



Ewan Campbell
Planning Department
Camden Council
Camden Town Hall
WC1H 8ND

11 December 2024

Our ref: 62261921

Dear Ewan,

**Former Eastman Dental Hospital, 256 Gray's Inn Road, WC1X 8LD -
Non-material amendment to incorporate additional patient transport bay**

On behalf of our client, University College London, we are pleased to enclose an application under section 96a of the Town and Country Planning Act 1990 for a non-material amendment to planning permission 2021/1809/P, which granted permission for the partial redevelopment of the site, including to the former Royal Free Hospital (Plot 1); Eastman Dental Clinic (Plot 2); Levy Wing (Plot 3); Frances Gardner House and the Riddell Memorial Fountain within the courtyard of the former Royal Free Hospital, for medical research, outpatient facility and academic (Use Class D1) floorspace.

This application for a non-material amendment relates to the incorporation of an additional patient transport bay for the University College London Hospital outpatient facility within Plot 1.

Background

The application site at 256 Gray's Inn Road comprises a 1.207ha parcel of land bounded to the west by Gray's Inn Road, to the north by the Calthorpe Project and the New Calthorpe Estate, to the east by Langton Close and to the south by Trinity Court and St Andrew's Gardens.

Full planning permission for the partial redevelopment of the site including the former Royal Free Hospital (Plot 1), Eastman Dental Clinic (Plot 2); Levy Wing (Plot 3), Frances Gardner House and Riddell Memorial Fountain to create a medical research outpatient facility and academic floorspace was granted on 10 March 2020 (LPA ref: 2019/2879/P).

Planning permission 2020/5791/P, granted on 21 June 2021, amended 2019/2879/P to extend to the Plot 3 basement, along with smaller extensions at the front and rear of the Plot 1 basement.

On 18 April 2023, planning permission 2021/1809/P was granted for further amendments to the development approved by 2019/2879/P and 2020/5791/P, including amendments to Plot 1 (former Royal Free Hospital Building) to amend the lecture theatre east facade; east facade updates (locations of doors); north west corner facade (change of detailing); facade level changes; firefighting lift; Alexandra Wing demolition and construction methodology); lowering height of link between Alexandra building and Plot 1, relocation of vent, new low level vent, altering the flue number and design, additional demolition and construction details, and changes to flues on Plot 1.

Since the grant of planning permission 2021/1809/P, the following non-material amendments to permission 2021/1809/P have been approved by LB Camden:

- On 19 October 2023, non-material amendment 2023/3533/P was granted to amend window sizes on the north elevation and alterations to facade on the east elevation (both Plot 1);
- On 15 February 2024, non-material amendment 2023/5114/P was granted for the removal of condition 41 for rainwater harvesting; and
- On 17 May 2024, non-material amendment 2024/1640/P was granted to amend the vents of west courtyard elevation of Plot 1.

Application Submission

In addition to this covering letter, we submit the following additional or updated drawings and documents:

- Sitewide Level 00 GA Plan - Proposed (drawing ref. BEMP-HBA-SW-00-DR-A-20-1102 Rev P06);
- Design Document prepared by Hawkins Brown
- Second Patient Bay note prepared by Momentum Transport
- Summary of need for patient transport vehicle access prepared by University College London Hospitals NHS Foundation Trust

For clarity, the full list of approved and proposed drawings are listed in **Appendix 1**.

The requisite planning application fee of £293.00 has been paid directly to the London Borough of Camden Council via Planning Portal (ref. PP-12922880).

Procedural Context

A Section 96a amendment can be used to make any amendment to a planning permission providing the local planning authority is satisfied that the amendment is not material.

Section 96a of the Town and Country Planning Act states that:

- (1) A local planning authority in England may make a change to any planning permission relating to land in their area if they are satisfied that the change is not material.
- (2) In deciding whether a change is material, a local planning authority must have regard to the effect of the change, together with any previous changes made under this section, on the planning permission as originally granted.
- (3) The power conferred by subsection (1) includes power —
 - a) to impose new conditions;
 - b) (b) to remove or alter existing conditions.

