrating on the need to rebuild the School and Play Facility on their existing sites), and, despite a Freedom of Information request, without access to basic project viability figures, the Forum put forward an alternative first phase CIP development proposal (40 - 50 new housing units). This proposal was assessed by LBC's independent Property and Cost Consultants who concluded that it "**could generate sufficient value to build a new school and complete the enabling and infrastructure works associated with the new private housing and school**" This was one of many local representations made to the LBC Cabinet Committee December 16th 2015. The Committee was unyielding and within hours the current planning application was submitted .

STNF RESPONSE

- The current planning application has taken no account whatsoever of any of the
- It appears to seriously, even deliberately, undermine the Neighbourhood Planning process by allowing for massive overdevelopment in the pursuit of maximum land and rental values far in excess of what is really required / would command local support.
- The starting gun is all set to fire the overt process of gentrification of Central Somers Town. **Advantage imported : Disadvantage exported**
- This could be avoided by working with the Forum, considering phasing, local needs cheaper solutions / options, and , in later phases of the CIP and the Neighbourhood Plan, exploring the kind of "fresh ideas for housing" set out eg in the Lyon Housing Review 2014.
- Clearly, given the enormous investment of unpaid time and effort by very many residents and other local interests / pride in, and commitment to, the Neighbourhood Plan, this is designed to confirm cynicism and distrust and cannot possibly enhance the Neighbourhood Planning process.

Represent

2a BASIS OF STNF RESPONSE

Forum members have had to disentangle an obvious conflict of interest : LB Camden are both the Local Planning Authority and the landowner /developer. A developers investment programme (be they public or private sector) will legitimately be an exercise, over time, in maximising capital and rental receipts from assets held. Were this to be the sole determinant of how land is developed, then there would be no need for a Local Development Framework. As far as STNF are aware, the Central Somers Town CIP is being realised as the current Planning Application and must be assessed against the Plans and Policies adopted by LB Camden for the very purpose of guiding development within the Borough. It is on this understanding that the Response has been set out in Sections 3 – 11 below.

3 OVERDEVELOPMENT

Height, mass, bulk and density

The existing building footprint within the development site comprises 2076m2 (mainly the

Primary School and Play Centre) almost all single storey. The proposed building footprint amounts to 4819 m², ranging from 4 – 25 storeys. As Attachment 1 (4JPG) illustrates, in terms of height, mass, bulk and density the proposed development dwarfs existing property in Central Somers Town. eg 25 storey tower (Plot 7) alongside 2 - 4 storey Coopers Lane estate, 9 storey block (Plot 2) opposite 3 storey listed frontage in Charrington Street. At 96.5m AOD the tower even dominates the Francis Crick Institute whose flues rise to 71.78mAOD in height. The serious environmental and other impacts upon the area and its existing residents are set out in subsequent sections of this Response.

Unacceptable precedent for future development within this part of the Neighbourhood

Were the proposed development to be permitted, it would set an unacceptable precedent for future development / redevelopment in this part of the Neighbourhood. Potentially, it is the "none too thin end of the wedge"

Increased population pressure on public services such as transport and open space

Existing public transport services are already operating at or near full capacity. Although the Neighbourhood Plan does not support the HS2 project, an additional 12 platforms at Euston together with the realisation of the Euston, and completion of the Kings Cross Growth Areas, would seriously overload the transport system. The proposed development would unnecessarily exacerbate this problem.

The predicted population increase arising from the proposed new housing will make what remains of green space so heavily used that more will be required than can be provided by the developer. (Planning Statement paras 5.30 – 33). In calculating the additional green space required, the Statement appears oblivious of the opening of the Crick this year with 1500 staff, plus visitors !

Prejudicial to future growth and master planning in adjoining Growth Areas

Central Somers Town is not in either of the two Growth Areas - Kings Cross immediately adjoining to the east, or Euston immediately adjoining to the west. Development of the scale proposed, particularly the 25 storey block on Plot 7, should properly be located in one or other of these Growth Areas. The fact that it isn't, and the precedent that could be set, is prejudicial to the future viability of development in both Growth Areas, and overall Master Planning at regional level eg existing / future "tall building clusters" in both Growth Areas.

Density related to Central Activities Zone (CAZ) or Policy CS4 (Camden Core Strategy)

In justifying the scale and density of the proposed new housing Para 5.8 of the Planning Statement (Turley) states "The site benefits from PTAL 6b and is within the central area and **so the highest densities would be expected on this site**". Later in the same section of the Planning Statement, at para 5.40 it is unequivocally stated that **"Plot7 is within the Central Activity Zone"**.

The proposed use of Plot 7 (market housing linked to a local community investment project) contrasts dramatically with the international / national profile of the two facilities (Crick and British Library) immediately to the south of Brill Place, both of which are undeniably, facilities of CAZ legitimacy, adding value to London as a global city.

In terms of boundary it is our contention that the whole of Central Somers Town is **outside** the

Central Activity Zone / Central London Area. This is confirmed on the **Policies Map** and **Map1 Key Diagram of the Core Strategy**. In terms of Plots 2,5 and 6 , this is explicitly confirmed by Max Fordham in Section 3.11 (Overheating) of the Sustainability Statement : “ The proposed site sits outside of the London CAZ and is situated on a green space with vegetation”

The responsibility for detailed local definition of the exact boundaries of the CAZ in London , is devolved to the Borough Councils. In addressing a fairly recent change in Permitted Development rights allowing change of use from commercial to residential , LB Camden successfully sought to exempt the CAZ, and following modification by the Secretary of State, other parts of the Borough, from such a change. Clearly, under these circumstances, when drawing that part of the boundary of the CAZ which lies within LB Camden, there can be no room for doubt or misinterpretation. The following weblink indicates on an OS base map (September 2014) produced for the purpose, that the **CAZ boundary in this part of the Neighbourhood runs along Brill Place .**

https://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=2998969

Following a single Member (Cabinet - Regeneration, Transport and Planning) decision, (14.04.2015), the Council agreed (12.05.2015) to proceed with the necessary Article 4 Direction and this formally came into operation 05.11.2015.

Highly accessible areas

Table 3.2 (Sustainable residential quality density matrix) accompanying London Plan Policy 3.4 makes a very clear distinction between different levels of **Public transport accessibility** (PTAL) and **Suburban , Urban and Central** locations.

Para 1.15 of the Camden Core Strategy states :- “Beyond the Growth Areas there are a number of other parts of the Borough which are considered suitable locations for significant development as they are **highly accessible** by a range of means of transport. These are the **Central London area** outside of the Growth Areas, and the town centres of Camden Town, Finchley Road/ Swiss Cottage, Kilburn High Road, Kentish Town and West Hampstead.”

STNF is convinced the proposed development site is not in a Central or Central London location as identified for either of these purposes. Furthermore para 3.28 supporting London Plan Policy 3.4 states :-

“It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important” Each of these factors is addressed in this Response but we would place greatest emphasis upon the following local context .

Area of more limited change

In para 1.18 of the LBC Core Strategy CS1 (Distribution of growth), Somers Town is specifically identified as a predominantly residential area where smaller scale, more incremental change is expected to take place. **Policy CS4 : Area of more limited change , and paras 4.5 and 4.6 of the Core Strategy** set out very clearly that Somers Town is to benefit from development in the closely adjoining Growth Areas eg by access to jobs and training , but that, other than in sites set out in the Camden Site Allocations document, and estate regeneration schemes, the area will

"experience more limited development and change". In the context of Somers Town, para 4.5 explicitly states "Places adjacent to Camdens Growth Areas will be affected by the changes taking place in those Areas, **although they are not expected to experience major development themselves**".

The Neighbourhood Plan fully supports the Policy and approach set out in CS4 and paras 4.5 and 4.6. of the LBC Core Strategy.

STNF RESPONSE

- The proposed development site does not lie within the Central Activities Zone / Central London Area.
- The proposed development site is not identified as a site for major development in the LBC Site Allocations document
- The proposed development is almost entirely located on Public Open Space and is therefore not an estate regeneration scheme
- The proposed development, per se and as a precedent, is prejudicial (at Borough and Regional level) to the Viability and Master Planning of the adjoining Growth Areas
- The proposed development would set an unacceptable precedent for further high density development / redevelopment in this part of Somers Town (the none too thin end of the wedge)
- In line with Policy CS4, an alternative first phase CIP development option requiring no more than 50 new residential units could, in the words of LBC's own Property and Cost Consultants, " generate sufficient value to build a new school and the enabling and infrastructure works associated with the new private housing and the school."
- The proposal under - provides on green space and over - provides on users of an already heavily overloaded transport system.
- The proposed development represents massive and unnecessary overdevelopment inflicting unacceptable environmental and social impact upon adjoining residents and others. It would radically change the character of central Somers Town.
- The Planning application represents a major, high density development in an Area of more limited growth. It is contrary to Core Strategy Policy CS4 , and the emerging Neighbourhood Plan. **It is a major departure and should be refused planning permission.**

Further grounds of objection are set out in subsequent sections of this Response

4 ENVIRONMENTAL IMPACT

Construction impact

Somers Town is a Neighbourhood fronting the inner city ring road, closely adjoined by two Growth Areas and currently subjected to proposals for HS2 at Euston (consolidation of Maria Fidelis Upper and Lower Schools, haul routes, utility works, traffic diversions, noise, dust, pollution etc) and Crossrail2 in tunnel. Residents in Coopers Lane, Phoenix Court etc have had to live with construction of the CTRL deck extension and the Thameslink box for many years (noise, dust, nighttime working, closure of Midland Road for 4 years etc). Construction of the Crick is still not finished.

Construction of the proposed development will effectively create a phased series of building sites striking to the very heart of the Neighbourhood at Chalton Street.

STNF RESPONSE : OBJECT -

- * However well managed , when added to the simultaneous HS2 Construction programme principally affecting the western / north western sides of the Neighbourhood, virtually the whole of Somers Town could be forced to endure yet more years of daytime / night time working, lorry movements in / out, mud, dust, noise, traffic diversions , footpath / cycle route diversions / closures etc. **This is particularly unacceptable** because of :-
 - > The unusually high number of schools in the area (Nursery / Infant , Primary and two Secondary Schools (Regents High and Maria Fidelis) at the very heart of Somers Town) .
 - > The economic, health and mobility characteristics of existing residents – many in poor health , high dependence on walking .
 - > Equally unacceptable impact upon visitors and those working in the area.
 - > Significant risk to Community Safety.

Archaeology

NPPF para 128 : “ Where a site on which development is proposed includes, or has the potential to include heritage assets with archaeological interest, Local Planning Authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation.

STNF RESPONSE

Applicant should provide an archaeological assessment, since St Pancras is an Archaeological Priority Area.

GENERAL COMMENT ON THE FOLLOWING ENVIRONMENTAL IMPACT ASSESSMENTS

With the exception of the new school site , development of every Plot in the proposed development would be on regular sized areas of Public Open Space adjoined by low – medium density housing , Regents High School and the Francis Crick Institute. In terms of layout and volume of new development therefore, there is no logical reason why new buildings should be deliberately designed / located to occasion significant environmental impact upon adjoining residential property or, as in the case of Plot 5 , relying on the presence of an existing tree to provide summer screening. But they have been

Loss of daylight and sunlight . (STNF highlighting)

Para 1.3 of the Daylight, Sunlight and Overshadowing Report accompanying the application makes it clear that general BRE guidelines have not been met and **alternative target values** have been applied “more suitable for an urban location” and (relying on para 6.5 of Camden's Planning Guidance), the “special circumstances of the site” (?)

In line with its advocacy of the “highest densities”, Para 5.74 of the Planning Statement appears to consider this situation acceptable :- “ The application is supported by a Daylight, Sunlight and Overshadowing Report which demonstrates that although in some areas the general BRE guidelines criteria **are not met**, where this is the case, **adequate** to good levels of daylight and sunlight will **generally** remain when taking into account the **urban context**” .

Even on the adopted sub standard basis of assessment, some residents will lose nearly all their daylight in some rooms, more will lose over at least 50% of their daylight.

The Planning Statement seeks to justify the very close proximity of Plots 5 and 6 to existing housing on Hampden Close and Coopers Lane as - “ this type of relationship is not unusual in a high density, central London location such as this .”

In fact three bedroom windows in Plot 5 overlook the back gardens to terraced housing on Hampden Close . “An existing 17m tree between the windows and the gardens will provide summer screening. Furthermore , bedrooms are generally not occupied during the daytime , when the gardens will be in use.”

Six windows (comprising 4 bedroom windows and two secondary living space windows) are located **12m** from the rear facade of terraced housing in Coopers Lane”. Heavy reliance is placed upon the use of obscured glazing, tree planting to provide summer screening and bedrooms not being occupied during the daytime .

The unnecessary and extreme relationship of the proposed new flats to existing 2 storey housing in Coopers Lane is dramatically illustrated on Duggan Morris Architects Drawings for Plot 5 – see Drawing Nos P201 and P204, and for Plot 6 - see Drawing Nos P201 and P302. It is not surprising therefore, that when standard BRE design guidelines **are** applied :-

- * 13 – 19 Coopers Lane appear to show a drastic reduction of natural daylight where, out of a total 20 , 15 suffer a **loss** of Vertical Sky component (VSC) of more than the 20% guideline. Also , 16 windows with an existing favourable VSC, show a critical drop, far below the BRE Good Practice parameter.
- * 21 -27 Coopers Lane appear to show a drastic reduction of natural daylight where, out of a total 22 windows , 20 suffer a **loss** of VSC of more than the 20% guideline. Also 20 windows with an existing favourable position, show a similar critical drop in VSC .
- * 29 – 35 Coopers Lane appear to show a drastic reduction of natural daylight where, out of a total 20 windows , all 20 suffer a **loss** of VSC of more than the 20% guideline. Also, 20 windows with an existing favourable position, show a critical drop in VSC.
- * 8 gardens in Coopers Lane appear to lose more than 50% of their existing daylight
- * 4 units at 117 St Anthony's Flats appear likely to enjoy only 3% Annual Probable Sunlight Hours (APSH) over the winter, when compared to the 5% guideline
- * 30% of the proposed new “Community Garden” appears to receive less than 2 hours of direct light at 21st March

Overlooking / Loss of privacy

Remarkably , no reference is made in the Planning Statement to the looming presence of the proposed 25 storey tower block allowing a birds eye view of virtually every footpath and private garden in Coopers Lane Estate, and beyond.

Due to the largely glazed facade and relatively open plan nature of parts of the Crick , residents living in the proposed tower opposite should have an unexpectedly direct view into the Institute itself.

Overshadowing (Master Plan – Design and Access Statement Section 4.24)

Due to substantial overshadowing from the 25 storey tower , it is possible that up to 50% of Purchase Street Park will receive less than 2 hours of direct light at 22nd March.

Overall environmental impact

The London Plan 7.6 (Architecture) point B d states :-

“Buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings”.

STNF RESPONSE : OBJECT -

- * The development of a 25 storey tower on Plot 7 will cause unacceptable harm to the amenity of surrounding land (park) and buildings. It is contrary to the London Plan 7.6 (Architecture) point B d .
- * The development will seriously reduce amenities of adjoining residents and users of Purchase Street Park. As such it is contrary to LBC Development Plan Policy 26 and should be refused planning permission.
- * The proposed development is being carried out largely on a school site and Public Open Space in an Area of more limited growth. There is no reason why BRE Guidelines should not be fully met.

Wind and microclimate

Permeability

Para 5.81 of the Planning Statement notes that “ appropriate mitigation measures “ will be required if the wind and microclimate around the / created by the Brill Place tower is to achieve a measure of comfort for “proposed activities”. The proposed landscaping will create calm conditions throughout the site.

The location of the tower is at the main entry point from the east into / out of Somers Town . It is in the immediate vicinity of the entrance to the Crick, St Pancras CTRL and Coopers Lane Estate. Midland Road is already becoming an “urban canyon” at this point. A high volume of pedestrians and cyclists of all ages and stages of health / mobility can be expected to use this pinchpoint on a daily basis. Brill Place is part of a London wide Healthy Walking network .

STNF RESPONSE : OBJECT -

- * Object to development of 25 storey tower on Plot 7. There is no reason to deliberately create a potentially unpleasant even dangerous wind tunnel / microclimate at a pinchpoint of maximum pedestrian usage, particularly for residents and visitors to Coopers Lane Estate, the rebuilt Primary School, and close to the entrance to the Crick Institute , a facility of international importance.
- * Instead of enhancing permeability, the potential microclimate created by the proposed tower and the introduction of a ground floor commercial use (servicing and general activity) reduces permeability and is in broad conflict with London Plan 7.6 (Architecture) Paras 7.21 – 7.23 and London Plan 7.7 (location and design of large and tall buildings) point C g

* Object to landscaping measures affecting Purchase Street Park solely required to create a “shield /calm conditions” throughout the site.

Air Quality : Loss of trees : Environmental Impact Assessment (EIA)

South Somers Town (close to the Euston Road) is one of the most polluted places in Britain, exceeding EU environmental standards on a daily basis. Within the site area, adjoining the CTRL Deck extension and the Francis Crick Institute, air quality on Brill Place also exceeds environmental standards. Indeed, the air quality is such that each apartment in the Brill Place tower will need its own mechanical ventilation unit to purify the air. It may be that LB Camden have recently received funding from TfL to explore how to improve the very poor air quality in Somers Town . NO₂ and particulate matter are major causes of illness in Somers Town.

Trees and green spaces contribute to the dispersal and absorption of air pollutants. Studies have shown that planting , such as street trees in street canyons, can reduce street level concentrations by as much as 40% for NO₂ and 60% for particulate matter .

See <http://pubs.acs.org/doi/abs/10.1021/es300826w>

The proposed development involves major development over several years on two out of the three significant areas of Public Open Space in Somers Town . In the process, 44 mature and semi mature trees, including 3 Category A trees are to be removed. Another 45 trees in 5 groups were also identified for removal in the Aboricultural Impact Assessment. In addition, there are a further 10 txrees, including fruit trees, in the Community Garden that were not counted. **In total, at least 99 trees are scheduled for removal.** They are to be replaced by an ever – changing but smaller number of semi – mature, feathered, muti stem and pleached species, many situated in areas of restricted daylight and sunlight.

PPG : EIA - Screening Schedule 2 projects states :-

“In certain cases, local designations which are not included in the definition of “sensitive areas”, but which are nonetheless environmentally sensitive, may also be relevant in determining whether an assessment is required. In considering the sensitivity of a particular location, regard should also be had to whether any national or internationally agreed environmental standards (e.g. air quality) are already being approached or exceeded”.

Development Policy 32 , para 32.4 The Council will take into account impact on air quality when assessing development proposals. Regard will be paid to Camden’s Air Quality Action Plan and to Cleaning London's Air: The Mayor's Air Quality Strategy. Where development could potentially cause significant harm to air quality, we require an air quality assessment

STNF RESPONSE : Although the current application falls just below the threshold of 150 new housing units, the development site is environmentally sensitive . The submission of an Air Quality Assessment by the applicant indicates how important these concerns are. However, in view of the very serious levels of air pollution already existing in this area, STNF considers that there is a strong case for an Environmental Impact Assessment to be submitted .

5 PUBLIC OPEN SPACE / SOFT – HARD LANDSCAPE / REPLACEMENT OPEN SPACE

Public Open Space

In the Camden Open Space, Sport and Recreation Study update June 2014 (Atkins) Somers Town as existing, is identified in Table 5.4 as deficient in public parks and would require the addition of one pocket park of 2ha to make good this deficiency. Most residents have no garden and access to open spaces outside the Neighbourhood is limited by relative ill health and poverty. This makes Purchase Street Park and Polygon Road Open Space doubly valuable to local people (see STNF Housing and Open Spaces survey – Appendix 2)

Open Space is protected at National, Regional and Borough level :-

1 NPPF paras 73 and 74 : “Existing open space should not be built on unless an assessment has been undertaken which has clearly shown that the open space is surplus to requirements” (nb PPG 7) To our knowledge no such assessment has been presented by LB Camden.

NPPF paras 76 – 78 : Local communities through Local and Neighbourhood Plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new development other than in very special circumstances. The submitted Neighbourhood Plan seeks such designation for both Purchase Street Park and Polygon Road Open Space.

NPPF Para 114 requires a strategic approach to consideration of, and planning for, Green Infrastructure (GI) (see 3 below)

2 London Plan 7.18 : B Planning decisions : The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area.

Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate. (no such Needs Assessment has been submitted). Urban greening is a key element of the much broader Climate change Adaptation Strategy which encourages the use of planting, green roofs and walls and soft landscape.

3 Kings Cross and St Pancras Green Infrastructure Audit 2013 was funded by the GLA and prepared by Land Use Consultants. Both Purchase Street park and Polygon Road open space are identified on Figure 2.4 of the Audit and feature prominently in Figure 3.1 “Green links”, 3.2 “London cycle network” and are specifically referred to under Parks and Open Space as key “nodes for recreation and relaxation”

4 LB Camden CS15 commits the Council to protect and improve Camdens parks and open spaces. Para 15.5 states : “Camden’s parks and open spaces are important to the borough in terms of health, sport, recreation and play, the economy, culture, biodiversity, providing a pleasant outlook and providing breaks in the built up area. They also help to reduce flood risk by retaining rain water and some are used for growing food. Camden’s growth will increase the demand for our open spaces so it is important that we protect our existing parks and open spaces” .

LB Camden DP 31 and paras 31.3 and 31.6 make it clear that planning permission will only be granted for proposed developments which, as with the current application, will lead to an increased use of public open space, if an appropriate contribution to the supply of open space is made. Priority will be given to the provision of publicly accessible open space. The Council will apply a standard 9m2 per person when assessing the appropriate contributions to open space from residential developments. After calculating what this might mean for the proposed development, Para 5.30 of the Planning Statement concludes **“This results in a requirement of 2059.7m2 of new open space as a result of the development. Given the built up, urban location of the proposed development it is not possible to meet this requirement.”**

Replacement of one type of open space with another

Character of Open Space : soft / hard landscaping

Purchase Street Park , Polygon Road Open Space and St Pancras Gardens are the three strategic elements of open space in the Neighbourhood. All three are designated Open Space on the LBC Policies Map.

In Neighbourhood Planning terms, these three spaces provide significantly different, and invaluable, outdoor recreational and environmental experiences for residents and visitors alike :

- 1 Purchase Street : “ A pleasant, leafy park, with good tree cover and plenty of shade” .
“A mature woodland landscape which feels like a place of retreat from the city” .
(Both quotes from LBC Consultant appraisals)
- 2 Polygon Road : An outdoor community hub , a meeting point , a more active play area , contributing to community cohesion and development
- 3 St Pancras Gardens : An area of wildlife , nature conservation , and historic interest of Borough / Regional importance . An important link to Camley Street, the canal , University of the Arts etc.

**This clear and separate distinction is totally lost in the development proposal :-
“Polygon Road and Purchase Street Open Spaces will be linked to form one Park”**

In Public Open Space terms, the Forum completely agrees with the Consultants views set out in sub para 1 above . Purchase Street Park needs relatively little extra money spent on it and this was an integral part of the cheaper, better, solution submitted to Cabinet in December 2015. Without access to the Viability Assessment , it is not possible to ascertain the cost of developing the proposed park, and unwinding that into reducing the need for such high density housing while still replacing Edith Neville Primary School and Plot 10 on their existing sites.

Not only will the clear distinction between the two open spaces be lost, but the character, particularly of Purchase Street Park, will be utterly transformed. Please see Attachment 2

- Existing public grass / soft landscape = 6556 m² approx (not including Coopers Lane Community Garden)
- Proposed public grass / soft landscape = 4680 m² approx (not including proposed “Community Garden”)
- Net loss of public grass / soft landscape = 1876 m² . Given that the applicant maintains that there is no loss of Public Open Space (see Plans 2 and 3 Existing / Proposed Public Open Space) , this suggests that in the proposed park, there is a net gain in hard landscaping of 1876m²
- Plot 10 is currently private open space. As proposed, it will be rebuilt below a MUGA. This together with Plots 1,2,5,6,7 means that an open airy green heart of immense value to residents (most of whom live in flats) , schoolchildren, and others, will be replaced by hard landscaping / City – Centre style urban development.

It is clear from comparison of Attachments 3 and 4 that whereas the existing designated Public Open Space (Plan 2) takes the form of solid blocks of land, quite a significant amount of the proposed open space (Plan 3) constitutes “land left over after planning” / screening to avoid overlooking of existing houses.

If any single paragraph sums up the complete transformation in character that is proposed for Purchase Street Park, then it has to be para 4.7 CST Master Plan : Design and Access

Statement :-

“ The Master Plan seeks to maintain the existing woodland character by locating new homes on the perimeter of the park . The generous route through the landscape passes the entrances to each of the new buildings bringing activity across the course of the day.” (STNF addition : these are Plots 5,6 and 7 – a 25 storey block of luxury flats with ground floor commercial use adjoined by “ new hard public realm “ !)

