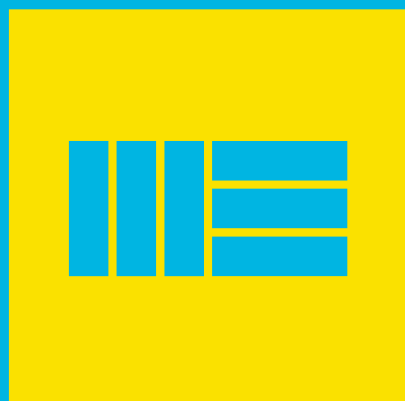


ROYAL FREE HOSPITAL, LONDON – HYBRID THEATRES EXTENSION

PLANNING STATEMENT

11 OCTOBER 2024



CONTENTS

1.0 INTRODUCTION	3
2.0 SITE AND SURROUNDINGS	5
3.0 RELEVANT PLANNING HISTORY	7
4.0 DEVELOPMENT PROPOSALS	8
5.0 DEVELOPMENT PLAN & MATERIAL CONSIDERATIONS	12
6.0 PLANNING ASSESSMENT	14
7.0 SUMMARY AND CONCLUSION.....	22

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Montagu Evans LLP on behalf of the Royal Free London NHS Foundation Trust ('the Trust' / 'the Applicant'). It supports a detailed planning application principally proposing a new extension to the Hybrid theatres accommodation to the immediate west of the Royal Free Hospital, Pond Street, London, NW3 2QG ('the Site').

1.2 The description of development concerning the proposals is as follows:

“Proposed extension to hospital at second and third storey level (above ground) with undercroft area beneath to deliver extension to hybrid theatres alongside roof-level plant and enclosure and associated works.”

1.3 Full details of the proposals are set out within the submitted Design and Access Statement, and Application Drawings, prepared by Hazle McCormack Young Architects which form part of this Application.

Critical Need of the Proposals

1.4 There is fundamental and critical need for the proposed development to be delivered within the short-term at the Royal Free Hospital. We set these matters out in further detail below:

- The wider Royal Free Hospital offers a range of vital in-patient and clinical services, Specifically, The Royal Free Vascular Surgery department provides tertiary vascular services to North Central London (NCL) as the Vascular Surgical Hub. Vascular surgery is a critical co-dependency for major specialist services at the Royal Free including Intensive Care Unit (ICU), renal transplantation and cancer. The Trust has a single vascular theatre (surgical theatre equipped with advanced medical imaging devices) which does not meet modern space standards, has outdated and obsolete imaging equipment that is unreliable and the cause of regular cancellations which cannot meet the demand for complex vascular surgery.
- The proposed planning application seeks permission for two new Hybrid theatres at the Royal Free. The Investment in two new Hybrid theatres will future proof the service, ensure recovery from the post-COVID backlog and enable expansion for the future. The business case approved by RFL Group in August 2023 provides a compelling argument for such an investment in line with Getting It Right First Time (GIRFT national programme) recommendations and will enable innovation and upscaling of highly specialist vascular services whilst facilitating translational research in cardiovascular disease, enhancing clinical & academic synergies with UCL Surgical Biotechnology, as well as expanding national and international training programmes for vascular surgery.
- There is therefore a critical need to increase and modernise theatre provision on-site whilst ensuring that the operation of the existing theatres and wider hospital is not impacted. As such, the Trust is seeking to deliver additional high-quality theatre space on-site. This will comprise an extension to existing theatre accommodation to help provide for a variety of procedures (including cardiology and vascular related services).

Purpose and Format of the Planning Statement

1.5 The purpose of this Planning Statement is to assess the proposed development with regard to the statutory development plan and other key material considerations. Throughout this document, we have provided an overview of the Site and its surroundings, key adopted development plan documents (both existing and emerging) and have ultimately set out how our proposals robustly addressed these key planning considerations and requirements (and/or the justification, where relevant, for any instances where policy requirements cannot be practicably or reasonably addressed).

Scope of Supporting Application Documents

1.6 The Planning Statement forms part of a suite of wider supporting documentation submitted as part of this planning application, as follows:

- Application Covering Letter, prepared by Montagu Evans;
- Planning Application Form, prepared by Montagu Evans;
- CIL Additional Questions Form, prepared by Montagu Evans;
- Site Location Plan, prepared by Hazle McCormack Young Architects;
- Drawing Schedule (Schedule S2), prepared by Montagu Evans;
- Existing and Proposed Drawings, prepared by Hazle McCormack Young Architects;
- Design and Access Statement, prepared by Hazle McCormack Young Architects;
- Planning Statement, prepared by Montagu Evans;
- Acoustic Report, prepared by KP Acoustics;
- Air Quality Assessment, prepared by Air Quality Consultants;
- Biodiversity Letter, prepared by Greenspace;
- Construction Management Plan (CMP), prepared by Blue Sky Building;
- Energy Statement, prepared by RSP;
- Sustainability Statement, prepared by RSP;
- Transport Statement (including travel plan commentary), prepared by Velocity;
- Sustainable Drainage Systems (SuDS) Strategy, prepared by Wareham Associates;
- Heritage Assessment, prepared by Montagu Evans;
- Statement of Community Involvement, prepared by the Royal Free London NHS Foundation Trust;
- Fire Statement, prepared by OFR Consultants; and
- Daylight and Sunlight Letter, prepared by DPR.