The wording of s96a specifically includes the ability to add, alter or remove conditions, but importantly there are no limitations on how s96a can be used for, providing the local planning authority is satisfied that the change is not material.

The National Planning Policy Guidance confirms that there is no statutory definition of 'non-material'. This is because it will be dependent on the context of the overall scheme. As such,

there is no standard definition as to what comprises a non-material amendment. It must be considered on an individual case-by-case basis at the discretion of the local planning authority.

Proposed Amendments

This non-material application deals with the proposal for an additional patient transport bay for the University College London Hospital outpatient facility within Plot 1. The sitewide layout plan approved under planning permission 2021/1809/P shows one patient transport bay within the public realm to the rear of the southern end of the Alexandra Wing. This application proposes a second patient transport bay adjacent to the approved bay.

The need for the second bay is set out in the note from prepared by University College London Hospitals NHS Foundation Trust. In 2025, UCLH will open an outpatient unit and MRI suite within 256 Grays Inn Road for patients who would otherwise have visited Queen Square for their care. These neurological/neurosurgical patients are managing conditions that affect their brain, spinal cord, peripheral nervous system and muscles and as such many will have some form of associated impairment – physical, cognitive or both. Given the vulnerability of our patients, the accessibility of the site is a key priority and can make the difference between a poor and excellent patient experience. UCLH require two ambulance bays to optimise the flow of patient transport vehicles and therefore the running of clinical services with patients arriving and being collected on time. The patients coming to Grays Inn Road are very vulnerable and therefore reducing their waiting time for collection as much as possible is important for their well-being and ability to recover after attending a hospital appointment. By having enough space for two ambulances to drop-off and collect patients at the same time, the benefits to patients and the operational running of the service will be significant.

The physical changes to the approved scheme are very minor, as shown on the approved and proposed layout plans below. These are the only approved plans that are affected by the proposed amendment.

Figure 1 - Approved sitewide layout plan



Figure 2 - Proposed sitewide layout plan



A Design Document has been prepared by Hawkins Brown, which:

- Identifies the location of the second patient transport bay (shown in orange on the plan above);
- Show the vehicle tracking diagrams for the patient transport vehicles;
- Shows how people would move around the site when the vehicles are in use and not in use and
- Shows how signage would be used to direct visitors to Plot 1 to the pedestrian entrance through the archway in the Alexandra Wing.

A Transport note has been prepared by Momentum Transport, which:

- Provides further details on expected vehicle movements and the need for the two patient transport bays;
- Provides an explanation of why alternative locations were previously considered and dismissed; and
- Provides an explanation of how pedestrian and cyclist safety would be maintained through signage arrangements.

Conclusions

In the context of the scale and nature of the development approved under planning permission 2021/1809/P, the proposed incorporation of a second patient transport bay is considered to constitute a non-material amendment for the following reasons:

- The physical changes to the approved scheme are very minor;
- The change would not in itself increase the number of vehicle movements, but would help UCLH manage patient transport vehicle movements in a way that optimises the flow of vehicles, reduce waiting times, and accommodate the needs of vulnerable patients; and
- The vehicle tracking for two bays is very similar to those for one bay.

Please do not hesitate to contact me or Tarleen Kaur should you have any queries.

