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Development Management
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London Borough of Camden
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FAO: **Ms J Walsh**

Via Planning Portal Ref. **PP-12108476**

25 May 2023

Dear Jennifer,

**ST PANCRAS HOSPITAL, 4 ST PANCRAS WAY, LONDON NW1 0PE
TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
SUBMISSION OF A SECTION 73 APPLICATION TO PLANNING PERMISSION REF: 2020/4825/P**

On behalf of our client, Bouygues UK ('the Applicant'), we hereby submit a minor-material amendment ('s73 application' / 'the/this Application') for changes to the basement, lower ground floor and upper ground levels of the approved scheme (ref. 2020/4825/P). Planning permission was granted on 5th August 2022 for:

"Partial redevelopment of the site, involving the demolition of seven existing buildings (Ash House, Bloomsbury Day Hospital, the Camley Centre, Jules Thorn Day Hospital, Kitchen and the Post Room & Former Mortuary) and construction of a part seven, part ten storey (plus roof plant) purpose-built eyecare, medical research and educational centre for Moorfields Eye Hospital, the UCL Institute of Ophthalmology and Moorfields Eye Charity.

New building to comprise a mixture of clinical, research and education purposes, including eye care accident and emergency department, outpatients, operating theatres, research areas, education space, cafe and retail areas, admin space and plant space.

Associated site relandscaping works including formation of patient drop off area to St Pancras way, new public realm and routes through the site, cycle parking and servicing ramp and cross over to Granary street."

Enclosed Documentation

Please find enclosed the following information, which has been submitted online via the Planning Portal:

1. Schedule of Required Information prepared by Montagu Evans;

2. Covering Letter including Planning Assessment (i.e. this letter) prepared by Montagu Evans;
3. Application Form and Ownership Certificate prepared by Montagu Evans;
4. Community Infrastructure Levy Form prepared by Montagu Evans;
5. Drawing Schedule prepared by Montagu Evans;
6. Site Location Plan prepared by AECOM;
7. Application Drawings (Approved & Proposed prepared IBI Architects;
8. Design and Access Statement Addendum prepared by IBI Architects;
9. Fire Statement prepared by ARUP;
10. Revised Basement Impact Assessment prepared by TERRELL; and
11. Construction Management Plan prepared by Bouygues UK.

Proposed Amendments

This Application seeks permission for changes to the basement, lower ground, and upper ground floors of planning permission ref. 2020/4825/P ('the Approved Scheme') to improve the layout and rationalise the floor levels. The proposed amendments are summarised as follows:

- Excavation of the basement level an additional 2.05m into the ground than the approved position, bringing the new depth to 15.1m to allow for a double height space to accommodate the new larger sprinkler tank and relocated wet plant and public health plant from the mezzanine level;
- Minor increase in basement area (an additional 267 sqm, from an enlargement to the eastern and southern boundary);
- Addition of stair from the basement level to lower ground floor which will provide easy access and escape to the MEP services area. Another dedicated firefighting and escape stairs is proposed that is directly accessed from Granary Street by the loading bay on the upper ground floor. This is required in the event of an emergency;
- Rationalisation of all levels in the lower ground to improve accessibility by removing stairs between the rooms and the lifts and firefighting stairs;
- Consolidation of the wet systems and the dry systems into a more coherent layout;
- Improved efficiency of maintenance access and egress of the plant rooms;
- Facilitation of the firefighting access directly to the sprinkler pump room;
- Access allowed via the lift core to the Lower Ground floor;
- Removal of oil storage tank as part of the structure, so it becomes a buried service; and
- Addition of a fire fighting and escape door to the northwest elevation.

No changes to the external landscaping or building envelope above ground level are proposed as part of this Application.

Full details of the proposed amendments are provided on the Application Drawings and within the Design and Access Statement prepared by IBI Architects.

A pre-application meeting was held with LB Camden officers on 23 February 2023 who confirmed during the meeting that a s73 application would be the appropriate procedural route for securing permission for the changes and the scope of application documents.