1.7 The scope and number of application documents has been agreed with the Council at pre-application stage.

2.0 SITE AND SURROUNDINGS

The Site

- 2.1 The Site comprises a broadly rectangularly shaped area of hardstanding (forming part of an existing vehicular access route into the Royal Free (“RF”) Hospital). The Site falls within the administrative area of the London Borough of Camden (LBC).
- 2.2 The Site is located to the immediate west of the Royal Free (“RF”) Hospital main building, on the south side of Pond Street. To the north, the Site is bounded by a further area of existing access road with Pond Street beyond. To the immediate west, the Site abuts the existing Pears Building (located within the wider hospital estate). To the south, the Site abuts a pre-existing extension to the main hospital building. For further clarity, please see the submitted Site Location Plan, which shows the Site within the context of the surrounding area (Drawing Ref: 02822-1000-P02).
- 2.3 Importantly, the Site is located adjacent to existing Vascular Theatre Facilities, and associated services, within the RF Hospital building, and this location is fundamental to the delivery of the proposed development. We set these matters out in further detail within later sections of this Planning Statement.

The Wider RF Hospital

- 2.4 The Site is situated within the wider hospital site, which comprises a mixture of hospital-related buildings and structures. The existing main hospital building comprises a part-4, part-12 storey structure fronting on to Pond Street (which, given its function as an operational hospital, has been extensively altered, extended and modernised in the past to meet RFL’s needs).
- 2.5 The wider hospital (denoted by a blue line on the submitted Site Location Plan) is broadly bounded by 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. The wider hospital site also includes various areas of hardstanding comprising a mixture of access and pedestrian routes and areas of car parking (including the largest main car park to the south).
- 2.6 The main vehicular access for the wider Hospital is currently via Pond Street.

The Surrounding Area

- 2.7 The character of the wider surrounding area comprises a mixture of land uses. In addition to the Royal Free London Hospital (and its predominant hospital-related use), a variety of residential and commercial uses can be found locally.
- 2.8 Surrounding building heights typically range between 2 and 8 storeys, albeit taller elements can be found locally, including the previously-mentioned 12-storey element (at its tallest) located centrally within the main hospital site.
- 2.9 As the surrounding area has been developed and altered over time, local buildings comprise a range of ages and architectural styles.

Local Heritage Considerations

- 2.10 There are no statutorily or locally listed buildings on the Site, nor is the Site located within a conservation area.

2.11 There are a variety of neighbouring / nearby heritage assets. The north and east of the Site lies in proximity to the boundary of the Hampstead Conservation Area (aligning with the wider hospital's Pond Street boundary). The boundary of the Mansfield Conservation Area also lies in proximity to the north-east. A number of other heritage assets also lie in proximity to the Site including the Grade I listed Church of St Stephen (lying circa 150m to the north-west) and a series of Grade II listed buildings to the north on the opposite side of Pond Street (i.e. the Roebuck Public House, and Nos. 17, 17a, 19 and 21 Pond Street)

Site Accessibility

2.12 The Site is easily accessible by public transport with a Public Transport Accessibility Level (PTAL) rating of 4 (good). The nearest London Underground stations are Belsize Park and Hampstead, located approximately 550m southeast and 1km north-west of the site, respectively. Hampstead Heath Overground station is located approximately 250m north of the site.

Other Site Designations

2.13 The Site lies entirely within Flood Zone 1 (i.e. its benefits from a low risk of flooding).

2.14 The Site is not subject to any site-specific designations within the Camden Local Plan (2017). However, the boundary of the South End Archaeological Priority Area lies to the north and west.

3.0 RELEVANT PLANNING HISTORY

The Site

- 3.1 Concerning the application site area specifically, part of the Site is currently the subject of a live planning application, which proposes the following development works:

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

- 3.2 The above application was submitted to LBC on 8th October 2024 and is yet to be determined.
- 3.3 Notably the above application proposals overlap, and are compatible with, the currently proposed Hybrid Theatre Extension. The above application proposes a suite of enhanced plant and external pipework installations predominantly connected with the proposed refurbishment of existing Clinical Research Facility (“CRF”) facilities within the wider hospital. However, it also proposes the temporary relocation of existing chiller units on-site and the permanent re-routing of existing quench pipes (both of which comprise ‘enabling works’ required to deliver the current Hybrid Theatre Extension proposals).

The Wider RF Hospital

- 3.4 The wider Royal Free Hospital is subject to an extensive planning history (given that 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. We note the following particularly relevant applications in this instance:

The Pears Building

- 3.5 We highlight the following application relevant to the delivery of the Pears Building (which lies immediately adjacent to the Site to the west):
- 2014/6845/P - Demolition of existing carpark and ancillary structures and erection of new 7 storey building, located on Heath Strange Garden site facing west to Hampstead Green footpath and Rosslyn Hill, containing laboratory/research space for Institute for Immunity and Transplantation, a patient hotel, Royal Free Charity offices plus a replacement carpark of 58 spaces, replacement memorial garden, plant and landscaping, all ancillary to Royal Free Hospital

- 3.6 The above application was approved on the 25th April 2016, and has since been built out on-site.