Yours sincerely



Simon Roberts
Planning Director
WSP

Attached: Appendix 1 – List of approved and proposed drawings

APPENDIX 1 – LIST OF APPROVED AND PROPOSED DRAWINGS

	Approved under 2021/1809/P as amended	Amended drawings proposed under this non-material amendment application
Plot 1 drawings	(BEMP-HBA-P1-)	
Plot 1 Level B2 GA Plan	B2-DR-A-20-1100 Rev P04	Not Superseded
Plot 1 Level B1 GA Plan	B1-DR-A-20-1101 Rev P04	Not Superseded
Plot 1 Level 00 GA Plan	00-DR-A-20-1102 Rev P03	Not Superseded
Plot 1 Level 01 GA Plan	01-DR-A-20-1103 Rev 02	Not Superseded
Plot 1 Level 02 GA Plan	02-DR-A-20-1104 Rev 02	Not Superseded
Plot 1 Level 03 GA Plan	03-DR-A-20-1105 Rev 03	Not superseded
Plot 1 Level 04 GA Plan	04-DR-A-20-1106 Rev 02	Not Superseded
Plot 1 Level Roof Plan	RF-DR-A-20-1107 Rev P02	Not Superseded
Plot 1 Level Roof Plan	RF-DR-A-20-1108 Rev P02	Not Superseded
Plot 1 West Elevation-	ZZ-DR-A-20-1210 Rev P03	Not superseded
Plot 1 North Elevation	ZZ-DR-A-20-1211 Rev P04	Not Superseded
Plot 1 East Elevation	ZZ-DR-A-20-1212 Rev P03	Not Superseded
Plot 1 South Elevation	ZZ-DR-A-20-1213 Rev P02	Not Superseded
Plot 1 West Courtyard Elevation	ZZ-DR-A-20-1214 Rev P04	Not superseded
Plot 1 East Courtyard Elevation	ZZ-DR-A-20-1215 Rev P02	Not Superseded
Plot 1 Sections AA	ZZ-DR-A-20-1300 Rev P02	Not Superseded
Plot 1 Section BB	ZZ-DR-A-20-1301 Rev P02	Not Superseded
Plot 1 Section CC	ZZ-DR-A-20-1302 Rev P02	Not Superseded
Plot 1 Section DD	ZZ-DR-A-20-1303 Rev P03	Not Superseded
Plot 1 Elevation Bay Study 01	ZZ-DR-A-21-1400 Rev 02	Not Superseded
Plot 1 Elevation Bay Study 02	ZZ-DR-A-21-1401 Rev 02	Not Superseded
Plot 1 Elevation Bay Study 03	ZZ-DR-A-21-1402 Rev P03	Not Superseded
Plot 1 Elevation Bay Study 04	ZZ-DR-A-21-1403 Rev 02	Not Superseded
Plot 1 Elevation Bay Study 05	ZZ-DR-A-21-1404 Rev 01	Not Superseded
Plot 1 Elevation Bay Study 06	ZZ-DR-A-21-1405 Rev 02	Not Superseded

Plot 1 Elevation Bay Study 07	ZZ-DR-A-21-1406 Rev 01	Not Superseded
Plot 1 Roof Level Plan Demolition	RF-DR-A-00-1155	Not Superseded
Plot 1 West Elevation Demolition	ZZ-DR-A-00-1254	Not Superseded
Plot 1 North Elevation Demolition	ZZ-DR-A-00-1255	Not Superseded
Plot 2 drawings	(BEMP-HBA-P2-)	
Plot 2 Level B1 GA Plan	B1-DR-A-20-1100;	Not Superseded
Plot 2 Level LG GA Plan	LG-DR-A-20-1101;	Not Superseded
Plot 2 Level 00 GA Plan	00-DR-A-20-1102;	Not Superseded
Plot 2 Level 01 GA Plan	01-DR-A-20-1103;	Not Superseded
Plot 2 Level 02 GA Plan	02-DR-A-20-(1104-1105);	Not Superseded
Plot 2 Level 03 GA Plan	03-DR-A-20-1106;	Not Superseded
Plot 2 Level Roof GA Plan	RF-DR-A20-1107;	Not Superseded
Plot 2 Elevations	ZZ-DR-A-20-(1200-1205);	Not Superseded
Plot 2 Sections	ZZ-DR-A-20-(1300-1301);	Not Superseded
Plot 2 Bay Studies	ZZ-DR-A-21-(1400-1403).	Not Superseded
Plot 3 drawings	(BEMP-HBA-P3-)	
Plot 3 Level B2 GA Plan	B2-DR-A-20-1100 Rev P02;	Not Superseded
Plot 3 Level B1 GA Plan	B1-DR-A-20-1101 Rev P02;	Not Superseded
Plot 3 Level 00 GA Plan	00-DR-A-20-1102 Rev P03;	Not Superseded
Plot 3 Level 01 GA Plan	01-DR-A-20-1103 Rev P02;	Not Superseded
Plot 3 Level 02 GA Plan	02-DR-A-20-1104 Rev P02;	Not Superseded
Plot 3 Level 03 GA Plan	03-DR-A-20-1105 Rev P02;	Not Superseded
Plot 3 Level 04 GA Plan	04-DR-A-20-1106 Rev P02	Not Superseded
Plot 3 Level 05 GA Plan	05-DR-A-20-1107 Rev P02;	Not Superseded
Plot 3 Level 06 GA Plan	06-DR-A-20-1108 Rev P02;	Not Superseded
Plot 3 Level Roof GA Plan	RF-DR-A-20-1109 Rev P02;	Not Superseded
Plot 3 Sections	ZZ-DR-A20-(1300-1302 Rev P02);	Not Superseded
Plot 3 Elevations	ZZ-DR-A20-(1200 Rev P02, 1201 Rev P03, 1202 Rev P03 and 1203 Rev P02)	Not Superseded