This route together with similar ones at Polygon Road eg immediately south of Plots 1 and 2, will, at the very least, serve emergency and service vehicles, maintenance, home deliveries, drop off and collect, as well as creating immense temptation for speeding cyclists.

No longer will the character of Purchase Street Open Space be a mature woodland landscape which feels like a place of retreat from the city. Instead it will have become an extension of the Central Activities Zone : yet another part of the hard, active, urban landscape designed for a certain property market , in large measure to support and maintain the kind of land and rental values that the current proposal needs to be viable.

Community Garden

Due, in part , to its integral connection to the Tenants Hall, the unacceptable demolition and replacement of the Coopers Lane Estate Community Garden is dealt with under Section 8 (Community facilities) below.

STNF RESPONSE – OBJECT

- * No assessment has been provided by LB Camden which has clearly shown that existing open space is surplus to requirements
- * Purchase Street Park is the only park in Somers Town. Loss of access to it over several years is unacceptable. As is its complete transformation from “a mature woodland landscape which feels like a place of retreat from the City” to the kind of overly designed urban landscape criss crossed with vehicular routes etc that one is increasingly finding in the City.

Somers Town is already deficient in public parks (one pocket park needed) :-

- * The proposal fails to make good this deficiency
- * The proposal fails to deliver adequate replacement open space – some of which is simply “land left over after planning” and some of which is screening to avoid overlooking of adjoining properties.
- * The proposal fails to deliver 2060m2 of additional open space required as a result of increased population pressure from the proposed new housing.
- * The proposals fails to recognise need for additional open space arising from imminent opening of the Crick with 1500 staff as well as visitors.
- * The distinctive and separately different character of Polygon Road Open Space and Purchase

Street Park has been lost as the two have been linked together to form a single new park. Two green neighbourhood open spaces, serving completely different functions, have been turned into a single urban corridor , with far more hard landscaping, less green/soft landscaping, and introducing Central London style activity / image eg associated with commercial activity on ground floors of Plots 2 and 7 (tower block of luxury apartments).

* Instead of concentrating upon hard landscaping , the proposed development should retain at least the existing amount of open green space , ideally more, as soft landscaping which is publicly usable and publicly managed and maintained. Urban greening is a key element of the much broader Climate Change Adaptation Strategy which encourages the use of planting and soft landscape.

* The proposal is contrary to London Plan para 7.18 B Planning Permissions and LB Camden Policies CS 15 and DP31, and should be refused.

6 HOUSING

6.1 Policy context

Housing is the priority land use in the LB Camden Core Strategy , and so it is in Somers Town. But as Sections 1.1 and 2 above make clear, the Neighbourhood is between a rock (gentrification / speculation) and a hard place (lack of genuinely affordable housing) . The following Policies and Papers have provided a measure of Policy Context to what is an extremely complex subject:-

- **NPPF** Core Planning principles , Section 6 and Annex 2 Glossary

Ministerial foreword :-

“Sustainable development is about change for the better, and not only in our built environment”.

para 17 Amongst Core planning principles are :-

- * be genuinely plan led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area
- * always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.’

Section 6 : Delivering a wide choice of high quality homes.

Section 7 : Good design.

Annex 2 : Glossary : Affordable housing = Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.

Social rented housing is owned by Local Authorities and private registered providers for which guideline target rents are determined through the national rent regime

Affordable rented housing is let by Local Authorities and or private registered providers to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent

- **London Plan Policies 3.10 – 3.12 . / LB Camden + 8 other Boroughs : Housing Policies** 9 Boroughs , including LB Camden challenged the Mayor of London's Plan revisions in 2014 on the grounds that they should be able to set %age of social rent in their Plans . They had previously received advice from Nathalie Lieven QC in July 2012 along the following lines :-

“The Boroughs’ position, as outlined in a number of documents that I have seen, is that if the

Mayor's approach is taken then a large proportion of the housing provided as "affordable housing" would not actually be affordable at all because of the very great differential in much of London between market rent levels and average income levels. Therefore the Mayor's approach, which is set out in the REMA and through his objections, will fail to meet the actual need for affordable housing.

It seems to me that the most reasonable way to interpret this policy in the London context, is to examine rents and housing markets at a Borough level, **and perhaps even lower**, rather than trying to set a London wide rent level. It is very well known that there are wide disparities in house prices across London, and that affordability levels will therefore vary. I do not think the NPPF supports an approach of analysing the markets and rent levels across London, rather than allowing individual boroughs to determine AR levels in their own areas."

However when the challenge came before Mrs Justice Lang DBE on 25th March 2014 at the High Court of Justice , Queens Bench division , the case was dismissed .

[http://www.landmarkchambers.co.uk/userfiles/documents/resources/LB Islington Ors v Mayor of London Judgment.pdf](http://www.landmarkchambers.co.uk/userfiles/documents/resources/LB%20Islington%20Ors%20v%20Mayor%20of%20London%20Judgment.pdf)

Among the many findings by Mrs Justice Lang :-

"The points made by the Claimants on, for example, land values, the difficulty of persuading developers to accept lower rents, and the uneven distribution of affordable rented housing across London, are reasons for disagreeing with his strategy, not grounds for finding the strategy unlawful."

Accordingly LB Camden Development Plans have to comply with the following London Plan policies :-

London Plan Policy 3.8 on " Housing choice" encourages a choice of housing based on local needs, while affordable housing is stated as a strategic priority.

London Plan Policy 3.10 on 'Affordable Housing', paragraph 3.61 provides: " .. Affordable Rent is subject to rent controls that require a rent of no more than 80% of local market rent ... In practice, the rent required will vary for each scheme with levels set by agreement between developers, providers and the Mayor through his housing investment function. In respect of individual schemes not funded by the Mayor, the London boroughs will take the lead in conjunction with relevant stakeholders, including the Mayor as appropriate, but in all cases particular regard should be had to the availability of resources, the need to maximise provision and the principles set out in policies 3.11 and 3.12."

London Plan Policy 3.11 advises that the Mayor, boroughs and other relevant agencies and partners should seek to "maximise affordable housing provision" to deliver 13,200 more affordable homes per year in London. 60% of affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Boroughs should set targets for different types of affordable housing, in absolute or percentage terms, reflecting strategic and local needs, targets and priorities

London Plan Policy 3.12 advises that boroughs should seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed used schemes. Paragraph 3.71 sets out the key role which boroughs play, together with registered providers, in delivering affordable housing at affordable rents on a scheme-by-scheme basis:

"In estimating provision from private residential or mixed use developments, boroughs should take into account economic viability and the most effective use of private and public investment,

including the use of developer contributions. To expedite the planning process, developers should engage with a registered provider prior to progressing the scheme and secure from them a commitment to provision. In doing so, they should require the provider to identify the resources it is bringing to the scheme and to demonstrate that the proposed affordable housing provision make optimum use of the resources applied in terms of Policy 3.12 and provides the range of affordable rents indicating in the London Housing Strategy. Boroughs should evaluate these appraisals rigorously, drawing on the GLA development control toolkit and other independent assessments. **Boroughs are encouraged to review and bring forward surplus land in their ownership to maximise their contribution to affordable housing provision, including the provision of land to registered providers on a nil cost or discounted basis.**”

Camden Policy CS6

The Council will aim to secure high quality affordable housing available for Camden households that are unable to access market housing by:

f) seeking to ensure that **50%** of the borough-wide target for additional self-contained homes is provided as affordable housing;

g) seeking to negotiate a contribution from specific proposals on the basis of:

- the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development,
- an affordable housing target of 50% of the total addition to housing floorspace, and
- guidelines of 60% social rented housing and 40% intermediate affordable housing;

The Council will aim to minimise social polarisation and create mixed and inclusive communities across Camden by:

j) seeking a diverse range of housing products in the market and affordable sectors to provide a range of homes accessible across the spectrum of household incomes;

l) seeking a variety of housing types suitable for different groups, including families, people with mobility difficulties, older people, homeless people and vulnerable people; and

m) giving priority to development that provides affordable housing and housing for vulnerable people.

LB Camden Development Plan Policies DP2 – 8 :-

DP2. Making full use of Camden’s capacity for housing

DP3. Contributions to the supply of affordable housing

DP4. Minimising the loss of affordable homes

DP5. Homes of different sizes

DP6. Lifetime homes and wheelchair housing

DP7: Sheltered housing and care homes for older people

DP8: Accommodation for homeless people and vulnerable people

DP26 : Managing the impact of development on occupiers and neighbours

- **House of Commons Briefing Paper by Wendy Wilson : Rent setting : Social housing (England) October 2015** Contains Parliamentary information licensed under the **Open Parliament Licence v3.0**.

The provision of affordable housing has not been made any easier following the end of efforts via HRA (?) to converge rents between LAs and HA's, and the Chancellors decision in summer Budget of 2015 to cut Housing Benefit resulting in providers of both social and affordable rented housing having to base their rents on Consumer Price Index minus 1% rather than the CPI + 1% which was anticipated ie less income coming in to provide affordable housing. The National

Housing Federation has estimated that :-

“the reduction will result in a loss of almost £3.85bn in rental income over the four years. Simply dividing this by the average build cost in the 2011-15 programme of £141,000, suggests that at least 27,000 new affordable homes won’t be built as a result of the change “

Around 1.2 million tenants not in receipt of Housing Benefit in the social rented sector are expected to benefit by £700 pa. although some may, in due course, be required to pay near market rents if they earn £40,000pa or more in London.

- Other sources consulted include :-

* London Housing Issues : Paper prepared by Jim Monahan March 2015 for “Fresh ideas for London housing Seminar hosted by Keir Starmer MP . September 2015

* The Guardian newspaper

6.2 THE CURRENT APPLICATION PROPOSES :-

MARKET HOUSING (Plots 2, 3, 7)
42 (1 bed) 44 (2 bed) 6 (3 bed) = TOTAL 92 UNITS
AFFORDABLE HOUSING (Plots 1 , 5 , 6)
13 (1 bed) 23 (2 bed) 8 (3 bed) = TOTAL 44 UNITS

6.3 MARKET HOUSING

Plots 7, 2 and 3 would introduce some 92 units of market housing deep into the heart of Somers Town . Both Plots 2 and 7 are visually intrusive, with commercial activity and a correspondingly hard urban edge / park at ground floor. Camden is increasingly home to the “uber wealthy”. See Guardian 30.01.2016 :-

“There has been a dramatic rise in overseas buyers of London property since 2007, according to the researchers. In 2011 alone, they accounted for more than £5bn worth of housing sales. The global uber-wealthy are concentrated in Kensington and Chelsea, Westminster and **Camden**” .
<http://www.theguardian.com/housing-network/2016/jan/30/luxury-london-homes-86m-social-housing>

Councillor Sarah Hayward in the Guardian on the 4th Aug 2014:-

“ Camden’s housing market is one of the most extreme in the country. The average cost of a house is £700,000. This would require a household income of about £175,000 to get a mortgage. Average weekly rent for a two-bed flat is £440, requiring an annual income of about £70,000. Even Boris Johnson’s so-called [affordable rents](#), at 80% of the market rate, need an income of £50,000. Average earnings in Camden (2013) are £33,000. **Something has to give**”.

Average household income in Somers Town is well below the Camden average.

According to Foxtons the average private rent today in Camden is £695 per week (just about £2800 per month) with a range from £300-£1800 ie cheapest is £1200 per month. Average for a 2 bed is £579 per week (£2316 per month and for 3 bed is £985 (just short of £4k per

month <http://www.foxtons.co.uk/living-in/camden/rentals/> And the average house price according to Foxton's is £900k : 2 bed is £814k and 3 bed is just over £1m.

Whether the incoming occupants of the proposed Market housing are “uber wealthy” or not (and given the proximity to CTRL, some almost certainly will be,) STNF are of the opinion that the current proposal will heighten social polarisation, and boost gentrification of this already vulnerable Neighbourhood. Based on evidence from similar developments in similar locations elsewhere, market flats may well be bought off plan and left empty as investment holdings. In terms of lifestyle and affluence it is hard to see how community cohesion and sustainable community development can be anything other than seriously undermined.

Without access to the Viability Statement, it is hard to be certain, but 92 market units at an average £900,000 = £82,800,000, looks to be very much more than enough to cover the cost of rebuilding Edith Neville Primary School, Plot 10 and St Aloysius Nursery. NB LB Camden is the landowner as well as the applicant

6.4 AFFORDABLE HOUSING : DELIVERABILITY

This is all the more so when it is apparent that not only will nothing like 50% affordable housing be provided, (in fact it is 32.5% approx) but that Para 3.6 from 16.12.2015 LB Camden Cabinet Committee Meeting states :-

"It is financially challenging to provide affordable homes within the scope of the project. This is because of the large investment in community benefits including the new school, open space, and community facilities, and because the scheme has to be self funding. The affordable housing strategy has focussed on providing social rented units at target rents in order to be affordable to local people. **The self funded scheme would provide a minimum of 10 units of social rented housing.**

Para 3.7 commits funding from the Affordable Housing Fund (AHF) to ensure provision of the remaining 34 units. (is this compatible with the scheme being self funding? Does it comply with London Plan? Is it viable/deliverable?).

Given the dismissal at the High Court of LB Camden's desire to set their own %age of social rent in their own Plans, how affordable will the new housing units be?

Any failure to deliver the 44 units of affordable housing should be substantiated by publication of the Financial Viability Appraisal (nb LB Greenwich, LB Islington)

What does appear obvious is that the costs of providing a complete makeover of both Purchase Street Park and Polygon Road Open Space, to ensure successful marketing and sale of units in Plots 2 and 7, will have serious implications for the provision of affordable housing. Unlikely as it may seem, the applicants appear unaware that the Council has a commitment from HS2 to turn Phoenix Road / Brill Place into a linear park between Euston and St Pancras. The applicants appear oblivious of such intentions eg serious prospect of wind / microclimate problems on Brill

Place created by proposed tower on Plot 7.

HS2 are to spend £3million between Brill Place and North Gower Street. TfL also want Phoenix Road / Brill Place changed and have included upgrading Purchase Steet Park in their plans . The Crick gave £74,000 s 106 to do up the Park. Thus not only is some money available for streetscape and Park improvements from other sources, but the equivalent should, simplistically, also be available for transfer to delivery of genuinely affordable housing.

But in fact , in the words of Cllr Hayward “**something has to give**” . STNF and experts as wide ranging as contributors to the Lyon Report on Housing, and identified in the House of Commons Briefing Paper , all agree that certainly in London, the existing processes of and vehicles for delivering genuinely affordable housing have failed . It is for this reason , that STNF put forward a first phase CIP development option in the first place.

STNF RESPONSE

- The development represents a kind of trojan horse - advantage imported : disadvantage exported . This is completely contrary to the Vision contained in the submitted Neighbourhood Plan
- STNF strongly recommends a **phased** delivery of the Community Investment Programme in Somers Town. This will allow for fresh ideas to emerge in terms of the process and delivery of affordable housing in London. Eg freeing up Housing Associations , Community Land Trusts .
- However, as currently submitted, it is perfectly conceivable that we could end up with 92 units of luxury flats (a few admittedly, wheelchair accessible) , 10 units of social rented housing, a City Park and two highly intrusive residential blocks (Plots 2 and 7) that brings the CAZ effectively to Chalton Street.
- The proposed provision of affordable housing includes very few 3 bed or larger homes. This should be rectified - either through additional affordable housing – or some reduction in 2 bed units. There are many big families in Social Housing in Somers Town (Concealed households / overcrowding). If Somers Town residents are to get priority in the new housing, the homes should meet local needs.
- Public access to the Viability Assessment is essential . This is a scheme using scarce public assets to provide public facilities ! Without it , it is not possible to ascertain the costs , benefits , yield on investment, and unwinding that into reducing the need for such high density housing while still replacing Edith Neville Primary School and Plot 10 on their existing sites.
- Without it and the relationship of different funding sources over time eg S106, CIL , AHF, Crick and HS2 / TfL funding , it is difficult to assess the deliverability of crucial community benefits such as affordable housing and public open space Nevertheless :-
- The development is in breach of aspects of London Plan policies 3.8, 3.10, 3.11 and 3.12. as confirmed in High Court , Queens Bench decision of March 2014.
- The development is clearly in breach of LBC CS6 f,g,j,l and m.
- Any failure to deliver the 44 units of affordable housing should be substantiated by publication of the Financial Viability Appraisal (nb LB Greenwich , LB Islington)

7 JOBS AND TRAINING

STNF RESPONSE :-

- In whatever form the development eventually takes place , STNF is committed to ensuring that local people and businesses get “a slice of the action” through :-
 1. Direct employment opportunities eg via the Job Hub
 2. Training eg sponsorship of local apprenticeships, access / information / education at local secondary, adult education and other venues such as New Horizons.
 3. Local supply and purchasing . Somers Town is home to a wide range of local businesses . STNF would particularly wish to see prioritisation of small and medium sized enterprises
 4. Application of Equal Opportunities and Equalities legislation

8 COMMUNITY AND CULTURAL FACILITIES

Plot 1 – Community uses at ground floor (St Aloysius Nursery and Plot 10) with 10 residential units and MUGA above

STNF RESPONSE :-

- The designs for both elements – particularly the new play areas – appear excellent and STNF strongly supports the rebuilding and upgrading of both facilities . They are immensely useful to the existing community and represent valuable social capital.
- There does appear to be something of a “silo mentality” , given the simultaneous , if not earlier, completion (2018) of HS2 required consolidation of Maria Fidelis Lower and Upper Schools on the existing Upper School site nearby on Phoenix Road combined with Site Allocation No 13 - Police Depot site on Drummond Crescent immediately to the south. This very large development site is immediately adjoined by St Aloysius Infants and Primary School . Recently displayed plans also indicate that a MUGA is to be provided as part of the comprehensive development.
- Somers Town already has a lot of MUGAs / pitches for hire. Along with that proposed for consolidation of Maria Fidelis , Regents High have 3, with a full size football pitch once the Nursery has moved . Edith Neville PS will have one. All will be competing against each other for bookings . All are often booked after school and closed during school holidays . The planned MUGA at Plot 1 is there to provide outdoor space for St Aloysius Nursery during the day and the Play Centre after school and during school holidays. .It will not be affordable or accessible for casual use residents. Somers Town families and children will be losing a pitch on Brill Place and will not have free useful access to the Plot 1 MUGA or Edith Neville pitches.

Plot 4 – Edith Neville Primary School

The new Primary School has been designed as a School and Childrens Centre. It has now lost its Childrens Centre status . As a result, the proposed new school area is 13% greater than the

target area ie it is a massive 1FE Primary School that will cost much more to build and run than a conventional 1FE Primary School. This is money and / or floorspace that could / should be given over to the provision of affordable (eg Key Worker – teachers) / market housing within the School site. (see Section 6 above) - thereby reducing the need for seriously intrusive development of the kind proposed on Plots 7,6,5 and 2.

To assist the funding of the new school building , the STNF alternative first phase CIP development option proposed the construction of residential units above what is now proposed as the Main Entrance to the new school. (Drawing No ENPS 176 – A101). Quite apart from the funding advantages, STNF felt that the addition would allow for “eyes on the street” at this particularly critical intersection of vehicular and pedestrian movement / main entrance , as well as assisting in orientation for visitors to the school. At the time objections were raised by Officers and others that to do so would preclude upward expansion of classrooms from ground to first floor level thereby prejudicing possible future expansion from 1FE to 2FE.

Drawing Nos ENPS 176 – A101 and 102 together with Cross sections eg ENPS 176 – A221 make it abundantly clear that this could still be achieved :-

1. Surprisingly 5 of the 7 classrooms are already located at first floor level.
2. At ground floor level, extensive open areas appear to be provided for walk – through Display and Gallery space. These lead off generous Entry Lobby and Foyer areas – both of which might benefit from display and other material.
3. More economical layout of the walk through area could allow for at least one , possibly two classrooms to be accommodated at ground floor level
4. The outdoor pitches / play space are provided with only two toilets beside an external store area under stairs leading up to first floor level . The bulk of the toilets and showers are at ground floor level across the foyer and entrance lobbys from the outdoor playspace and downstairs from the majority of classrooms. Some rationalisation of facilities in this area close to the main entrance (which is not the Pupil entrance) could be achieved.
5. Unlike most of the terraces at first floor level, the large terraced area at the top of the stairs leading down to the outdoor pitch / play spaces is not allocated for a specific purpose. It is more than large enough to accommodate a classroom, thereby, in combination with economies / improvements suggested in 1-4 above, releasing space above the Main Entrance for residential development.

Edith Neville Primary School could well be one of the very few schools in the immediate area without a residential component :-

1. Proposed St Aloysius Nursery with 10 units above (Plot 1)
2. Kings Cross Academy / Frank Barnes Deaf School, with 14 storeys / 252 market flats above (Plimsoll Building – part of Kings Cross Central)
3. St Mary / St Pancras with 150 units of student accommodation above
4. Development Brief for Site Allocation Site 13 allows for both school and residential development .

This is particularly unfortunate, given the dire predictions for delivery of genuinely affordable housing in the foreseeable future. (see Section 6 above)

STNF RESPONSE :-

- STNF strongly support the rebuilding of Edith Neville Primary School on its existing site.
- STNF would encourage a limited measure of redesign . There are potential improvements that can be made in the proposed layout at ground and first floor levels that could free up floorspace at first floor level for other purposes
- STNF consider there are advantages in providing for a relatively small , but valuable element of housing (eg including for Key Workers such as teachers) above the School Main Entrance, without prejudicing any future move from 1FE to 2FE. These advantages include :-
 1. Provision of housing / contribution to funding
 2. Eyes on street at a critical point in Central Somers Town
 3. Orientation for visitors

Plots 5 and 6 : Coopers Lane Tenants Hall and Community Garden

- Camden Community Strategy theme *A connected Camden community where people lead active, healthy lives*, which seeks to encourage a greater sense of community. Camden's community facilities provide people with opportunities to meet, learn, socialise and develop skills and interests and, by doing this, help improve their quality of life.
 - CS10 - Supporting community facilities and services
- f) support the retention and enhancement of existing community, leisure and cultural facilities

Reference in para 3.31 of the Planning Statement to the "Community Hall" being in need of "significant enhancement" is completely wrong . In fact the existing Tenants Hall is modern, fully equipped, disabled accessible and provides a very attractive and well managed asset for tenants and residents of Coopers Lane Estate. When weather permits it can be opened out directly onto the Community Garden which is an equally attractive, useful and well managed asset . The Tenants Hall is famous as it was the venue for the only successful Public Inquiry ever held into breaches of construction practice by CTRL contractors amongst the many conducted all along the route to Folkestone.

Each estate holds allegiance to its own people, place or courtyard and the few facilities such as Tenants Halls and often tiny greening projects found there. This is the very finest grain of community development and social cohesion. Neighbours can meet and get to know each other in safety, comfort, and at no, or affordable cost. Coopers Lane is no different and is rightly proud of both their Hall and Garden.

Both are to be demolished ! The Hall is to be replaced on the lower ground floor of Plot 5 and a new Community Garden is to be created on land adjoining. The overbearing relationship of the proposed new flats to existing 2 storey housing in Coopers Lane is illustrated on Duggan Morris Architects Drawings for Plot 5 – see Drawing Nos P201 and P204, and for Plot 6 - see Drawing Nos P201 and P302. When standard BRE guidelines are applied, it would appear that 30% of the proposed new "Community Garden" would receive less than 2 hours of direct light at 21st March.

Equally important, the very fine grain of local control and usage is likely to be lost or

undermined as the developer envisages much wider public access of both facilities. There are grave concerns about security eg of gardeners and their equipment as a result. It may even come to Coopers Lane TRA having to book their own Hall !

STNF RESPONSE :- OBJECT

- The existing Tenants Hall and Community Garden are more than fit for purpose and should be retained . To replace both would be an unnecessary and cavalier use of public money.
- Any enhancement can only be with the agreement of, and under the control of , the existing local Management Committee
- The proposed development is contrary to the basic objectives set out in the Community Strategy
- The proposed development is contrary to Policy CS10 f.

9 HERITAGE AND CONSERVATION

Heritage assets are protected at national, regional and borough level :-

1 NPPF para 17 : one of the 12 Core Principles of Sustainable Development :-

“Conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”.

NPPF para 58 :- Planning policies and decisions should aim to ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation

NPPF para 133 :- Where a proposed development will lead to substantial harm to, or total loss of significance of, a designated heritage asset, Local Planning Authorities should refuse consent

2 London Plan 7.8 point c :- Development affecting heritage assets and their settings should conserve their significance , by being sympathetic to their form, scale, materials and architectural detail.

St Pancras Station (Grade 1 Listed) Sir Giles Gilbert Scott 1868 ?

Within the King’s Cross Conservation Area and to the southeast of the site, St Pancras and King’s Cross stations form a major heritage resource. According to the Area Statement,

4.2.36 The two stations, both grade I listed, form a part of our architectural and historical heritage and are of national importance; they form a national set piece. They are the most dominant elements of this area in terms of scale and use. With their wide train shed roof spans, they are also examples of technological virtuosity. Together with the Great Northern Hotel, this group reflects the power of the Railway age and is of notable historic value. It is the most important group of railway buildings in Britain. The extension of St Pancras train shed using new technology is in keeping with the tradition of that of the railway stations.