Other Relevant Applications

- 3.7 Given that the wider RF Hospital complex has been extensively altered and extended in the past, a variety of more minor planning applications (i.e. concerning plant installations and other minor physical works and alterations) have been submitted in the past.

4.0 DEVELOPMENT PROPOSALS

4.1 As set out previously, this planning application proposes the following works at the Site:

“Proposed extension to hospital at second and third storey level (above ground) with undercroft area beneath to deliver extension to hybrid theatres alongside roof-level plant and enclosure and associated works.”

4.2 As set out previously, there is a fundamental and critical need to deliver the proposed development, as follows:

- There is currently only a single vascular theatre within the hospital (i.e. a surgical theatre equipped with advanced medical imaging devices). Currently, this does not meet modern space standards and has outdated and obsolete imaging equipment which is unreliable. Overall, the existing vascular theatre accommodation cannot meet the demand for complex vascular surgery, leading to regular cancellations of procedures.
- The proposed development, comprising a 2-storey extension to the existing main RF Hospital building at second and third storey level, will provide 2no. new ‘Hybrid Theatres’ and associated recovery areas. The proposals will significantly modernise the vascular theatre services offered by the Hospital, whilst also increasing overall theatre capacity and importantly helping to address existing patient waiting lists (and the backlog of patients resulting from the recent Covid-19 pandemic).
- The proposed development is located immediately adjacent to the Hospital’s existing vascular theatre accommodation at third storey within the main hospital building. This location is fundamental, to ensure that the new Hybrid Theatres work effectively with these existing vascular-related services. In addition, the proposals include additional floorspace at second storey level (to help futureproof, and help respond to, the needs of the Trust in the future).

Proposed Scale and Massing

4.3 The proposed development comprises a 2-storey extension, delivered at second and third storey level with rooftop plant area above. The proposals will be supported by a series of slender columns beneath, positioned to maintain an undercroft area below (to ensure retention and maintenance of the existing access road on-site from Pond Street).

4.4 The floorplate of the proposed extension will be 43m in length and 16m in width. Overall, the proposed development will deliver 1,652sqm (GIA) of new hospital (Class C2 use) floorspace across two-levels, with an enclosed dedicated plant area above.

4.5 The design and scale of the proposals is the result of extensive design optioneering, to help ensure that the proposed Hybrid Theatre Extension is robustly designed and fit-for-purpose. Further details of the internal space planning requirements, associated with delivery of the Hybrid Theatre accommodation and associated equipment, are included within the submitted Design and Access Statement.

Materiality and Detailed Design

4.6 The design has evolved to ensure that the proposed development is in-keeping with, and sympathetic to, the appearance and design of the existing main RF Hospital building. Notably:

- The levels, proportions and visual horizontality of proposed soffits, window sills and parapets have been designed to reflect and align with those of the main existing building.

- The proposals will include glazing/curtain walling and solid cladded elements, which reflect the materiality and appearance of the existing main RF Hospital.
- The scale and proportions of the proposed cladding / panelling has also been designed to resemble that associated with the main RF Hospital building. The colour palette selected (envisaged as a mixture of light coloured / grey elements) will also be complimentary to that of the concrete elements associated with the existing hospital .

4.7 Overall, the design has evolved to ensure that the proposals appear as a comprehensive and well-designed extension to the existing RF Hospital premises, rather than a piecemeal ‘add on’.

4.8 To help avoid the requirement for planning conditions attached to any forthcoming permission, the submitted Proposed Drawings include details of the intended materials palette at this stage. Importantly, the proposed have been selected to meet relevant fire performance requirements. The proposed materials have also been selected to help ensure their durability and maintenance in the future (as set out further within the Design and Access Statement).

Roof-level Plant Area

4.9 The proposed rooftop plant area will be enclosed in a frameless louvre system, in a similar tone to the lower storey panel cladding. This approach will notably reflect the louvre systems installed on the adjacent Pears Building. As such, this aspect of the proposed development will help to create an aesthetic ‘bridge’ between the original main RF Hospital building and the Pears Building when viewed as part of the long elevation from Pond Street.

4.10 Importantly, the proposed plant enclosure has been scaled and designed to ensure that proposed plant requirements for the new hybrid theatres can be suitably housed within it (to help avoid any appearance of visual clutter at roof level).

Access Considerations

4.11 Given that the proposed development will be delivered atop a series of slender columns at second and third storey (with an undercroft area beneath), the proposals will not result in any changes to the existing access route / junction into the wider hospital from Pond Street. To confirm, following completion of the proposed development, access to the main car parking area to the south of the main hospital building, and other car parking areas, will be maintained as existing.

Pre-application Engagement and Consultation

4.12 The proposed development is the result of pre-application engagement with planning, design and transport officers within LBC.

4.13 A total of 2no. formal pre-application meetings with LBC officers have taken place (in April 2022 and April 2024), alongside follow-on design and transport discussions at pre-submission stage. We have summarised some of the key ways in which this process has informed the proposed development (and planning application submission) below:

- Further to feedback received from LBC officers at pre-application stage, the tonality and colour of the proposed cladding and external finishes was reviewed (to ensure as strong a relationship as possible between the proposed extension and the main existing RF Hospital building).
- The ongoing durability of the proposed cladding approach was also discussed and reviewed at pre-application stage. In short, LBC officers initially queried whether the proposed cladded elements

would maintain a high-quality appearance in the future. These discussions triggered a design exercise being undertaken by the Trust's instructed design team to demonstrate that a high-quality finish could be maintained in the future.

