

3rd July 2024
Ref: 2023-287

Camden Council
Planning - Development Control,
Camden Council,
Camden Town Hall,
London,
WC1H 8ND

Newsteer
Real Estate Advisers

C/O HubHub London
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To Whom It May Concern,

Town and Country Planning Act 1990 (as amended) Town & Country Planning (Development Management Procedure) (England) Order 2015 Planning (Listed Buildings and Conservation Areas) Act 1990

Site: Highgate Mental Health Centre, Dartmouth Park Hill, London, N19 5NX

Proposal: Removal of existing ventilation system equipment from the roof of Block M (including existing Air Handling Unit (AHU)) and installation of 1no. new AHU (and associated ductwork), a new dirty air extractor fan, VRF units and access staircase on the roof of Block M.

On behalf of our client, Camden and Islington NHS Foundation Trust (hereafter 'the Trust'), Newsteer (hereafter "the Agent") is pleased to enclose an application seeking full planning permission (as detailed below) at Block M, Highgate Mental Health Centre, Dartmouth Park Hill, London, N19 5NX.

The application is submitted electronically via the Planning Portal under reference PP-13144564 and seeks full planning permission for the following:

"Removal of existing ventilation system equipment from the roof of Block M (including existing Air Handling Unit (AHU)) and installation of 1no. new AHU (and associated ductwork), a new dirty air extractor fan, VRF units and access staircase on the roof of Block M."

In line with validation requirements, the application consists of the following documents:

- Planning Application Form;
- Covering Letter (Including Planning Statement);
- Site Location Plan (M10295- HUN- BM- 00- DR- A- 01-0300 prepared by Hunters);
- Existing Site Plan (M10295- HUN- BM- 00- DR- A- 01-0310 prepared by Hunters);
- Existing Roof Plan (M10295- HUN- BM- RF- DR- A- 01-0610 prepared by Hunters);
- Proposed Roof Plan (M10295- HUN- BM- RF- DR- A- 01-0620 prepared by Hunters);
- Proposed North and East Elevation (M10295- HUN- ZZ- XX- DR- A- 07-0610 prepared by Hunters);
- Design and Access Statement (M10295-HUN-PP-00-0010-XC prepared by Hunters); and

- Acoustic Design Report (12466.RP01.ADR.0 prepared by RBA Acoustics).

Site Description

The Site comprises the roof space of Block M (known as the 'Admin Block' at the Highgate Mental Health Centre ('HMHC'), Dartmouth Park Hill, London, N19 5NX. The HMHC is located on the northwestern boundary of the London Borough of Camden (hereafter 'LBC') and the London Borough of Islington. Block M is located to the central north of the Highgate Mental Health Centre Campus. The building comprises a part 1, part 2 and part 3 storey building with a central clocktower visible from the entry into the HMHC campus. To the immediate east is the Place of Safety building which was approved under application ref. 2018/4834/P, beyond that is the Highgate Wing. To the west is a turning circle and parking area associated with Block K located towards the western boundary of the HMHC campus.

Notably, there is existing plant equipment on the roof of the Admin Block which is currently accessed via existing service doors and stairs. In terms of the surrounding areas, Waterlow Park is located to the north beyond the site boundary, the Whittington Hospital (including the new Highgate East mental health inpatient facility) is located on the opposite side of Dartmouth Park Hill, Highgate Cemetery is located to the wider west of the HMHC campus.

The Site is within the Highgate Conservation Area, and while the building itself is not listed, the building is noted as being a positive building within the Highgate Conservation Area Appraisal.

Clinical Context

The HMHC is the main base of operation for the North London Mental Health Partnership. The recent developments of the Place of Safety, alongside the new inpatient facility on the opposite side of Dartmouth Park Hill at Highgate East emphasise the importance of the mental healthcare provision in this part of North London and the existing Highgate Centre is a central hub for this care and supporting administration function.

For obvious reasons, ensuring the functionality and quality of the wards on the Site has been the main priority for the Trust Partnership, but it has now come to light that there are a series of improvements and upgrades required to also support the staff who currently provide the important supporting administration function in the existing Block M (known as the 'Admin Block'). The Admin Block is subject to full internal refurbishment, including a series of equipment and IT updates to assist in this upgrade to working conditions and the provision of a new ventilation system is another part of the much-needed improvement works for the benefit of the staff.