Plot 3 Bay Studies	ZZ-DR-A-21-(1401-1405 and 1406 Rev. P02);	Not Superseded
Site wide drawings	(BEMP-HBA-SW-)	
Proposed Location Plan	ZZ-DR-A-20-(1005 Rev P04)	Not Superseded
Proposed Site Plan	ZZ-DR-A-20-(1010 Rev P05	Not Superseded
Sitewide Level B2 GA Plan	B2-DR-A-20-1100 Rev P05	Not Superseded
Sitewide Level B1 GA Plan	B1-DR-A-20-1101 Rev P05	Not Superseded
Sitewide Level 00 GA Plan	00-DR-A-20-1102 Rev P05	00-DR-A-20-1102 Rev P06
Sitewide Level 01 GA Plan	01-DR-A-20-1103 Rev P04	Not Superseded
Sitewide Level 02 GA Plan	02-DR-A-20-1104 Rev P04	Not Superseded
Sitewide Level 03 GA Plan	03-DR-A-20-1105 Rev P05	Not Superseded
Sitewide Level 04 GA Plan	04-DR-A-20-1106 Rev P04	Not Superseded
Sitewide Level 05 GA Plan	05-DR-A-20-1107 Rev P04	Not Superseded
Sitewide Level 06 GA Plan	06-DR-A-20-1108 Rev P04	Not Superseded
Sitewide Level Roof GA Plan	RF-DR-A-20-1109 Rev P04	Not Superseded
Site West Elevation	ZZ-DR-A-20-1200 Rev P03	Not superseded
Site North Elevation	ZZ-DR-A-20-1201 Rev P03	Not Superseded
Site East Elevation	ZZ-DR-A-20-1202 Rev P03	Not Superseded
Site South Elevation	ZZ-DR-A-20-1203 Rev P02	Not Superseded
Site Elevation South	ZZ-DR-A-20-1204 Rev P05	Not Superseded
Site Section AA	ZZ-DR-A-20-1300 Rev P04, 1302-1303 Rev P02 and 1304 Rev P.04).	Not Superseded
Site Section BB	ZZ-DR-A-20-1301 Rev P04	Not Superseded
Site Section CC	ZZ-DR-A-20-1302 Rev P02	Not Superseded
Site Section DD	ZZ-DR-A-20-1303 Rev P03	Not Superseded
Site Section EE	ZZ-DR-A-20-1304 Rev P01	Not Superseded
Site Wide Roof Level Plan Demolition	RF-DR-A-00-1156 Rev P01	Not Superseded
Site wide Roof Level Plan Demolition	RF-DR-A-00-1157 Rev P01	Not Superseded
Site Section AA Demolition	ZZ-DR-A-00-1350 Rev P01	Not Superseded
Site Section DD Demolition	ZZ-DR-A-00-1353 Rev P01	Not Superseded



Frances Gardner House drawings		
Frances Gardner House Roof Plan	BEMP-HBA-FGH-RF-DR-A-20- 1100	Not Superseded