- At pre-application stage, officers queried the size and scale of the proposed plant enclosure (and whether this could be reduced). This triggered a further design exercise to be undertaken by the client, to identify how/whether this would be possible. Overall, this process confirmed that the currently proposed plant enclosure meets the minimum technical requirements necessary to deliver the proposals.
- Further to discussions with the Council's highways officer, the scope and methodology for the Trust's transport reporting was agreed. Further details concerning these discussions, and how they informed the transport survey / assessment assumptions in this instance, are set out within the submitted Transport Statement.

4.14 Further details concerning the design options reviewed in response to pre-application engagement and feedback from LBC are included within the submitted Design and Access Statement.

Stakeholder Consultation

4.15 In addition, and informed by discussions with LBC planning officers at pre-application stage, the Trust undertook pre-application consultation with members of the local community and other key stakeholders as follows:

- A programme of engagement was undertaken, whereby a variety of stakeholders (including staff within the RF Hospital, key local amenity groups, local councillors, the relevant Member of Parliament and local residents) were notified concerning the proposed development. These stakeholders were also invited to attend an initial online consultation session held by the Trust and its design team (whereby any queries could be raised and responded to). This online session was held on the 25th June 2024.
- Further to feedback received at the online consultation session, all identified stakeholders were then invited to register for, and attend, an in-person consultation session, which took place on the 24th July 2024. This allowed these attendees to review the proposals and raise any queries / comments at this stage in the lead up to planning submission.
- In addition to the above steps, the Trust has also published details of the proposed development, and the intended submission of this current planning application, on its website. A dedicated email address has also been provided, allowing local stakeholders to contact the Trust directly in the event of any questions or concerns over the proposed development.

4.16 The above consultation strategy was discussed and agreed with LBC planning officers at pre-application stage. Throughout the preparation of the proposals, the Trust has been committed to ensuring that the local community, and other key stakeholders, have been provided an opportunity to understand, discuss and comment on the proposals for this much needed Hybrid Theatre Extension.

4.17 Further details concerning the consultation process undertaken, and feedback received, are included within the submitted Statement of Community Involvement. At this stage, we highlight / summarise the following notable feedback received:

- Overall, those who provided feedback highlighted general support for the proposals and what the Trust was aiming to achieve.

- No significant design-related comments were received during the above-mentioned engagement events. Overall, respondents appreciated the need for the building to be functional (and in-keeping with the existing main RF Hospital building).
- Concerns were raised over the forthcoming construction management process (and the need to ensure that any impacts on existing local residents and the surrounding area were mitigated throughout the construction of the proposals). This feedback has informed the preparation of the submitted Construction Management Plan.

5.0 DEVELOPMENT PLAN & MATERIAL CONSIDERATIONS

The Development Plan

- 5.1 As established in Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined 'with regard to' the development plan, unless 'material considerations indicate otherwise'.
- 5.2 The Statutory Development Plan for the Site comprises the following documents.
- The London Plan (2021);
 - Camden Local Plan (2017); and
 - London Borough of Camden Policies Map (2017).

Emerging Local Plan

- 5.3 LBC is also in the process of preparing an updated Local Plan. Most recently, a Draft Local Plan (Regulation 18 version) was published for consultation between January 2024 and March 2024.
- 5.4 Further to the above, LBC is now in the process of preparing an updated Draft Local Plan (Regulation 19 version), taking account of feedback and responses gathered earlier this year.
- 5.5 *Greater London Authority Call for Sites Consultation* The Greater London Authority (GLA) is currently carrying out a Call for Sites consultation to identify sites to deliver the homes that London needs. The consultation is taking place from 18 September 2024 for 6-weeks. The data collected is vital for informing the London Plan (and its future updates / iterations).
- 5.6 Given the early stage of the Call for Sites consultation, it currently holds no material weight in planning decision-making terms.

Other Material Considerations

National Planning Policy Framework (and National Planning Policy Guidance)

- 5.7 The National Planning Policy Framework (the "NPPF") was published on 24th July 2018 and further updated in February 2019, July 2021, September 2023 and most recently December 2023. The NPPF comprises a material consideration in planning decision-making
- 5.8 The NPPF sets out the Government's approach to planning matters and is a material consideration in the determination of planning applications. At the heart of the NPPF is a presumption in favour of sustainable development, to ensure that sustainable development is pursued in a positive way (Paragraph 11). With regards to healthcare-related development specifically, Paragraph 127 of the NPPF identifies that local planning authorities should support proposals which "*make more effective use of sites that provide community services, such as schools and hospitals, provide that this maintains or improves the quality of service provision*".

5.9 In addition to the NPPF, Planning Practice Guidance (PPG) was published on 29th November 2016, revised on 24th July 2018 and most recently updated in February 2024. This document provides further guidance to the policies set out in the National Planning Policy Framework (NPPF).

