



Centre for Children's Rare Disease Research
at Great Ormond Street Hospital

Great Ormond Street
Hospital for Children
NHS Foundation Trust



Planning Statement

DP9
05 September 2014

CONTENTS

1.0 INTRODUCTION

2.0 SUMMARY OF NEED

3.0 SITE AND SURROUNDING CONTEXT

4.0 APPLICATIONS

5.0 PLANNING POLICY AND ASSESSMENT OF PLANNING ISSUES

6.0 CONCLUSION

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by DP9 Ltd (DP9) on behalf of Great Ormond Street Hospital Children's Charity (GOSHCC) in support of an application for planning permission and conservation area consent for the redevelopment of 20 Guilford Street which is bound by Guilford Street to the north, Millman Street to the east, Millman Mews to the south and Guilford Place to the west.
- 1.2 The redevelopment will provide a state of the art research and medical building facilitating and promoting the translation of rare disease research into tangible therapies and treatments, consolidating Great Ormond Street Hospital (GOSH) and University College London's (UCL's) role as one of the world's leading centres for the development of novel therapies for children with rare diseases.
- 1.3 The centre is a partnership between Great Ormond Street Hospital for Children NHS Foundation Trust (GOSH), University College London (UCL) and Great Ormond Street Hospital Children's Charity.
- 1.4 GOSH and UCL's Institute of Child Health (ICH) and Institute of Cardiovascular Science (ICS) undertake research and develop new diagnostics, treatments and devices that can improve the lives of patients treated at GOSH and children elsewhere in the UK and abroad.
- 1.5 The CRRDC will give the medical and scientific experts the facilities and access to patients they need to:
- understand and read genetic codes more quickly;
 - develop gene and cell therapies to treat genetic conditions;
 - use stem cells to regenerate organs or tissues; and
 - manufacture new medical devices.
- 1.6 The CRRDC will focus on research into the genetic and molecular basis of rare diseases, improving diagnosis and developing novel therapies for treatment with a potential for cures. It will also enable research into complex conditions whilst providing direct links in patient care through the provision of outpatient facilities.
- 1.7 The description of development is set out below:

“Demolition of existing building at 20 Guilford Street and redevelopment for a research and medical building (Sui Generis) ranging from 2 – 6 storeys (above ground) comprising 13,045sqm (GEA) of research, medical and ancillary floorspace,

provision of improvements to the public realm and other works incidental to the development”.

- 1.8 The submission of this application follows discussions with a wide range of stakeholders and statutory consultees, including both the planning and design teams at the London Borough of Camden (LBC), local businesses, ward councillors, local groups, the Camley Street Neighbourhood Forum, Bloomsbury Conservation Area Advisory Committee, Rokeby House residents group (Lambs Conduit Street), Rugby and Harpur Residents Association, and local neighbours.
- 1.9 This statement should be read and considered in conjunction with the plans and drawings submitted as part of this planning application. The Council has confirmed that the following documents are required for the validation of the planning application:
- Design and Access Statement (including Landscaping) – Stanton Williams Architects;
 - Arboricultural Assessment – Simon Jones Associates;
 - Basement Impact Assessment – Pell Frischmann;
 - Demolition and Construction Management Plan – Gardner and Theobald;
 - Energy and Sustainability Assessment, including BREEAM Pre Assessment Hoare Lea;
 - Historic Environment Assessment – MoLA
 - Daylight and Sunlight Assessment – GVA Schatunowski Brooks;
 - Transport Assessment – Pell Frischmann;
 - Travel Plan – Pell Frischmann;
 - Noise and Vibration Assessment – Hoare Lea;
 - Ecology Assessment and Biodiversity Management Plan – Ecology Solutions ;
 - Air Quality Assessment – Air Quality Consultants; and
 - Statement of Community Involvement – Great Ormond Street Hospital;
- 1.10 This document provides an overview of the site and the development proposal and an evaluation of the proposed development against the relevant national, strategic and local planning policy and guidance. The Planning Statement is structured as follows:
- **Section 1** provides an introduction to document;
 - **Section 2** presents an executive summary identifying the planning benefits of the proposed development;
 - **Section 3** describes a site and the context of the surrounding area;
 - **Section 4** provides a description of the proposed development;
 - **Section 5** summarises the planning consultations undertaken;

- **Section 6** sets out the relevant national, regional and local planning policies relevant to the planning application and provides an assessment of the proposed development against these policies;
- **Section 7** provides draft Heads of Terms for a Section 106 Agreement; and
- **Section 8** sets out our conclusions.

2.0 SUMMARY OF NEED

2.1 Great Ormond Street Hospital NHS Foundation Trust (GOSH) and UCL's Institute of Child Health (ICH) and Institute of Cardiovascular Science (ICS) undertake research and develop new diagnostics, treatments and devices that can improve the lives of patients treated at our hospital and children elsewhere in the UK and abroad. Rare diseases are complex and not well understood in comparison to other illnesses. This means that sufferers often experience a delay in getting diagnosed and have limited options for treatment. But recent advances in science and technology offer new hope. Genomics (the science of genetic mapping and DNA sequencing) is helping scientists to identify the genetic basis of rare diseases. And new treatments such as stem cell therapies allow us to offer patients the chance of a longer and fuller life. Bringing knowledge, technology and patients together in one place would speed up the 'bench to bedside' process of developing new treatments. The building would give our medical and scientific experts the facilities and access to patients they need to:

- understand and read genetic codes more quickly;
- develop gene and cell therapies to treat genetic conditions;
- use stem cells to regenerate organs or tissues; and
- manufacture new medical devices. Most importantly, it will bring breakthroughs and cures for rare diseases closer with every passing day.

2.2 Rare diseases represent a considerable health burden, a fact that is attracting increasing concern both nationally and internationally. This is because, taken together, they are in fact relatively common. Much more needs to be done to help those whose lives are affected by rare disease, including much greater emphasis on medical research. Rare diseases in children include childhood cancers, cystic fibrosis and muscular dystrophy. There are over 6,000 conditions in total. Individually, each disease affects less than one in 2,000 people. But as a group, they will affect one in 17 of us at some point in our lives.

2.3 Seventy-five per cent of rare diseases affect children, and nearly one-third will die before their fifth birthday. Most rare diseases are caused by a genetic defect, which means that children are born with the condition and will not get better by themselves. The symptoms of rare diseases can often be very serious, making patients very sick or causing disabilities that impact on their how long they will live and their quality of life. But scientific breakthroughs and new technologies open up possibilities for treatment that were unimaginable even just a few years ago. The new building will help us to harness this potential and help more children not just at Great Ormond Street Hospital but nationally and internationally.

2.4 Working together, Great Ormond Street Hospital (GOSH) and University College London (UCL) operate the largest centre for paediatric research in Europe and one of the largest worldwide. This is one of the only centres in the world with the specialist

expertise and diverse patient population needed to discover cures for rare diseases. Discovering cures for rare diseases in children is challenging for many reasons, for example:

- Each condition affects comparatively small numbers of patients, so it's difficult for researchers to obtain enough patients to study each disease thoroughly;
- It can be difficult to gather enough patients to take part in experimental treatments or clinical trials; and
- Many patients have serious and life threatening conditions, so the back up of a large, specialist children's hospital nearby is essential for their safety.