Views of the stations and associated buildings have been protected and improved over recent years, and it is clear that the 25-storey tower (plot 7) should not intrude into this set piece.

STNF RESPONSE :-

- The key view (view 9) in the Heritage, Townscape and Visual Impact Assessment was not taken from the corner of Birkenhead Street and Euston Road as stated. This view needs to be reprovided.
- STNF supports Historic England, the Victorian Society, Kings Cross Conservation Area Advisory Committee, Bloomsbury Conservation Area Advisory Committee and Camden Civic Society in calling for “kinetic views” to see where the tower appears as one moves around the conservation area and beyond. In particular, we would like to see where, if at all, the tower appears above the Barlow shed when moving along the south side of the Euston Road. There are important views of St Pancras from St Pancras Gardens (Sir John Soane monument) and Pentonville Road that should also be tested.
- The British Library has recently been listed grade I. We are concerned that the tower may appear above the library from the south side of Euston Road, altering the roofline of the library, and would like to be assured that this is not the case.
- There are several ways of providing “kinetic views”, some more accessible than others. STNF supports the idea of a blimp being flown on site to show the maximum height of the plot 7 tower. A series of Zmapping walks around the area, exported as movie files and uploaded onto the forum website, would be another way of demonstrating the impact of the building to residents, but it could be a more costly exercise

Extensions to a Grade 1 Listed building would not be granted planning permission unless they were of equivalent architectural quality and merit. Two such extensions are the extension to the hotel on the Midland Road elevation, and the CTRL deck extension. We deal next with the impact upon the deck extension.

CTRL Deck extension . Sir Norman Foster / Alastair Lansley 2006?

The masterplan for the extension to St Pancras was originally created by Sir Norman Foster, and subsequently developed by RLE's Chief Architect Alistair Lansley. The extension has been awarded the RIBA London and English Heritage Award for a Building in an Historic Context.

Sir Norman Foster is an architect of world renown, famous in London for the astonishing roof to the inner court of the British Library, and for the “Gherkin” office block in the City of London. The CTRL St Pancras Deck extension is one of relatively few other works of his in London.

The extension to the Barlow Shed, is characterised by a seemingly simple mathematically based, elegant and functional solution to a formidable architectural problem: how to relate and tie the horizontal deck to the world famous single span arch? Originally, the roof to the deck was louvred and, when opened, would allow passengers alighting from CTRL trains to look up and see the arch in outline. The highest design quality is reserved for the brief but critical treatment of the transitional linking element of the horizontal roof to the vertical single span arch. The deck extension is characteristically cool, restrained, and at ground floor level, supremely functional (as indeed, was the original Sir Giles Gilbert Scott building). In both elevation and materials used, the Deck extension provides a coherent and modest compliment to the ornate grandeur of the original. To some extent this is also the case with the building of the Francis Crick Institute

STNF RESPONSE : (see Attachment 5)

The proposed 25 storey tower block on Plot 7, conflicts with London Plan policy 7.8 point c) and should be refused for the following reasons :-

- It would obliterate views of critical sections of the Deck extension in views from the west , both long distance (eg from Primrose Hill) and immediate eg from Purchase Street Park and Brill Place.
- It would unnecessarily intrude into views of the Deck extension from both west and east (Kings Cross Central)
- It would introduce a vertical architectural element which , far from complementing the essential restraint of the horizontal Deck extension, seeks to announce its very presence in terms of height , profile, elevational treatment and materials used.
- Given that this is already achieved in the original Victorian gothic red brick structure, the proposed tower further detracts from the achievement : instead of it being a marriage of two ; inappropriately, the marriage becomes one of three, and architectural harmony and ease inevitably suffers.
- This appreciation is only now possible in local views from the west
- The tower would set an unacceptable precedent. Not only does it not pay respect to its historical context but it goes out of its way to intrude into an award winning marriage of architectural styles.

PLOT 2 : 8/6 Storey block of 35 residential units above 137m2 commercial / D1 Floorspace. Opposite 3 storey listed frontage of terraced housing in Charrington Street

The 8/6 storey block would occupy a very prominent central position in what is currently an open airy location dominated by playspace of various kinds , and overlooked by a listed 3 storey terrace on Charrington Street , being the western edge of Conservation Area.

The proposed building would be visually intrusive, standing virtually alone surrounded by predominantly playspace. It would not relate satisfactorily or logically to either the listed terrace opposite it , or the 2 storey development of Plot1 (including another MUGA) beside it.

The proposal includes twice the flexible A1-3 / D1 ground floorspace as that proposed at Plot 7 (the tower). A1 = Shops, and other commercial activities including Sandwich bars and internet cafes. A2 = Financial and professional services including Estate Agents. A3 = Restaurants and cafes. Putting viability to one side, were the range and size of units indicated all let, the character of the whole area, including the adjoining Conservation Area would be utterly transformed. Commercial deliveries, nighttime noise and litter could well be a serious problem Both the LB Camden Core Strategy and the submitted Neighbourhood Plan seek to protect and enhance Chilton Street as the Neighbourhood Centre

STNF RESPONSE :- REFUSE -

- The development development would seriously detract from the character of the adjoining Conservation Area due to :

1. The proposed development is unsympathetic to the form, scale, materials and architectural detail of the listed 3 storey terrace opposite.
 2. Unnecessarily prominent, and visually intrusive 8-6 storey building occupying a place of high visibility from , and out of scale with, surrounding 2 – 3 storey development and playspace of various kinds.
 3. The Conservation Area is a quiet residential area, its character is likely to be seriously diminished by the proposed large area of commercial floorspace . This could well lead to much increased traffic through and adjoining the Conservation Area, as well as a reduction in daytime and night time amenity.
 - Community Safety concerns : Introduction of large volume of commercial units and traffic (services / deliveries etc) into a generally quiet residential / educational / recreational area, with many children of all ages (StAloysius, Edith Neville, Regents High) close by,
 - The site is not designated for commercial development
 - The proposed Commercial development is arbitrary, would set a dangerous precedent, and would detract from the commercial viability of the designated Neighbourhood Centre at Chalton Street.
-

Attachments

1. **4JPG – Overdevelopment : Impact of tower on Coopers Lane, Phoenix Court etc**
2. **Plans comparing existing and future amounts of soft and hard landscaping**
3. **Existing Public / Private Open Space**
4. **Proposed replacement Open Space**
5. **1JPG – Impact of tower on Barlow Shed and Deck Extension.**

6 July 2016



Martin Jones, Senior Strategic Planner
Development & Projects
Planning Department
GREATER LONDON AUTHORITY
City Hall, The Queen's Walk, London, SE1 2AA

Dear Martin Jones,

LB Camden planning application 2015/2704/P, Central Somers Town CIP

We understand that you are the case officer for the above planning application. Somers Town Neighbourhood Forum strongly objects to the proposal, which we believe goes against local, London and national planning policies. Copies of our original objection, our request to the Secretary of State to call in the application and independent air quality reports are attached.

We have listed below some of the reasons we think the application does not comply with the London Plan.

1. Principle of development

The site is located between King's Cross St Pancras and Euston Opportunity Areas (OAs). According to the London Plan, these OAs should:

"support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration." [2.13 B e]

Camden's own policies reinforce this position: Core Strategy 4 of the Development Plan explicitly defines Somers Town as an area of more limited change, where *"the Council will seek to spread the redevelopment benefits of nearby schemes, to predominantly residential areas, where smaller scale and more incremental change is expected take place."* Benefits listed include, *"the provision of open space and other community facilities where there are local deficiencies."*

The idea that a tower block should be built on a Somers Town park in order to fund community and environmental improvements is against the London Plan and Camden's own policies.

The need to expand Edith Neville Primary School to two-form-entry in the future is driven by a projected population growth in Somers Town of 47.4%. This population growth comes from the King's Cross and Euston OAs. Again, funding for the school expansion should come from the OAs themselves. This is made explicit on page 116 of the Euston Area Plan:

"New housing development in the plan area should contribute towards school places provision. These could fund the expansion of nearby Edith Neville by 1FE if sufficient need exists for additional primary school places in the area arise."

2. Social infrastructure

On-site existing and proposed educational and community uses:

	Existing (GIA)	Proposed (GIA)
Edith Neville Primary School (including former children's centre & nursery)	1451 sq.m	2245 sq.m
St Aloysius Nursery	off-site	197 sq.m
Community Play Facility	145 sq.m	430 sq.m
TRA/community hall	182 sq.m	190 sq.m
Total	1778 sq.m	3062 sq.m

i. Edith Neville School is no longer a children's centre, having lost its status in September 2015. The school is designed as a massive one-form-entry primary school that is already bigger than a BB103 two-form-entry school. The school should be reduced in size and any children's centre services be provided in the additional hall/studio spaces that would be surplus to requirements until the school roll was expanded.

ii. St Aloysius Nursery is currently in temporary accommodation off site. The new nursery should be co-located with the nearby St Aloysius RC Infant School, giving children a seamless transition between nursery and reception class. The infant school is also in need of a new school building and the two should be planned together.

iii. Plot 10 Community Play Centre is currently classed as an adventure playground and designated open space. We support upgrading and expanding existing internal spaces but object to the drastic reduction in external area from 1305m² to 861m² (including the proposed MUGA).

iv. We object to the change in nature of the hall from a TRA hall to a community hall. A community hall would be expensive to run and would compete with existing community buildings in Somers Town. Coopers Lane residents would lose their tenants' hall.

v. As these buildings would be on existing open space, the benefits of having a more educational and community space have to be weighed against the loss of open space in an area where few residents have access to private gardens.

3. Open space

The loss of protected open spaces must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate. [London Plan 7.18 B]

The application proposes to build on all three designated open spaces in Somers Town: Purchase Street Open Space, Polygon Road Open Space and Plot 10 Adventure Playground. **There will be a loss of designated open space of over 600m²**, even if the proposed MUGA and Plot 10 outside space is redesignated.

As well as a loss of designated open space at Plot 10, private open space will be lost from Coopers Lane TRA community garden. Pre-application advice from the planning

officer stated: *“Private Open Space should also be provided, and there should also be no loss (unless there is a corresponding increase in Public Open Space)”*. According to the planning report, there will be “a reduction in private open space from 6,170sqm to 4,775sqm.” And an increase in public open space of 5sqm.

There will be a loss of activity space:

Junior play space reduced from 880m² to 610m²

Infant play space reduced from 245m² to 235m²

Playable green space reduced from 4925m² to 3840m²

Outdoor gym space reduced from 200m² to 140m²

Dog activity space reduced from 495m² to 265m²

According to Camden’s Local Development Framework guidance (CPG6), the required amount of additional open space for 136 new homes is 3780m². The actual amount of additional open space for 136 new homes: 0m². Predicted number of new residents: 420, including 54 children. Under London Plan Policy 3.6, an additional 540m² of play space should be provided for these children, but the actual amount of play space is reduced from 1125m² to 845m² (a reduction of roughly 25%).

4. Education

We support the rebuilding of Edith Neville Primary School, but believe this could be done in another way. It has already been noted that Edith Neville Primary School is no longer a children’s centre. The school as designed would be 1FE+, but already as big as a BB103 2FE primary school. The demand for expansion to 2FE would come from the surrounding OAs and should be funded by them.

5. Density

The planning application wrongly assumes that the site area is within the Central Activity Zone (CAZ) and is a central area. In fact, the site is just outside the CAZ and is classified as an urban area. The density of the scheme is 866 habitable rooms per hectare (hrha). This is significantly above the upper limit of 700 hrha for a well-connected urban site, as set out in the London Plan’s Table 3.2. Accounting for the mixed-use nature of the proposals, 866 hrha is likely to underestimate the impact of the development in terms of scale and massing, activity and the demand for services. It is outside the London Plan density matrix and doesn’t meet London Plan policy.

6. Children’s play space

As detailed above, there is a reduction in the amount of infant play space, junior play space and playable green space in an area with the highest child population density in Camden. Somers Town has two nurseries, four primary schools and two secondary schools, and children from all these institutions use the parks before and after school. To reduce the amount of dedicated play space and increase the number of children living within an area is against London Plan Policy 3.6.

The proposed doorstep play does not compensate for the loss of playground space. There are also concerns that doorstep play would be problematic for visually-impaired people: they would find it difficult to negotiate the public open space if it was filled with obstacles. This is important given the site’s proximity to the Royal Institute for the Blind and the London branch of Guide Dogs UK.



“Doorstep play” could prove hazardous for the visually impaired.

7. **Historic environment**

The applicant’s original HTVIA did not show that the residential tower would be visible above the train shed roof of St Pancras Station (Grade I) – subsequent studies have shown that it would be visible from much of the Kings Cross Conservation Area.

The applicant’s original HTVIA did not show that the residential tower would be visible above the roof of the British Library (Grade I) – subsequent studies have shown that it would be visible.

The applicant’s original HTVIA did not show that the residential tower would be visible above the roof of Chester Terrace from the Inner Circle of Regent’s Park (Grade I) – subsequent studies have shown that it would be visible.

The following organisations have objected to the application: Historic England, Georgian Group, Victorian Society, Twentieth-century Society, Royal Parks, Westminster City Council, Regent’s Park Conservation Area Advisory Committee, Bloomsbury Conservation Area Advisory Committee, King’s Cross Conservation Area Advisory Committee and the Camden Civic Society.

The application will harm numerous Grade I, Grade II* and Grade II listed buildings and should be withdrawn.



8. **Urban design and tall buildings**

The proposed new development deliberately falls well short of nationally agreed environmental planning standards in terms of loss of daylight and sunlight by adjoining residents, overlooking of adjoining residents and microclimate (wind). In terms of scale, the nine-storey building proposed for Plot 2 would dominate the nearby conservation area. The 25-storey building proposed for Plot 7 is outside the Central Activity Zone and is completely out of scale with the housing to the east and west. It would overshadow the park and housing for much of the year.

9. **Trees and biodiversity**

The number of trees said to be affected has changed throughout the consultation period, but the number shown on the Arboricultural Impact Assessment (AIA) is 45 trees and 5 groups of trees (another 46 trees). A further 10 fruit trees in the community garden were missed off the AIA. If the application were to go ahead, there would be an overall loss of trees in Somers Town and a great loss of mature trees, with the associated negative environmental impacts. The fact that there would be a massive move from soft to hard landscaping would have a negative impact on biodiversity, as would the loss of the existing Coopers Lane TRA Community Garden.

The King's Cross and St Pancras Green Infrastructure Audit included the site area. It recommended low-impact enhancements for increasing biodiversity and appeal. Routes through Somers Town, and particularly the east-west route along Phoenix Road, are important green walking links that would not be enhanced by tower blocks and wind tunnels. Maidenhair spleenwort was noted on the remnant of the brick coal yard wall at the corner of Purchase Street Open Space.

10. Inclusive design

The fact that disabled parking is not being provided on site means there will be additional pressure on Blue Badge parking. The parking study overestimated underutilised spaces, did not take into account the 1500 people soon to start work at the Francis Crick Institute (some of whom will be disabled), ignored parking suspensions for the Friday market on Chalton Street and the proposed parking suspensions on Phoenix Road, Chalton Street, Drummond Crescent and Churchway associated with HS2 works. Removing existing parking spaces will cause real hardship to disabled people, including the 147 existing wheelchair users living in Somers Town.

As stated above, the proposed doorstep play may cause problems for the visually impaired, including, according to the Equality Impact Assessment, the 26 partially sighted people living in Somers Town and those people travelling through on their way to, for example, the nearby RNIB.

11. Air quality

Somers Town is bordered by Euston Road, Midland Road and Eversholt Street. Areas close to these roads have some of the poorest air quality in the country. The site area, for the main, has better air quality, although Brill Place is significantly above the annual EU Limit for NO₂ of 40µg/m³.

All of the six schools in Somers Town appeared on the GLA's recently released air pollution in London's schools study:

Primary Schools	Average NO₂ Concentration 2015
St Aloysius Infants	43.75
St Aloysius Juniors	43.08
Edith Neville	42.96
St Mary & St Pancras	42.63

Secondary Schools	NO₂ annual mean 2013
Regent High	45.5
Maria Fidelis	43.7

Because an Environmental Impact Assessment was deemed unnecessary by LB Camden, the applicant's air quality report only looked at the site area. It found the existing air quality at the proposed residential Plots 1, 2, 3, 5 and 6 is predicted to meet air quality objectives, but that the proposed residential tower at Plot 7 would not meet air quality objectives. It should be noted that the applicant's air quality findings conflict with the GLA's own report.

A peer review of the applicant's air quality report (attached) found that:

- i. The traffic data used proved to be inadequate to describe vehicular emission both at the application site and road network in its vicinity. This is clearly supported by the GLA's predicted NO₂ concentrations for 2013, just one year apart from the year used in the study to describe the baseline (2014).
- ii. The model set up did not take into account the canyon street effect and therefore it is very likely that the results presented are significantly underestimated along

locations where there are high buildings and relatively narrow roads.

iii. The background value mapped by Defra along Brill Place was altered – a practise considered “incorrect and unacceptable”.

iv. There was no consideration of the cumulative impact of other planned works in Somers Town, including HS2, the Maria Fidelis schools consolidation project and Crossrail 2. These major projects are likely to occur at the same time as Central Somers Town CIP.

12. Conclusion

i. LB Camden’s planning application 2015/2704/P does not consider that Somers Town is designated an area of more limited change between two Opportunity Areas in the Council’s planning policy.

ii. The proposed school is too big. Expansion to a 2FE primary school should not be funded by building on public open space in Somers Town.

iii. The proposed nursery is in the wrong place.

iv. The proposed community play facility suffers an unacceptable loss of external play space.

v. There is an overall unacceptable loss of designated open space and private open space.

vi. The application wrongly assumes the site is within the CAZ in a central area. It is not. The boundary of the CAZ was drawn for a reason. The site is within an urban area.

vii. The proposed density of the application is 124% of the maximum recommended in the London Plan for an urban area.

viii. There is an unacceptable loss of children’s play space. Doorstep play is no replacement for proper playgrounds and may be hazardous.

ix. There is near-universal agreement that the impact on the surrounding built heritage is unacceptable. The lone dissenting voice is LB Camden.

x. There is an unacceptable impact on existing residents’ amenity.

xi. The scale of the proposed buildings does not fit in this low-rise residential area.

xii. There is an unacceptable loss of trees, including mature trees.

xiii. Parking, particularly for existing disabled drivers, will be made very difficult by this application.

xiv. The applicant’s air quality report was lacking.

xv. The application should be refused.

Please do not hesitate to contact us if you require any more information.

Yours sincerely,

Slaney Devlin
Acting Chair
Somers Town Neighbourhood Forum
[REDACTED]

Michael Parkes
Community Planner
[REDACTED]

Enc:

Somers Town Neighbourhood Forum response to LB Camden planning application 2015/2704/P

Somers Town Neighbourhood Forum request to SoS to call in LB Camden planning application 2015/2704/P

Independent Air Quality report

Peer review of applicant's air quality report for LB Camden planning application 2015/2704/P

Martin Jones

From: Slaney Devlin [REDACTED]
Sent: 06 July 2016 17:33
To: Martin Jones
Cc: [REDACTED]
Subject: LB Camden planning application 2015/2704/P
Attachments: LBC2015-2704-P.pdf

Dear Martin Jones,

Attached is a letter on behalf of Somers Town Neighbourhood Forum regarding the above planning application, which I believe you are handling on behalf of the GLA.

I will put a hard copy in the post, along with the relevant attachments. Electronic copies of the relevant documents can also be found [here](#).

Please don't hesitate to get in touch if you have any queries. I would appreciate confirmation that you have received our letter.

Kind regards,

Slaney Devlin
[REDACTED]

This message has been scanned for viruses by the Greater London Authority.

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**Letter to CNJ from Camden Civic Society re Somers Town scheme, re CNJ letters 23rd June
'This plan is a travesty of justice'.**

The long drawn-out war waged by local residents against the 100 Avenue Road development (including four letters in last week's CNJ) reflects a growing hatred felt by Londoners for speculative towers of luxury flats. Very large numbers of local people are also opposed to another such proposal, the 25-storey Brill Place building, part of Central Somers Town scheme which last week Camden were 'minded to approve'. How especially shocking therefore that this is Camden Council's own proposal and that, in addition, this tower of private high-value flats is to be built over a public park, the Purchase Street Open Space (the plot was wrongly identified in the application as within the Central Activity Zone).

In the past, most residential tall buildings were council-built for council tenants, for example, the three Amptill Square towers. We might not have liked these either, but at least there was no question of wealthy private owners looking down on, *de haut en bas*, the low-rise social housing below.

Letters last week from Diana Foster and Fran Heron about the Somers Town application rightly emphasised the essential dishonesty of the case put forward by Camden: that this was the ONLY way of funding the rebuilding of Edith Neville School (the need for which no one denies).

The Camden Civic Society was especially disturbed by the way that a council officer dismissed the 'harm' that the tower would cause to the setting of a number of listed buildings of national importance, both close to the site and at a distance. The Brill Place tower will obtrude into a crucial view of Nash's Chester Terrace from the centre of Regent's Park and for this reason Historic England (previously English Heritage) and the City of Westminster both asked Camden to withdraw their application (objections also came from two statutory amenity bodies, the Georgian Group and the 20th Century Society). This authoritative advice was overridden and the officer suggested that the harm to Nash's architecture was not so important firstly because Nash himself had modified his original concept for Regent's Park (a reason for dismissing very many great works of art, in many media) and secondly because there were some other viewpoints where later buildings were already visible above the Regent's Park terraces (this argument ignoring the fact that most of these other intrusions date to before much of the legislation and planning guidance which requires local authorities to 'preserve or enhance' listed buildings, conservation area and their settings).

In their approval in December last year of the King's Cross Coal Drops application, Camden's Development Control Committee expressly used Heritage England's support for that scheme to override the many objections from other bodies (including the Victorian Society, SAVE Britain's Heritage, the Islington Society, Camden Civic Society, the King's Cross Development Forum and the Regent's Canal Conservation Area Advisory Committee). Camden's high-

handedness on that occasion was specifically referred to in a critical article in the *Architects' Journal* for 6th January this year: *The efforts and opinions of all these voluntary groups have thus been negated...* . Last week, since it suited them, Camden dispensed even with the advice of Heritage England. Camden's Planning Committee has demonstrated yet again that it is incapable of acting as a neutral arbiter and of making sound decisions on major cases. The Camden Civic Society, among others, has therefore asked that their Central Somers Town application is 'called in' by central government, to be decided only after a Public Inquiry.

Hero Granger-Taylor, committee member, Camden Civic Society,
camdencivicsociety@gmail.com

Somers Town scheme

❑ ON the Somers Town scheme (This plan is a travesty of justice, Letters, June 23), how especially shocking this is Camden Council's own proposal and that, in addition, this a tower of private flats is to be built over a public park.

Camden Civic Society was especially disturbed by the way that a council officer dismissed the "harm" that the tower would cause to the setting of a number of listed buildings of national importance, both close to the site and at a distance.

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Objections also came from the Georgian Group and the 20th Century Society. This authoritative advice was

original concept (a reason for dismissing many great works of art, in many media) and second, because there were some other viewpoints where later buildings were already visible above the terraces (ignoring the fact that most of these other intrusions date to before much of the legislation and planning guidance requiring local authorities to "preserve or enhance" listed buildings, conservation areas and their settings).

Now Camden has dispensed even with the advice of Heritage England. The planning committee demonstrated yet again it is incapable of acting as a neutral arbiter and of making sound decisions on major cases. Among others, we have therefore asked that the Central Somers Town application is "called in" by government, to be decided only after a public inquiry.

HERO GRANGER-TAYLOR

Camden Civic Society's (the Society's) *pro tem* detailed comments for submission on 8th February concerning the Somers Town Central application 2015/2704/P

The Society will submit further comment when the additional views required by Historic England have been provided and the blimp requested by the Society and the CAACs of Kings Cross and Bloomsbury has been flown. It will then be possible to assess the impact of the proposed tower on lines of sight and on 'kinetic' views, particularly in relation to St Pancras station.

Summary

Camden Civic Society strongly objects to

1. the proposed 25 story tower on Brill Place, as this is not in keeping with the setting of Somers Town with its maximum of six stories, is to be built on green space, reduces light and intrudes on the historic St Pancras setting.
2. the reduction in the public green space of the Purchase St open space and loss of trees as a public health issue in an area of high pollution, and for the loss of public amenity, narrow walkways and bisecting paths.
3. the use of the need to rebuild Edith Neville Primary school as a justification for reducing scarce green space, to the detriment of the children's health.
4. the proposed 9 story block in Charrington St, as this is not in keeping with the setting of three story terraces and the historic view along Charrington and Ossulston streets.
5. the proposal to build housing on the Coopers Lane community gardens, further reducing open green space.
6. the HE views not yet having being provided nor the blimp having been flown.