Draft Updates to the NPPF

5.10 Following election of the Labour administration in 2024, the Government recently drafted and published for consultation an updated version of the NPPF (July 2024). Notably, the current Draft NPPF (at Paragraph 98) includes additional wording to inform planning decision and policy making: “*significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development*”. Additional wording makes clear that ‘public service infrastructure’ includes hospital provision.

5.11 As this document proceeds towards adoption, it will gain increasing weight in planning decision-making.

6.0 PLANNING ASSESSMENT

6.1 We have provided an assessment of the proposed development, in relation to key development plan policies, below.

Delivering Additional and Enhanced Hospital Floorspace and Facilities

- 6.2 At a national policy level, the Draft NPPF (Paragraph 27) now includes a clear direction that local planning authorities should plan for the delivery of strategic health and social infrastructure, including hospitals. Paragraph 125 of both the adopted and emerging NPPF also requires planning authorities to support proposals which “*make more effective use of sites that provide community services such as schools and hospitals*”.
- 6.3 London Plan Policy S2 (Health and social care facilities) identifies that “*development proposals that support the provision of high-quality health and social care facilities to meet identified need and new models of care should be supported*”. In addition, new facilities should be ‘easily accessible by public transport, cycling and walking’.
- 6.4 LBC Core Strategy Policy C10 (Supporting community facilities and services) identifies that “*the Council will...support the retention and enhancement of existing community, leisure and cultural facilities*”
- 6.5 In addition, Core Strategy Policy CS16 (Health and Wellbeing) identifies that the Council will “*support the provision of new and improved health facilities*” in line with plans to “*modernise facilities*”.
- 6.6 Whilst only limited weight is currently attached to the Draft Local Plan at this stage, we also note that Draft Policy SC2 identifies that the Council will “*support the provision of new, improved and extended social and community infrastructure where proposals...meet the needs of intended uses and the local community*”.
- 6.7 Given the above, there is clear policy support for proposals which seek to enhance, modernise and improve existing facilities, including through the proposed delivery of innovative additional hospital floorspace which includes 2no. new hybrid theatres.
- 6.8 As set out previously, the proposed development will not only deliver new hybrid theatre capacity within the hospital (greatly improving the array of vascular related services provided there) but will also increase operational efficiencies, in turn reducing existing patient waitlists for these vital services.
- 6.9 Overall, therefore, the proposed development will accord with the above policies.

Scale, Massing & Form of Development

- 6.10 Policy D1 (Form, character and capacity for growth) identifies that new development should consider local “*urban form and structure*”, including local building heights and densities.
- 6.11 London Plan Policy D3 (Optimising site capacity) identifies that “*all developments must make the best use of land by following a design-led approach that optimises the capacity of sites*”. In addition, the form and layout of new development should “*enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions*”.
- 6.12 Policy D1 (Design) of LBC’s Local Plan states that the Council will “*seek to secure high quality design in development*” and will notably require proposals to:
- Respect local context and character;

- Integrate well with the surrounding streets;
 - Preserve and enhance the local historic environment and heritage assets.
- 6.13 Policy D1 (Achieving Design Excellence) of LBC's Draft Local Plan reiterates the above adopted Local Plan policy requirements. Proposals should respond positively to local context and character *"through layout, orientation, scale, height, bulk massing, proportion [and] appearance"*.
- 6.14 Overall, the proposed development comprises a principally two-storey extension (with plant area above and undercroft below), connecting to the existing hospital building at second and third storey level with an undercroft area retained beneath.
- 6.15 The height of the proposals aligns with that of the existing main RF Hospital building and steps have been taken to help ensure that the proposed structure is as lightweight an extension as possible (whilst ensuring that the layout and scale of proposed floorplates are fit-for-purpose and aligned with the technical requirements of the proposed new hybrid theatres).
- 6.16 The layout / location of the proposals has also been closely considered and we highlight the following:
- There is a need for the proposed development to be adjacent to existing vascular theatre accommodation within the main RF Hospital building (to ensure strong operational interconnectivity between existing and new theatre services). In short, the proposed location of the new hybrid theatres is a fundamental operational requirement.
 - Given the inclusion of an undercroft area below the proposed extension (at ground and first storey level), the existing access road / junction for the hospital from Pond Street will remain unaffected in the future. As such, the design of the proposals ensures as minimal disruption to the ground floor layout and functionality of the wider hospital as possible.
 - The form and layout of the proposed development has also been closely considered in relation to the Pears Building. Steps have been taken to ensure that the proposed floorplate concerning the new hybrid theatre extension, can slot cohesively in between the existing main RF Hospital building and nearby Pears Building.
- 6.17 In addition to the above, the proposed scale and massing of the proposals is considered to be in-keeping with the character of the wider hospital and surrounding area. Overall, the proposed development comprises a modestly-scaled addition to the existing RF Hospital (when viewed within the context of the existing main building), and its height does not exceed that of the prevailing building.
- 6.18 Overall, we therefore consider the scale, massing and form of development to address the above policy requirements and considerations.
- 6.19 We address the heritage considerations, associated with the proposed height, scale and massing of the proposed development, more specifically below.