2.5 In recent years, GOSH and UCL have overcome these challenges and achieved some ground breaking results. But we urgently need better facilities and more space to allow GOSH to help more patients, develop new treatments and share their discoveries with others. The building will support scientists, clinicians, engineers and other experts to pool their knowledge and improve expertise in the diagnosis, understanding, management and care of rare diseases.

3.0 SITE AND SURROUNDING AREA

The application site

- 3.1 The site is located on Guilford Street, immediately to the south of Coram's Field and is bound by Millman Street to the east, Millman Mews to the south and Guilford Place to the west. The Site has an irregular shape, measuring 72.4m, east-west, along Guilford Street and 38.5m at widest point north-south behind Guilford Place.
- 3.2 The Site covers an area of 3,402sqm or 0.34 hectares
- 3.3 The site is currently occupied by a disused building which was formerly a computer centre last used by the University of London.
- 3.4 The site is located within the Bloomsbury Conservation Area and within the sub-areas of Great James Street / Bedford Row and Queens Square / Red Lion Square and Coram's Fields/Brunswick Centre. The Conservation Area contains a number of listed buildings in the immediate vicinity of the site including Coram's Fields itself, whose principal entrance lies directly opposite and north of the site and properties along Guilford Place.
- 3.5 The existing building currently on the site was built in the late 1960s and is formed of a series of blocks linked at basement level. The building's principal block faces Guilford Street with four storeys above a raised ground level and a single storey basement. The light metal and glass façade seen on the main north elevation extends to the building's east and west elevations. An open basement light well is present on Guilford Street and Millman Street. The other buildings on the site, a three storey block fronting onto Millman Mews, a single storey link building to 20 Guilford Street, and 33 Millman Street are of similar style and date.
- 3.6 The overall complex of buildings has been assessed as being of negligible significance as a heritage asset and is also assessed as a 'negative' building within the Townscape Appraisal of the site.

Heritage and conservation

- 3.7 As noted earlier the site falls within the Bloomsbury Conservation Area and there are a number of heritage assets within close proximity of the Site.
- 3.8 North of the site, directly across Guilford Street the listed buildings form a group that as individuals and together have high heritage significance. This group includes:
- Coram's Fields and Coram's Fields Playground Memorial Pavilion (Grade II);
 - Coram's Fields Playground and former Foundling Hospital (Grade II);

- 89 and 82 Guilford Street (Grade II); and various gates, railings and bollards (Grade II).
- 3.9 To the west of the site there are two listed structures:
- the Public Conveniences; and
 - (Grade II) and the Drinking Fountain (Grade II), both of high significance derived from the historic values.
- 3.10 Other buildings include 3-6 Guilford Place, attached railings and Lamp Holders (Grade II) and The Lamb Public House (Grade II). Additional buildings south and south west of the site on Great Ormond Street and Lambs Conduit Street are considered to be assets of high significance.

Accessibility

- 3.11 The proposed development is surrounded by the following adopted public highway network: Guilford Street, Millman Street, Guilford Place and Millman Mews. The closest Transport for London Road Network (TLRN) also known as a red route network is Euston Road to the north and Gray's Inn Road to the east. These roads have stopping and parking restrictions in place.
- 3.12 Guilford Street is a single carriageway with on-street car parking on both sides of the road. A provision of some 5 motorcycle spaces is also provided on the southern side on the road. In addition to this, one disabled space is provided on the northern side. There are footways on both sides of the road and a zebra crossing in the vicinity of the junction with Guilford Place. Guilford Street is a cycle route marked with advisory cycle road markings. According to Camden's road hierarchy published in Network Management Plan, Guilford Street is classified as district link (main local distributor) and is defined as an emergency route.
- 3.13 Guilford Place / Lamb's Conduit Street forms a priority junction with Guilford Street (one way in and out to and from Guilford Street) with a kerbed square in the middle of the junction. Lamb's Conduit Street is similar to Guilford Street and is a single carriageway and footways on both sides and is classified as district link (main local distributor) and emergency route. Lamb's Conduit Street has a double yellow line on the western side and a single yellow line on the eastern side, which allows short stay for loading/unloading from local business.
- 3.14 Millman Street has an 8.2m wide carriageway with on-street car parking on both sides of the road. The road operates as two-way and is classified as a local road. The existing parking spaces in the immediate vicinity of the proposed development on Millman Street are resident permit holders only. A 23m long on street car parking bay is located on the south west side of Millman Street between the junction with Guilford

Street and Millman Mews, which can accommodate 4 vehicles. One disabled parking space is allocated on the eastern side of the road.

- 3.15 Millman Mews is a cul-de-sac access road to and from Millman Court. The carriageway is 3.6m wide, and operates as a two way road. The road is marked with single yellow lines on both sides and provides a 1.6m wide footway on the southern side and a 0.5m hard verge providing the recommended safety margin to the existing building on the northern side.
- 3.16 The proposed Site is highly sustainable with a manual PTAL rating for the site of 6a 'excellent', which is one of the highest levels of accessibility.
- 3.17 Any transport related impacts are discussed further in the Transport Assessment prepared by Pell Frischmann.

Planning history

- 3.18 There are no recent, relevant planning applications at the site.

The surrounding area

- 3.19 The site sits within three sub-areas of the Bloomsbury Conservation Area which was designated to protect the distinctive local area of grid patterned streets with predominantly Georgian townhouses mixed with institutional buildings that were laid out between the late 17th and 19th centuries.
- 3.20 The main block of 20 Guilford Street sits within the Coram's Field/Brunswick Centre sub-area. This is dominated by the open area of Coram's Fields. The description of the sub-area in the conservation area appraisal notes that "*a number of large footprint 20th century university and hospital buildings lining Guilford Street detract from the character and appearance of the Conservation Area as a result of their height, bulk and scale.*"
- 3.21 The south-east of the site lies within the Great James Street/Bedford Row sub-area of the conservation area. It is characterised by terraced townhouses with rear mews. The south-west of the site lies within the Queen Square/Red Lion Square sub-area of the conservation area, this is characterised by diverse architectural styles and a predomination of commercial buildings.

4.0 APPLICATION PROPOSAL

Summary of overall concept

- 4.1 A full assessment of the proposed development is contained within the Design and Access Statement prepared by Stanton William Architects. This Planning Statement should be read in conjunction with the plans and drawings submitted as part of the application.
- 4.2 The redevelopment will provide a state of the art research and medical building facilitating and promoting the translation of rare disease research into tangible therapies and treatments, consolidating Great Ormond Street Hospital (GOSH) and University College London's (UCL's) role as one of the world's leading centres for the development of novel therapies for children with rare diseases.