Introduction

The Camden Civic Society strongly objects to these proposals, particularly to the 25 storey tower and the impact it will have on the area, and to the reduction in size and amenity of the Purchase Street Open Space. Camden's Community Investment Programme for improving school buildings and increasing the amount of affordable and social housing would seem to be predicated on generating funds through the sale of "luxury" housing, however it is not acceptable for the luxury flats to reduce the amenity of existing residents.

A recent example of where the amenity of existing residents is undermined is on the Regent's Park Estate where the proposal to hold out for the termination of leases on the Albany St Police station and Stanhope St parking was rejected by Camden itself in favour of new tall buildings on the scarce remaining green space near the Hampstead Rd. This may have seemed expedient to fit in with High Speed 2, but in the Society's view it is that it is a very short-sighted decision with repercussions for future generations, particularly as HS2 is delayed as could be expected of any major infrastructure project. There is no possible justification for the local authority to reduce the amount of public green space and number of mature trees in inner London, where pollution is already at unacceptably high levels impacting on public health.

The Central Somers Town project is predicated on the idea that funding is needed to rebuild Edith Neville School, St Aloysius nursery, the play centre and improve any remaining open space. We believe that it is preferable to minimise the plan and utilise the s106 and CIL monies from all the works planned in Somers Town, including 42 Phoenix Road, Maria Fidelis, HS2, Crossrail2, British Library extension and St Pancras hospital. In addition, there are still funds banked from the Unison and Crick s106 agreements. The school, like St Mary St Pancras and Netley, could also contribute by, for instance, putting housing on top.

1. The proposed 25 story tower of luxury flats on Brill Place

Camden Civic Society strongly objects on a number of grounds to the **proposed 25 storey tower**.

a) While a tower of this sort might be acceptable amongst a group of tall buildings it is completely out of place in the maximum six story context of Somers Town. Camden's proposed tower is visually highly inharmonious with both the Crick buildings and St Pancras station. The model of the proposed development provided shows neither the whole of the Crick building nor any part of the original St Pancras station, which conceals this issue.

b) The proposed tower may intrude into important views of St Pancras, particularly its train shed, thereby damaging the setting of this Grade I building. The sole visualisation given in the application is not accurate; this must be corrected. St Pancras station is not only a masterpiece of Victorian architecture, and a monument of the railway age, it is of great significance in the history of the conservation movement as the point at which ordinary people's voices managed to put a stop to the widespread destruction of the 1960s including the demolition of Euston Station and St James Hampstead Rd. The Society is also concerned about the effect of the proposed tower on views of the British Library. The one visualisation given looks up to the gate, masking the tower behind. It is likely that the tower would be visible from nearby viewpoints.

c) It is absurd to suggest that a tall modern building in this position can create an 'intentional dialogue' with the St Pancras clock tower (ref. p36 of the Brill Place Tower DAS, vol 3 application *Design and Access*) The St Pancras clock tower performs a dual function as landmark and clock on a street which has been London's most important highway since the 18th century. The 'dialogue' has already been provided by the clock tower at the British Library, another landmark building of international importance. The proposed tower on Brill Place has no function other than as a container for residential units and is in a place where no landmark is in any way required.

d) In the planning application, the number one justification given for positioning the tower on Purchase Street Open Space is that it is within the Central Activities Zone (CAZ). In fact, the CAZ border is Brill Place, a border drawn up to reflect the low-level residential nature of that part of Somers Town. https://www.camden.gov.uk/ccm/cms-service/stream/asset/?sessionId=F095443E595DBB56450E12178D290ECD?asset_id=2998969

e) A tall building in a residential area where there were previously none is a hostage to fortune, paving the way for other tall buildings. A group of tall buildings in Somers Town would be very objectionable for the reasons given in the Society's Residential Density section below. It would also represent the northwards spread of Central London, breaking the boundary formed by Euston Road which has for so long marked a separation between the commercial centre of the city and the residential inner suburbs to the north and this opposed by the Society, as well as the majority of local residents. This should not be the intention of Camden Council and Transport for London/GLA, rather Camden Council should be protecting its citizens from the northwards march of big business and commercial property. It is true that the new buildings at King's Cross and on the Railway Lands are very large and far too few are devoted to housing. However, as the Society has argued in relation to HS2's plans for Euston, these are areas where there was a very low population previously. Somers Town is quite different, being already densely populated.

f) The tower will have a deleterious effect on the area around it: in the first place by sitting to the south of low rise housing, it will very much reduce the sunlight experienced by the inhabitants of the latter (London is at a high latitude, there is only a very short period in the year where the sun at midday is directly overhead); like all tall buildings, it will create unpleasant downdrafts, damaging in particular the amenity of the remaining area of Purchase Street Open Space; it will set up what might be called an anti-dialogue, with the segregation of "luxury" residents from council and housing association tenants and leaseholders. This undermines the integrated communities that are such a positive characteristic of Camden, providing the underpinning for inner city social cohesion.

g) Camden, HS2, Crossrail 2, TfL all want to see a strong east-west walkway between Euston and St Pancras. In July 2015, Urban Partners for Kings Cross, Euston and St Pancras unveiled London's first designated station to station Wellbeing Walk. This initiative was supported by TfL and Cross River Partnership and was in partnership with the Somers Town community. The proposed tower block will make the route less appealing and less green.

2. Reduction of open spaces – Purchase Street

The Camden Civic Society objects in principle to **the loss of part of Purchase Street Open Space** WE object very strongly indeed to the reduction of the Purchase Street Open Space for the construction of the tower.

a) The Society objects to the use of public open space for any kind of development, particularly a privately-owned tower. It is a policy of the Society to resist the loss or reduction of any public green space. While the London Borough of Camden is generally very well provided with public open space this is not true of Somers Town, which is characterised instead by its proximity to three railway termini.

b) The Society also objects to how, in the plans, the remaining green space is bisected by large paths, creating an area with a transitional feel, not a coherent enclosed area, safe and relaxing. While the Purchase Street Open Space requires improvement, this should be based on the good points of this existing small park.

c) The community garden belonging to the Coopers Lane development, at present visually part of the Purchase Street Open Space, is currently very pleasant. What will be provided in its place is too narrow and has too little light to function as a replacement. Coopers Lane TRA are losing their garden which is currently private open space, as the replacement is needed to make up the public open space figures.

Further Objections

3. We very much object to Camden justifying the proposed Brill Place tower on the need to rebuild and reposition Edith Neville Primary School. This cannot reasonably be used to justify the further reduction of public open space in an area in which this is so scarce.

4. The Society objects to the 9 story block proposed for Charrington St, which otherwise is a terrace of three story buildings. There is a lot of local opposition to the nine-storey building at the end of Charrington Street. It has long been accepted not to build higher than six storeys in Somers Town. The CIP report to the Cabinet of Dec 2013 (when an earlier version was approved) acknowledged this: "The majority of the indicative heights proposed for the new housing designs are set within the Somers Town context of buildings up to six storeys. The exception is the proposed residential block on the corner of Brill Place and Purchase Street. The maximum height proposed here would be no higher than the emerging Francis Crick Institute." Nine storeys at the end of Charrington Street would dominate the listed three-storey streetscape and destroy views into and out of the conservation area. In addition to conforming to the height of buildings in the setting, any new buildings proposed for Charrington Street must be set back to the established building line (as preserved by the original houses to the north and the old blocks to the south) and must not obtrude onto the right of way and into the long views up and down Charrington Street/Ossulston Street.

5. We recommend that another solution be found for the housing to be provided by **the blocks due to sit on the Coopers Lane community garden** as this further reduces the Purchase St open space. These blocks will overlook existing housing, with the façade elevations of the new and existing buildings at one point just 12 metres away from each other.

6. We do not consider that **landscaping along Polygon Road** will compensate for the loss of part of the Purchase Street Open Space.

7. Disabled parking must be provided for the 14 homes planned for people with disabilities.

Comment on the accessibility of the application - Fortunately the Council provided hard copy of this application in St Pancras Library. It is virtually impossible to use online as it takes over 30 minutes to download the main Masterplan document plus a further half hour to scroll through, and it is difficult to locate specific information, which may of course not even be there.

The Society has emphasised in our recent submission to the consultation on the presentation of planning applications, that some paper copies **must** always be required by the council from applicants and made easily available to the public, and for committee members to view together.

Camden Civic Society's observations concerning residential density

Tall buildings are not a means to increased density. As well as obtruding into well-loved views, they blight the area immediately around them, by casting shadows and causing downdrafts, and so discourage street usage and future streetscape improvements.

Evidence that tall buildings do not lead to greater density is provided by the relative densities of various cities: in New York the average number of inhabitants is 2,050 per km², in London 5,100, in Paris 26,000, and Barcelona Example district 36,000. (ref Guardian 16/4/15, article by Lloyd Alter, "*Cities need Goldilocks housing density – not too high or low but just right*").

The very high densities of Paris, Barcelona and Madrid occur particularly in areas developed in the 19th and early 20th century, before the impact of cars on cities and before the introduction into Europe of tall buildings.

In London, the boroughs with the highest density are Kensington and Chelsea and Islington, both typified by a high proportion of traditional terraced housing. Kensington and Chelsea combines this high population density with a very good amount of green space, including the communal squares characteristic of the area.

Greater density can only be successfully achieved by distributing additional housing relatively evenly, keeping as far as possible to the character of the area, and not by the intrusion of one or more out of place tall buildings.

There are some benefits to greater density, most obviously improvements to local amenities: transport, services e.g. post offices, shops, meeting places including libraries and cafes.

Most of these amenities will only flourish in a relatively formal setting, more particularly in traditional streets. Properly planned streetscapes are therefore essential if greater density is to be experienced to some extent as an improvement.

Careful planning and the establishment of trust are needed to integrate additional housing into existing communities (see the study *Better neighbourhoods: Making higher density work*, published 2005 by CABE and the Corporation of London).

Local authorities making "cross-financing" deals with private developers as a means of raising funds is a worrying trend. Private commercial developers will always be far more concerned with the individual buildings they themselves put up than with the area at large and the community it contains. The Society is concerned that such deals are a quick fix which will lead to the social and "affordable" housing in the same area having reduced amenity, most immediately a loss of light and views if the new private building is too high and/or too broad for the context.

CAMDEN CIVIC SOCIETY WRITTEN SUBMISSION
in respect of Central Somers Town Covering Land at Polygon Rd Open Space, Edith Neville
Primary School 174 Ossulston St and Purchase Street Open Space NW1 ref: 2015/2704/P
to be heard by Development Control on 21st June 2016.

Camden Civic Society asks that Camden Development Control Committee does not grant this application.

Camden Council, as the Local Authority, has the duty to preserve the heritage of Somers Town. This proposal would destroy and undermine that heritage.

The Society responded in February to the consultation for this planning application, and no account has been taken of our strong objections, particularly to the tower:

1. The proposed 25 story tower on Brill Place is not in keeping with the context of Somers Town with its maximum of six stories. It is to be built on scarce green space, reduces light and harms the historic St Pancras setting and the setting of other important listed buildings up to the distance of Regents Park.
Additional views are needed, as indicated by the blimp flown at the community's expense. Allowing this application would make it difficult for Camden to refuse future commercial applications for high rise buildings in this predominantly low-rise residential area.
2. The reduction in the public green space of the Purchase Street open space and loss of trees is a public health issue in an area of high pollution, as is the unacceptable loss of public amenity, replaced by narrow walkways and bisecting paths.
3. The use of the need to rebuild Edith Neville Primary school as a justification for reducing scarce green space, to the detriment of the children's health, is unfair.
4. The proposed nine story block in Charrington Street is not in keeping with the setting of three story terraces nor the historic view along Charrington and Ossulston streets.
5. The proposal to build housing on the Coopers Lane community gardens, further reduces open green space.

We note that Historic England (previously known as English Heritage) has objected to these proposals, recommending that Camden withdraws the application for the high tower, which harms the setting of nearby important buildings and obtrudes into distant views.

At a previous planning application concerning the Coal Drops the fact that Historic England did not object to the major disruption of the roofline was taken as reason grant permission despite the objections of all other relevant bodies including the Society. (See the article by James Dunnett critical of Camden's DC Committee and Historic England in the *Architects' Journal*, 8th Jan 16.)

In respect of this planning application therefore, we urge Camden Council to again follow the advice of Historic England, and in this instance not grant planning permission.

In the event Camden Council do grant permission, then the Society will have no option than to ask the Secretary of State to apply the call-in procedure.

In addition, the Society expresses concern at the report on page 15 of the *Camden New Journal* 16 June 2016 of potential Council bias in advance of the committee decision.

Dorothea Hackman, Chair, Camden Civic Society camdencivicsociety@gmail.com Charity 276262

NW1 7RS

Martin Jones

From: Dorothea Hackman [REDACTED]
Sent: 07 July 2016 16:59
To: Martin Jones; Camden Civic Society
Cc: Hero Granger Taylor
Subject: Camden application 2015/2704/P
Attachments: Camden Civic Society letter to CNJ re Somers Town scheme 28.6.16.odt; Camden Civici Society letter on Somers Town as published in CNJ 30.5.16.jpg; Somers Town CCS detailed comments@8Feb16.pdf; CCS written submission Somers Town June 16 final.pdf

Camden Civic Society

[REDACTED] NW1 7RS

5th July 2016

Martin Jones, Senior Strategic Planner martin.jones@london.gov.uk
Development & Projects
Planning Department
GREATER LONDON AUTHORITY
City Hall, The Queen's Walk, London, SE1 2AA

RE: Central Somers Town: Tower on Purchase St open space ref D&P/3711/91

Dear Mr Jones,

I am writing to you as the case officer for this planning application. You will have seen the Camden Civic Society submission and response, attached for your convenience, and can read below the Society's request for a call-in by the Secretary of State.

What you may not be aware of is that at the time of the stage 1 response, the consequences for Chester Terrace views had not been unearthed. Nor had it been shown that the tower would appear above the Barlow shed and the British Library roofline. As a result, the GLA concluded that "no harm will be caused to designated heritage assets".

A taller building to the north east of the station (as shown in blue in figure 3.4) would need to be less than 60 metres tall from approximate ground level (which equates to between 82 metres AOD and 84 metres AOD) to not affect the setting of, and views within and of, nationally important heritage assets including Regent's Park and Chester Terrace.

Camden are going against their own established policy, as stated on page 49 of the Euston Area Plan adopted by Camden and the Mayor in January 2015 which stipulates that the Chester Terrace should be protected.

The EAP also states how a two-form-entry primary school should be funded on page 116:

"1. Social infrastructure: New housing development in the plan area should contribute towards school places provision. These could fund the expansion of nearby Edith Neville by 1FE if sufficient need exists for additional primary school places in the area arise."

Yet at Camden planning committee on 14th July 2016, the planners argued that a projected population surge from the Euston and King's Cross growth areas meant we had to plan for a two-form entry primary school. They did not explain that this should be funded by those growth areas and not a tower block of luxury flats on the Purchase St/Brill Place park in Somers Town. While we may all agree the school needs rebuilding, building luxury flats to sell is not the only way to fund it.

I hope that these points will assist the Mayor in considering this case.

Yours sincerely,

Dorothea Hackman
Chair, Camden Civic Society
camdencivicsociety@gmail.com [REDACTED]

Sent from [Mail](#) for Windows 10

From: [REDACTED]
Sent: 01 July 2016 17:13
To: npcu@communities.gsi.gov.uk
Cc: [Dorothea Hackman](#)
Subject: request to SoS to call in Camden application 2015/2704/P

to the National Planning Casework Unit, 5 St Philips Place, Colmore Row, Birmingham, B3 2PW, tel 0303 444 8050

from Camden Civic Society, charity reg 276262, camdencivicsociety@gmail.com, [REDACTED]
[REDACTED] NW1 7RS, [REDACTED]

Request to the Secretary of State for Communities and Local Government and the Secretary of State for Culture Media and Sport to call in Camden planning application 2015/2704/P, 'Central Somers Town' (applicants: London Borough of Camden themselves).

We believe you have already received a request to call-in this application.

At a meeting of Camden's Planning Committee on 21st June the Committee were minded to approve it.

This is a large and relatively complex application which is objectionable in a number of ways. The aspect of 'more than local importance' is the proposal for a tall narrow tower of 25 storeys, to contain luxury flats to be sold off for profit to fund the rebuilding of a school. This tower would be built on what is currently a small park (Public Open Space) and would be just outside the Central Activity Zone.

This tower would be in an area where there are presently no such towers: it would be surrounded to the north and west by lower-rise houses, in council or housing association ownership, on the east by the Foster Associates extension to St Pancras Station, and to the south by the new Crick Institute.

It raises 'raises significant architectural and urban design issues' because it would impinge on the setting of a number of Grade I buildings of national importance. One of these is St Pancras station itself, particularly the Barlow train shed. The Camden Civic Society believes it would also be visible in views of King's Cross station from Gray's Inn Road and of the British Library from Euston Road.

Most significantly, it would stick up above the roofline of John Nash's Chester Terrace from viewpoints within Regent's Park, from along Chester Road and from the point where Chester Road joins the Inner Circle. Although Chester Terrace itself is within the London Borough of Camden these viewpoints are within the City of Westminster.

Historic England and the City of Westminster have both requested that Camden withdrawn the application. The Georgian Group and SAVE British Heritage have both also objected.

Camden has chosen to ignore the requests to withdraw and has overridden the great many objections to their proposal.

The discussion of the 'significant architectural and urban design issues' by the committee at the meeting on 21st June in our view failed to give sufficient weight to the question of harm to the setting of Listed Buildings and Conservation Areas. We have set out some of our concerns about this in a letter to the Camden New Journal and I attach the whole letter as sent to the CNJ and the edited version as published yesterday. (I also attach our two letters of objection to Camden.)

Another area of serious concern is that we do not believe that Camden has identified all the views which would be affected by this development. A 'blimp' flown at the expense of local residents (we made a contribution to the costs) indicated that the impact of the tower would be considerably more extensive than indicated in the application. Requests from local people that Camden fly its own blimp were turned down (though a couple of extra verified views as requested by HE have been added to the application).

The Camden Civic Society requests the Secretaries of State call in this application so that a Public Inquiry can be held. In this way the issues of 'more than local importance' which this application raises could be fully investigated.

Yours sincerely,

Hero Granger-Taylor, committee member, Camden Civic Society

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Martin Jones

From: Richard Simpson [REDACTED]
Sent: 07 July 2016 11:05
To: Martin Jones
Subject: LB Camden planning application 2015/2704/P: Somers Town Tower: Advice from Regent's Park Conservation Area Advisory Committee

Dear Martin Jones,

LB Camden planning application 2015/2704/P: Somers Town Tower

I understand that you are preparing the report for the Mayor's Stage II review of this project.

I write as chair of the Regent's Park Conservation Area Advisory Committee, and add below our advice to Camden dated March 2016.

The RPCAAC is a community-based local group with expertise in heritage issues: the RPCAAC has nominees from local and national bodies. The RPCAAC was involved in the development of the Euston Area Plan, which addressed, in principle the key issue for us – the harm caused by high buildings to heritage assets, in this case to the Regent's Park skyline and its Listed Buildings. Regent's Park, with its skyline, is recognized as heritage of international importance, contributing to London's standing as a world-city.

I note that the Euston Area Plan was developed by Camden and the local community in conjunction with the GLA: it was adopted by the Mayor as SPG to the London Plan in 2015. We hope that the Mayor and the GLA would support the effective implementation of its own policies not only as part of protecting our environment, but also as giving credibility to community engagement with the democratic process of plan-making.

Many thanks for your help: I look forward to hearing from you,

Good wishes,

Richard

Richard Simpson FSA

Chair RPCAAC

RPCAAC Planning meeting March 7 2016 Somers Town Tower 2015/2704/P

Strong objection.

Long views across Regent's Park are specifically identified as protected in Camden's own *Regent's Park appraisal and management strategy* formally adopted July 2011 at p. 43. The visibility of the Somers Town Tower above Chester Terrace, a Grade I Listed Building, would be an unnecessary intrusion into both the skyline of the Park – part of the original concept of the Nash plan – and of the setting of the Listed building.

The approval of this application would be harmful as a precedent. It would substantially weaken the Council's own policy in the *Euston Area Plan* adopted January 2015, where at p. 49 height limits are set to protect these views across Regent's Park. Camden needs to be consistent in its decision making.

A building only marginally lower would have no such harmful impact on this major heritage asset. It is clear in the NPPF that this sort of harm should be avoided.

Richard Simpson FSA

Chair, Regent's Park Conservation Area Advisory Committee

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Martin Jones

From: Fowler, David <David.Fowler@camden.gov.uk>
Sent: 07 July 2016 09:34
To: Martin Jones
Cc: Brookes, Aidan; Bartlett, William; Hopson, Mark
Subject: Central Somers Town - delay referral

Martin,

Further to our discussion, please could I withdraw the request for a Stage II response for now, until we have had further discussions with the Francis Crick? We are going to meet the Crick at the end of next week. I will let you know when we would like you to report this case to the mayor.

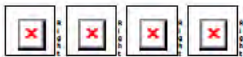
Thanks,

David

David Fowler
Principal Planning Officer
Regeneration and Planning
Supporting Communities
London Borough of Camden

Telephone: 0207 974 2123
Web: camden.gov.uk

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Historic England

Mr Marc Timlin
Associate Director- Heritage
Turley Associates
17 Gresse Street
London
W1T 1QL

Our ref:
Your ref:

Telephone 02079733488
Fax

08 July 2016

Dear Mr Timlin

Re: Central Somers Town LB Camden

Thank you for arranging the presentation of the proposals for Somers Town to the London Advisory Committee at the offices of Camden Council on 28th June. It was, as you suggested, very helpful for them to be able to see the model of the development following their visit to Regents Park to assess the impact of the proposal, which has given rise to Historic England concerns, as expressed in our letters of advice.

As was stated at the meeting the Committee were seeking both an understanding of the approach to the important regeneration of this site, but they also wanted to be as informed as possible on the heritage impacts, and their justification, before advising Historic England staff on our final position.

You will recall that the Committee were particularly asking about the efficiency of the proposed tall building and the links to the provision of affordable housing, alongside the consideration of alternative locations within the site for additional development if the proposed taller element at Brill Place had to be reduced in height to avoid impact on The Regents Park and Chester Terrace. In response to the latter point it was explained to them that an exercise considering alternative locations had been carried out but that the impacts on adjacent conservation areas and residents was felt to be unacceptable. The Committee requested a copy of that information so they could assess it but to date it has not been forthcoming. We have received no additional information following the presentation which is very disappointing and the Committee has therefore provided its advice on the basis of the existing material.



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The Committee acknowledge that the proposals have the potential to deliver public benefits and commend the extensive public consultation undertaken by the council. However, it is clear that the impacts of the proposals upon the historic environment were not fully understood or appreciated until further modelling was requested by Historic England when we were first consulted. That modelling of the impact- specifically upon the Designated Heritage Assets of Regents Park and Chester Terrace- means that the earlier feasibility and options appraisals are fatally undermined because this was not factored into an assessment of whether the environmental benefits of the proposals included protection of the historic environment, which is a core planning principle. You will recall that this issue was raised at the presentation.

The Committee has noted that in response to Historic England objections regarding harm to the historic environment the approach was to rebut our expert assessment and to assert that the proposals caused no harm. No changes were made to the design of the proposed development. The Committee regard this response to expert advice as disappointing and simply not credible and we note that in their consideration of the proposals the local planning authority concur with us that harm is caused to the setting of these assets.

Great stress was laid at the presentation on the enhancement of the public realm and retention of local open space, as required by the London Plan Policy; but it seems that this emphasis on local open space has been given much more weight than the statutory duty regarding preservation of Designated Heritage Assets and their setting. You will be aware from the Barnwell Manor Case that the local planning authority has to give special regard to the setting of Heritage Assets when reaching a planning judgement and on the evidence before us we do not believe that they have done so.

In our letters of January and March Historic England drew attention to the significance of the assets affected by this proposal- both of which are listed at Grade 1. We have been advised by the Committee, which includes Professor Elizabeth McKellar an acknowledged expert on Nash and the development of London, that the international significance of these assets has not been sufficiently stressed. The Committee advises that this significance should not be underestimated and that appreciation and enjoyment of that significance is vulnerable to changes in setting. Those changes do not need to be substantial to cause harm and we are concerned that in this instance the Local Planning Authority has taken less than substantial harm to mean a less than substantial objection in reaching their judgement.

In conclusion, following consideration by the London Advisory Committee it has been agreed that Historic England will formally request the Mayor to direct refusal of this application because of its conflict with both London Plan heritage policy and, should the Mayor be minded not to intervene, to formally advise the Secretary of State to call-in the application for his own consideration.



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Yours sincerely



Nigel Barker
Planning Director London
E-mail: nigel.barker@HistoricEngland.org.uk

cc
Stewart Murray Greater London Authority
David Fowler LB Camden
NPCU
Jules Pipe Deputy Mayor for Planning GLA



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Historic England

Mr Stewart Murray
Assistant Director
Development Enterprise and Environment
Greater London Authority
City Hall
London
SE1 2AA

Our ref: P/00492930
Your ref: D&P/377/01/MJ
Telephone 02079733488
Fax

08 July 2016

Dear Stewart

Re: Somers Town Camden

You will recall I wrote on 27th June regarding concerns about the application for the redevelopment of Somers Town and seeking clarification on how your authority was proposing to deal with the failure to address impact on designated heritage assets. Unfortunately I do not seem to have received a substantive response.