Detailed Design: Appearance and Materiality

- 6.20 As previously set out, Policy D2 of the London Plan identifies that the appearance of new development should 'enhance' and 'respond positively to' local context and distinctiveness.
- 6.21 London Plan Policy D4 (Delivering good design) identifies that the design quality of development should be delivered, notably through *"ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development"*.

- 6.22 At a local level, Policy D1 (Design) of Camden's Local Plan requires all development to be designed to the highest standards. Proposals should include *"details and materials that are of high quality and complement the local character"*. In addition, proposals should integrate well with their surroundings.
- 6.23 Policy D1 (Achieving Design Excellence) of the Draft Local Plan requires new development to use high quality, durable and sustainable materials.
- 6.24 As set out within the submitted Design and Access Statement, steps have been taken to ensure that the appearance, materiality and design quality of the proposals is in-keeping with the character of the main RF Hospital building, notably:
- The tonality / colour of the proposed materials palette comprising a mixture of lighter-toned / grey elements) has been selected to reflect and compliment the appearance of the main RF Hospital building. The proposed colour palette will also help ensure that the proposed development appears visually subordinate to the main original RFL building.
 - The proportions of soffits, glazing and cladding system proposed, and the horizontality of these elements, has been designed to align and be compatible with the appearance of the main RF Hospital building.
 - The proposed plant enclosure design, comprised louvred elements, reflects the design of that associated with the adjacent Pears Building.
- 6.25 In addition, it should be noted that the proposed cladding, comprising texturised panelling, will be lightweight to help minimise the wall thickness of the overall design (resulting in necessary thermal performance requirements being achieved and to help maximise levels of internal space). This approach also provides a visual similarity between the original concrete (of the main RF Hospital building) in textural terms and replicates a similar modular appearance without the need for 'wet' traditional render or concrete.
- 6.26 Overall, significant steps have been taken to ensure that the proposed design is as high-quality as possible, to ensure that the proposed development will appear as a comprehensively integrated addition to the main RF Hospital building. Importantly, the proposed design also maintains the functionality of the proposals, to help ensure the efficient delivery of these much-needed new hybrid theatre facilities on-site.
- 6.27 Given the above, we consider that relevant design-related policy requirements have been robustly addressed.

Heritage Considerations

- 6.28 London Plan Policy HC1 (Heritage Conservation and Growth) requires that *"development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings"*. In addition, *"development proposals should avoid harm"* to the setting or character of nearby heritage assets.
- 6.29 Local Plan Policy D2 (Heritage) identifies 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"*. Notably, it is further identified that the Council will *"resist development outside of a conservation area that causes harm to the character or appearance of that conservation area"*.
- 6.30 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.
- 6.31 As set out previously, there are no heritage assets on the Site, nor is the main RF Hospital considered to be a statutory or non-designated heritage assets. However, the Site is located in proximity to the boundary of

the Hampstead Conservation Area (to the north) and there are a number of listed and locally listed buildings in proximity to the Site (to the north and north-west, principally on Pond Street).

6.32 To assess the potential impacts of the proposals on the setting and character of these nearby heritage assets, this planning application is supported by a Heritage Statement, prepared by Montagu Evans. The report notably concludes that:

- The significance of local heritage assets would be preserved, primarily because the proposed development affects a relatively small area of the existing Hospital building, which already characterises the setting in which local heritage assets are appreciated.
- The visibility of the proposals would be very limited and the proposed development would not in any way interfere with the appreciation of the historic townscape on Pond Street.

6.33 Further details concerning the above are included within the submitted Heritage Statement.

6.34 Given the above, the proposed development is considered to accord with the heritage-related policies and requirements cited above.

Transport Considerations

6.35 Policy T4 (Assessing and Mitigating Transport Impacts) of the London Plan states that proposals should reflect and be integrated with current and planned transport access, capacity, and connectivity. In addition, development proposals should not increase road danger.

6.36 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. In addition, LBC will *“resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network”*.

6.37 Policy T1 (Safe, Healthy and Sustainable Transport) of the Draft Local Plan notably identifies that the Council *“will prioritise the delivery of safe, active, healthy, affordable, and sustainable transport”* modes within new development.

6.38 In response to the above policy requirements, the planning application is supported by a Transport Statement (prepared by Velocity), the scope and approach to which was agreed with LBC officers at pre-application stage. This document notably confirms that:

- The Site benefits from good accessibility, with a PTAL rating of 4 (Good). It is well-served by public transport, including multiple bus routes and proximity to Hampstead Heath Overground station and Belsize Park Underground station. The surrounding area also offers good walking and cycling infrastructure.
- The Proposed Development is designed to be car-free, in accordance with London Plan and Camden Local Plan (2017) Policy T2 (Parking and Car-Free Development). There is existing 20 blue badge parking spaces available for visitors and patients across the Site. This provision is considered sufficient to meet the anticipated demand generated by the Proposed Development, given its nature and scale within the context of the wider main Hospital building. As such, no additional parking spaces will be provided, with the existing hospital car parks continuing to serve the new extension.
- A vehicular trip assessment has been undertaken, informed by staff and visitor surveys undertaken by Velocity and information from the Trust. This assessment has projected that up to a total of 294

two-way person trips will be generated by the development daily (comprising a mixture of modes, including pedestrian, cycling and vehicular trips – the latter of which will be comparatively low). It should also be noted that this figure is anticipated to be ‘worst case’ (i.e. the maximum likely trips which would be generated by the most intensively-used type of hospital floorspace). However, in reality, the proposed hybrid theatres will deliver a maximum number of operations per day (and therefore the number of daily visitor trips will likely be much lower).