The proposed scheme

- 4.3 The application seeks full planning permission for:

“Demolition of existing building at 20 Guilford Street and redevelopment for a research and medical building (Sui Generis) ranging from 2 – 6 storeys (above ground) comprising 13,045sqm (GEA) of research, medical and ancillary floorspace, provision of improvements to the public realm and other works incidental to the development”.

- 4.4 The proposed scheme seeks to demolish the existing former computer centre building and construct a new eight-storey building, with six levels above ground and two below. The massing has been informed by balancing the requirement to accommodate an ambitious brief on a constrained urban site and the relationship to the existing buildings that surround the site. Other constraints which have also had a particular impact on the massing include the requirement to maintain good levels of daylight and sunlight to neighbouring properties in Millman Street, Millman Mews and Guildford Place, together with the identification of an acceptable overall height for the building within the context of the Bloomsbury Conservation Area.
- 4.5 The proposed building contains both research and clinical areas and has been designed to give expression to the applicants vision for the promotion of 'bench to bedside' translational research.
- 4.6 Both the public and private areas of the building have a clearly identifiable focus in the form of an atrium or day-lit 'heart', however, the unified vision is reinforced through visual and physical connections between both parts of the building. From the street the identity of the building and its activities are given public expression by

creating views into internal areas of the building including the principal laboratory spaces on the lower ground floor.

- 4.7 Internally, the building has been designed to promote interaction between the different users of the building by creating important connections between floors and by establishing circulation routes which encourage use of stairs rather than lifts in order to promote chance meetings and encounters. The stairways within the larger main atrium converge on the centrally located staff café on the second floor, envisaged as a focal point for interaction between researchers and consultants.
- 4.8 Within the workspaces, the interior is designed to provide a high quality working environment, within the constraints of the deep floor plate, by maximising access to daylight and views to the exterior from work stations.
- 4.9 Amenity spaces include the ground floor public accessible terrace for the Outpatients department and the second floor terrace for staff. These south facing external spaces respond to the surrounding site and provide important breakout areas which will contain planting to encourage local biodiversity.
- 4.10 In addition to the proposals for the CRRDC, areas of public realm adjacent to the building are submitted as part of the application. Due to its urban location there is a very strong relationship between the CRRDC and its surroundings. At pavement level this is especially important and careful consideration of how the building engages with the public realm has been an important aspect of the design proposal.

This includes proposals and improvements for Guilford Street, Guilford Place, Millman Street and Millman Mews.

- 4.11 The proposals for the CRRDC have been developed to meet, and in some cases to exceed, typical environmental standards and targets. A significant carbon saving against current Building Regulations will be made with the incorporation of a high performance building fabric, passive design features, efficient building services and a low carbon energy supply. A BREEAM ‘Excellent’ rating is targeted for the building.

Proposed floorspace schedule

- 4.12 A breakdown of the existing and proposed floorspace is provided in Table 1 below.

Table 1 – Existing and proposed business floorspace

Existing Floorspace (sqm GIA)	Proposed Floorspace (sqm GIA)
--	--

6,371sqm	13,045sqm
----------	-----------

CONSULTATIONS

- 4.13 The submission of this planning application follows extensive consultation undertaken over a period of more than twelve months. This process has seen the scheme develop through close consultation with officers from the London Borough of Camden, as well as local residents, businesses, representative organisations and council Members.
- 4.14 Full details of the pre-application consultation can be found in the Statement of Community Involvement prepared by GOSH submitted as part of this application.

London Borough of Camden

- 4.15 The project team have met with planning and design officers on numerous occasions through formal pre-application meetings and break out design workshops.
- 4.16 The design has evolved as a result of these meetings with Camden's planning and design officers in line with the advice and comments received, most notably in terms of the reduction in the height of the development, the treatment of the recessed upper two floors and the overall design evolution of the development.
- 4.17 In addition, discussions have also been held with officers on daylight and sunlight, trees, and the Council's highways department to discuss the development proposals.
- 4.18 Through these meetings officers at the LBC have confirmed the following:
- Principle of development – Officers have agreed that in this case there is no requirement for the provision of any residential floorspace as the type of development proposed falls outside of the mixed use policy (DPI – mixed use development);
 - Height / bulk / mass – Officers have confirmed that the overall height of the development is acceptable subject to careful consideration of the treatment of the top two floors;
 - Design – Design officers have confirmed they welcome the design approach to the building in terms of the 'civic' façade fronting Guilford Street and Guilford Place and the more 'domestic' treatment proposed on the other facades on Millman Street and Millman Mews
 - Daylight and Sunlight Impacts – Officers confirmed they are generally comfortable that the height and scale of the proposed building would have a very minor impact on daylight/sunlight levels for the occupiers of properties in Millman Court and Guilford Place. Officers requested that the

application submission should provide information on the use of rooms which are affected and assess the implications of overshadowing on Coram's Fields;

- Transport / Servicing – Ongoing discussion has taken place with officers on the appropriate servicing options for the building with an on street solution taking place from Millman Street having been selected as the preferred option.

Public consultation

4.19 A number of consultation events have been held with neighbouring residents, groups and interested parties. Presentations to the GOSH Residents Liaison Group have also been undertaken to keep residents updated on the proposed planning application. Set out within the Table below are a summary of the key consultation events that have taken place prior to submission of the planning application.

June 2013 – ongoing	Engagement with planning officials at the London Borough of Camden
April 2014	Engagement with GOSH Members' Council
May 2014	Engagement with GOSH Redevelopment Residents' Liaison Group
June 2014	<p>Consultation opens week commencing 16 June 2014:</p> <ul style="list-style-type: none"> • Invitations to exhibitions issued to key stakeholders • Leaflets and flyers distributed to local community • Press advertisement appears in Camden New Journal • Email announcement to staff and FT members • Posters distributed in GOSH buildings • Website feedback form goes live
22, 23, 24 June 2014	Exhibition at Coram's Fields
25 June 2014	Exhibition at the Institute of Child Health
26 June 2014	Exhibition at Great Ormond Street Hospital
27 June 2014	Exhibition board content posted online at gosh.nhs.uk/CRRDC - consultation
6 July 2014	Consultation update provided to GOSH Redevelopment Resident's Liaison Group
7 July 2014	Website content is updated with answers to the questions asked most frequently at public exhibitions or in feedback forms
27 July 2014	Consultation closes (total duration – 6 weeks)

August 2014	Design team reflects on feedback received and statement of community consultation is prepared
18 August 2014	Message of thanks sent to consultation respondents, including date for follow-up exhibition
15 September 2014	Public exhibition is planned to share the plans as submitted for planning permission and respond to issues raised during the public consultation

Conclusions regarding pre-application consultation

4.20 The consultation undertaken on the proposals has returned very positive levels of support for the scheme as follows:

- Local residents have welcomed the early and committed engagement from the project team and the team have been pleased to see the enthusiasm shown towards the proposals;
- Wider community groups have also engaged during the consultation process and have responded positively to the overall objectives of the proposed development; and
- The development team have responded to feedback received following various meetings held with officers from the London Borough of Camden.