I am writing to let you know that our London Advisory Committee has now considered the proposal and I attach our advice to the applicants, copied to the local planning authority. The Committee was clear in its advice that these are assets of the highest significance and that both the NPPF and the London Plan Heritage policies advise that harm to their significance should be avoided. In these circumstances I am formally requesting that the Mayor direct refusal of the proposals for the reasons set out in the attached letter.

I would welcome a response at your earliest convenience.

Yours sincerely

Nigel Barker
Planning Director London
E-mail: nigel.barker@HistoricEngland.org.uk



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Martin Jones

From: Willmott, Paul @ London HH <paul.willmott@cbre.com>
Sent: 11 July 2016 12:13
To: Martin Jones
Cc: Stewart Murray; Blunstone, Hannah @ London HH; [REDACTED]
Subject: Central Somers Town - GLA Reference 3711

Dear Martin (and Stewart – especially for the final paragraph)

I refer to the LB Camden's own planning application for the development of 'Central Somers Town' and write to seek confirmation that the LB Camden have not, as yet, submitted the file to the Mayor for consideration.

The Francis Crick Institute have been meeting with the Council, in both its capacities as Applicant and Planning Authority, at least once each week since the Committee sat to try and reach a legally acceptable solution that will enable both uses to coexist. Those negotiations are moving forward but we have not yet reached a position whereby the Crick would consider reviewing its standing objection. Currently there remains a risk to the Crick which could compromise its operations under certain conditions.

Following our last meeting, Camden as Planning Authority indicated that they would alert you as to progress and to advise that they would like to hold submitting the Central Somers Town application to you pending reaching agreement with the Crick.

I would be grateful if you could confirm that you have not received the application, to date, and that this is your understanding too.

On a separate note, the Crick would like to extend a note to you and Stewart Murray (and possibly 1 or 2 others) to visit the Crick to learn about its science and what it is seeking to achieve. Fundamentally this will help understand the importance of the Institute and why the Government maintained the £650m investment despite austerity. With BREXIT, the scheme takes on even greater prominence as it will be at the forefront of the UK's Research understanding why disease develops and to find new ways to treat, diagnose and prevent illnesses such as cancer, heart disease, stroke, infections, and neurodegenerative diseases. I should add that this would probably be one of the very last tours into the facility as the transition and commissioning process has just started. (The Crick extended an invitation to the Mayor before the elections in May and they are in the process of extending a new invitation to him before the official opening).

Regards

Paul

Paul Willmott OBE | Senior Director
Planning & Development
CBRE Ltd

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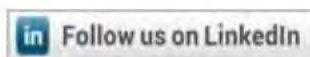
paul.willmott@cbre.com | www.cbre.co.uk | www.cbre.co.uk/planning

Personal Assistant: Bobbie Harris | DDI +44 (0)20 7182 2783 | bobbie.harris@cbre.com

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Martin Jones

From: Fowler, David <David.Fowler@camden.gov.uk>
Sent: 14 July 2016 15:40
To: Martin Jones
Subject: Central Somers Town and Francis Crick Institute (2015/2704/P)

Hello Martin,

I hope you had a nice break.

Just to update you, we had a meeting this afternoon with the FCI. Following this meeting, please could the application be reported to the Mayor on 25/07/2016 as we discussed? We made some progress at the meeting with the FCI. There are still a few issues but we are hoping to resolve these shortly and have another meeting next week. The main points discussed are as follows:

- A Management Plan section 106 obligation which looks to ensure there is no impact on the operation of the Crick. We are discussing the wording of this.
- A letter of comfort from the Chief Executive at Camden stating that all obligations on the planning permission would be carried forward to any future iterations of the proposal in future applications.
- Camden lawyers to circulate relevant obligations to the FCI.
- Planning officers to report the application back to our committee on some clarification points (that the winter gardens will be hermetically sealed 15th storey up – not the whole flat), wording of the Management Plan, and any progress/resolution with FCI.

Please note that Planning Officers do still consider the application acceptable as it stands but we are nevertheless hoping to alleviate the FCI's concerns. Please let me know if you want to discuss any of the above.

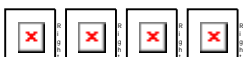
Thanks,

David

David Fowler
Principal Planning Officer
Regeneration and Planning
Supporting Communities
London Borough of Camden

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Martin Jones

From: Slaney Devlin [REDACTED]
Sent: 19 July 2016 00:32
To: Martin Jones
Cc: Mayor; [REDACTED] Donna Turnbull
Subject: LB Camden Planning Application 2015/2704/P

Dear Martin,

Further to my email of 6 July 2016, I would like to make the following points about the information published by LB Camden regarding their planning application 2015/2704/P, and the of the way that LB Camden's Planning Committee was conducted on 21 June 2016.

1. That in receiving representations from the general public the Committee Chair favoured those supporting the application as follows:
 - a. Allowed considerably longer to Supporters to make positive comments on the application than to Objectors. It was clear that the Committee Clerk was warning the Chair that Supporters had exceeded the Council Standing Orders. A link to the webcast is [here](#) Eight minutes were allotted to those speaking against the proposal ("the Objectors"), and another eight minutes awarded for those speaking for ("the Applicant and Supporters"):

Objecting

Slaney Devlin, Somers Town Neighbourhood Forum, start 01:34:13, end 01:36:31, total 00:02:18

Slaney Devlin, Somers Town Petitioners, start 01:37:10, end 01:39:28, total 00:02:18

Tony Tugnutt, Bloomsbury CAAC, start 01:39:47, end 01:41:13, total 00:01:26

Michelle Rispin, resident, start 01:41:34, end 01:44:10, total 00:02:36

Total time given to those Objecting: 00:08:38

Supporting

Martin Pratt, Director of Children, Schools and Families, start 01:44:42, end 01:46:47, total 00:02:05

Esther Caplin, Governor Edith Neville School, start 01:46:49, end 01:51:37, total 00:04:48

Bezawit Verga, child attending Plot 10 Community Play Project, start 01:51:45, end 01:53:27, total 00:01:42

Sara Begum and Fiona Pachouli, children attending Edith Neville School, start 01:53:51, end 01:56:56, total 00:02:59

Total time given to those Supporting: 00:11:34

- i. Specifically, they allowed school children to present what was clearly prepared and not their own statements, after more than 8 minutes 30 seconds had already passed.
 - b. Cutting off Objectors, especially Ward Councillors, at the end of their prescribed 2 minutes (Cllr Robinson, Objector, was cut off after 00:02:30, Cllr Tomlinson, Objector, cut off after 00:02:35, Cllr Khatoon, Supporter and Governor and parent of Edith Neville School, cut off after 00:02:50, after vocal complaints from the gallery.
 - c. Not allowing an Objector to speak. An Objector handed in his deputation request before 9am on Monday 20 June 2016. His written deputation though receipted was not received by the Committee Clerk (see 00:07:32). It did not appear in the supplementary agenda and he was not allowed to speak. His written deputation was "tabled for Members to look at".
 - d. Allowing Cllr Mason additional time to speak in Support of the application (or "giving more time to the school", as Cllr Jones made explicit at 02:06:19). Cllr Mason is Cabinet Member for Children and

has been heavily involved in the application, which has been led by Children, Schools and Families. Her deputation, which was not advertised in the supplementary agenda, should have been included in the 8 minutes given for those speaking in Support of the application. **She spoke for 00:02:40, so total time given to those speaking in Support of the application was actually 00:14:14.**

This approach was a breach of the Council's procedures and demonstrated pre-conceived support for a Council application that is openly contrary to the statutory development plan. The Council's behaviour would never have been tolerated had it been a private developer.

2. That a peer review of the applicant's Air Quality Report, which demonstrated the report was lacking, did not form part of the Supplementary Agenda, despite being received before 9am on Monday 20 June 2016 and being assured that it would be reported on by the Planning Department and the Clerk.
3. That the information made available for public viewing both in the Council Offices and on the Council website was and remains inaccurate. A number of the plans referred to in Officers' Reports to Committee were not available and are still not available for viewing by the general public – amounting to 62 plans or documents that are missing or that are wrongly identified. These contain amendments to the proposals that the community have not had the opportunity to review and were not formally consulted on through the application process. This includes amendments to the application in March and May 2016 that we have not seen.

As this is a Council's own application there is a clear breach of process and procedure that has not enabled Londoners to properly consider the proposals and has created a situation where we cannot be certain what the Council is granting permission for. Can the Mayor be certain that he has been sent the correct plans given that the Council has failed to let the local community see such a large number of the plans they are now seeking to approve? This clearly cannot be fair and must question the confidence that can be given to the proposals being considered.

In light of this, we ask the Mayor to recover the application and determine it himself to ensure that the planning application is determined in an open and transparent fashion, avoiding the consistent bias shown by the Council in favour of its own development, as demonstrated above and noted elsewhere in the many objections already registered.

Kind regards,

Slaney Devlin

Acting Chair
Somers Town Neighbourhood Forum

These Plans are listed in Draft Condition 2 but are not on the Council's website

246-100-P-02
246-100-P-03
246-100-P-04
246-100-P-05
246-100-P-10
246-100-P-25
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246-100-P-40
246-100-P-41
246-100-P-42
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246-110-P-2
246-110-P-03
246-110-P-04

246-110-P-05
246-110-P-056
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246-110-P-16
246-110-P-17
246-110-P-18
246-110-P-25
246-110-P-30
1108-802
1108-803
TLG-100-P-26_rA
Energy and Sustainability Statement – Community Hub
372-SITE-100_P04
372-SITE-101_P04
372-LB-20_P04
372-LB-202_P04
372-L01-203_P05
372-L02-204_P05
372-L04-205_P05
372-L05-206_P05
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372-ELE-46_P02

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Martin Jones
Senior Strategic Planner
Development & Projects Planning Department
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

19 July 2016

Dear Martin

**CENTRAL SOMERS TOWN (LAND AT POLYGON ROAD OPEN SPACE, EDITH NEVILLE
PRIMARY SCHOOL, 174 OSSELSETON ST AND PURCHASES STREET OPEN SPACE)
LONDON NW1
PLANNING REFERENCE NO: 2015/2740/P**

This letter is written on behalf of the Francis Crick Institute, in order to update you on the Institute's position with respect to the London Borough of Camden's planning application (Ref No: 2015/2704/P), and the relationship which would exist between the proposed 25 storey tower (referred to as the Brill Place Tower building) and the Institute's building immediately to the south.

The Institute's position is as follows:

- We have made it clear from the outset that we do not have in-principle objections to the redevelopment of these sites for the stated purpose of improving the school and community facilities, and regenerating this part of Somers Town.

Rather, the concern is to make certain that the proposed development of the Brill Place Tower building can co-exist satisfactorily in the form proposed, as an immediate neighbour of the Institute particularly given the importance of the Institute to the interests of the United Kingdom's medical research activities and the benefits to healthcare for all, to the economy and to maintaining our global leadership role in this sector. All supported by the London Plan.

Given the state of the discussion and negotiation between the parties, which is continuing, it is premature for the Institute to be able to say that this satisfactory co-existence has been established.

- We made this point clear to LB Camden's legal, project and planning Officers at a meeting which took place on 6 July 2016. This had been arranged in order to discuss some topics presented to the meeting in the form of draft Heads of Terms for protections for the Institute.

It was indicated to us at the end of that meeting that the papers were being finalised for presentation to your office for a Stage II determination. We expressed concern over this, given the manifestly incomplete state of the negotiations. We pointed out that it would be necessary for the Institute, in order to protect and safeguard the £650m of public investment in its building and the importance of this National Infrastructure project, to write making clear that the Institute continues to have very real concerns which had not been met by any sufficient assurances or legal protections.

It is our understanding that for this reason, Camden asked for the consideration of the matter by your office to be deferred.

- A follow-on meeting took place with substantially the same representatives of the Council and the Institute, last Thursday, 14 July 2016.

Some progress was made in further discussing the issues; but I should make clear that the Institute's position remains, for the time being, as before.

We are continuing to explore in what we intend as a constructive dialogue, a series of protections.

These include:

- Protections in the form of s106 planning obligations; and
- A proposed letter from the Chief Executive of LB Camden to an equivalent office-holder in the Institute, confirming for the record and for the avoidance of doubt that any development on the Brill Place Tower site will carry the same equivalent protections to safeguard the Institute as those for which we are contending in the existing Resolution-to-Grant scheme.

These offers only go part of the way towards protecting the Institute. The Council has thus far declined to give any assurance that protections can be offered which would future-proof the Institute against proposals governed by a different planning permission for a later scheme, if changes were later to be proposed.

- We received last Friday afternoon draft extracts of a proposed s106 planning obligation under negotiation between the Council's freehold-owner team and the Planning Authority, which we are reviewing.

Given that the Council will not be in a position to enter into this Deed until a third party landowner has taken an interest in the site, the Institute will need to be satisfied that the

mechanism in place guarantees that, when the final wording has been agreed, the obligations are indelible as regards this planning permission.

- We have yet to receive the draft of the proposed letter to be provided by Camden's Chief Executive.
- In the first of the two meetings which took place subsequent to the Committee Resolution (i.e. the meeting on 6 July 2016) the Institute was assured that the drawings listed in the proposed planning permission (Condition 2) and in the Resolution to Grant embedded in the design of the proposed Brill Place Tower building the protections required to ensure that "black start" operations of plant at the Crick would not trigger exceedances in terms of air quality which could in turn lead to future enforcement action.

This has been a clear area of concern to the Institute since we were first given an opportunity to study the application drawings; and it has been a consistent requirement of the Institute that the proposed tower building be sealed from Level 15 and above.

At the second meeting (i.e. the meeting on 14 July 2016) , the Council accepted that the drawings, substituted as very late un-consulted amendments, do not in fact contain any, or any sufficient, guarantees of the protections which the Institute needs. The Council acknowledges that these elements are appropriate; but the drawings do not so provide.

At last Thursday afternoon's meeting we were told that (a) the position would be cured (we are still seeking to establish how); and (b) the matter would be taken back to the Development Control Committee for affirmative resolution given that the Council recognised that additional wording to conditions would likely be required and we have been invited to propose text for inclusion in those conditions.

As you will see, the negotiation is by no means concluded; the wording of and means of securing obligations which are designed to protect the Institute are still under discussion; and a critical draft (the proposed letter from the Chief Executive) has yet to be provided.

I am therefore asked to make you aware that the Institute regards the position as still insufficiently progressed for me to be able to confirm that the objections can be withdrawn.

Our objective remains the same. We are looking for satisfactory co-existence. We will continue to negotiate until that position has been secured, and I, and the Institute's lawyers, Herbert Smith Freehills LLP, are in a position to jointly confirm to the Institute that the matter is sufficiently protected.

Until then, consideration, still less determination, of the matter by the Mayor is in our view still premature especially against the background of the London Plan's support to 'Med City' of which the Institute's building lies at it's very heart. The Institute's importance to our national interest, its contribution to promoting London as a Global City, the commercial and economic benefits that it offers, let alone what could be achieved in understanding why disease develops and to find new

ways to treat, diagnose and prevent illnesses such as cancer, heart disease, stroke, infections, and neurodegenerative diseases are the elements of the Institute we are seeking to protect. See www.crick.ac.uk

If the position changes during the course of the week, I will let you know.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'P. Willmott', with a stylized flourish above the name.

PAUL WILLMOTT
SENIOR DIRECTOR

Martin Jones

From: Consult <Consult@georgiangroup.org.uk>
Sent: 22 July 2016 10:53
To: Martin Jones
Subject: 2015/2704/P: Impact of proposed tower at Plot 7 Brill Place on Grade I listed heritage assets in The Regent's Park

Dear Mr Jones,
Camden Civic Society have asked us to forward a copy of the Georgian Group's original objection. Please refer to the letter below.
Regards,
Alice Yates

Dear Mr. Fowler,

2015/2704/P: Impact of proposed tower at Plot 7 Brill Place on Grade I listed heritage assets in The Regent's Park

Thank you for referring the above application to the Georgian Group.

We wish to object to the granting of consent for the following reasons:

The proposed tower at Plot 7 Brill Place would cause harm to the setting of the Grade I listed Chester Terrace when viewed from the inner circle of The Regent's Park (itself a Grade I Registered Landscape).

Chester Terrace is a palace-style terrace of 37 houses & 5 semi-detached houses from c1825. It was designed by John Nash and J Thomson for the Commissioners of Woods, Forests & Land Revenues. Its architectural effect is that of a palace siting in a picturesque landscape. The proposed tower at Somers Town would be visible above the central section of the palace-façade when viewed from the main axial approach eastwards from the Inner Circle. This is one of the most important views in this part of the Park as it creates one of the few formal axial views between the monumental architecture and the surrounding designed landscape.

The visibility of the upper floors of the proposed tower undermines the architect's intentions that Chester Terrace should read as a grand composition in a 'rural' landscape, and subsequently would cause significant harm to the setting of the Grade I listed terrace and its relationship to the Grade I Registered Landscape.

The Group strongly advises that this application is refused consent, or withdrawn for amendment. Should you wish to discuss this further please contact me.

Yours sincerely,

David McKinstry
Secretary



The Georgian Group
6 Fitzroy Square
London
W1T 5DX

020 7529 8920

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Martin Jones

From: Robinson, Roger (Councillor) <Roger.Robinson@camden.gov.uk>
Sent: 22 July 2016 17:18
To: Martin Jones
Cc: Tomlinson, Paul (Councillor)
Subject: FW: LBC 2015/2704/P

Dear Mr Jones

Very grateful that you have kindly agreed to make a verbal update when the Somers Town CIP application is considered by the London Mayor on 25th JULY. I am also a ward councillor for St Pancras and Somers Town and totally agree with the comments and points made by Cllr Paul Tomlinson so my name can be shown too as someone who has served Somers Town for many years as a councillor & community voluntary worker for disability issues and concerns.

Best wishes

Cllr Roger Robinson
St Pancras and Somers Town Ward
07833 437 471

From: Tomlinson, Paul (Councillor)
Sent: 22 July 2016 14:58
To: 'Martin Jones'
Subject: RE: LBC 2015/2704/P

Dear Martin

Thank you for offering to make a verbal update. Please see my comments followed by notes which could be printed up under my name and distributed if you feel appropriate.

Comments:

I'm very worried about the precedent that this application, if approved would set.

- It would for example, go against Camden's Core Strategy 4 which defines Somers Town as an area of more limited change. Clearly, the massive development proposed by the application is well beyond limited change;
- It would offend the London Plan's policy 7.18 B on open space because there will be a loss of designated open space. It offends Camden's Local Development Framework guidance as well (CPG6) by not providing additional open space for the new homes proposed. The 25 storey tower would be built on precious open space, which if lost, will be gone forever;
- It would have a greater habitable rooms per hectare level than the upper limit that is set out in the London Plan's Table 3.2;
- The 25 storey tower block would harm the views of the many listed buildings in King's Cross and Regent's Park and
- It would provide a potential threat to national security being place so near the Francis Crick Institute and St Pancras/King's Cross Stations.

If approved, the application could set in motion many other applications in and adjacent to the Ward of St Pancras & Somers Town which could establish a precedent for other jurisdictions.

Kind regards
Paul Tomlinson

Paul Tomlinson, Councillor
St Pancras & Somers Town Ward

Notes:

1 Impact upon the lives of people in Somers Town

- The proposed development represents massive and unnecessary overdevelopment inflicting unacceptable environmental and social impact upon adjoining residents and others. It would radically change the character of central Somers Town. (Advantage imported : Disadvantage exported)
- When combined with HS2 and Crossrail 2 the whole Neighbourhood faces a potential tsunami of construction / new development / redevelopment over the next decade and beyond

2. Adopted Planning Policy Context 2010 : Policy CS4

- No explanation or justification has been put forward in the Officers report, for the complete absence of Policy CS4 from analysis of the current planning application.
- Central Somers Town is outside CAZ and Central London defined boundaries on Key Diagram
- Policy CS4 (adopted 2010) : Area of more limited change , and paras 4.5 and 4.6 of the Core Strategy specifically and deliberately sets out that Somers Town is to benefit from development in the closely adjoining Growth Areas eg by access to jobs and training , but that the area will "experience more limited development and change".
- Most of my constituents live in flats. The proposed development is on extremely scarce and valuable Public Open Space.
- This has formed the planning context of the Neighbourhood Plan and at no point in the process has any Camden officer advised that such a context is not sound
- Para 3.28 supporting London Plan Policy 3.4, states :“It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local CONTEXT, design and transport capacity are particularly important”

3. Public Transport Accessibility Level (PTAL) / Density

- Justification for the scale and density of the proposed development at Central Somers Town appears to rely almost entirely upon an urban PTAL of 4 - 6 . Table 3.2 accompanying London Plan Policy 3.4 .suggests a density range for such a location of between 200 hrha and 700 hrha.
- Section 12.3 of the Officer Report indicates that the density of the proposed development is 866 hrha.
- St Pancras International was opened in 2007. Central Somers Town was as well connected to public transport in 2010 as it is now. ie it had the same PTAL in 2010 as it has now.,
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- In this context therefore, a density nearer 200 – 300 hrha would appear more appropriate for Central Somers Town.

4. Regional Planning

- In Town Planning terms densities of 866/hrha and 25 storey tower blocks should be guided toward Growth Areas / Opportunity Areas at Borough and Regional level. (Kings Cross and Euston)
- Permission of 2015/2704/P would set a dangerous regional planning precedent in terms of potential coalescence of London Plan Opportunity Areas

5.Environmental Impact

- The proposed new development sets a highly dangerous precedent : it deliberately underachieves on nationally agreed environmental planning standards eg in terms of provision / replacement Open Space, loss of daylight and sunlight by adjoining residents, overlooking of adjoining residents, microclimate (wind), deliberate location of a 25 storey tower block containing 54 residential units on a High Risk site which exceeds EU air quality limits at all levels.

6 National Security

- Following the London bombings of 7 July 2005, Somers Town residents are in no doubt that St Pancras International Station and the newly completed Francis Crick Institute are both potential targets for terrorist attacks. The proximity of the proposed tower to these buildings therefore causes concern.
- No evidence has been submitted that 2015/2704/P has been designed to meet 'Protecting Crowded Places : Design and Technical issues' 2012. As such it represents a massive potential threat to national security and the safety and well being of the immediately adjoining community in Somers Town / King's Cross - St Pancras.

Paul Tomlinson, Councillor
St Pancras & Somers Town Ward

From: Martin Jones [<mailto:Martin.Jones@london.gov.uk>]
Sent: 21 July 2016 08:24
To: Tomlinson, Paul (Councillor)
Subject: RE: LBC 2015/2704/P

Dear Councillor Tomlinson

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Kind regards
Martin
Martin Jones, Senior Strategic Planner
Development & Projects
Planning Department
GREATER LONDON AUTHORITY
City Hall, The Queen's Walk, London, SE1 2AA
T: 020 7983 6567
M: 07984 422177
E: martin.jones@london.gov.uk

From: Tomlinson, Paul (Councillor) [<mailto:Paul.Tomlinson@camden.gov.uk>]
Sent: 20 July 2016 17:52

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Dear Sir

Thank you. Will the Mayor receive further representations, or is he limited to considering what has been submitted by Camden?

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From: Tomlinson, Paul (Councillor) [<mailto:Paul.Tomlinson@camden.gov.uk>]
Sent: 19 July 2016 12:15
To: Martin Jones
Subject: LBC 2015/2704/P

Dear Mr Jones

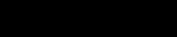
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Thanking you in advance, I remain

Yours truly

Paul Tomlinson

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Martin Jones

From: Willmott, Paul @ London HH <paul.willmott@cbre.com>
Sent: 22 July 2016 15:00
To: Martin Jones
Cc: Stewart Murray
Subject: Central Somers Town/Francis Crick

Dear Martin

I promised to come back to you on progress in respect to the negotiations taking place with Camden Council following our letter last Tuesday.

We are moving forwards but as yet we have not reached a position where we, or the Crick's solicitors, can recommend that the conditions have been reached whereby they could withdraw or caveat their standing objection.

You should however be aware that the Mayor is visiting the Crick formally next Thursday and will be joined by Camden Council's Chief Executive. In light of this we would request that the Mayor is invited to defer making a decision until after his visit. However, we do feel that he should be aware of the issues in advance; both in respect to the purpose of the Somers Town project to fund the school and the Crick's concerns regarding the tower and how it might impact the research activities undertaken. We recognise that dependant on your recommendation this could be a difficult decision. However, this would allow him to understand the wider context and implications of the decision that he has to ultimately make and to balance the issues; in a far better way than any of us could address through a report or verbal presentation.

I should add that none of those who have been involved in the negotiations will be in attendance at that visit.

