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**Submitted via Planning Portal: Ref
No. 13203930**

Dear Sir or Madam,

ROYAL FREE HOSPITAL, POND STREET, LONDON, NW3 2QG TOWN AND COUNTRY PLANNING ACT 1990 APPLICATION FOR PLANNING PERMISSION

On behalf of our client, RFL Property Services on behalf of the Royal Free London NHS Foundation Trust (“the Applicant”), we write in support of an application (“the / this Application”) for full planning permission proposing the delivery of a new MRI unit at Royal Free Hospital, Pond Street, London, NW3 2QG (“the Site”).

The proposed description of development in this instance comprises:

“Demolition of existing structures and installations and delivery of an MRI unit, comprising a control room, examination room, tech room and plant room and supported by further ancillary works (including delivery of a new associated canopy structure).”

PURPOSE / CRITICAL NEED FOR PROPOSALS

There is a fundamental need to deliver a new ‘low field MRI’ unit at the Royal Free Hospital.

The Royal Free London Hospital has a strong track record delivery high-quality cardiovascular magnetic resonance (“CMR”) research and has set up an innovative MRI-guided cardiac catheterisation and MRI service offer. This is a much-needed and important service provided at the Hospital.

The proposed low field MRI unit will help significantly improve MRI-related services within the Hospital. It will importantly provide an ability provide state-of-the-art ‘image guided intervention and a better overall patient experience.

Fundamentally, it will allow more cardiac trial patients to be scanned through the use of more sophisticated imaging technology. As such, the proposed installation will greatly improve patient experience and will reduce waiting list associated with MRI scanning services in the Hospital currently.

SITE LOCATION DESCRIPTION

The Site sits within the wider Royal Free Hospital complex, located within the administrative boundary of the London Borough of Camden.

Whilst irregularly shaped, the wider Hospital comprises a mixture of wings, structures and buildings (and the main hospital building has been extended and altered in the past). The wider Hospital complex fronts on to (and is accessed via) Pond Street to the north, Hampstead Green to the west, the rears of residential properties on Aspern Grove to the south and

Fleet Road to the west. In addition to various buildings and structures, the complex also includes various areas of hardstanding mainly comprising car parking locations and access routes through the Site.

The Site specifically relating to this application comprises an 108 sqm area located at ground level and situated at the corner between the West Wing and the South Wing. A Site Location Plan is submitted as part of the application under drawing ref. 23036(00)011. Given the Site's location, it is well-screened and is not fully visible from Pond Street.

The Application Site itself is not subject to any site-specific designations within the Camden Local Plan (2017).

To the north and east of the Site lies the boundary of the Hampstead Conservation Area (aligning with the wider Hospital's Pond Street boundary). A number of other heritage assets also lie in proximity to the Site including Grade I Church of St Stephen (lying circa 150m to the north-west).

PLANNING HISTORY

The wider Royal Free Hospital site is subject to an extensive planning history (given that main hospital building has been altered and extended significantly in the past). In short, various buildings, extensions, plant and other medical-related facilities have been delivered on-site in the past.

PROPOSED DEVELOPMENT

This planning application seeks permission for the demolition of the existing structures and installations and the delivery of a new low field MRI unit which will help support and improve the services provided at the current MRI department at the Hospital and needs of the local area.

The proposed building will be accessed via a connection pathway from the existing entrance on Rowland Hill Street to the south of the proposed building connecting the unit to the wider hospital. The proposal incorporates the provision of a single storey prefabricated Lamboo unit which houses the MRI system.

The design of the unit will be functional but in keeping with the wider character of the hospital within a well screening location replacing an existing prefabricated building on site. This new MRI unit will be supported through external plant, the proposal additionally incorporates a canopy to support the functionality of the unit providing protection to staff and patients from the weather. This will be further supported through the creation of a new paving area between the unit and access to the wider hospital.

It is envisaged that an enclosure will be required in relation to the plant, this is in the process of being prepared by the design team and it is requested that this is addressed through an appropriately worded condition for the application.

PLANNING POLICY CONTEXT

Section 70 of the Town and Country Planning Act 1990 requires planning applications to be determined in accordance with policies of the statutory Development Plan, unless material considerations indicate otherwise.

The Development Plan for the Site comprises:

- The London Plan (2021);
- Camden Local Plan (2017); and
- London Borough of Camden Policies Map (2021).

Material consideration will also be given to the National Planning Policy Framework (2023) ('NPPF') and any relevant Supplementary Planning Documents.

Camden are in the process of preparing an updated Local Plan and have most recently undertaken Regulation 18 consultation between January and March 2024. Responses received to the consultation are currently under consideration

with a further consultation targeted for later in the year by Camden. Due to the early stage of the draft Local Plan limited weight is applied.

PRINCIPLE OF DEVELOPMENT

NPPF Paragraph 127 sets out that Local authorities should take a positive approach to applications for alternative uses of land which are developed but not allocated for a specific purpose in plans where this would meet an identified need such as making more efficient use of sites that provide community services such as hospitals.

London Plan Policy S2 (Health and social care facilities) states that the development of high-quality health and social care facilities will be supported in areas of identified need.

In addition, Core Strategy Policy C1 (Health and Wellbeing) supports the provision of new or improved health facilities in other accessible locations to maximise community access. Whilst also seeking to protect existing health facilities. The current draft of the Local Plan acknowledges within Appendix 1 the infrastructure schedule item 12 which refers to the Royal Free Hospital Masterplan and includes an endoscopy suite rebuild and hybrid theatre expansion.

