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email: colin.sinclair@montagu-evans.co.uk
alex.partridge@montagu-evans.co.uk

70 St Mary Axe

London

EC3A 8BE

Tel: +44 (0) 20 7493 4002

FAO Josh Lawlor
Principal Planning Officer
Planning – Development Control,
Camden Council,
Camden Town Hall,
London,
WC1H 8ND

8th October 2024

**Submitted via Planning Portal: Ref
No. 13417002**

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, the Royal Free London NHS Foundation Trust ("the Applicant"), we write in support of an application ("the Application") for full planning permission proposing a series of plant-related installations and associated works at the Royal Free Hospital, Pond Street, London, NW3 2QG ("the Site").

The description of the proposed development is as follows:

"Proposed new plant and associated works including new air handling unit, proposed re-routed quench pipes and proposed temporary relocation of external chiller and condenser units"

PURPOSE OF APPLICATION

The proposals seek to deliver much-needed and modernised permanent plant-related equipment and installations to facilitate the refurbishment of RFL's Clinical Research Facility ("CRF"). The newly refurbished CRF is a key part of the Royal Free's expansion plan, designed to support its research and development workstreams. The proposed development is therefore crucial in meeting the growing demands of the CRF and promoting ongoing innovation within the wider RFL institution

Additionally, elements of the proposals (namely the quench pipe re-routing and temporary plant relocation works) will serve as 'enabling works' to allow for the future delivery of a new Hybrid Theatre Extension to be delivered at the Hospital. More detailed proposals for the new Hybrid Theatre Extension will be submitted to the Council via a separate standalone planning application in due course.

The proposals are therefore fundamental to both the Trust and the ongoing running, and future necessary expansion, of the Royal Free Hospital and the important health-related services which it provides.

SCOPE OF APPLICATION SUBMISSION

This planning application is supported by the following documents:

- Completed Application Form and CIL Additional Questions Form;

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- Application Covering Letter, prepared by Montagu Evans (this document);
- Site Location Plan, prepared by Ansell + Bailey;
- Existing and Proposed Drawings (Plans and Elevations), prepared by Ansell + Bailey;
- Design Access Statement, prepared by Ansell + Bailey; and
- Plant Noise Impact Assessment, prepared by RSK Acoustics.

SITE LOCATION DESCRIPTION

The Site sits within the wider Royal Free (“RF”) Hospital complex, located within the administrative boundary of the London Borough of Camden (“LBC”).

Specifically, the Site comprises a series of areas located on / adjacent to the western part of the of the main RFL Hospital building (including an existing fifth storey plant area on-site, parts of the main building’s western elevation and an existing first storey platform location adjacent to an existing staircase structure).

Further details concerning the location of the Site are shown on the submitted Site Location Plan and included within the submitted Design and Access Statement.

The wider RFL Hospital comprises a mixture of wings, structures and buildings (with the main hospital building having been extended and altered in the past). The RFL 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 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 the Grade I Church of St Stephen (lying circa 150m to the north-west).

To the west lies of the Site lies the Pears Building (forming part of the wider RFL Hospital complex).]

The nearest residential premises to the Site comprises terraces / flatted premises to the north, on Pond Street.

PLANNING HISTORY

The wider RFL Hospital complex has been subject to an extensive planning history (given that the 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.

Forthcoming Planning Applications:

As mentioned previously, an application proposing an extension to the existing hybrid theatres accommodation at the RFL Hospital is in the process of being prepared and finalised for submission. This application is due for imminent submission.

As set out previously, the purpose of this current planning application overlaps with forthcoming planning application for the Hybrid Theatre Extension, given that elements of the proposals will serve as 'enabling works' to help prepare the Site for delivery of this extension in the future. We set these matters out in further detail below.

PROPOSED DEVELOPMENT

The following works are proposed as part of this planning application:

- A series of permanent plant installations principally to serve the newly refurbished CRF. These comprise:
 - o Delivery of a permanent new Air Handling Unit ("AHU"), installed on an existing 1st floor platform area (adjacent to the main RFL Building's western elevation). This will provide much-needed ventilation / cooling for newly refurbished CRF services.
 - o The installation of 3no. new condenser units, and the relocation of 3no. existing condensers, within an existing 5th storey plant enclosure area.
 - o The proposed relocation of 4no. existing quench pipes - these are now proposed to run vertically on the main RFL Hospital Building's western façade (from 1st storey to roof level).
- A series of temporary plant installations, to serve as 'enabling works' for the forthcoming Hybrid Theatre Extension proposals, namely:
 - o The proposed temporary relocation of 2no. chiller units from a 1st floor roof area to 5th floor roof level (adjacent to other roof-level plant installations); and
 - o The proposed temporary relocation of 7no. existing condenser units from a 1st Floor roof area to the north-west corner of the ground floor level.