5.0 PLANNING POLICY AND ASSESSMENT OF PLANNING ISSUES

5.1 This section identifies the statutory development plan which is relevant to the application site, and provides an evaluation of the proposed development against the relevant planning policies. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level these is both planning policy and guidance which combine to provide the framework for the consideration of the proposed development.

National Planning Policy

5.2 The National Planning Policy Framework (NPPF) was adopted on 27 March 2012 and provides planning policy guidance at a national level and is a material consideration in the determination of planning applications.

5.3 At the heart of the NPPF is a presumption in favour of sustainable development, for both plan making and for decision taking. The NPPF directs local planning policies to approve development proposals that accord with the development plan without delay. The NPPF supports sustainable economic development, including the delivery of new business units, and also seeks to significantly boost the supply of new housing.

5.4 The proposed development will use previously developed (brownfield) land within an area of good accessibility for the provision of new homes and enhanced business space. The NPPF supports mixed use developments, such as the proposed development, which seeks to respond positively to the opportunities for growth. The design has been informed by the principles of sustainability and is therefore compliant with the underlying principles of the NPPF.

5.5 The Government published National Planning Policy Guidance (NPPG) on 6 March 2014, which effectively cancels the majority of previous planning practice guidance documents. This online, up-to-date planning practice guidance is a material consideration in the determination of planning applications, and has been considered as part of our assessment of the development proposals considered within this section.

The Development Plan

5.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan for the site is:

- The London Plan (2011);
- The Revised Early Minor Alterations to the London Plan (2013);
- Draft Further Alterations to the London Plan (2014);

- Camden Core Strategy (2010);
- Camden Development Policies (2010); and
- Camden Planning Guidance documents (various).

5.7 The London Plan was published in July 2011. This document provides the overall strategic plan for London, setting out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031.

5.8 In October 2013, the Mayor published Revised Early Minor Alterations to the London Plan (REMA). This document seeks to ensure consistency with the NPPF and the REMA are operative as formal alterations to the London Plan.

5.9 Between January and April 2014, the Mayor consulted on draft Further Alterations to the London Plan (FALP). The FALP has been prepared to respond to address key housing and employment issues emerging from an analysis of census data which indicates a substantial increase in the capital's population. Although not formally adopted, the proposed draft FALP has minor weight as a material consideration in the determination of planning applications.

5.10 The Greater London Authority (GLA) has produced a number of documents which provide more detailed strategic guidance regarding London Plan policies and are also relevant to the proposed development. These include:

- London View Management Framework (March 2012);
- Sustainable Design and Construction SPG (April 2014);
- The Mayor's Climate Change Mitigation and Energy Strategy (2011);
- The Mayor's Transport Strategy (May 2010);
- The Mayor's Economic Strategy (October 2010);
- Use of Planning Obligations in the Funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013); and
- Interim Housing Design Guide (2010).

5.11 Where relevant within the supporting application documents these guidance notes have been referred to. They tend to relate to detailed technical or individual topic matters and have not all been directly referred to in this Planning Statement.

5.12 The London Borough of Camden LDF comprises a suite of planning policy documents to guide and inform development within the borough. The principal documents within the LDF are the Core Strategy and the Development Policies documents which were both adopted in 2010. The Council has started to review these documents to ensure that they are up to date, reflect current circumstances and help to deliver local priorities. A Draft Local Plan is anticipated to be published for public consultation later this year.

5.13 LBC have also prepared a number of Camden Planning Guidance documents. Where relevant these documents have also been considered.

Site designations

5.14 The site is identified within the Camden Proposals Map as having the following site specific designations:

- The Bloomsbury Conservation Area;
- The Central London Area;
- An archaeological priority zone;
- The right lateral assessment area of the protected vista from Primrose Hill to St Paul's Cathedral (Assessment Point 4A.4); and
- The background assessment area of the protected vista from Greenwich Park: The General Wolfe Statue to St Paul's Cathedral (Assessment Point 5A.2).

Planning policy assessment

5.15 This section reviews all of the above policies which are relevant to the proposed development and provides an assessment of how the proposed development complies with planning policy in respect of the following:

- i. Land use - commercial / employment floorspace;
- ii. Amenity;
- iii. Design and conservation;
- iv. Landscape, biodiversity and playspace;
- v. Energy and sustainability;
- vi. Transport, servicing and parking; and
- vii. Accessibility.

i. Land use

5.16 The acceptability of the Development in terms of land use is assessed against national, regional and development plan policies in the paragraphs below.

5.17 The NPPF seeks to “promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas” (Para 17).

5.18 At Policy 2.10 with the London Plan, the Mayor seeks to “*enhance and promote the unique international, national and Londonwide roles of the Central Activities Zone (CAZ), supporting the distinct offer of the Zone based on a rich mix of local as well as strategic uses and forming the globally iconic core of one of the world's most attractive and competitive business locations*”.

- 5.19 The London Plan at Policy 3.17 ‘Health and social care facilities’ notes that the Mayor will support the provision of high quality health and social care appropriate for a growing and changing population, particularly in areas of under provision or where there are particular needs. The policy notes that development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Part F of the policy notes that Boroughs should promote the continued role and enhancement of London as a national and international centre of medical excellence and specialised facilities.
- 5.20 The London Borough of Camden’s approach to growth and development is influenced by three main themes which are set out in Policy CS1 of the Core Strategy. They are to:
- focus growth in the most suitable locations, particularly the Central area;
 - promote efficient use of land, but taking account of its surroundings, heritage, local amenities and other constraints; and
 - expect a mix of uses “in suitable schemes” including an element of housing where appropriate.
- 5.21 Development Policy DP1 expands on the preference for a mix of uses in development schemes. In the Central London Area where more than 200 sqm (gross) additional floorspace is provided, the Council requires a mix of uses in development “*where appropriate*”. The supporting text notes that “*No non-residential uses are excluded from the policy. However we acknowledge that there are a number of circumstances where a mix of uses may not be sought*”.
- 5.22 The headline policy is that 50% of all additional floorspace should be provided as housing and that the Council will require the housing to be provided on site. The policy states that:
- “Where housing cannot practically be achieved on the site, the Council may accept a contribution to the mix of uses elsewhere in the area, or exceptionally a payment-in-lieu. In considering whether a mix of uses should be sought, whether it can practically be achieved on the site, the most appropriate mix of uses, and the scale and nature of any contribution to the supply of housing and other secondary uses, the Council will take into account:*
- (a) *the character of the development, the site and the area;*
 - (b) *site size, the extent of the additional floorspace, and constraints on including a mix of uses;*
 - (c) *the need for an active street frontage and natural surveillance;*
 - (d) *the economics and financial viability of the development including any particular costs associated with it;*
 - (e) *whether the sole or primary use proposed is housing;*
 - (f) *whether secondary uses would be incompatible with the character of the primary use;*

- (g) *whether an extension to the gross floorspace is needed for an existing user;*
- (h) *whether the development is publicly funded; and*
- (i) *any other planning objectives considered to be a priority for the site.”*

5.23 As agreed with the Council there are cases where the proposed primary use of the Site does not lend itself to the introduction of residential accommodation. Paragraph 1.23 of the Development Policies notes that:

“the Council will not seek housing or other secondary uses where they are not compatible with the primary use, for example where noise levels from an industrial use would compromise residential amenity, or where the incorporation of secondary uses would be precluded by the operational requirements of a specialised use, such as a hospital or healthcare facility, or an academic, research or educational institution”.