Regards

Paul

Paul Willmott OBE | Senior Director
Planning & Development
CBRE Ltd

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Birmingham +44 (0)121 616 5279 | London +44 (0)20 7182 2779 | M [REDACTED] | Internal Extensions 22779 / 65279

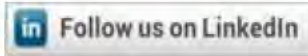
paul.willmott@cbre.com | www.cbre.co.uk | www.cbre.co.uk/planning

Personal Assistant: Bobbie Harris | DDI +44 (0)20 7182 2783 | bobbie.harris@cbre.com

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Martin Jones

From: Fowler, David <David.Fowler@camden.gov.uk>
Sent: 22 July 2016 11:57
To: Martin Jones
Subject: Central Somers Town and the Francis Crick Institute

Hi Martin,

I just thought I'd update you on our latest meeting with the FCI. Negotiations are progressing well and we hope to agree a resolution soon.

I hope it goes well with the presentation to the Mayor on Monday.

Thanks,

David

David Fowler
Principal Planning Officer
Regeneration and Planning
Supporting Communities
London Borough of Camden

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Web: camden.gov.uk

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London N1C 4AG



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MAYOR OF LONDON

David Fowler

Regeneration and Planning
Development Management
London Borough of Camden
5 Pancras Square
London N1C 4AG

Our ref: D&P/3711/02/MJ

Your ref: 2015/2704/P

Date: 25 July 2016

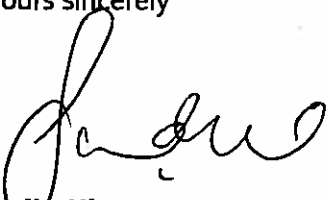
Dear Mr Fowler

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Central Somers Town**

I refer to your letter of 14 July 2016 informing me that Camden Council is minded to grant planning permission for the above planning application, subject to conditions and completion of a Section 106 agreement. I refer you also to the notice that was issued on 14 July 2016 under the provisions of article 5(1)(b)(i) of the above Order.

Having now considered a report on this case I am content to allow Camden Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal or to take over the application for my own determination.

Yours sincerely



Sadiq Khan

Mayor of London

cc Andrew Dismore, London Assembly Constituency Member
 Tony Devenish, Chair of London Assembly Planning Committee
 National Planning Casework Unit, DCLG
 Lucinda Turner, TfL
 Claire Newbury, Turley, The Charlotte Building, 17 Gresse Street, London W1T 1QL

Central Somers Town

in the London Borough of Camden

planning application no. 2015/2704/P

Strategic planning application stage II referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and the provision of approximately 2,190 sq.m. replacement school (Use Class D1); approximately 1,765 sq.m. of community facilities (Use Class D1); approximately 207 sq.m. of flexible Use Class A1/A2/A3/D1 floorspace; and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys. Provision of 11,765 sq.m. of public open space along with associated highways works and landscaping.

The applicant

The applicant is the **London Borough of Camden**, the architects are **DSDHA, Duggan Morris, Hayhurst and Co., dRMM, and Adam Khan**, and the agent is **Turley**.

Key dates

- Pre-application meeting: 17 August 2015.
- Stage 1 considered: 25 February 2016.
- Camden Council Planning Committee: 21 June 2016.

Strategic issues summary

Affordable housing: 30% (by habitable room) social rent (44 units). The independent viability assessment shows that 14% affordable housing (20 units) is the maximum possible; however the Council is contributing £10.3M from its Affordable Housing Fund to boost the affordable units to 44. This is in addition to the residential element cross-subsidising the rebuilding of the school, community facilities and re-provision of public open space (£27M). (Paras 5-10).

Historic environment and tall buildings: Historic England have requested that the Mayor direct refusal of the application. GLA officers consider that the harm caused by the residential tower on the Grade I listed Chester Terrace and Regent's Park is 'less than substantial'. Considerable weight and importance has been given to the conservation of these highly significant heritage assets; however the proposals will result in public benefits that outweigh this harm. Design modifications to the tower and conditions appropriately respond to the concerns of the Crick Institute. (Paras 19-28)

Open space and trees: The proposals will result in a much improved area of public open space of a slightly greater area than existing. Although the loss of trees is regrettable, this has been fully justified and will be appropriately mitigated by new tree planting. (Paras 29-33)

The Council's decision

In this instance, Camden Council has resolved to grant permission, subject to conditions and completion of a 'shadow' Section 106 agreement.

Recommendation

That Camden Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 20 January 2016, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Categories 1B(c) and 1C(c) of the Schedule to the Order 2008:

- 1B(c) *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.”*
- 1C(c) *“Development which comprises or includes the erection (c) a building of more than 30 metres high and outside the City of London.”*

2 On 25 February 2016, the previous Mayor considered planning report D&P/3711/01, and subsequently advised Camden Council while the application is generally acceptable in strategic planning terms, it did not yet comply with the London Plan, for the reasons set out in paragraph 95 of that report; but that the possible remedies set out in that paragraph could address these deficiencies:

- **Affordable housing:** GLA officers support the use of receipts from the market residential element to cross-subsidise the delivery of Edith Neville Primary School, nursery, community play facilities, community hall and new public realm; however, the applicant’s viability assessment, together with the results of an independent review, should be shared with the GLA before the application is referred back to the Mayor. The local planning authority should provide clarification on how contributions will be secured. The proposal for all of the affordable housing to be social rent is acceptable in this instance, subject to the outcome of the viability assessment.
- **Inclusive design:** The access arrangements for the proposal are acceptable, apart from the need to provide Blue Badge parking spaces. The Council should secure M4(2) and M4(3) requirements by condition.
- **Transport:** The applicant should resolve issues regarding deliveries, the provision of cycle and Blue Badge parking, and pedestrian/cycling movement before it can be confirmed if the development is in accordance with London Plan transport policies.
- **Climate change:** The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however further passive measures should be considered in line with Policy 5.9; evidence of correspondence with the Somers Town Heat Network operator should be provided; and a roof layout showing the location of the PV on Plots 2, 5 & 6 should be provided. The approach of a separate system for space heating for Plot 7 is not supported, and the applicant should revise the heating strategy.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. Since then, further information has been provided as discussed below, the design of the upper storeys of the residential tower have been amended to include winter gardens, and further views analyses have also been submitted (see below).

4 On 21 June 2016, Camden Council decided that it was minded to grant planning permission, subject to conditions and completion of a 'shadow' Section 106 agreement, and on 15 July 2016 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008, the Mayor may allow the draft decision to proceed unchanged, direct the Council under Article 6 to refuse the application, or issue a direction to the Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application. The Mayor has until 27 July 2016 to notify the Council of his decision and to issue any direction.

5 The decision on this case, and the reasons will be made available on the GLA's website www.london.gov.uk.

Affordable housing

6 The proposals include the following housing:

	Market sale	Social rent	Total
One bed	42	13	55 (40%)
Two bed	44	23	67 (50%)
Three bed	6	8	14 (10%)
Total	92 (68%)	44 (32%, 30% by habitable room)	136

7 The site is currently owned by the Council. It is proposed to sell the plots that would accommodate market housing blocks (Plots 2, 3 and 7) to generate a land receipt required to fund the rebuilding of the school, community facilities and re-provision of public open space (expected to be approximately £27M). At consultation stage, given the strategic support for social infrastructure provision, the proposal to fund the new school, community facilities and public realm was considered acceptable, subject to a financial viability assessment. The applicant has submitted a viability report (by Savills) to justify not providing a policy-compliant level of affordable housing (50%). As requested at consultation stage, the Council's independent assessment (by BPS) has been provided to GLA officers. The applicant's viability appraisal shows that 14% affordable housing (20 units) is the maximum that can be delivered; however the Council is contributing £10.3M from its Affordable Housing Fund (AHF) to boost the number of affordable units to 44. Target social rents for the affordable units will be secured via the 'shadow' Section 106 agreement, with clauses specifying that the units will be provided at target rent levels in perpetuity.

8 Conditions secure that the school will be built and fully fitted out prior to first occupation of any residential units; the community hall in plot 5 and the community hub facilities in plot 1 will be built and fully fitted out prior to first occupation of more than 50% of the market residential units; the improvement works to Polygon open space will be completed prior to occupation of 50% of Plots 2 and 3; and the improvement works to Purchase Street open space will be completed prior to occupation of 50% of Plots 5 and 6.

9 The Council (as applicant) would sell the residential plots to a residential developer, and should the land sale receipt significantly exceed the currently anticipated level, then the scale of the subsidy from the AHF would be reduced, with any surplus spent on affordable housing elsewhere. As discussed below, the 'shadow' section 106 agreement will include a provision requiring that in the event of any disposal of the land, the 'shadow' section 106 agreement terms will be included in the terms of the sale transfer and the purchaser will be formally required to enter into the 'shadow' section 106 agreement as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site).

10 London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. The Council's planning policies do allow for flexibility on tenure split, and specifically state that wholly social rented schemes may be acceptable where the level of affordable housing is below its 50% target, and where high land costs and residential values make intermediate affordable housing too expensive for households who would otherwise seek homes that cost more than social rent and less than market housing. Somers Town is one such location where shared ownership intermediate provision is likely to be too expensive to provide, even within the GLA income cap. On that basis it is considered appropriate to prioritise social rented housing in this instance.

11 In conclusion, bearing in mind the cross subsidy of the market residential units to the school, community facilities, and public realm, the provision of affordable housing is considered to be the maximum reasonable amount.

Inclusive design

12 As requested at consultation stage, the Council has secured M4(2) and M4(3) requirements by condition.

Transport

13 As requested at consultation stage, alterations to cycle parking arrangements have been made in accordance with London Plan requirements. The Council has also included planning conditions to secure that the scheme is car free and residents will not be able to apply for CPZ permits, as requested. It is regrettable that only four Blue Badge spaces are provided; however it was noted at consultation stage that Blue Badge holders are able to use any parking bays within the area with no time restrictions, and the Council will consider designating specific bays on request. The 'shadow' section 106 agreement secures contributions towards pedestrian and cycling improvements as part of wider proposal of highway alterations, which are strongly supported. Final details of these enhancements have yet to be developed; however TfL should be consulted as these proposals develop in order to address the shortfall of Blue Badge parking, as well as servicing issues associated with Plot 6. Requests for a Travel Plan and a Construction Logistics Plan have been secured by condition.

14 On balance the application is in accordance with the transport policies of the London Plan.

Climate change

15 As requested at consultation stage, the applicant has explained the measures followed to demonstrate compliance with the London Plan cooling hierarchy, including locating major plant items being away from living areas, minimising the district heating infrastructure, low energy lighting, optimised window areas, internal blinds in combination with external roller shutters and balconies, solar control glazing, thermal mass incorporated into the walls, dual aspect rooms where possible and mechanical ventilation heat recovery (MVHR) units. In response to some identified overheating risks on Plot 1, the applicant has further developed the design of the housing to increase the number of openable window areas and enhance mechanical ventilation. On Plot 7, the applicant has included further passive measures including additional natural ventilation openings, alternative positioning of shutters and reduction in glazing areas.

16 At consultation stage, further information was requested on the gas absorption heat pump system proposed to provide space heating to Plot 7. The applicant has confirmed that the heat pump system will be centralised and routed through the main riser from the basement via metered heat exchangers within each flat. The applicant has also provided heating calculations, as well as an explanation on how any potential overheating issues will be addressed. As part of detailed design, the applicant should ensure that all pipework is highly insulated so as to minimise distribution losses and any likely overheating risk.

17 The applicant has provided evidence of correspondence the Somers Town Heat Network, with the estimated costs of connection and a roof layout showing the location of PV panels on Plots 2, 5 & 6.

18 Based on the energy assessment submitted a reduction of 86 tonnes of CO₂ per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 39%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan.

19 As requested at consultation stage, an appropriate planning condition has been applied, requiring the details of a drainage system to be submitted and agreed by the Council.

Historic environment and tall buildings

20 A large number of objections relate to the 25 storey building proposed, including from Historic England. The justification for a tall building within the Central Activities Zone, in a highly accessible location, and adjacent to existing large-scale buildings including the Crick Institute, was accepted at consultation stage. The rationale for siting the building at the southern end of the site was also supported, so as to avoid the Phoenix Court energy centre flue contamination zone; limit over-shadowing of the new public open space; limit the extent of tree removal; respect views from the Crick Institute atrium; and to delineate a gateway space, with views into the new park. The high residential and design quality of the building was also recognised and the density of the entire site is within the appropriate London Plan density range for a site within a 'central' setting.

21 At consultation stage, based on the information provided, GLA officers considered that the proposals would cause no harm to designated heritage assets, in particular St. Pancras Station train shed. Further views were subsequently produced in response to concerns raised by objectors, which show that the very small element of the top of the residential tower will be visible over the train shed when viewed from parts of the pavement on the south side of Euston Road between Birkenhead Street and Crestfield Street. GLA officers do not consider this to cause any harm to the setting of the train shed.

22 In response to concerns raised by Historic England, additional views were produced showing the impact of the tower on the Grade I listed Regent's Park, and Grade I listed Chester Terrace on the east side of the Park, which were not available at Stage One. These show that the top 6 storeys of the tower will be visible above the roofline of Chester Terrace when viewed along Chester Road from the entrance to the Inner Circle. Historic England defines the harm caused as 'less than substantial', although it objected to the application due to the 'highest significance' of these heritage assets. Historic England has also requested the Mayor to direct refusal for this reason, and states that the Council did not sufficiently consider the international significance of these assets in determining the application.

23 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or*

any features of special architectural or historic interest which it possesses". The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Recent judgements have provided detailed consideration of the duty imposed on local planning authorities. The Court of Appeal in *Barnwell Manor* held that a finding of harm to a listed building or its setting is a consideration to which the decision-maker must give considerable weight and importance.

24 As Grade I heritage assets, the Terrace and the Park are clearly of considerable heritage significance, described as international significance by Historic England. According to the NPPF, the greatest weight should therefore be given to the conservation of these heritage assets. In terms of the harm caused by the residential tower, it is noted that the viewing point in question is over 400m. from the Terrace, and 1.6km. from the tower, and consequently the top 6 storeys would comprise a very small element in the view. The harm caused to the Park would be similar, as the tower would be hidden by trees from other locations in the Park. Furthermore, as the viewer approaches the Terrace, the tower would quickly disappear behind the Terrace. Consequently, GLA officers consider that any harm caused is very limited and 'less than substantial', which needs to be weighed against the public benefits. These benefits include the regeneration of the existing site, additional market and affordable housing of a much improved quality, a new high quality school and extensive community facilities, much improved public space, as well as economic and regenerative benefits to the wider area. These benefits are considered to be considerable and outweigh the harm caused. In coming to this conclusion, GLA officers have had special regard to the desirability of preserving listed buildings and their settings and have given considerable weight to the harm caused to heritage assets of the greatest significance.

25 It is also noted that the applicant considered a number of different options in terms of height, bulk and location of the tower during the formative stages of the design process. Low-rise options were considered but these were discounted given they would result in the loss of a much larger area of open space and would result in greater overshadowing of Purchase Street Open Space. Furthermore, these options would create a barrier between the open space and the street. Given Historic England's objection to the proposed tower and its impact on the Grade I listed Nash Terrace and Regent's Park, the applicant has assessed the impact on the overall viability of the scheme of removing 6 storeys from the tower, which would equate to a loss of 35% of the building's floorspace or 18 units, and a reduction of 20 affordable units (44 units to 24 units) due to less favourable viability. Historic England consider that a reduction of less than 6 storeys would still cause 'less than substantial harm' to the listed terrace. Given the less than substantial harm caused to Chester Terrace and Regent's Park and the urgent need for new housing and in particular affordable housing, GLA officers consider that the loss of 20 affordable housing units in order to remove the harm would not be justified in public benefit terms.

26 Further views were also produced in response to objections from the Twentieth Century Society. These show that the proposed residential tower will be visible in a glimpsed view from the pavement on the south side of Euston Road, over the British Library roof. However, the tower will appear behind the chimneys of the Francis Crick Institute, and both are partially screened by trees in the British Library courtyard. GLA officers do not consider this to cause any harm to the setting of the British Library.

27 The Francis Crick Institute has objected on grounds of the impact of the height and location of the residential tower on the operations of the Institute. It also raised concerns about the impact on operations from the tower due to construction, including construction of the basement and vibrations; overlooking from the tower into laboratories; and impact on air quality from emissions from the Crick's flue outlets. The Institute fears its activities may be affected by the future service of an abatement notice in the event that a nuisance arises.

28 In response to the concerns of the Institute, it is noted that the residential units in the proposed tower would be located 16.5m. from the Institute's building. This is slightly less than the 18m. between habitable rooms suggested in the Housing SPG; however there is no such guidance for distance involving non-residential uses, and the buildings would have a usual separation distance for an urban environment. Due to air quality concerns arising from the Crick Institute's use of emergency generators and the tower's proximity to its flue's, winter gardens and a filtered air supply have been introduced on the fifteenth floor and above for the residential tower. With regards to the concerns about construction impacts, a Construction Management Plan and a Basement Construction Plan have been secured by the 'shadow' section 106 agreement. A condition has also been applied to secure a Management Plan to be drawn up in consultation with the Crick Institute, which requires a package of measures to mitigate any material impact on the operation of the Crick Institute, including assessment of air quality consequences associated with use of generators in the event of total power failure; a requirement to implement any further measures/commitments needed to address specific air quality impacts; and measures to mitigate direct views into research laboratories or other parts of the building where sensitive work is undertaken.

29 Given these measures, GLA officers consider that the operation of the Crick Institute has been appropriately safeguarded; however the Institute remains concerned that there is a risk to its operations. The Institute has been meeting with the Council both before and after the Council's Committee meeting in order to arrive at a solution acceptable to all parties; however the Crick regards the current position as insufficiently progressed to be able to confirm that its objections can be withdrawn. This may involve amendments to planning conditions and section 106 agreement clauses, which may require reconsideration by the Council's Planning Committee. Should the application be reconsidered by the Planning Committee, the Council should refer the application back to the Mayor in order to consider an updated Stage II report.

Open space and trees

30 A large number of objections relate to the open space and trees. The Stage One Report noted a key objective of the scheme is to ensure that there is no net loss of public open space. Currently the site includes 11,760 sq.m. of designated public open space, although large parts of this are of poor quality and suffer from anti-social behaviour, and the proposals will result in the provision of 11,765 sq.m. of much improved public open space. The two existing open spaces will be unified to create a connected open space. The positioning of new buildings around the open space will provide a much improved definition and enclosure to the public realm, as well as allowing good levels of activity and overlooking across the site, in particular to those areas that currently suffer from anti-social behaviour due to low levels of overlooking and surveillance. The proposals to redesign the layout and landscaping of the open spaces will also improve legibility and permeability across the site, which is currently fragmented and unclear. The new open space is also designed to allow a variety of formal and informal events to take place, which aligns well with the community and school uses proposed on the site. The range of open space uses, and the proposed design and material quality, indicates that the new open space will be of exemplary quality. The Stage One Report also noted the increased play floorspace, which is expected to be of a very high standard.

31 The Stage One Report noted the significant groups of trees on the site; however none are subject to tree preservation orders. It has now been confirmed that a total of 41 trees and 4 groups of small trees are proposed to be removed, including three category 'A' trees. Removals are associated with the continued operation of the school during construction; the creation of a unified open space; and the creation of more active and overlooked edges to the open space, where problems of anti-social behaviour currently exist. The three category 'A' tree removals are on the site of the new school, the residential tower, and the community/residential building at the north-west corner of the site. Although these losses are regrettable, the application demonstrates that their loss is unavoidable and have been fully justified. In particular, the location of the residential tower has been located so as to minimise the loss of trees and limit the impact on the open space; as well as avoiding the Phoenix Court energy centre flue contamination zone, and respecting views from the Crick Institute atrium. A total of 105 trees will be retained, and 78 new trees will be planted in mitigation, with a further 10 trees proposed for neighbouring highways land.

32 An ecological assessment is provided with the application, which finds that the existing site is of limited biodiversity value, with hard and paved surfaces being predominant, and areas of close-mown amenity grassland in the two areas of public open space. The scheme aims to retain and enhance biodiversity across the site with wildlife friendly planting, wetlands, green roofs, brown roofs, vertical greening, new tree canopy, nesting and roosting features, with a meadow character to the west and woodland character to the east.

33 A condition secures detailed landscape proposals and an open space management plan. A condition also secures a public open space construction plan, which details what proportion of open space is closed during construction works, ensuring that a sufficient area of public open space remains open at all times.

34 In conclusion, the proposals will result in a much improved area of public open space of a slightly greater floorspace. Although the loss of trees is regrettable, their loss has been fully justified and will be appropriately mitigated by new planting.

Response to consultation

Representations to the Council

35 Historic England objected to the proposal due to the proposed tower, which it stated would cause 'less than substantial harm' and recommended that the application be withdrawn and alternatives considered. It stated that the proposed tower would harm the ability to appreciate and enjoy the significance of Regent's Park and some of the buildings associated with it, specifically the Grade I listed Chester Terrace, which is of the highest architectural significance, in a European and world context.

36 The Victorian Society stated that insufficient views of the proposed 25 storey tower have been included to allow its impact to be assessed. Noted that the proposals have the potential to affect the setting of numerous listed buildings and conservation areas, most notably St. Pancras Station. *(Further views were subsequently produced and have been taken into consideration.)*

37 The Georgian Group objected on grounds of the harm caused to the setting of Grade I listed Chester Terrace when viewed from the Inner Circle of Regent's Park (a Grade I Registered Landscape), one of the most important views of the park.

38 The Twentieth Century Society objected on grounds of the impact of the proposed tower on the significant architectural interest of the Grade I listed British Library; however it stated that it is not possible to assess the impact of the tower from the submitted information, with no

views from the courtyard or landscaped roof terraces. *(Further views were subsequently produced and have been taken into consideration.)*

39 The London Borough of Westminster objected on grounds that the proposed tower would be clearly visible in views from Regent's Park above the roofline of Chester Terrace, and would have a particularly harmful impact on the setting of the Regent's Park Conservation Area, upon the remainder of Regent's Park, and upon the setting of the Grade 1 listed Chester Terrace.

40 The Royal Parks objected on grounds of the height of the residential tower and its impact on views from Regent's Park and specifically from Chester Road and the Inner Circle.

41 The Francis Crick Institute objected on grounds of the impact of the height and location of the residential tower on the operations of the Institute. Also raised concerns about the impact on operations from the tower due to construction, including construction of the basement and vibrations; overlooking from the tower into laboratories; and impact on air quality from emissions from the Crick's flue outlets. The Institute fears its activities may be affected by the future service of an abatement notice in the event that a nuisance arises. Also raised concerns about the lack of additional public open space provision to account for the uplift in residential floorspace, the new design of the open space resulting in less soft-landscaped areas in an area deficient in open space.

42 Camden Council publicised the application by sending notifications to 616 neighbouring properties, as well as issuing site and press notices. The Council received 442 responses, including 376 in support and 66 objections. It also received a 1,058 signature petition in objection; a 10 signature petition requesting an extension in the consultation period; a 192 signature petition in objection; a 670 petition against the proposals (prior to submission) and a 762 signature petition in support of the proposals (prior to submission).

43 Camden Civic Society, Somers Town Neighbourhood Forum, Somers Town Community Forum, Coopers Lane Tenants and Residents Association, Goldington Estate Residents Association, Camden Town District Management Committee, Camden Disability Action, Bloomsbury Conservation Area Advisory Committee objected to the proposals.

44 Councillor Paul Tomlinson and Councillor Roger Robinson objected to the proposals on grounds of overdevelopment; heights in excess local context; loss of open space and trees; impact on wildlife; impact on daylight and privacy; air quality; lack of disabled parking; and impact on residents' parking.

45 Councillor Roger Robinson objected to the proposals on grounds of lack of affordable housing; flats not accessible by disabled people; loss of grassland and trees; lack of parking including disabled; loss of existing parking; impact on privacy and security of residents; danger of tower being located next to Francis Crick Institute and 2 railway stations; loss of community garden; flats could be erected above school; and concerns regarding consultation methodology.