- The majority of trips (47%) are expected to be made by Underground, Overground, Light Rail, or Train. An average of three two-way vehicle trips per hour will be generated by the Proposed Development, with the majority of these trips associated with patients (i.e. primarily short-stay visits). Given this low number, this demand is expected to be accommodated within the existing parking provision.
- Deliveries, servicing, and emergency vehicle access will continue to use existing arrangements. Swept path analysis undertaken demonstrates the suitability of continued access for refuse collection vehicles and ambulances.

6.39 Given the above, overall, the Proposed Development is not expected to give rise to any material transport-related impacts. The submitted Transport Statement demonstrates that the Proposed Development will be acceptable in traffic and transport terms and that it complies with relevant local and strategic policy requirements.

Energy and Sustainability

6.40 London Plan Policy GG6 (Increasing efficiency and resilience) identifies that development must “seek to improve energy efficiency and support the move towards a low carbon circular economy”.

6.41 Local Plan Policy CC1 (Climate change mitigation) identifies that “the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards”. Overall, LBC will “promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy”.

6.42 The submitted Energy Statement confirms that the scheme has been developed with a ‘fabric first’ approach. This in addition to passive and active design measures adopted for the scheme, including photovoltaic panels, will enable the proposed scheme to reduce carbon (overall) by 21.7% above Part L). This aligns helps address the Borough’s climate related policy requirements.

Noise

6.43 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.

6.44 Local Plan Policy A4 (Noise and vibration) states that noise and vibration must be controlled and managed. Notably, new development should have regard to “Camden’s Noise and Vibration Thresholds”, and planning permission will not be granted for:

- “Development likely to generate unacceptable noise and vibration impacts; or
- Development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses”.

6.45 To respond to the above requirements, a Noise Impact Assessment (prepared by KP Acoustics) has been submitted as part of the planning application. This confirms that:

- An environmental noise survey has been undertaken concerning the proposed development. The results of this survey have enabled criteria to be set for noise emissions.
- In addition, manufacturer's noise data concerning the proposed plant units has been used to obtain Specific and Rated Noise Level at the nearest noise sensitive receiver in accordance with British Standard BS4142:2014 for compliance with London Borough of Camden requirements. The nearest noise sensitive receptors comprise established residential uses to the north on Pond Street.
- The rating level was compared with the representative background noise level to assess the likelihood of impact considering the environmental noise context of the area as per the requirements of BS4142:2014.
- It has been concluded that noise emissions from the proposed plant units would not have an adverse impact on the nearest sensitive receivers, given the proposed noise control / mitigation measures within the proposed development (notably the inclusion of in-line ductwork attenuators and anti-vibration mounting, where required).

6.46 Overall, the results of the Noise Impact Assessment, and noise surveys undertaken, have informed the proposed development and its designed-in mitigation strategy. As such, the proposals will comply with the above-mentioned policy requirements.

Daylight, Sunlight and Overshadowing

6.47 Policy D6 of the London Plan identifies that *"the design of development should provide sufficient daylight and sunlight to...surrounding housing that is appropriate for its context"*.

6.48 Policy A1 of the Local Plan identifies that *"the Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity"*. This includes consideration of 'sunlight, daylight and overshadowing factors'.

6.49 In support of this planning application, a Daylight and Sunlight statement from DPR has been prepared. This confirms that:

- The nearest residential properties to the proposed development site (in daylight, sunlight and overshadowing terms) are situated across Pond Street to the north, at a distance of at least approximately 50 meters. In DPR's professional opinion, given the relatively modest size of the proposed development extension and the substantial separation distance of at least 50 meters, any potential effect on daylight or sunlight to these properties is expected to be immaterial. This assessment is based on the understanding that the effects fall well within the parameters typically expected when reasonably developing in urban locations.
- In addition, the Belle Vue Hampstead apartments, located on Roland Hill Street to the south of the proposed development site, are situated at a considerable distance at approximately 55 meters away. The windows within this property facing the proposed development site face north, and in accordance with BRE Guidelines, they can be scoped out from consideration for sunlight. Regarding daylight, the substantial distance between the Belle Vue Hampstead apartments and the relatively modest nature of the proposed development, indicates that any effects on daylight would be negligible and immaterial.
- Consideration has been given to Hampstead Hill School, located on Pond Street to the northwest of the proposed development site. The school is positioned at an oblique angle, meaning that no

windows within the main building directly face towards the proposed development. Consequently, in DPR's professional opinion, any effects on daylight or sunlight received by the school are also likely to be immaterial and consistent with what is typically anticipated in urban environments.

- There is an outdoor amenity terrace located immediately to the east of the Pears Building (within the wider the Royal Free London Hospital). The proposed development site is positioned to the north-east of this. In its current condition, this area benefits from excellent sunlight in accordance with BRE guidelines, primarily due to its open southern aspect. The proposed development will not obstruct the southern aspect of the outdoor amenity area, ensuring that good levels of sunlight will be maintained in the future.