The proposed MRI unit is located in the central area of the wider Royal Free Hospital Site and will support existing MRI facilities provided at the Hospital and across the Trust. The additional facilities will improve current services to patients and support the requirements of the current MRI Department, in addition to shortening MRI-related waiting lists.

Therefore, the principle of delivering the proposed lowfield MRI (and associated works) is considered to accord with these national and local policy principles.

HERITAGE

The wider Royal Free Hospital Site neighbours a number of heritage assets including both statutorily and locally listed buildings. The boundary of the Hampstead Conservation Area is also located to the north.

The proposed, single storey building is not located near or adjacent to any nearby statutory listed buildings. Nor will the proposals abut (nor impact the character or setting of) the t The Hampstead Conservation Area).

In short, the proposed single storey building, and associated works will be located within a well-screened location within the heart of the wider Hospital complex – with very limited visibility of the proposals from outside of the Hospital complex.

Overall, we conclude that the proposed development is acceptable with regard to its impact on heritage assets identified above and meets the requirements of the NPPF and the duty set out in Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 that special regard is to be had to the setting of listed buildings.

DESIGN

Chapter 3 of the London Plan reinforces the Mayor's commitment to ensuring the delivery of good quality designed developments, which reflect and respond to London's character. Policy D1 (London's Form, Character, and Capacity for Growth) further seeks developments to respond to local context by delivering buildings and spaces that are of a scale, appearance and shape that responds successfully to the identity and character of the locality.

At a local level, Development Management Policy D1 (Design) of Camden's Local Plan requires all development to be designed to the highest standards and incorporate principles of good design. Which includes proposals being in keeping with local context particularly scale and size, using high quality building materials, maximising sustainability and seeking to protect features of value and landscaping.

As set out above, the application proposes a new MRI unit and associated works to support ongoing services at the Hospital and across the Trust. The proposal is for a single storey building which is to be a prefabricated modular building. Further details are contained within the Design and Access Statement regarding the proposed design.

A canopy structure is also proposed – the location and scale of which is indicated on proposed plans. At this stage, we envisage the materiality / detailed design of this structure could be secured via a planning condition in due course.

It is considered that the Proposed Development accords with the policy requirements as set out above regarding design for this building which is set within the existing Hospital complex.

HIGHWAYS

Policy T4 of the London Plan (Assessing and Mitigating Transport Impacts) states that proposals should reflect and be integrated with current and planned transport access, capacity, and connectivity.

Local Plan Policy A1 (Managing the impacts of development) sets out that proposals should meet the transport needs of the development with the transport impacts managed in a sustainable way.

The proposal will support existing facilities and critical care services provided on the wider Hospital Site. No change or disruption to the access or parking strategy for the wider Hospital complex will result.

NOISE

Policy D14 of the London Plan (Noise) identifies that development should manage noise and avoid significant adverse noise impacts on health and quality of life, adhere to the Agent of Change Principle, mitigate, and minimise existing and potential adverse noise impacts.

The Local Plan Policy A4 (Noise and vibration) states that noise and vibration must be controlled and managed. With development likely to be resisted where this is likely to generate an unacceptable impact.

In support of the Proposed Development an External Plant Noise Assessment has been prepared by RSK Acoustics which concludes that:

“An assessment of noise emissions from the proposed units indicates that the plant proposals with the Borough’s relevant noise requirements. Noise limits would be met at all times with all proposed plant running simultaneously, with no unacceptable noise impacts being generated at nearby noise-sensitive residential properties, should mitigation be provided to the Siemens chillers as described in section 4.5.”

Through the incorporation of acoustic louvres to enclose the chillers it is therefore considered that the proposals would adhere to relevant policies set out within planning policy regarding noise impacts of a proposal. As discussed previously an acoustic enclosure is being designed and it is proposed that the detail for this is provided through an appropriately worded condition.

CONCLUSION

The proposal is for the development of a new low field MRI unit (and associated works) located in the central area of the wider Royal Free Hospital Site.

As set out above it is considered that the proposed building is acceptable in line with national, regional and local planning policy. As such, we respectfully ask that permission is granted without delay.

To allow the Council to consider the application, the following application documentation has been submitted in support of the application:

- Application forms, duly completed and signed;
- Planning letter, prepared by Montagu Evans (this document);
- Site Location Plan, prepared by Ansell + Bailey;

- Existing Block Plan, prepared by Ansell + Bailey;
- Existing and Proposed Drawings (Plans, roof, Elevations and Sections), prepared by Ansell + Bailey;
- Design Access Statement, prepared by Ansell + Bailey; and
- External Plant Noise Assessment, prepared by RSK Acoustics.

APPLICATION PROCEDURE

The planning permission application has been submitted via the Planning Portal PP-13203930. The application fee has been calculated in accordance with the Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment) (England) 2012 (as amended). The fee amounting to £578 (plus £70 service charge) will be paid via the Planning Portal upon submission.

We would be grateful if Camden Council could confirm that our application is complete and will be validated shortly. In the interim please contact Colin Sinclair (07385 113 603 / colin.sinclair@montagu-evans.co.uk) or Alex Partridge (07584 154 762 / alex.partridge@montagu-evans.co.uk) of this office.

Yours sincerely,



Montagu Evans LLP