The above-mentioned temporary works will no not be required (and will be removed) following completion of the proposed Hybrid Theatres Extension project.

PLANNING ASSESSMENT

The adopted Development Plan relevant to the Site comprises:

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

LBC is also in the process of preparing a new Local Plan (with a Regulation 18 'Draft Local Plan' most recently published for consultation between January and March 2024). As this document proceeds to adoption, it will gain increasing weight in planning decision-making.

Principle of Development

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

In addition, LBC Local Plan Policy C1 (Health and Wellbeing) supports the provision of new or improved health facilities in accessible locations to maximise community access.

The proposed development comprises a series of much-needed permanent and temporary plant-related installations, all geared towards ensuring the ongoing efficient and successful running of the RFL Hospital.

The permanent plant proposals will notably help to ensure the delivery of much-needed hospital improvement works in the form of the CRF refurbishment project. In addition, the series of proposed temporary plant installations will help prepare the wider site for the delivery of the Hybrid Theatres Extension project in the future.

Therefore, the principle of development is acceptable, given that the proposals align with strategic and local policy aspirations concerning the delivery of improved healthcare facilities.

Heritage

LBC Local Plan Policy D2 (Promoting High Quality Places and Conserving our Heritage) identifies that the Council will require development proposals to preserve and enhance “*Camden’ rich heritage assets, including conservation areas [and] listed buildings*”.

To confirm, the proposals will be located within a series of discrete and well-screened locations. Notably, the existing 1st-storey platform area (where the new AHU is proposed to be located) is set back from the main building’s façade and benefits from screening via an existing western staircase structure. In addition, the plant-related proposals at 5th storey level will be predominantly located within a dedicated existing enclosure area (to minimise their visual impact).

Therefore, steps have been taken to minimise any potential harm from the proposals on the setting and character of nearby heritage assets.

Overall, we consider that the proposals will ensure that the character of the nearby Camden Conservation Area, and proximate listed buildings, will be preserved. This aligns with the above heritage-related policy requirements.

Design

London Plan Policy D1 (London’s Form, Character, and Capacity for Growth) seeks that new development responds 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 local area.

At a local level, LBC Local Plan Policy D1 (Design) requires new development to incorporate principles of good design. Proposals should notably be in-keeping with local context particularly scale and size.

The proposals comprise a series of necessary plant-related installations at the RFL Hospital, which has already been significantly altered and extended in the past. As such, the character of the proposals is in-keeping with that of the wider hospital complex.

The proposals are also of a scale and design which allows them to be located within well-screened locations on-site (as set out above). This approach will help ensure no adverse impacts on local context and character. As such, the proposals are considered to accord with the above design-related policy principles.

Noise and Vibration

Policy D14 of the London Plan (Noise) identifies that development proposals should manage and avoid significant adverse noise impacts on health and local quality of life.

LBC Local Plan Policy A4 (Noise and vibration) states that noise and vibration must be controlled and managed within new development – with proposals likely to be resisted by the Council where they will generate an unacceptable noise and vibration impact.

In support of this application, a Noise Impact Assessment has been prepared by RSK Acoustics which concludes that:

“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, with no acoustic mitigation measures deemed necessary to do so.”

As such, any noise generated from the proposals is considered to accord with the above policy requirements.

CLOSINGS

As set out above, the proposals are essential to the delivery of enhanced hospital-related services at the RFL Hospital. In addition, the proposals (including their design, noise and heritage impacts) are considered to accord with all key development plan policy requirements.

Given the above, we strongly consider that the proposals should be supported.

OTHER MATTERS

The requisite application fee of £648 (plus £70 service charge) will be paid via the Planning Portal electronically upon submission.

We would be grateful if you could confirm that our application is complete and will be validated shortly. Should you have any questions or queries, 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