Medical / Research Use

5.24 Policy CS16 of the Core Strategy ‘Improving Camden’s health and well-being’ seeks to improve health and well-being in Camden. Part d) of the policy states that the Council will *“recognise and support the borough’s concentration of centres of medical excellence and their contribution to health-related research, clinical expertise, employment and training provision”* Under the supporting text to the policy reference is made to ‘Centres of medical excellence’ and it is noted that *“Camden has an internationally important concentration of medical education, research and care institutions. These make a significant contribution to the borough and the nation by providing healthcare facilities, specialist research, employment and education opportunities, and by encouraging innovation. We will seek to support these institutions, which include the University College London Hospital (UCLH), the Royal Free Hospital, Great Ormond Street Hospital and the Wellcome Trust, and balance their requirements with those of other sectors and the local community.”*

5.25 The proposed development meets the policy objective through the development of a building that will provide the following key aspirations:

- To provide a world class facility for GOSH and UCL in which scientists and doctors can work side- by-side to care for children and young people with rare diseases;
- To bring knowledge, technology and patients together in one place;
- To promote the ‘bench to bedside’ model of translational research;
- To improve the expertise in the diagnosis, understanding, management and care of rare diseases;
- To discover new ways to help patients and offer the chance of a longer and fuller life;
- To bring breakthroughs and cures for rare diseases closer; and
- To help children nationally and internationally.

- 5.26 The aspirations identified above place an emphasis on the creation of a world class and high quality building with outstanding research and clinical facilities that promote interaction, quality patient care and facilitates world-class research.

Built form

- 5.27 The acceptability of the Development in terms of design is assessed against national, regional and development plan policies in the paragraphs below.

Design

- 5.28 The NPPF considers that “Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”. It goes on to say that “it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes”.
- 5.29 The NPPF further states that “in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area”.
- 5.30 The NPPF identifies that the Government attaches “great importance to the design of the built environment” and that good design is a key aspect of sustainable development and should contribute positively to making places better for people.
- 5.31 The London Plan requires all large scale proposals to be of the highest quality design especially in terms of impact on views, the wider and local townscape context and local environmental impact. The achievement of high quality urban design is also highlighted as a key factor in achieving a more attractive and green city.
- 5.32 London Plan policy states that development should be of the highest standards of accessible and inclusive design (Policy 7.2) and consistent with the principles of ‘secured by design’ (Policy 7.3). Development should have regard to the form, function or structure of an area (Policy 7.4).
- 5.33 London Plan Policy 7.6 sets out design principles, which include maximising the Site potential, promoting high quality inclusive design and enhancement of the public realm.
- 5.34 Camden’s Core Strategy Policy CS14 seeks to promote high quality places and conserve heritage assets. The policy requires proposals to be of the highest standard of

- design that respects local context and character. Development Policy DP24 seeks to secure high quality design.
- 5.35 The proposed building form has emerged from the requirements of the development brief and is dictated by the building footprint. Stanton Williams developed a concept of a ‘carved’ base which dissolves the transition between interior and exterior.
- 5.36 The extent of the north elevation has been defined by the alignment with the adjacent building facades to the east and west along Guilford Street. A single storey cut-back on the ground floor helps to define the base and reflects the mass and scale of the listed buildings on Coram’s Fields. The east elevation has similarly been located on the existing building line, which aligns with the general urban frontages further south. The massing on this elevation reduces to four storeys to respond to the residential scale of Millman Street. To the south, the building line has been maximised to align with the back edge of the pavement on the north side of Millman Mews (as the current arrangement at the junction with Millman Mews). The massing of this elevation reduces to two storeys towards the west end of Millman Mews to maintain acceptable daylight and sunlight levels to adjacent residential properties. The height of this is lower than the existing block in this location.
- 5.37 Since the initial concepts were shown to the Council in July 2013, the building massing has been substantially reduced through the removal of one storey above ground (this added a second basement level). This strategy minimised visible massing whilst still achieving the requirements of the brief.
- 5.38 Subsequently, at further pre-application meetings with the Council the following steps were undertaken to reduce the height of the development:
- Reducing the height of the building by approximately 1m through the rationalisation of services zones;
 - Raising the lower parapet line on the fourth floor to 1.1m above roof level. This helped to reduce the proportions and visible massing of the upper two floors when viewed from pavement level; and
 - Setting back the facades of the upper two floor by approximately 2.5m on the north elevation. The set back on the west elevation was also increased to approximately 2.8m to minimise the massing impact on Guilford Place. On the east elevation, the set-back has been maintained at approximately 1.1m.
- 5.39 The façade treatment and architectural details address and respond to the potential conflicting requirements of the site context and the ambition of the proposed development to make an appropriate statement on this very prominent site.
- 5.40 Externally, the nature of Bloomsbury Conservation Area, which is predominantly defined by three or four storey brick built terraces, has identified the importance of maintaining a masonry quality if the building is to make a positive contribution to its context.

- 5.41 Internally, the vision for the building is best summarised in the ‘bench to bedside’ definition of the activities taking place within the building. These activities are given expression through their visibility and the clarity of building organisation. The proposals therefore emphasise the building’s vision through prominence of the key activities from the street: a shared entrance for research staff and outpatients, views into the research laboratories and views into and out of the outpatients waiting areas.
- 5.42 In response to the surroundings the building has two aspects with two different façade treatments. To Coram’s Fields and Guilford Place the building has a public façade and a civic presence, offering opportunities for views towards the Fields with the potential for significant glazed areas.
- 5.43 The north and northwest orientation also provides good daylighting to the workspaces. To give the impression of a solid masonry building appropriate to its context vertical blades create a layered façade, obscuring the glazing behind and reducing solar gains. On the east and south, the building responds to the residential nature of Millman Street and Millman Mews, addressing issues of overlooking, direct sunlight and risk of solar gains. These facades have been conceived with more traditional proportions of glazing to solid, reflecting the domestic context of these streets.
- 5.44 Concepts of permeability and rhythm have also informed the openings across the facades, which are derived from the organisational concept. These concepts have focussed design development on ways in which the envelope of the building can provide a regular pattern of textured surface to modulate natural light, frame views into, and out of the building, and introduce transparency and depth into the facades.

Materiality

- 5.45 Brick has been chosen as the primary material for the solid areas of the building, as one of the traditional materials of the historic vernacular of the Bloomsbury area. In this way the building is able to relate to the historic past while able to convey a modern high quality building. Its modular nature allows it to form large solid areas when viewed from a distance, while at close proximity it is detailed to form textured surfaces to give the building a comfortable human scale and high quality finish. A greyish-buff multi stock brick is proposed to provide the necessary variations in colour and appearance, whereas the detailing of the coursing and jointing will be introduced for further articulation.
- 5.46 Typically, a traditional stretcher brick bond will be used throughout with soldier brick coursing between the first and second floor to provide a continuous expression on the south and east elevations. English bond coursing will be used on the ground floor to differentiate and define the base of the building, and to provide an increased level of articulation and texture.