Area Schedule

It should be noted that the mezzanine level did not feature on any of the drawings approved under planning permission ref. 2020/4825/P. The mezzanine level did however feature on the approved area schedule (ref. 210312 Rev J).

Condition 5 attached to the planning permission requires that:

“The proportion and quantum of health care, research and education areas within the composite use shall, as a minimum, remain in accordance with the areas schedule hereby approved (ref. areas schedule 210312 Rev J.).

Reason: To ensure that the strategic public benefits of the scheme are delivered and that the building does not adversely affect the adjoining premises/occupiers/immediate area by reason of an intensification via the use of a higher proportion of internal areas for activities (such as commercial) that generate higher trips numbers and employment density and therefore cause excessive pressure on the local open spaces, transport network and cycle parking provision in accordance with policies G1, C1, CC1, D1, A1, A2, TC1, T1, T3 and DM1 of the London Borough of Camden Local Plan 2017.”

This Application also seeks to amend Condition 5 to obtain approval for a revised area schedule to remove reference to the mezzanine floor and also reflect the minor increase in basement area listed above.

Planning Assessment

Basement Development

Policy A5 (Basements) of the Camden Local Plan (2017) indicates that the Council will only permit basement development where it can be demonstrated that the proposal would not cause harm to:

- a. *Neighbouring properties;*
- b. *The structural, ground and water conditions of the area;*
- c. *The character and amenity of the area;*
- d. *The architectural character of the building; and*
- e. *The significance of heritage assets.*

The Council will require applicants to demonstrate that proposals for basements:

- a. *do not harm neighbouring properties, including requiring the provision of a Basement Impact Assessment which shows that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 ‘very slight’;*
- b. *avoid adversely affecting drainage and run-off or causing other damage to the water environment;*
- c. *avoid cumulative impacts;*
- d. *do not harm the amenity of neighbours;*
- e. *provide satisfactory landscaping, including adequate soil depth;*
- f. *do not harm the appearance or setting of the property or the established character of the surrounding area;*
- g. *protect important archaeological remains; and*
- h. *do not prejudice the ability of the garden to support trees where they are part of the character of the area.*

Policy A5 (Basements) goes on to state that:

“In determining proposals for basements, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.”

A Basement Impact Assessment (‘BIA’) prepared by AECOM (dated October 2020) was approved by LB Camden under planning permission ref. 2020/4825/P.

A revised Basement Impact Assessment has been prepared by Terrell which is submitted with this Application. The relevant amendment which impacts upon the BIA is the proposed minor increase in basement area (an additional 267 sqm, from an enlargement to the eastern and southern boundary) and increase in depth (by 2m, resulting 94m³ of additional excavation).

The assessments have been undertaken by appropriately qualified professionals, including a Chartered Hydrogeologist (CGeol FGS) and Chartered Civil Engineer (CEng MICE).

The Site is underlain by the London Clay Formation and Lambeth Group, suitable bearing strata for the proposed development’s foundations, confirmed by the site investigation. The London Clay has potential to shrink and swell with moisture variation, which may cause movement and damage to structures bearing upon it. The risk of movement and damage to this development due to moisture variation is negligible, considering the proposed depth of the basement, the suspended slabs and piled foundations.

The London Clay is designated Unproductive Strata. There is a very low risk of groundwater flooding and there will be no impact to the wider hydrogeological environment.

The Site and the adjacent properties have not been impacted by flooding. There is no change to the impermeable site area as a result of the development. The SuDS proposals are to attenuate surface water discharge flow off-site, in accordance with best practice. There is a very low risk of flooding to the proposed development and the development will not impact on the wider hydrological environment. There will be no impact to slopes due to the proposed development. The site is not situated in a wider hillside environment of slopes of 7 degrees or more.