46 Edith Neville Primary School and Scene and Heard (children's mentoring project) wrote in support of the application.

47 Grounds for objection included:

Open space and trees

- Loss of existing public open space, private open space, green space and play space
- Insufficient public open space for the proposed flats
- Parts of open space will be 'dead zones' around new buildings

- Loss of trees, including mature trees, and remaining trees at risk of damage during construction work and shade from new buildings
- Overshadowing
- Impact on dog walkers/dogs, not enough space for dogs
- Proposed park is overly-landscaped, park will be less functional
- Loss of wildlife, biodiversity
- Purchase Street will remain a street and the parks will not be truly connected

Design and conservation

- Height of the tower, nothing in the area is this height, sets precedent for tall buildings, tower is not within the Central Activities Zone
- Height of 9 storey building beside existing Plot 10 play facility, out of character, impact on listed buildings in areas
- Overdevelopment
- Should look at Somers Town as a whole and replace old buildings
- Impact on listed buildings, loss of views of listed buildings, impact on Grade I listed St. Pancras Station and British Library
- Impact on skyline, character of area, surrounding conservation areas
- Impact on design of Francis Crick Institute
- Moving plaque/bench will be upsetting for members of the family of the person who was killed on the estate (*The applicant has been in direct contact with the family and met with them to discuss relocating the bench. The memorial will be re-sited in an area of planting at the very southern end of Coopers Lane.*)

Proposed flats

- Not for local people, unaffordable, insufficient affordable housing, gentrification, social polarisation
- Density too high in an overcrowded area, with impact on local services

Amenity impact

- Loss of light to neighbouring development
- Loss of views
- Overlooking, loss of privacy
- Air quality, pollution, cumulative impact with Francis Crick and Phoenix Court CHP
- Wind impact from tower
- Noise from plant
- Effect on people's mental and physical health

Transport

- Loss of parking
- More pressure on disabled parking spaces
- Does not provide blue-badge parking (14 spaces required)
- Transport Assessment uses inadequate data, was done out of school times
- Increase in cyclists in the area poses a danger to residents including children, new bicycle lane is dangerous
- Increase in pedestrian traffic

Community facilities

- What will happen to Tennant's Hall, bigger hall not needed, loss of tenants and residents association (TRA) hall, a community hall is not the same as a TRA hall
- Another community facility is not necessary as there are a number in the area
- Impact on school with reduced playground
- School site could be used more efficiently

Building works

- Noise and disruption from building works, cumulative impact from building works in area
- Danger to children
- Dust and air quality
- Non-stop building works in the area
- Structural impact on listed buildings

Conflict of interest/procedural concerns

- Council is planner and developer
- Lack of transparency, should be open book on viability
- The decision has already been made
- Undermines localism and democracy
- There are alternatives to funding the school and community facilities, proposals are excessive to fund rebuilding of school
- Somers Town Neighbourhood Plan should be taken into account
- Waste of community assets
- Flawed consultation, questions were framed, poor consultation, misleading
- Cabinet not informed accurately of plans (e.g. re number of trees to be lost)
- Applicant did not respond to Coopers Lane residents

Safety and security

- Building on park will make it difficult for people to evacuate in an emergency
- The proposal's claim to improve safety and security is based on inadequate data
- Applicant has manipulated crime figures, area does not suffer high crime
- Risk of terrorism
- Easier for gangs to gather, which will decrease use of park, and increase concern for public safety

48 Grounds for support included:

- Improve quality of life and wellbeing for hundreds of children and families who are residents in Somers Town.
- Wide range of improvements and benefits, for diverse community groups, including the Community Play Project Plot 10, St Aloysius Nursery and Edith Neville Primary School.
- Application focuses on current and future demographic and the need for state of the art educational, recreational, sporting and community facilities for increasing numbers of children and families.
- Upgrade and improvement of usability and safety of public open spaces without any loss of public open space.
- Well-designed housing and additional social housing.
- State of the art educational, recreational, sporting and community facilities.

Representations to the Mayor

49 Historic England has requested the Mayor to direct refusal due to the 'less than substantial' harm caused to heritage assets of the 'highest significance' (Grade I listed Chester Terrace and Regent's Park), and states that the Council did not sufficiently consider the international significance of these heritage assets in determining the application. Historic England also highlighted that the impact of the tall building on Chester Terrace and Regent's Park were not addressed in the Mayor's Stage One report, since these additional views were only provided at a later stage.

50 The Francis Crick Institute has raised concerns about the impact of the height and location of the residential tower on the operations of the Institute. As discussed above, discussions between the Institute and the Council are ongoing; however the Institute regards the current position as insufficiently progressed to be able to confirm that its objections can be withdrawn.

51 An objection has been received from the Somers Town Neighbourhood Forum, which has also requested the Mayor to take over the application, suggesting that the Council has not properly or fairly considered the application. Grounds for objection include that the residential tower should not be built on public open space to fund community and environmental improvements; incorrect floorspace provision of community and education uses, in the wrong place; a loss of open space (public and private); excessive density; reduction in the amount of play space; harm to the historic environment; loss of daylight/sunlight to surrounding residents; loss of trees and biodiversity; lack of Blue Badge parking; and air quality impacts, including the cumulative impacts of High Speed 2, the Maria Fidelis schools consolidation project and Crossrail 2. It is noted that the air quality reports provided by the Forum were considered by Camden Council, who concluded that the applicant's air quality report was robust, had been conducted in accordance with the appropriate methodology, and had been appropriately reviewed internally by experts.

52 An objection has been made by the Regent's Park Conservation Area Advisory Committee, on grounds of the harm caused by the residential tower to Regent's Park and Chester Terrace.

53 An objection has been made by Camden Civic Society, on grounds of harm caused to Chester Terrace, St. Pancras Station train shed, and the British Library; and the building of the residential tower on the public open space to fund the new school.

54 An objection has been made to the Mayor through an open letter from the 'Somers Town Petitioners' (1,058 signatures) published in the Camden New Journal. The objection is on grounds of *"cutting down dozens of trees on Purchase Street and Polygon Road open spaces, and covering the grass with roads and paving, will have a terrible impact on our health and wellbeing"*. The objection also suggests that the residential units in the 25 storey building will be purchased by foreign investors.

55 Issues raised by objectors have been considered in this report, the Mayor's Stage One report, and the Council's Committee Report of 21 June 2016.

Shadow section 106 heads of terms

56 Planning contributions would usually be incorporated into a section 106 agreement; however in this case the applicant is the Council and as a matter of law the Council cannot enter into a section 106 agreement with itself. Nevertheless, the applications must be dealt with in a way that is consistent with the way the Council would deal with non-Council applications. Therefore, the heads of terms will be embodied in a 'shadow' section 106 agreement, which will be negotiated by separate lawyers within the Borough Solicitors Department representing the interests of the Council as landowner/applicant and the Council as regulatory planning authority.

57 The 'shadow' section 106 will include a provision requiring that in the event of any disposal of the land, the 'shadow' section 106 terms will be included in the terms of the sale

transfer and the purchaser will be formally required to enter into the 'shadow' section 106 as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site).

58 The 'shadow' section 106 agreement will secure 44 social rent units, to be provided at target rent levels in perpetuity.

59 The following financial contributions are included in the heads of terms:

- £1,700,000 towards highways, pedestrian, cycling and environmental measures.
- £16,000 for Legible London signage.
- £13,560 towards Travel Plan monitoring.
- £6,485 towards tree planting.

Article 7: Direction that the Mayor is to be the local planning authority

60 Under Article 7 of the Order, the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at Stage One, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

61 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal, the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

62 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

63 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

64 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the Council to do so) and determining any approval of details (unless the Council agrees to do so).

Conclusion

65 It is considered that the scheme, with the suggested conditions and 'shadow' section 106 obligations, is compliant with the London Plan. Issues regarding affordable housing, inclusive design, transport, climate change, historic environment and tall buildings, and open space and trees have been appropriately addressed.

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Central Somers Town

in the London Borough of Camden

planning application no. 2015/2704/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and the provision of approximately 2,190 sq.m. replacement school (Use Class D1); approximately 1,765 sq.m. of community facilities (Use Class D1); approximately 207 sq.m. of flexible Use Class A1/A2/A3/D1 floorspace; and 136 residential units (Use Class C3) over 7 buildings ranging from 3 to 25 storeys. Provision of 11,765 sq.m. of public open space along with associated highways works and landscaping.

The applicant

The applicant is the **London Borough of Camden**, the architects are **DSDHA, Duggan Morris, Hayhurst and Co., dRMM, and Adam Khan**, and the agent is **Turley**.

Strategic issues

The proposed development of a school, residential, and community uses is strongly supported in strategic planning terms; however issues with respect to **affordable housing, transport and climate change** should be addressed before the application is referred back to the Mayor at his decision making stage. **Social infrastructure, open space, housing, historic environment, urban design and tall buildings, inclusive design, trees and biodiversity** policies are also relevant to this application.

Recommendation

That Camden Council be advised that while the application is generally acceptable in strategic planning terms, it does not yet comply with the London Plan, for the reasons set out in paragraph 95 of this report; but that the possible remedies set out in this report could address these deficiencies.

Context

1 On 20 January 2016, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 1 March 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B(c) and 1C(c) of the Schedule to the Order 2008:

- 1B(c) *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres."*
- 1C(c) *"Development which comprises or includes the erection (c) a building of more than 30 metres high and outside the City of London."*

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The Central Somers Town site is approximately 2.2 hectares and comprises Polygon Road Open Space, Edith Neville Primary School and Children's Centre, and Purchase Street Open Space.

6 To the west, Polygon Road Open Space is 5,310 sq.m. in area, bordered by Chalton Street to the west, Polygon Road to the south, a pedestrianised section of Charrington Street to the east, and a path from Chalton Street to Charrington Street to the north. It is a designated as public open space and made up of a small area of grass, a children's play area, and an outdoor gym. This area includes the 'Plot 10' Community Play Project, covering an area of 1,478 sq.m. It includes a single storey building for indoor play and children's activities and areas of outdoor play and playing pitches that are designated as private open space. A former public house (now in residential use) and Regent High School lie to the north, with Edith Neville Primary School to the east and residential buildings of up to five storeys, with some commercial uses to the south and east.

7 At the centre of the site is Edith Neville Primary School and Children's Centre, covering 5,900 sq.m. and bordered by Purchase Street to the east, Polygon Road to the south, the pedestrianised section of Charrington Street to the west, and the rear of Georgian terraced houses within the King's Cross St. Pancras Conservation Area to the north. The site comprises a one form entry primary school and children's centre made up of collection of panelised concrete and block single storey buildings constructed in the 1970s, which are in poor condition. A four storey house, currently used as the school keeper's house, forming the end of a Grade II listed terrace on Charrington Street, is also included within the site boundary. The school grounds drop to below street level to the south-west corner adjacent to Polygon Road and the pedestrianised section of Charrington Street. To the south and east are brick built residential

blocks dating from the 1970s of up six storeys, with Polygon Road Open Space to the west and three/four storey Georgian terraced houses to the north.

8 To the east is Purchase Street Open Space, covering 6,450 sq.m., and bordered by Purchase Street to the west, Brill Place to the south, Hampden Close to the north, and the rear of residential blocks facing onto Coopers Lane to the east. It is designated as public open space and made up of undulating grassed open space, a large number of trees, with an informal play area at its centre. A remnant of the brick coal yard wall bounds the south-west corner of the open space. A community hall, with private external garden space, is included within the site to the north. The rear gardens of two and three storey brick terraced houses, dating from the 1970s, back onto the park to the east and north. To the west are post-war residential buildings ranging from three to six storeys, and to the south is the almost complete Francis Crick Institute, rising to 48 metres on the south side and stepping down to 30 metres on Brill Place.

9 More widely, the area to the east is dominated by St. Pancras Station and railway lines, and to the south are large-scale buildings including the Crick Institute and the British Library. The areas to the north and west are generally low to mid-rise residential, with some taller blocks up to ten storeys.

10 The site does not front onto the Transport for London Road Network (TLRN) or Strategic Road Network (SRN). The nearest TLRN is the A501, 400m south of the site, while the nearest SRN is the A4200, 200m away to the west.

11 The site is highly accessible by public transport, with part of the development being adjacent to St. Pancras International Station, where national rail and underground services on the Metropolitan, Piccadilly, Victoria, Circle and Hammersmith & City lines can be accessed. London Overground, the Northern line and national rail services are also within a short walking distance at Euston station. A new Crossrail 2 station is also proposed just south of the site with new station entrances provided at both Euston and St. Pancras Stations. High Speed 2 (HS2) is also expected to begin operating from Euston Station by the mid-2020s. Ten bus routes can also be accessed within a short walking distance of the site. As such, the site records the highest possible public transport accessibility level (PTAL) of 6b.

12 There are three cycle hire docking stations within walking distance to the site, the nearest being available approximately 200m away to the north on Pancras Road. Two cycle routes also pass through the site along Polygon Road, Purchase Street and Brill Place, with dedicated cycle paths along parts of Polygon Road and Purchase Street. As part of HS2, Polygon Road, Phoenix Road/Brill Place will also form the most direct and convenient east/west pedestrian connections between Euston and St. Pancras Stations (as opposed to Euston Road). The nearest taxi rank is located outside the Midland Road entrance to St. Pancras Station.

Details of the proposal

13 The proposal involves the demolition of existing buildings on the site and the provision of a replacement school (Use Class D1) of approximately 2,190 sq.m.; approximately 1,765 sq.m of internal and external community space (Use Class D1); approximately 207sq.m of flexible Use Class A1/A2/A3/D1 floorspace; and 136 residential units (Use Class C3) in seven buildings ranging from 3 to 25 storeys. The proposals also include 11,765 sq.m. of public open space along with associated highways works and landscaping. The proposals are divided into seven plots, as follows:

- Plot 1: Community uses at ground floor (Use Class D1) of approximately 1,554 sq.m. (internal and external space), to include a children's nursery and community play facility, with 10 residential units above, up to six storeys.

- Plot 2: Nine storey building containing 35 residential units above flexible A1/A2/A3/D1 floorspace at ground level (approximately 137 sq.m.).
- Plot 3: Extension of the existing Grade II listed terrace to provide 3 three storey townhouses.
- Plot 4: Replacement primary school (Use Class D1) of approximately 2,190 sq.m. over two storeys.
- Plot 5: 20 residential units over a replacement community hall (Use Class D1) of approximately 200 sq.m., of four to six storeys.
- Plot 6: 14 residential units of three to four storeys.
- Plot 7: A 25 storey tower containing 54 residential units over flexible A1/A2/A3/D1 floorspace at ground level of approximately 70 sq.m.

Case history

14 On 17 August 2015, a pre-application meeting was held at City Hall for full planning permission for the demolition of existing buildings to facilitate the redevelopment of the site to provide 11,110 sq.m. of public open space; a replacement primary school (Class D1); a community building (Class D1) (to include a children's nursery, community place facility and community hall); with up to 10 residential units above; up to three residential units to the end of Charrington Street and the provision of up to 145 residential units across 4 separate blocks (1 x part 5/part 9 storeys; 1 x part 4 and part 6 storeys; 1 x 3 storeys; and 1 x 26 storeys); and associated highways works.

15 The GLA's pre-application advice report of 14 September 2015 concluded that the principle of a new replacement school, replacement community floorspace, together with 145 residential units and re-provided and upgraded open space was strongly supported in strategic planning terms; however the applicant was requested to ensure that issues raised with respect to housing, education, social infrastructure, open space, affordable housing, historic environment, urban design, tall buildings, inclusive design, transport, and climate change were fully addressed prior to the submission of a planning application.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- | | |
|-------------------------|---|
| • Social infrastructure | <i>London Plan; Social Infrastructure SPG</i> |
| • Open space | <i>London Plan</i> |
| • Housing | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG; draft interim Housing SPG</i> |
| • Historic Environment | <i>London Plan</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings | <i>London Plan</i> |
| • Biodiversity | <i>London Plan; the Mayor's Biodiversity Strategy; Preparing Borough Tree and Woodland Strategies</i> |

- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Camden Core Strategy, the 2010 Camden Development Policies, the 2013 Camden Site Allocations Plan, and the 2015 London Plan (Consolidated with Alterations since 2011).

18 The following are also relevant material considerations:

- The National Planning Policy Framework and accompanying Planning Practice Guidance.
- The 2015 draft Minor Alterations to the London Plan.

Principle of development

Residential development

19 London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 889 new homes per year in Camden between 2015 and 2025. The site is also located between the King's Cross St. Pancras and Euston Opportunity Areas, which have minimum targets of 1,900 and 2,800 new homes, respectively, between 2015 and 2025.

20 The proposal for development including 136 residential units on this currently inefficiently used site would be consistent with London Plan policies and is supported.

Social infrastructure

21 London Plan Policy 3.16 'Protection and Enhancement of Social Infrastructure' supports the provision of high quality social infrastructure based on local and strategic needs assessments, and resists the loss of social infrastructure without realistic proposals for re-provision.

22 The proposal re-provides space for all educational and community uses currently on the site, as summarised below:

	Existing (GIA)	Proposed (GIA)
Edith Neville Primary School	1,451 sq.m.	2,190 sq.m.
Nursery	141 sq.m.	197 sq.m.
Community Play Facility	145 sq.m.	432 sq.m.
Community Hall	150 sq.m.	190 sq.m.
Total	1,887 sq.m.	3,009 sq.m.

23 A number of the existing buildings are in a poor state of repair and the proposal will re-provide all of these community uses within the site, including a new consolidated, purpose built Community Hub. The Community Hub will include a new nursery and community play facility, each of which will benefit from larger and higher quality internal spaces compared to their existing accommodation, as well as benefiting from private outdoor play areas for each use. A multi-use games area (MUGA) will be provided on the roof of the building, and will include changing facilities. The Community Hub will also include a flexible community space that will be able to open up onto the new park to allow for larger scale events. A new community hall to replace the existing facility is proposed on the ground floor of block 5, with entrances from both the proposed community garden and the main park path. The application demonstrates that the proposed space will be available for a wide range of groups and will be well used. It will also provide welcome activity surrounding the public spaces. This will be supplemented by two small commercial units for flexible uses on the ground floor of Plots 2 and 7, which is welcomed.

24 The re-provision of a greater level of educational and community space of significantly better quality is strongly supported.

Open space

25 London Plan Policy 7.18 'Protecting Open Space and Addressing Deficiency' resists the loss of open space unless equivalent or better quality provision is made. The application emphasises that a key objective of the scheme is to ensure that there is no net loss of public open space. Currently the site includes 11,760 sq.m. of designated public open space, although large parts of this are of poor quality and suffer from anti-social behaviour, and the proposals will result in the provision of 11,765 sq.m. of much improved designated public open space. The two existing open spaces will be unified to create a connected open space.

26 The proposal to re-provide the same area of public open space as currently exists, and to significantly improve its quality, is strongly supported. As discussed under 'urban design' below, the design of the proposed public open space is considered to be of very high quality.

Education

27 The NPPF gives the highest level of national policy support for school provision. London Plan Policy 3.18 'Education Facilities' supports enhanced new build provision, in particular to address the current and projected shortage of primary school places. Community use of facilities is also encouraged.

28 Edith Neville Primary School and Children's Centre is currently a one form entry, mixed school occupying a series of single storey buildings constructed in the 1970s. The school was built with a short life expectancy and is in a poor state of repair, making inefficient use of the site. A primary objective of the proposal is for the redevelopment of the school and children's centre to provide a replacement one form entry school, with a nursery and children's centre. The proposal would increase the internal area from 1,451 sq.m. to 2,190 sq.m. The school will remain one form entry for up to 210 pupils, since a new two form entry school is included in the neighbouring King's Cross development. While short and medium term population projections show that a one form entry school will provide sufficient school places for the area, long term projections indicate that a two form entry school may be required to meet growing demands for school places in the area. The design therefore allows for future expansion of the school by adding floors to the building and the plant room and servicing has been designed to allow this. The proposal will also provide approximately 3,470 sq.m. of net external space, including hard and soft landscaped areas for a variety of age groups, an increase on the existing 3,268 sq.m. The school design includes a separate community entrance, which will allow for the school hall to be used by community groups outside of school hours.

29 The application demonstrates that the phasing of the construction of the school will minimise disruption to pupils. The nursery and the Children's Centre will be moved into temporary accommodation during construction on the car park of the school, while the rest of the school will remain operational until the new building is completed, after which the existing building will be demolished.

30 The re-provision of much improved educational facilities is strongly supported, including expanded external space and community use. The approach to allowing future expansion of the school is also supported.

Housing

31 The proposals include the following housing:

	Market	Social rent	Total
One bed	42	13	55 (40%)
Two bed	44	23	67 (50%)
Three bed	6	8	14 (10%)
Total	92 (68%)	44 (32%)	136

Affordable housing

32 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing.

33 The current proposals include 44 social rent units out of a total of 136, which equates to approximately 32% of the total. The introduction of an element of market housing to an area dominated by social housing is welcomed, in line with Policy 3.9. It is the applicant's intention that the receipt from the market residential element will be used to cross-subsidise the delivery of Edith Neville Primary School, nursery, community play facilities, community hall and public realm.

34 Any financial surplus would normally be subject to the requirements of London Plan Policy 3.12 to provide the maximum reasonable amount of affordable housing, and the applicant has submitted a viability assessment to the local planning authority in support of this. London Plan Policy 8.2 'Planning Obligations' provides the strategic context for planning obligations and whilst affordable housing and transport are given the highest priority at the strategic level, the need for planning obligations to fund social infrastructure, such as schools and community facilities, is also acknowledged as important. Given the strategic support for social infrastructure provision, the proposal to fund the new school, community facilities and public realm is acceptable, subject to a financial viability assessment. Mindful of the Mayor's priorities for planning obligations and having regard to the nature of this scheme, and its potential to contribute towards the wider objectives of the Camden's schools delivery programme, in accordance with the aims of London Plan Policy 3.18, GLA officers support such a surplus split in principle. However, the applicant's viability assessment, together with the results of an independent review, should be shared with the GLA before the application is referred back to the Mayor. GLA officers will update the Mayor on the findings of the review, and of any further negotiations, at the Stage Two decision making stage.

35 At Stage Two, the local planning authority should provide clarification on how contributions will be secured. Planning contributions would usually be incorporated into a section 106

agreement; however in this case the applicant is the Council and as a matter of law the Council cannot enter into a section 106 agreement with itself. Nevertheless, the applications must be dealt with in a way that is consistent with the way the Council would deal with non-Council applications. Therefore, a 'shadow' section 106 agreement is expected to be negotiated by separate lawyers representing the interests of the Council as landowner/applicant and the Council as regulatory planning authority. The shadow section 106 should include a provision requiring that in the event of any disposal of the land, the shadow section 106 terms will be included in the terms of the sale transfer and the purchaser will be formally required to enter into the shadow section 106 as owner of the land at the point of acquisition.

36 London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. However, in reflection of the relatively small number of affordable units provided, and the challenge of making intermediate tenures genuinely affordable in this central location, the proposal for 100% social rent is acceptable in this instance, subject to the outcome of the viability assessment.

Housing choice

37 London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing.

38 With regard to the market housing, Camden's Policy DP5 identifies a very high need for two-bed units, and seeks to achieve a minimum of 40% two-bed units in market developments. The proposal includes 48% of the market units as two-bed units.

39 Camden's Policy DP5 also requires 50% of social rented units to have three or more bedrooms; however the proposal includes only 18%. The application includes details of Camden's current housing waiting list, which shows that 41% of demand is for two-bed units (compared to 52% proposed); 22% for one-beds (compared to 29% proposed); and 28% for three-bed (compared to 18% provided). The proposed social rented units are similar to that needed, and Camden's Housing Department has confirmed that it reflects local demand. The proposed mix is therefore supported.

Density

40 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within a central location where the density matrix sets a guideline of 650-1,100 habitable rooms or 140-405 units per hectare for a PTAL of 4-6. The applicant calculates that the density of the proposal is approximately 879 habitable rooms, or 325 units, per hectare, excluding the public open space. Accounting for the mixed use nature of the proposals, this is likely to underestimate the impact of the development in terms of scale and massing, activity, and the demand for services (as discussed in paragraphs 1.3.62-1.3.63 if the draft interim Housing SPG); however the density would still be within the London Plan density matrix, demonstrates no characteristics of over-development, and is considered to meet London Plan policy.

Residential quality

41 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, with further guidance provided by the Housing SPG. The Mayor has published draft Minor Alterations to the London Plan, which have been prepared to bring the London Plan into line with new national housing standards and car parking policy. A draft interim Housing SPG has also been published reflecting these and other changes.

42 Residential quality across the scheme appears to be high, exceeding London Plan space standards. All of the units are dual aspect, with a number being triple aspect, and all of the residential units also benefit from an area of private amenity space in the form of terraces and balconies.

Children's play space

43 London Plan Policy 3.6 'Children and Young People's Play and Informal Recreation Facilities' seeks to ensure that development proposals provide access to inclusive, accessible and safe spaces, offering high-quality play and informal recreation opportunities. Further detail is provided in the Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

44 The residential elements proposed indicate a child yield of 54 (made up of 55% under 5, 28% 5-11 and 16% 12+), which would result in a requirement for 540 sq.m. of playspace. The play strategy included in the application indicates a very high quality and imaginative play provision, as detailed below:

	Existing (sq.m.)	Proposed (sq.m.)
Playable green space	4,925	3,840
Doorstep play	0	1,825
Infant play	245	235
Junior play	880	610
Activity area for all ages	400	445
Outdoor gym	200	140
Community garden	375	455
Dog activity area	495	265
TOTAL	7,520	7,815

45 The proposals will also result in the enhancement of the Community Play Facility which includes private play space for children, and provision of a MUGA,. The proposed play spaces could be seen as the redistribution of existing play space; however it is recognised that much of the existing space is of a low quality and the area is not identified as deficient in play space. The introduction of 1,825 sq.m. of doorstep play where none currently exists is particularly welcomed. The proposals fully meet the requirements of Policy 3.6.