- 5.47 Terracotta has been chosen as a material with similar characteristics to brickwork and widely used in the civic buildings in Bloomsbury, terracotta has been chosen to form the single and double height fins of the north and west elevations. Sharing the tonal value of the brickwork, the terracotta will have a glazed finish with a slight sheen to achieve a subtle colour variation in natural warm and earthy tones. The fins will be arranged in a tight vertical arrangement to give the necessary level of solidity when viewed at oblique angles, while at the same time providing transparency at perpendicular angles to enable the extensive glazing areas to allow natural light into the workspaces on the upper levels of the building. The terracotta fins will also have a sculpted profile to reveal an additional level of detail and articulation.
- 5.48 On the north elevation, a level of permeability has been introduced by setting the ground floor back behind the façade line of the first floor. On the floors above, a highly modelled layered façade is characterised by a regular rhythm of deep terracotta fins. On the second and third floors the fins are expressed as double height elements, whereas the first floor employs a combination of faster rhythm fins with a band of flush glazing to the Outpatients waiting areas. The north elevation emulates similarities to the repetitiveness of Georgian terraces and these subtle changes to the regularity of the façade have been incorporated to break down the perceived bulk of the building. Further detailing to the terracotta fins will also provide an additional level of articulation and interest when the façade is experienced up close.
- 5.49 The east elevation has been designed as a more solid façade than the north elevation to respond to the residential nature of Millman Street, with high quality brickwork as the primary material.
- 5.50 The rear elevation has been designed with careful consideration to its context, maintaining the regular rhythm of full height windows as the east elevation. The use of flush and recessed glazing and carefully considered brick coursing allows the façade to maintain a very strong form whilst establishing a variety and level of interest across each façade.
- 5.51 The west elevation is similar in composition and language to the north, acknowledging the more public aspect of Guilford Place.

The Historic Environment

- 5.52 National planning guidance on the historic environment is provided by the NPPF. It defines what constitutes the historic environment, including ‘heritage assets’ (which can be designated or undesignated), and sets out the policy approach to assessing development proposals which affect heritage assets either directly or in terms of their setting.

- 5.53 The NPPF includes an objective to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
- 5.54 In determining planning applications, the NPPF states that local authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. In determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.55 One of the objectives of the London Plan is the promotion of heritage. Policy 7.8 seeks to sustain and enhance the significance of heritage assets and utilise their positive role in place shaping, and states that new development in the setting of heritage assets, and conservation areas should be sympathetic to their form, scale, material and architectural detail.
- 5.56 Policy 7.9 of the London Plan advises that regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant. It also states that the significance of heritage assets should be assessed when development is proposed and schemes designed so that the heritage significance is recognised.
- 5.57 Camden's Core Strategy Policy CS14 seeks to promote high quality places and conserve heritage assets. The policy requires proposals to be of the highest standard of design that respects local context and character. Development Policy DP24 seeks to secure high quality design.
- 5.58 The relationship of the proposed development within the context of Bloomsbury Conservation Area has been carefully studied. Early massing models were used to study the symmetrical arrangement around Guilford Place and determined the requirement for a single storey physical connection to the Grade II listed Georgian terrace. This connection is necessary to define the corner of Guilford Place at street level, in a similar manner to the Institute of Children's Health on the western side. The connection has been released on the upper floors to allow a taller building.
- 5.59 The position of the building line to the rear of 3-6 Guilford Place has also required careful consideration. In the developed proposal the building line is located approximately 2m from the rear boundary wall of the residential properties. This will

enable a sufficient construction zone in this location and will allow a small number of windows to be located on the new elevation on the ground floor.

Open Space and Public realm

- 5.60 The London Plan states that development should make the public realm comprehensible with gateways and focal points (Policy 7.5). Architecture should contribute to a coherent public realm, streetscape and wider cityscape. Buildings should be of the highest architectural quality, appropriately enclose the public realm and provide high quality spaces.
- 5.61 Core Strategy Policy CS15 states that where development proposals create additional demand for open space, opportunities should be secured for improvements to open spaces including the facilities provided for play, access arrangements and connections between spaces. The policy encourages biodiversity in the borough through the provision of biodiverse green or brown roofs and new trees and vegetation.
- 5.62 Core Strategy Policy CS15 aims to protect and improve open spaces and encourage biodiversity by creating the provision of new or enhanced habitat through green walls, roofs etc and by protecting trees and promoting the provision of new trees and vegetation, including additional street trees.
- 5.63 Development Policy DP24 seeks to ensure the developments consider existing natural features, provision of appropriate hard and soft landscaping including boundary treatments and the provision of appropriate amenity space.
- 5.64 The proposed development, like the existing building on Site takes up most of the Site footprint. Due to its urban location there is a very strong relationship between the CRRDC and its surroundings. At pavement level this is especially important and careful consideration of how the building engages with the public realm has been an important aspect of design proposals. This includes improvements for Guilford Street, Guilford Place, Millman Street and Millman Mews.
- 5.65 The improvements include the filling and paving over the existing lightwells along Guildford Street, Guildford Place and Millman Street. This will increase the overall pavement widths along the streets adjacent to the building, increasing the extent of the public realm by some 297sqm in total. The final finish of the new paved areas and kerbs will require to be agreed with LBC and whether they should match the existing palette of standard material or enhanced in any way.

Energy and Sustainability

- 5.66 The NPPF identifies that Local Planning Authorities should adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (paragraph 94).
- 5.67 London Plan Policy 5.2 sets out the Mayor's energy hierarchy to: be lean, (use less energy); be clean (supply energy efficiently); and be green, (use renewable energy). Targets are proposed for minimum improvements over the Target Emission Rate: 25 per cent (Code for Sustainable Homes level 4) on 2010 Building Regulations (residential and non-domestic buildings between 2010-2013). Where targets cannot be met on Site any shortfall can be provided offsite or through payment in lieu.
- 5.68 Sustainable design and construction standards include minimising carbon dioxide emissions, avoiding pollution, minimising waste and maximising recycling and avoiding impacts from natural hazards (Policy 5.3). Relevant London Plan policies relating to sustainable development are as follows.
- 25% of energy supply should be decentralised by 2025 (Policy 5.5). Boroughs are encouraged to undertake energy masterplanning and development of networks for development to connect to.
 - Policy 5.6 sets out the approach to decentralised energy in development proposals, prioritising connection to existing systems, followed by Site wide CHP and communal heating and cooling.
 - Policy 5.7 seeks that a proportion of energy is generated from renewable sources. Paragraph 5.42 sets out a presumption that all major development proposals will seek to reduce carbon dioxide emissions by at least 20 per cent through the use of on-Site renewable energy generation wherever feasible.
 - Major developments should reduce potential overheating (Policy 5.9).
 - Policy 5.10 promotes urban greening with a target increase in green space in the CAZ of 5% by 2030. Developments should include green roofs and walls where feasible (Policy 5.11).
 - Development should comply with PPS25 (superseded by technical guidance accompanying the NPPF) on flood risk and management (Policy 5.12) and utilise sustainable urban drainage unless it is not practical to do so (Policy 5.13).
 - Developments should seek to minimise waste and exceed targets of recycling and reuse of waste in construction, excavation and demolition to meet the Mayor's objective for waste self-sufficiency (Policy 5.16 and Policy 5.18). Suitable waste and recycling storage facilities are required in all new developments (Policy 5.17).
 - Developments are required to ensure adequate and accessible provision of recycling, composting and residual waste disposal facilities. The design of waste and recycling facilities must be easily and safely accessible, improving local amenity.
 - Developments should promote sustainable design and construction methods to reduce emissions (Policy 7.14) and should aim to be 'air quality neutral' and not lead to further deterioration of existing poor air quality. Offsetting should be used to ameliorate negative impacts associated with development proposals.