Biodiversity Net Gain

- 6.50 London Plan Policy G6 (Biodiversity and access to nature) states that *“development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain”*.
- 6.51 LBC's Local Plan does not have a specific BNG related policy, however, Policy A3 (Biodiversity) does advised that the Council will *“resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation”*.
- 6.52 In addition, and in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act), developers must deliver a Biodiversity Net Gain (“BNG”) of 10%. However, as set out within the submitted Biodiversity Net Gain Exemption Letter (prepared by Greengage), and as agreed with LBC officers at pre-application stage, some exemptions do apply including the following ‘de minimis’ rule which would apply to the Site:

“This exemption applies to development that does not impact a priority habitat and impacts less than 25m² (e.g. 5m x 5m) of non-priority on-site habitat or 5m of non-priority on-site linear habitats. This exemption is designed to ensure that BNG does not apply to either very small scale development or development which does not impact habitat through loss or degradation within the redline boundary “

- 6.53 To confirm, given that the Site comprises an existing area of hardstanding, with no ecological or biodiversity value at present (or any priority or non-priority habitats on-site), it has been agreed that the statutory BNG requirements, and the above strategic / local policy requirements, would not apply in this instance

Regeneration Statement / Employment Strategy Commentary

- 6.54 As per the Council's validation requirements for major development proposals, a Regeneration Statement and Employment Strategy is technically required in support of this planning application. However, given the nature of the proposed development (and as agreed with LBC officers at pre-application stage), a slimline approach to these deliverables has been adopted. We therefore confirm the following:

- The proposed new hybrid theatres are expected to generate the equivalent of 37no. full time equivalent (FTE) staff members. This would be in addition to the significant numbers of existing staff employed within the wider hospital.
- The proposals will deliver overall 1,652sqm (GIA) of new hospital (Class C2 use) floorspace. No other land uses are proposed in this instance.
- The proposals, given their critical need - and the innovative and modern technologies delivered via the new hybrid theatres which in turn will enhance the Trust's vascular service offer whilst helping to reduce patient waiting lists – **will result in significant and unignorable public benefits to both the local community and more widely.**

S106 Heads of Terms

6.55 Given the scale and nature of the proposal, it is not envisaged that a S106 agreement would be required in this instance, however, the Trust would like to discuss these matters with LBC officers (as required) post-submission.

7.0 SUMMARY AND CONCLUSION

7.1 This Planning Statement has been prepared by Montagu Evans LLP to assist with the consideration and determination of an application for detailed planning permission by Royal Free London NHS Foundation Trust which proposes an extension to the Hybrid theatres at the Royal Free London Hospital, Pond Street, London, NW3 2QG ('the Site').

7.2 The description of development is as follows:

“Proposed extension to hospital at first and second storey level (above ground) with undercroft area beneath to deliver extension to hybrid theatres including roof-level plant and enclosure and associated works.”

7.3 This Planning Statement has assessed the proposals against the adopted Development Plan, as required by Section 38(6) of the Planning and Compulsory Purchase Act and in relation to other material considerations. In summary:

- The principle of delivering additional hospital-related floorspace at the Site, forming a sensitively designed extension to the existing RF Hospital building, is considered to be acceptable in land use terms (and in accordance with relevant strategic and local planning policies, which support the enhancement and extension of healthcare and community facilities).
- The proposed scale, massing and design of the proposed development is considered to be sensitive to the character of its surroundings, in accordance with relevant policy requirements. As set out within this Planning Statement, considerable steps have been taken to ensure that the scale, design and overall appearance / materiality of the proposals is in-keeping with, and complimentary to the main RF Hospital building. In addition, and as demonstrated by the submitted Heritage Statement, the proposals will result in no adverse impacts on the setting, character of significance of nearby heritage assets.
- Relevant technical matters, including the potential transport, noise and overall amenity impacts of the proposals have been carefully considered and assessed as part of the planning application. As set out above, the suite of technical assessments submitted demonstrate strong rates of compliance with relevant development plan policies.
- Overall, and fundamentally, **there is a critical and fundamental need to deliver the proposed development** – the proposed new hybrid theatre accommodation will enhance and modernise the existing Vascular Surgery department and its service offer. **The additional theatre accommodation, and the innovative technologies which it will deliver will undeniably result in significant and measurable public benefits**, not least in terms of service improvements for vascular patients and the much-needed reductions in patient waiting lists.

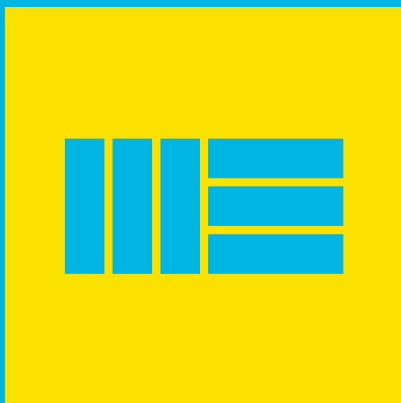
7.4 Given the above, and when assessed against the Development Plan, it is clear that the Proposed Development is acceptable and as such planning permission should be granted. As such, we respectfully ask that permission is granted without delay.

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WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.