Historic environment

46 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The proposal will have an impact on designated heritage assets, including the Grade I listed British Library, St. Pancras Station, and Kings Cross Station; the Grade II* listed St. Pancras Church with its associated Grade I and II listed mausolea and funerary monuments, and

St. Pancras Gardens, which is Grade II listed on the Register of Parks and Gardens of Historic Interest; the Grade II listed terrace at 1-7 Charrington Street and 20/21 Platt Street, Pancras Road arches, Walker House, Chamberlain House, Levita House, and St. Mary the Virgin Church; and Kings Cross St. Pancras, Bloomsbury, Camden Town, and Regent's Canal Conservation Areas. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*.

47 The NPPF states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Recent judgements have provided detailed consideration of the duty imposed on local planning authorities. The Court of Appeal in *Barnwell Manor* held that a finding of harm to a listed building or its setting is a consideration to which the decision-maker must give considerable weight, and that there should be a strong presumption against granting permission that would harm the character or appearance of a conservation area.

48 The applicant has provided a Heritage, Townscape and Visual Impact Assessment (HTVIA), which contains an analysis of 17 views towards the site from all directions, as agreed with Camden planning officers, including wirelines and full renders. The HTVIA also contains an assessment of the significance of the Conservation Areas and statutorily listed buildings around the site, which GLA officers consider to be appropriate. The impact on designated heritage assets and their settings will arise primarily from the 25 storey residential tower; however GLA officers consider this to be largely neutral, with some positive impacts arising from the distinctive roofline of the tower, with no harm identified. The most sensitive view (number 9) is from Euston Road, overlooking Kings Cross Station Square and the roof of St. Pancras Station train shed. The wireline view demonstrates that the residential tower will be hidden behind the train shed roof, which is welcomed, and it is noted that the tower will be 2.7 metres lower than the St Pancras Station clock tower. In coming to this conclusion, GLA officers have had special regard to the desirability of preserving listed buildings and their settings, and paid special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

49 London Plan Policy 7.8 also applies to non-designated heritage assets. No locally listed historic buildings are identified within the HTVIA and the applicant should confirm that none are affected by the proposals. Although not identified within the HTVIA, GLA officers consider the remnant of the brick coal yard wall in the south-west corner of the site to be a non-designated heritage asset, providing a reminder of the former use and history of the site. The NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

50 It is recognised that the existing wall significantly compromises access and overlooking in the existing open space. The application proposes to retain the wall but to make it more permeable, with two new openings to create new views and routes into the open space, and existing openings expanded to create new seating ledges and views between the open space and Purchase St. Improved lighting on both sides of the wall will enhance the wall and ensure safety at night. The wall is considered to be of relatively low significance, being only a remnant, and the harm caused to the heritage asset will be outweighed by the public benefits arising from increased pedestrian permeability and improved views into the new open space.

Urban design and tall buildings

51 The proposals were presented at pre-application stage to GLA officers and were considered to be of a high quality, which has been carried through into the submitted application. The use of five different architectural practices working together results in a diverse but complementary range of buildings. The proposals indicate a very high quality of development, and the Council should seek to maintain this quality by securing the architects through to delivery.

52 The proposal to position new buildings around a reconfigured and much improved open space is strongly supported, including community buildings and an element of commercial space with residential units above, and a new school building. This provides much improved definition and enclosure to the public realm, as well as allowing good levels of activity and overlooking across the site throughout the day, in particular to those areas that currently suffer from anti-social behaviour due to low levels of overlooking and surveillance. The re-provision of existing well-used community spaces, together with the introduction of a small element of flexible commercial space, ensures that the streetscape and public open space will be fully activated. The proposals to redesign the layout and landscaping of the open spaces will also improve legibility and permeability across the site, which is currently fragmented and unclear. The open space is also designed to allow a variety of formal and informal events to take place, which aligns well with the community and school uses proposed on the site. The range of open space uses, and the proposed design and material quality, indicates that the new open space will be of exemplary quality.

53 The Plot 1 brick-clad community/residential building in the north-east corner of the site (Adam Khan Architects) is described as a celebratory public building in the new park, incorporating a playful roof line forming the boundary to the upper level MUGA, which is echoed on the residential block, as well as distinctive arched ground floor openings. The building clearly defines the park edge and provides a good level of active frontage at ground floor level onto both Chalton Street and the new Polygon Road Open Space, while respecting the need for a degree of privacy for the user groups. The building incorporates 'shop' windows on these elevations, in the form of deep windows incorporating shelves for displaying objects. This is an innovative approach to providing a level of overlooking to the public realm, while maintaining a degree of privacy for the nursery and other children's facilities. In order to minimise any noise impacts, the MUGA has been sited to maximise distances (12-16 metres) to the Plot 1 and Plot 2 housing units and the existing housing on Chalton Street, with ground floor external play spaces in between. Furthermore, the size and number of window openings in the residential elevations facing towards the MUGA have been minimised. The six-storey element contains two residential units per core, and the drawings indicate that they will be of a high quality.

54 The adjacent brick-clad Plot 2 nine storey residential building to the east (Duggan Morris Architects) incorporates a commercial unit fronting onto the new park, which introduces a new use to the site and will help to activate the public realm. The building takes the form of two

slightly off-set blocks, which allows the introduction of additional corner units providing a high proportion of dual and triple aspect units. The main residential access is from Charrington Street, which provides activity to that street. Further to a request at pre-application stage, the application demonstrates that the benefits of having street access to the ground floor residential unit are outweighed by drawbacks, including proximity to the refuse store and loss of elevated living space, which is accepted. A maximum of five units per core are proposed at upper levels, and the drawings provided indicate that they will be of a high quality. Impacts arising from the proximity of the existing school playground, the proposed high level MUGA, and the proposed community play space have been fully considered and appropriate responses included, such as the location of living spaces, inset boundaries, and landscape screening.

55 The three Plot 3 townhouses proposed in the north-west corner of the site (Hayhurst & Co.) form a sensitive contemporary extension to the listed terrace. The rear boundary of this plot forms the boundary with the new school playground, and as requested at pre-application stage, the proposals demonstrate how views to the school will be restricted, while introducing an element of external amenity space.

56 Similar to the community/residential building to the north-west of the site, the proposed Plot 4 school (Hayhurst & Co.) incorporates 'shop' openings on some elevations, providing a level of overlooking to the public realm, while maintaining a degree of privacy. The location of the main entrance at the south-east corner of the building also provides activity and overlooking to both Purchase Street and the new park to the south. Notwithstanding this, at pre-application stage, some concerns were expressed about the ground floor elevation and boundary treatments, which had a relatively small area of active use and overlooking, and could be perceived as somewhat fortress-like. In response, significant amendments have been incorporated in the submitted scheme, including a reduction in the height of the solid boundary plinth on Charrington Street to one metre; a reduction in the height of the reception play screen fronting onto the new park; more 'shop' openings to the reception playspace onto the new park; and more openings to the Purchase Street frontage, including low-level child-scale windows. These changes are strongly supported and will allow the school to have a more open aspect to the surrounding public realm, while maintaining the required levels of privacy to the school.

57 On the opposite side of Purchase Street are the brick-clad Plot 5 and 6 buildings (Duggan Morris Architects). Plot 5 consists of six storey and four storey components and Plot 6 of four storey and three storey components, stepping down to align with neighbouring development on Coopers Lane. Plot 5 includes a re-provided community hall at lower ground level, with residential units above. The level change between Purchase Street and the existing community garden is approximately 2 metres, so the lower ground floor is set at community garden level, resulting in the ground floor being approximately 1 metre above the level of Purchase Street, allowing security and passive surveillance of the public realm. The level of the lower ground floor allows direct level access from the community hall to the re-provided community garden accessed from Hampden Close, with stepped access and a platform lift from Purchase Street, adjacent to the residential entrance. Plot 6 is located in an area of the existing Purchase Street open space that forms a hollow, visually separated from the surrounding area, which coupled with the exposed back gardens of Coopers Lane, has led to security problems and anti-social behaviour. The Plot 5 building will introduce activity and passive surveillance, which is strongly supported. Similar to Plot 2, both buildings take the form of two slightly off-set blocks, which allows the introduction of additional corner units providing a high proportion of dual and triple aspect units. Residential quality is generally high. The rear elevation of the Plot 6 block and the rear elevation of the existing Coopers Lane housing are 12 metres apart, which is less than the 18-21 metres minimum generally expected, although a small number of units are affected and the planting of new trees will mitigate this to an acceptable degree.

58 London Plan Policy 7.7 'Location and Design of Tall and Large Buildings' sets out a range of criteria for tall buildings. A building of 25 storeys by dRMM Architects is proposed as part of the scheme. Within the Central Activities Zone; in a highly accessible location; adjacent to large-scale buildings including the Crick Institute, which rises to 30 metres (equivalent to 15 storeys); and minimising the loss of open space, the rationale for siting the building at the southern end of the site is supported. The building has been sited towards the eastern end of Brill Place, so as to avoid the Phoenix Court energy centre flue contamination zone; limit over-shadowing of the new public open space; limit the extent of tree removal; respect views from the Crick Institute atrium; and to delineate a gateway space, with views into the new park. Residential quality appears high, with three-four units per core, all with dual aspect. The 'scissor' design creates a distinctive top to the building in this prominent location, which provides a visually interesting contrast to the curved horizontal massing of the Crick Institute. The application includes a Wind Microclimate Study in relation to residential tower, which states that wind conditions are considered suitable, in terms of comfort, for the planned pedestrian activities. Exceptions to this are identified at the south-west entrance and the balconies on the west elevation and the Study suggests further mitigation measures may be required. The applicant should provide a response to this suggestion.

59 As noted at pre-application stage, the ground floor layout of a tall building, with a relatively small footprint, creates challenges in its relationship to surrounding public realm. The residential entrance and lobby on the north and east elevations faces the pedestrian route into the new park, while a return to the south provides some overlooking onto Brill Place. A commercial/cafe space facing onto the north and west elevations relates well to the public open space, while also sitting adjacent to Brill Place. Locating the goods lift on the southern elevation, providing direct access from the street to basement servicing, is the most logical location and is supported. The facade of the tower is made up of projecting bays and recessed balconies of glass and metal panelling, with sliding aluminium screens pierced with a design referencing DNA sampling, a reference to the Crick Institute. The highly reflective surface is intended to minimise the visual impact on the new park and the existing trees and is supported.

Trees and Biodiversity

60 London Plan Policy 7.21 'Trees and Woodlands' states that existing trees of value should be retained and any removal should be mitigated by re-provision.

61 Significant groups of trees are scattered throughout the site; however none are subject to tree preservation orders. A total of 45 trees are proposed to be removed, including three 'category A' trees. Removals are associated with the continued operation of the school during construction, the creation of a unified open space, and the creation of more active and overlooked edges to the open space where problems of anti-social behaviour currently exist. The three category A tree removals are on the site of the new school, the residential tower, and the community/residential building at the north-west corner of the site. Although these losses are regrettable, the application demonstrates that their loss is unavoidable and have been fully justified. A total of 70 trees will be retained, and 74 new trees will be planted in mitigation, with a further 14 trees proposed for neighbouring highways land. The proposals are considered to meet the requirements of Policy 7.21.

62 London Plan Policy 7.19 'Biodiversity and Access to Nature' states that development proposals should enhance biodiversity where possible.

63 An ecological assessment is provided with the application, which finds that the existing site is of limited biodiversity value, with hard and paved surfaces being predominant, and areas of close-mown amenity grassland in the two areas of public open space. Semi-mature non-

native trees provide extensive canopy cover, with a shrub layer only present in certain areas. The scheme aims to retain and enhance biodiversity across the site with wildlife friendly planting, wetlands, green roofs, brown roofs, vertical greening, new tree canopy, nesting and roosting features, with a meadow character to the west and woodland character to the east. These proposals are supported in line with Policy 7.19.

Inclusive design

64 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

65 Policy 3.8 'Housing Choice' requires all new housing to be built to 'Lifetime Homes' standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan (MALP) proposes to replace this with *"ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings'"*. Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with *"ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users"*. The application confirms that the residential units have been designed in line with Building Regulation Part M, with 90% of units meeting requirement M4(2) and 10% (14 units) meeting M4(3), which are spread across units sizes and includes both tenures. The units have also been designed in consideration of Lifetime Homes Standards. The three proposed terraced houses on Charrington Street do not meet requirement M4(2) or all of the Lifetime Homes Standards, due to heritage constraints imposed by neighbouring listed buildings, which is accepted in this case. The local planning authority should secure M4(2) and M4(3) requirements by condition.

66 Level access is also provided to all non-residential floorspace, and fixed play structures within the community facilities and the public open space will be inclusive to allow for use by all children. The public open space will provide access that exceeds the design requirements of Buildings Regulations Part M. Street furniture and paving will be designed for ease of movement by all, including wheelchair users and blind and partially sighted people.

67 The lower-ground level community hall in Plot 5 incorporates stairs and a platform lift from Purchase Street, due to the changes in levels surrounding the site. Although platform lifts should be avoided wherever possible in new buildings, in this case it is accepted that level access is provided from the community garden to the rear, and a full passenger lift would be excessive for a level change of 1.7 metres.

68 Blue Badge parking bays for employees, visitors and residents to all the uses proposed, should be provided in line with London Plan Policies 3.8 'Housing Choice' and 6.13 'Parking' as well as Table 6.2. The applicant states that it is not possible to provide any parking on the site and there are no Blue Badge parking spaces proposed, although Blue Badge holders are able to park in any parking bays within the area with no time restrictions. Furthermore, the applicant states that the Council will look to designate specific bays on request. As discussed under 'transport' below, this is not an acceptable approach and the applicant should seek to convert existing underutilised spaces to provide at least 14 Blue Badge spaces, which should be sited to provide safe and convenient access to the accessible units.

Transport

69 The impact of the development upon the strategic highway and public transport network is not expected to be significant. It is also noted that the new community facilities will provide programmes and measures to help spread the intensity of drop-off and pickup throughout the morning and afternoon school peaks in the local area, which is supported.

70 The proposal will result in enhancements to pedestrian and cycle routes through the upgrading of public open space. The public realm improvements to be delivered as part of the scheme are complementary to the long-term aspirations for enhanced links between Euston and St. Pancras Stations and are supported.

71 The applicant has carried out both PERS and CERS audits for key links, crossings and routes within the vicinity of Central Somers Town. These have identified issues with the quality of some links and crossings. It is also noted that the Wind Study stated soft landscaping measures may be required along Phoenix Road/Brill Place to mitigate some microclimate issues arising from the new residential tower. As part of the development, the Council should rectify some of the identified deficiencies within the highway in light of the uplift in pedestrian and cycling movements, in accordance with London Plan Policies 6.9 and 6.10.

72 The Transport Assessment indicates a total of 217 secure cycle parking spaces will be provided as part of this scheme, which represents a total shortfall of 56 spaces (including 24 short-stay visitor spaces). After reviewing the floorspace allocated for various cycle stores across the site in conjunction with the supporting material provided, TfL is not convinced that this number will be achievable. In addition, several routes to/from the cycle stores do not meet minimum standards set out within the London Cycling Design Standards (LCDS). Overall, this is not considered to be an appropriate arrangement and the overall provision of long-stay and short-stay cycle parking spaces and supporting infrastructure is significantly below the requirements set out in London Plan Policy 6.13. Once reviewed in line with this guidance, the cycle parking should be secured by condition and/or section 111 agreement. The applicant is encouraged to expand scooter storage facilities at the school, due to their increasing popularity, particularly with younger primary students.

73 The proposal provides for a car-free development, accounting for the site's excellent PTAL rating, which is strongly supported. The applicant has also proposed that future residents and employees be exempt from applying for local parking permits, which is also supported. These arrangements should be secured via a section 111 agreement. The London Plan and the Mayor's Accessible London SPG requires 1 Blue Badge space for every accessible dwelling (10% of units), requiring 14 spaces for this proposal. No Blue Badge parking has been proposed, which is not considered to be an acceptable approach. The applicant should take this opportunity to convert existing underutilised spaces to Blue Badge spaces, which should be sited to provide safe and convenient access to the accessible units.

74 The application has provided a Framework Delivery and Servicing Plan (DSP), which is welcomed. The proposal provides for waste to be collected from the public highway, which may require the construction of some loading bays on the highway. This is acceptable, subject to the local planning authority being satisfied with these arrangements and final DSP's should be secured via section 111 agreement. Any changes to the highway should be implemented prior to completion of the relevant component of the development.

75 With regard to deliveries, no specific information has been provided as to how these can be practically accommodated for residential block C (Plot 6). The distance between the building core and the nearest on-street (proposed) or off-street loading space is over 100m, which will lead to increased dwell times within the loading bay or require vehicles to stop within the carriageway closer to the site to offload deliveries. As such, the proposal is not considered to be in accordance with London Plan Policy 6.14 and should be reconsidered.

76 A construction logistics plan (CLP) should be secured via appropriate planning conditions or obligations. A final CLP should include the cumulative impacts of construction traffic, likely construction trips generated, and mitigation proposed. Details should include site access arrangements, booking systems, construction phasing, vehicular routes, and scope for load consolidation or modal shift in order to reduce the number of road trips generated. The CLP should be submitted and approved before any works commence, including site preparation and enabling works.

77 The applicant has submitted a Framework Travel Plan, which is welcomed. Individual travel plans should be prepared for each of the major land uses post-consent and final versions should be secured, managed, monitored and enforced through the section 111 agreement.

Community infrastructure levy

78 The Mayor has introduced a London-wide community infrastructure levy (CIL) to help implement the London Plan, particularly Policies 6.5 and 8.3. The Mayoral CIL will be paid on commencement of most new development in Greater London granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail.

79 The Mayor has arranged boroughs into three charging bands. The rate for Camden is £50 per square metre. The required CIL should be confirmed by the applicant and the Council once the components of the development have themselves been finalised.

Climate change

Energy

80 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting throughout all plots and mechanical ventilation with heat recovery in Plots 2, 3, 4, 5, 6 & 7.

81 The demand for cooling will be minimised through a variety of different measures across the plots, including solar control glazing (Plots 1, 3, 7), internal blinds (Plot 1), external blinds (Plot 1) and louvres (Plot 4). The applicant has undertaken dynamic overheating assessments for each of the plots using the CIBSE TM52 methodology and London Design Summer Year (DSY) weather files, which is welcomed. The dynamic overheating modelling shows that the CIBSE criteria can be met for the majority of the spaces modelled for the 1976 and 1989 weather files; however it is predicted that none of the plots will meet the CIBSE requirements under the 2003 weather file. An explanation is provided for this; however the applicant does not appear to have investigated additional measures in order to meet the requirements or improve the conditions. Further passive measures should be considered in line with Policy 5.9 to avoid the risk of overheating for all weather files, including 2003. It is noted that for Plots 2, 5 & 6 the applicant states that there is little justification for external shading due to maintenance costs; however it is therefore unclear why this is proposed for Plot 1.

82 The development is estimated to achieve a reduction of 11 tonnes per annum (5%) in regulated CO₂ emissions under the first step of the energy hierarchy ('Be Lean'), compared to a 2013 Building Regulations compliant development.

83 The applicant has identified that Somers Town Heat Network (STHN) is within the vicinity of the development and is proposing to connect to the network. The STHN is currently being developed by an ESCO with Phase 2 due to be completed in 2017. The applicant has provided a feasibility study carried out on behalf of the London Borough of Camden investigating the potential for connection to the STHN, which indicates that the network would be able to accommodate the additional loads of the proposed development. Connection to the network should continue to be prioritised and evidence of correspondence with the network operator should be provided, including confirmation that the network has the capacity to serve the new development, together with supporting estimates of installation cost and timescales for connection.

84 The applicant has confirmed that all apartments and non-domestic building uses will be connected to the site heat network. The applicant has stated that the STHN will meet the entire heat demand of the proposals and no additional back-up heating systems will be required. An indicative layout has been provided showing the proposed pipe routes to each plot from the STHN energy centre.

85 The applicant is proposing to connect to the Somers Town Heat Network, which when fully built out in 2017 will include an 890 kWe gas fired CHP unit as the lead heat source for the district heating network (60% of the total heat load). The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated CO₂ emissions of 34 tonnes per annum (15%) will be achieved through this second part of the energy hierarchy ('Be Clean').

86 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install photovoltaic (PV) panels on Plot 1 (35 sq.m.), Plots 2, 5 & 6 (117 sq.m.), Plot 3 (45 sq.m.) and Plot 4 (150 sq.m.). The applicant is also proposing 150 sq.m. of glazing integrated PV panels on the south facade of Plot 7. A roof layout showing the location of the PV on Plots 2, 5 & 6 should be provided.

87 A gas absorption heat pump is proposed to provide space heating to Plot 7. The applicant states that a separate system for space heating is required due to the varying space heat load throughout the year, and that running the CHP to meet this load would not be good practice as it would not run at full load. Whilst this could potentially be the case for a building of the size of Plot 7 if considered in isolation, the CHP will be part of a wider district heating network with different building uses and will therefore have sufficient diversity to run the CHP at full load. The approach of a separate system for space heating is not supported, as following the energy hierarchy the use of the heat network should first be optimised before considering the use of renewable technologies. In addition, there is concern that separate distributions for space heating and hot water will bring extra cost and complexity, including potential overheating issues from the additional distribution pipes required. The applicant should therefore revise the heating strategy for Plot 7 to include space heating from the STHN.

88 A reduction in regulated CO₂ emissions of 41 tonnes per annum (18%) will be achieved through this third element of the energy hierarchy ('Be Green').

89 Based on the energy assessment submitted a reduction of 86 tonnes of CO₂ per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant

development, equivalent to an overall saving of 39%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however, the comments above should be addressed before compliance with London Plan energy policies can be verified.

Climate change adaptation

90 The site is within Flood Zone 1 and although there are some small areas of potential surface water flooding on site, these are not significant. A Flood Risk Assessment has been undertaken and given the low level of flood risk, the proposals are acceptable in relation to London Plan Policy 5.12 'Flood Risk Management'.

91 Whilst the site itself is generally free from flood risk, areas close to the boundary have significant and extensive areas of surface water flood risk, which is most likely associated with the route of the former Fleet River. Given this, the sustainable management of surface water on this site will be an important consideration, in line with London Plan Policy 5:13 'Sustainable Drainage'. The development incorporates extensive areas of green space, permeable surfaces, as well as 955 sq.m. of green/brown roofs, and 895 sq.m. of roof terraces, which will reduce water run-off and further mitigate any potential flooding in the future. The landscape proposals target a greenfield run-off rate, which is welcomed. This overall approach is in line with London Plan Policy 5:13, however an appropriate planning condition should be attached to any planning permission, requiring the details of a drainage system that achieves a greenfield run-off rate to be achieved.

Local planning authority's position

92 The local planning authority's position is not yet known.

Legal considerations

93 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

94 There are no financial considerations at this stage.

Conclusion

95 London Plan policies on social infrastructure, open space, housing, affordable housing, historic environment, urban design and tall buildings, inclusive design, trees and biodiversity, transport and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Social infrastructure:** The re-provision of a greater level of educational and community space of improved quality is strongly supported.

- **Open space:** The proposal to re-provide the same area of public open space as currently exists, and to significantly improve its quality, is strongly supported.
- **Housing:** The choice of units, residential density, and play space provision are supported.
- **Affordable housing:** GLA officers support the use of receipts from the market residential element to cross-subsidise the delivery of Edith Neville Primary School, nursery, community play facilities, community hall and new public realm; however, the applicant's viability assessment, together with the results of an independent review, should be shared with the GLA before the application is referred back to the Mayor. The local planning authority should provide clarification on how contributions will be secured. The proposal for all of the affordable housing to be social rent is acceptable in this instance, subject to the outcome of the viability assessment.
- **Historic environment:** No harm will be caused to designated heritage assets. The harm caused to non-designated heritage assets will be outweighed by the public benefits arising from increased pedestrian permeability and improved views into the new open space.
- **Urban design and tall buildings:** The design of the proposals is considered to be of a very high quality.
- **Inclusive design:** The access arrangements for the proposal are acceptable, apart from the need to provide Blue Badge parking spaces. The Council should secure M4(2) and M4(3) requirements by condition.
- **Trees and Biodiversity:** The loss of trees is regrettable; however the application demonstrates that their loss is unavoidable, has been fully justified, and will be mitigated by new planting. The scheme aims to enhance biodiversity across the site, which is welcomed.
- **Transport:** The applicant should resolve issues regarding deliveries, the provision of cycle and Blue Badge parking, and pedestrian/cycling movement before it can be confirmed if the development is in accordance with London Plan transport policies.
- **Climate change:** The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however further passive measures should be considered in line with Policy 5.9; evidence of correspondence with the Somers Town Heat Network operator should be provided; and a roof layout showing the location of the PV on Plots 2, 5 & 6 should be provided. The approach of a separate system for space heating for Plot 7 is not supported, and the applicant should revise the heating strategy.

96 On balance, while the application is generally acceptable in strategic planning terms, it does not yet comply with the London Plan; however the possible remedies set out above could address these deficiencies.

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