5.69 This planning submission is accompanied by a Sustainability Statement and Energy Strategy which has been prepared by Hoare Lea.

5.70 The Sustainability Statement demonstrates that high standards of environmental sustainability would be achieved for the Development. This would be achieved by the commitment to energy efficiency, water conservation, recycling, and providing cycle storage facilities.

5.71 The Development will target a BREEAM 2013 rating of 'Excellent'. The combination of the optimised passive design measures, energy efficient plan selection, specification of onsite generation (CHP) and a small amount of onsite renewable energy will result in an overall annual carbon reduction of over 36.8% relative to the current 2013 Part L target emission rate (TER) of regulated energy.

5.72 In accordance with the London Plan objectives the Mayor's energy hierarchy (Policy 5.2) has been followed:

- Be Lean: a range of energy saving measures have been applied to establish the building energy demands and carbon emissions, the emissions are approximately 36.8% less than those of the Part L 2013 compliant baseline.
- Be Clean: Site wide Combined Heat and Power would provide for the Proposed Development's heating, cooling demands and energy requirements. Provision would be made for a future connection to a district heating network.
- Be Green: renewable technologies would be incorporated in the form of photovoltaic panels on the roofs within the development. Other renewable technologies have been assessed and have been considered inappropriate for the Proposed Development. The renewable energy produced by the photovoltaic panels will reduce the overall emissions by a further 3.4%.

5.73 Other key sustainability proposals include:

- Rainwater run-off attenuation would be provided by attenuation tanks and green roofs;
- Sustainable urban drainage;
- Water will be conserved through the use of water efficient devices;
- Use of sustainable materials and construction methods; and
- A Site Waste Management Plan would ensure the construction waste on Site would be monitored, sorted and recycled.

5.74 In conclusion, the Energy and Sustainability are key features of the Development, which is in accordance with the objectives of the national, London Plan and local planning policy.

Movement

5.75 The NPPF at paragraph 35 identifies that developments should be located and designed, where practical to:

- accommodate the efficient delivery of goods and supplies;
 - give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
 - create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
 - incorporate facilities for charging plug in and other ultra low emission vehicles; and
 - consider the needs of people with disabilities by all modes of transport.
- 5.76 At Paragraph 37, the NPPF encourages planning policies to aim for a balance of uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure and other activities.
- 5.77 In terms of parking, Paragraph 39 of the NPPF notes that when setting local parking standards for residential and non-residential development, local planning authorities should take into account:
- the accessibility of the development;
 - the type, mix and use of development;
 - the availability of and opportunities for public transport;
 - local car ownership levels; and
 - an overall need to reduce the use of high-emission vehicles.
- 5.78 The Mayor encourages closer integration of planning and development and promotes development that reduces the need to travel and encouraging walking by improving the urban realm (London Plan Policy 6.1).
- 5.79 Development proposals should ensure that impacts on transport capacity are assessed (London Plan Policy 6.3).
- 5.80 Developments should provide secure cycle facilities (Policy 6.9). Maximum parking standards are set out in table 6.3 of the London Plan. The Draft Early Minor Alterations to the London Plan proposes amendments to these standards.
- 5.81 London Plan Policy 6.13 states that an appropriate balance must be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. Maximum parking standards are set out in table 6.2. All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit.
- 5.82 The proposed development will not have on-site car parking and thus can be considered as car-free. However due to the buildings purpose it aims to meet the parking needs of disabled people and visitors requiring a space for short visits by the

provision of a drop off and pick up area on Guilford Street. The drop off area is 30m long and can accommodate 5 or 6 vehicles at any one time. Staff and incoming occupiers will be informed that they will not be eligible to obtain a parking permit for on-street parking, or to purchase a space in a LB Camden-controlled car park. Visitors can use the drop off which is suitable for use by taxis and mini buses. It is proposed that there would also be one designated ambulance space.

5.83 It should also be noted that the visitors trips to and from the proposed development will only effectively be displaced traffic from the existing hospital located within the same area (Great Ormond Street).

5.84 The development is proposing two disabled spaces which would be formally marked with one on Millman Street and one on Guilford Street.

5.85 The proposal provides 6 spaces for visitors on Guilford Street and 1 disabled space on Millman Street and 1 delivery and servicing bay on Millman Street. The existing parking spaces on nearby streets require to be re-arranged as described in Section 2 of the Transport Assessment and would include the following:

- 4 residential spaces currently located on the western side of Millman Street will be relocated to the eastern side of Millman Street;
- A disabled space located on the eastern side of Millman Street will be relocated to the western side of the road;
- A motor cycle parking area and 4 pay and display spaces located on Guilford Street will be relocated on the eastern side of Lamb's Conduit Street; and
- 2 pay and display spaces on the eastern side of Millman Street will be changed to residential permit, while the 2 pay and display spaces will be relocated to Lamb's Conduit Street.

5.86 Cycle parking provision provided for the building follows the standards set out in Camden Development Policy, which is:

- Staff – from threshold of 500sqm, 1 space per 250sqm or part thereof.
- Visitor – from threshold of 500sqm, 1 space per 250sqm or part thereof.

5.87 As the development has a total area of 13,237sqm, the minimum required cycle parking provision would be 53 spaces. The development proposes a total of 72 spaces, 52 which are “safe-secure” cycle parking spaces located at the end of Millman Mews and 20 “safe-secure” (Sheffield stands) cycle parking for visitors is located on Guilford Street close to the main entrance to the building.

Servicing and Refuse

5.88 Further details on the proposed servicing and waste management strategy can be found in the Transport Assessment, prepared by Pell Frischmann. The document sets out

how deliveries and servicing will be managed to ensure there is no negative impact on the surrounding streets and road network.

5.89 A wide range of servicing options for the building was explored including servicing the building internally and from Millman Mews. In appraising the site for redevelopment there are two streets in order to gain servicing access:

- Millman Street; and
- Millman Mews.