Planning History

The following planning applications associated with the Site are considered to be relevant to the proposal:

- **2022/2169/P** – Erection of 4 temporary buildings (2 two storey and 2 single storey) to accommodate site welfare and office facilities associated with the Camden and Islington

New Mental Health inpatient facility currently under construction on the Whittington Hospital site, for a period of 18 months. **Granted 20/05/2022.**

- **2022/1691/P** – Single storey upwards extension and two storey side / front extension to existing Place of Safety building, in association with creation of new Mental Health Crisis Assessment Service. **Registered 21/04/2022**
- **2018/4834/P** – Erection of single storey building to facilitate inpatient suites (Use class D1) including the installation of mechanical plant; erection of link to new building with associated alterations; alterations to existing car park and landscaping works to mental health centre complex. **Granted 20/12/2018**
- **2010/3946/P** – Non-material amendments to planning permission granted 28/10/09 (2009/4070/P) for the erection of a 5.2m high wire-mesh fence around perimeter of garden adjacent to block 4 of existing mental health centre (Class C2). Amendment comprises relocation of 5.2m high wire-mesh fence around perimeter of garden adjacent to block 4 due north of the raised embankment. **Granted 28/07/2010**
- **2009/4070/P** – Erection of a 5.2m high wire-mesh fence around perimeter of garden adjacent to block 4 of existing mental health centre (Class C2). **Granted 02/09/2009**

Proposed Development

The application seeks planning permission for the removal of an existing AHU on the second-floor roof of the main Block M building and the to install a new 1 no. Air-handling unit on the rear first-floor flat roof of Block M at Highgate Mental Health Centre with associated ductwork. The AHU will be built on a new gantry that will allow easier access for servicing and maintenance. New stairs will be installed on the ground-floor roof that will provide access to the first-floor roof from an existing service access door. The ductwork will run across the first-floor roof and into the main Block M building at the first-floor level.

In addition to the proposed AHU, ductwork and associated access works, the proposal includes new VRF units that will be installed on the rear ground-floor flat roof of Block M that will be surrounded by existing plant equipment. Also, a new dirty air extractor fan with an attenuator will be installed on the second-floor roof of the main Block M building, adjacent to existing plant equipment.

The new AHU and associated works are required to supply the newly refurbished Block M with air conditioning. This will include a new replacement AHU, VRF units, a dirty air extraction fan and associated ductwork.

Relevant Planning Policy and Guidance

A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are statutory Development Plans which seek to guide the decision-making process. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

In this case, for the purpose of determining planning applications at the Site, Havering Development Plan comprises of:

- The London Plan (2021); and
- Camden Local Plan (2017)

In January 2024, Camden Council released their draft new Local Plan for consultation and engagement (Regulation 18). The Council is aiming to adopt the plan in the Spring of 2026 and will serve as the Local Plan for a planned 15 years thereafter. While the draft Local Plan has been and should be acknowledged in this application, given that it is the first draft of the plan and the nature of the development little material weight should be given to the below policies.

It should also be noted that the Council also refer to a series of supplementary planning guidance documents and Conservation Area Appraisals, of relevance to this proposal is the Highgate Conservation Area Appraisal (2007). The Site sits with the Highgate Conservation area and Block M is listed as a positive building of influence with the conservation area.

The National Planning Policy Framework ('NPPF'), National Planning Policy Guidance ('PPG') are also considered to be material considerations. We highlight the key planning policies that are considered particularly relevant in the determination of this application:

The London Plan (2021)

- **Policy GG2** seeks to create sustainable places which make the best use of land with a particular focus on the development of brownfield land and sites which are well-connected by public transport.
- **Policy S1** states that development proposals providing high-quality, inclusive social infrastructure which address a local or strategic need and supports service delivery strategies should be supported. Development proposals which seek to make the best use of land, including public sector estate should also be encouraged and supported.
- **Policy S2** states that boroughs should work with Clinical Commissioning Groups and NHS organisations to understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes.
- **Policy GG3** seeks to improve Londoner's health, reduce inequalities and plan for appropriate healthcare infrastructure to address the needs of London's changing and growing population.
- **Policy D3** 'Optimising site capacity through the design-led approach' requires that development proposals should be of a high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of the use, flexibility, safety and lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.
- **Policy D5** 'Inclusive design' states that all development proposals should be able to be entered, used and exited safely and easily.
- **Policy D14** 'Noise' requires that developments reduce, manage and mitigate noise to improve health and quality of life.
- **Policy HC1** requires proposals which affect heritage assets and their settings to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings.

Camden Local Plan (2017)

- **Policy C1** 'Health and wellbeing' states that the Council will improve and promote strong, vibrant and healthy communities by ensuring a high-quality environment with local services to support health, social and cultural wellbeing and reduce inequalities.
- **Policy A4** 'Noise and vibration' states that the Council will seek to ensure that noise and vibration are controlled and managed.
- **Policy D1** 'Design' states that the Council will seek to secure high-quality design in development.
- **Policy D2** 'Heritage' states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

Draft New Camden Local Plan (January 2024)

- **Draft Policy SC1** 'Improving health and wellbeing' states that the Council will continue to work closely with its partners to improve the physical and mental health and wellbeing of all people who live, work in, study in, and visit Camden, and reduce health inequalities.
- **Draft Policy CC8** 'Overheating and Cooling' states that the Council will ensure that development is designed to minimise overheating and promote cooling.
- **Draft Policy D1** 'Achieving Design Excellence' the Council requires all developments in Camden to achieve excellence in the architecture and design of buildings and places to respond to the climate change emergency, improve the health and well-being of our communities and celebrate Camden's diversity of people and place.
- **Draft Policy D5** 'Heritage' the Council states that they will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.
- **Draft Policy A4** 'Noise and Vibrations' states that the Council will seek to ensure that noise and vibration are controlled and managed to avoid significant adverse impacts on health and quality of life.