Ground movements caused by the excavation and construction of the proposed development will be minimal. Damage impact to adjacent structures is assessed to be a maximum of Very Slight (Category 1 in accordance with the Burland Scale) with impact to the highway and underlying utilities assessed to be negligible. Asset protection criteria will be agreed with LB Camden (Highways) and relevant utility asset owners (e.g. Thames Water). Structural movement monitoring is proposed and mitigation actions will be implemented if movement trends indicate structural tolerances could be exceeded.

The revised BIA submitted with this Application demonstrates that the proposed development will not cause adverse impacts relating to land stability, groundwater and surface water flow, and is at very low risk of flooding. Therefore, it is considered that the proposals comply with Policy A5 (Basements) of the Camden Local Plan.

Detailed Basement Construction Plan

Clause 4.27.1 (Detailed Basement Construction Plan) of the S106 agreement dated 5th August (and read in conjunction with the Deed of Variation dated 29th March 2023) for the Approved Scheme requires that *“on or prior to the commencement of basement excavation works to provide the Council for approval the Detailed Basement Construction Plan.”*

The Detailed Basement Construction Plan will contain detailed information relating to the design and construction of the basement in order to minimise any impacts of the relevant phase of basement construction and the water environment and to provide a programme of detailed mitigating measures to be undertaken with the objective of maintaining the structural stability of the building and neighbouring properties. The basement excavation works are currently programmed to commence shortly and the Detailed Basement Construction Plan will be submitted to LB Camden for their consideration shortly after the submission of this Application.

The latest version of the Construction Management Plan for the Approved Scheme is submitted as part of this Application which addresses the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites, will be mitigated and managed.

Fire Statement

Policy D12 (Fire Safety) of the London Plan states that all major development proposals should be submitted with a Fire Statement, produced by a third-party qualified assessor.

A Fire Statement prepared by ARUP is submitted as part of this Application. This report covers the requirements in Policy D12 relating to construction, means of escape, safety features and access for fire personnel. The report confirms that the proposed amendments are in accordance with Policy D12, the proposals will meet the requirements of Building Regulations. The proposed amendments will also result in the creation of a more coherent escape route from the services area of the building to ground level.

Summary

The proposed amendments are mostly limited to the basement, lower ground and upper ground floors of the building with the exception of the addition of the escape door on the northwest elevation. The following key benefits arising from the Approved Scheme will still be delivered notwithstanding the proposed amendments under this Application:

- comprise an exceptional design and will take account of the existing form, character and appearance, detailing and material palette of the local area;
- have acceptable impact on existing and future occupiers of surrounding properties in terms of privacy, daylight and sunlight and overshadowing;
- Comply with the adopted car and cycle parking standards and will promote use of active modes of transport as far as possible; and
- Reduce carbon emissions as far as possible on-site.

The proposed amendments will improve the design of the Approved Scheme at the basement, lower ground and upper ground levels by:

- Rationalising all levels in the lower ground;

- Improving accessibility by removing stairs between the rooms and the lifts and firefighting stairs;
- Consolidating the wet systems and the dry systems into a more coherent layout;
- Improving the efficiency of maintenance access and egress of the plant rooms;
- Facilitating firefighting access directly to the sprinkler pump room; and
- Enabling access via the lift core to the lower ground floor.

We therefore consider that the proposed amendments to the basement, lower ground floors of the Approved Scheme will not result in any adverse impacts and are wholly acceptable.

Application Procedure

The application has been submitted via the Planning Portal under reference PP-12108476.

The application fee of £234.00 plus service charge has been calculated in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (as amended). An electronic payment for this amount has been made at the time of submission, including the £64 admin fee.

We would be grateful if LB Camden could confirm that the application is complete, and we look forward to receiving confirmation of validation shortly. If you have any outstanding queries on this matter, please contact Emily Disken (07818 012 487 / emily.disken@montagu-evans.co.uk) or Guy Bransby (07709 331 014 / guy.bransby@montagu-evans.co.uk) in the first instance.

Yours sincerely,



MONTAGU EVANS LLP

Enc.