Planning Considerations

Principle of Development

At the heart of the NPPF is the presumption in favour of sustainable development (Paragraph 11) which states that planning permission should be approved where proposals accord with the Development Plan *without delay*. Furthermore, Paragraph 119 of the NPPF requires the effective use of land with substantial weight to be given to the value of using sustainable brownfield land for identified needs. London Plan Policy GG2, Policy D3 and Draft Policy SC1 express a clear desire to make the best use of land, and in relation to social infrastructure, Policy S1 of the London Plan states the requirement to make the best use of land.

The Site comprises the roof space located on the ground, first and second-floor of Block M (Admin Block) at the Highgate Mental Health Centre, where existing plant equipment is located. Therefore the Site is considered to be in a sustainable location where the principle of development is considered to be acceptable, subject to the other relevant policies of the Local Plan.

Principle of Proposed Use

Policy GG3 of the London Plan identifies the need to plan for appropriate healthcare infrastructure. Policy S2 of the London Plan states that boroughs should work with CCGs and NHS organisations to understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision. Policy C1 of LBC's Local Plan states that LBC will improve and promote strong, healthy and vibrant communities by ensuring a high-quality environment with local services to support health, social and cultural well-being and reduce inequalities. Draft Policy SC1 of the new local plan states that the Council will continue to work closely with partners to improve health and well-being. As part of this, LBC will support the provision of improved health facilities.

The proposed development is necessary to install a new ventilation system as part of a series of upgrades to the working conditions at Block M at Highgate Mental Health Centre so that staff members have healthy and high-quality well-being while at work to deliver the best 24-hour care to patients. The proposed works are therefore in accordance with the above-mentioned policies.

Loss of Existing

The proposed development will result in the loss of an existing AHU, however, this unit is to be replaced by the proposed new AHU so there is therefore no net loss to be considered.

Design

Policy D3 of the London Plan, Policy D1 of LBC's Local Plan and Draft Policy D1 require developments to create attractive and high-quality places. The proposed new and replacement plant equipment is a product of its function, and design solutions are limited. Notwithstanding this, the proposed have taken steps to mitigate its visual impact so as to acknowledge its surroundings. The location of the plant equipment has been carefully selected so it cannot be seen from any public highway or sensitive location within the HMHC campus. The Design and Access Statement shows that the replacement AHU is largely invisible – it can only be seen from one specific point on the campus. Other elements of the proposed works will be installed in existing plant locations and will therefore not stand out from existing uses.

As detailed within the supporting plans, given the nature of the proposed development, the scheme is compliant with regional and local design policies.

Heritage

Policy D3 and Policy HC1 of the London Plan require that proposals which impact heritage assets, and their settings conserve their significance, and be sympathetic to the assets' significance. Local Plan Policy D2 and Draft Policy D5 also state that new developments need to preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings.

The Site is located within the Highgate Conservation Area and while the building itself is not listed, it is recognised within the Conservation Area appraisal as a positive building in the area. This has been carefully considered in the design process and the location of the proposed development has been selected to mitigate any potential harm that could be caused. As stated above, the proposed new and replacement plant equipment will be largely invisible at street level and will

blend into areas of roofscape which already comprise existing plant equipment. The new plant is screened by existing buildings ensuring that it cannot be seen from the Conservation Area or the public highway.

In this way, the proposals are sympathetic to the existing 'positive' building and preserve the character of the Conservation Area and are thereby in accordance with national, regional and local planning policies.

Noise

Policy D14 of the London Plan requires that development proposals reduce, manage, and mitigate noise to improve health and quality of life. Policy A4 of LBC's Local Plan and Draft Policy A4 states that the Council will ensure that noise and vibrations are controlled and managed.

An initial acoustic design report has been carried out and is included within this planning application which sets limits for the proposed external plant noise emissions that are in line with LBC's and HTM 08-01 requirements. In accordance with these noise limit guidelines, the proposals will be in accordance with both regional and local policies.

Summary

In summary, the new and replacement plant equipment and associated ductwork is required to provide high-quality ventilation and improve staff well-being and working conditions in the administration block (Block M) of the Highgate Mental Health Centre.

This application is supported by plans, a Design and Access Statement and the Planning Statement contained within this Cover Letter which make it clear that the proposals are in accordance with relevant planning policies.

We trust that you have all the necessary information to progress this application and look forward to receiving confirmation of validation. If you have any queries, please contact me on the details below.

Yours sincerely,



Jessica Wilson

Director