5.90 In reviewing the two locations the Transport Assessment demonstrates that, Millman Street is the most appropriate option and whilst Millman Mews is currently used for refuse collections, increased servicing from this street is not appropriate.

5.91 Feedback from the public consultation highlighted concerns from residents regarding increased activity within the Mews and identified that the current arrangement is problematic.

5.92 Pell Frischmann looked at measures to manage and mitigate deliveries and servicing as much as possible, enabling a reduction in the number of vehicles. An in-building turntable option was explored and discounted for the following reasons:

- Impact on usable building area – a large area of internal floorspace would be lost at lower-ground, ground and first floor level;
- The loss of floorspace on the ground floor would equate to 2/3 consultation rooms or 120 appointments per week;
- It would be necessary to lower the ground floor and basement levels to accommodate the necessary turntable and the mechanism would likely impact on functionality and use of research facilities;
- A deeper basement construction would be required and there would be vibration issues from the turntable mechanism which would likely impact on the use of necessary sensitive equipment, in the lower ground floor in the Research Equipment Rooms; and
- There would be a potential increase in building height by 150mm to accommodate the turntable opening together with changes to the Millman Street elevation to accommodate the opening together with additional projects costs of circa £1million.

5.93 The proposed servicing of the building is proposed to take place from Millman Street as it is believed that:

- The existing servicing arrangement into Millman Mews requires relatively unsafe manoeuvres and not considered adequate for new development; and
 - The increase in vehicle numbers within the Mews would have greater noise and vibration impact on a higher number of residents compared to Millman Street.
- 5.94 Deliveries to the proposed development has been based on the information received from the currently operating UCL building, use of which will be relocated to the CCRDR building, once the development is completed. The expected delivery volumes to the outpatients section of the building were provided by the Great Ormond Street Hospital for Children NHS Foundation Trust and are summarised in Table 7.6 and 7.7 within the Transport Assessment.
- 5.95 It can be noted that the average daily number of deliveries are estimated to be 21 vehicles per day, which is equivalent to 3 deliveries per hour.
- 5.96 The deliveries of gases (Bulk CO₂, Liquid Nitrogen) is thought to have the biggest impact mainly due to the time required to refill vessels (some 30-45minutes) which are often relatively noisy. In order to mitigate any negative effects, the volume of such deliveries will be minimised by the provision of larger storage within the building and consolidation of deliveries between UCL/GMP or CCRDR users.
- 5.97 The majority of deliveries will be by transit vans (61%) and only 4% of deliveries / collection will be undertaken by large trucks, some of which (e.g. domestic refuse collection) currently take place within the area and thus will not have an additional impact.
- 5.98 The Transport Assessment demonstrates that all servicing activities can be accommodated without materially affecting the operation of the surrounding highway network.

Surrounding Highway Improvements

- 5.99 Proposals to improve the quality of public realm are proposed as part of the development as follows:
- 5.100 It is intended that further discussions will take place with planning officers to identify the extent to which the proposed development can contribute to the above suggested public realm improvements.
- 5.101 In conclusion, the Transport Assessment demonstrates that the Proposed Development meets the transport aspirations of the national, regional and local planning policy in respect of sustainable modes of transport.

Environment

- 5.102 At paragraph 109 the NPPF identifies that the planning system should contribute to and enhance the natural and local environment by “*preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water, or noise pollution or land instability.*”
- 5.103 Strategic Policy 13 of the Core Strategy also states that developments are expected to demonstrate minimisation of waste and water usage, and measures for reducing air, land, water, noise and light pollution and avoiding amenity and environmental problems.
- 5.104 New developments are required to be assessed in terms of their impact on the residential amenity of existing neighbouring residents. London Plan Policy 7.6 seeks to ensure new buildings do not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy overshadowing, wind and microclimate. This is particularly important for tall buildings.

Daylight and Sunlight

- 5.105 An assessment of the daylight and sunlight issues in relation to the Development has been prepared by GVA Schatunowski Brooks (GVA). The assessment relates to the potential impact of the Development on neighbouring residential properties
- 5.106 GVA have worked closely with the design team to ensure the Development will leave neighbouring residential properties with adequate levels of daylight and sunlight.
- 5.107 As demonstrated within the Design and Access Statement, there is a large portion of the site (corner of Guilford Street and Guilford Place) which is underdeveloped which means that any development will result in losses to levels of daylight and sunlight received by neighbours.
- 5.108 The following residential properties were assessed as part of the Daylight and Sunlight Report
- Of the above properties assessed, all with the exception of 1-25 Millman Court and 3-6 Guilford Street retain level of daylight that is in full compliance with the BRE guidance. 15-16 Guilford Street;
 - 66-68 Millman Street;
 - 60-62 Millman Street;
 - 52-58 Millman Street;
 - 1-25 Millman Court;
 - 1-17 Rokeby House;

- 94 Guilford Place Public House; and
- 3-6 Guilford Place.

5.109 In terms of 1-25 Millman Court, this property is located to the south of the site with five flats that have their rear elevations facing the existing deep recess in the Mews façade of the exciting former computer centre building. As a consequence they benefit from a high level of existing light. The proposed development infills the set back area and the consequence is that three flats see reductions of in excess of 20 VSC to the rooms facing the Site.

5.110 It should be noted that the rooms that are impacted within these three flats include a bathroom, kitchen and one bedroom with the main living area facing south on the opposite side which is unaffected by the proposed development. Consequently GVA consider the impact on these flats to be acceptable.

5.111 In terms of 3-6 Guilford Place, these comprise four terraced houses which in some cases divided into flats. Number 3, located at the northern end has its front door and façade facing north across the open space at the north end of Guilford Place. It has 13 windows that face towards parts of the site and out of those a number are stair windows.

5.112 The basement rear window appears to serve a kitchen and this does not have a significant level of light in the existing condition. Its reduction is of 2.20% VSC which GVA consider to be unnoticeable. This is the only habitable room that sees more than a 20% reduction in light.

5.113 Number 4 has a rear extension at basement and ground level that covers the majority of what would have been its garden. It has windows in this that face north and south. The northern ones are heavily impacted by the scheme however the basement room, lit solely from the north, appears to be a utility room or similar whilst the first floor windows appear to serve a WC and a lounge. The lounge has south facing windows so despite loss from the north retain an unimpeded view to the sky. All other windows retain in excess of 27% VSC or see increases in daylight given the proposed reduction of the height on the site at the south western corner. GVA consider the impact on these flats to be acceptable.

5.114 Overall, the assessment demonstrates that the Development is able to maintain levels of compliance with the daylight and sunlight assessment methodologies that is considered acceptable for a Site located within an urban area.

Ecology

5.115 The existing Site is nearly 100% covered with buildings or impermeable areas of hard standing.

5.116 It is considered that the development complies with relevant national, regional and local ecology legislation and policy as they:

- Respect the natural environment, and seek to enhance biodiversity and open space;
- Incorporate ecological measures into the scheme; and
- Creation of areas of roof top amenity space and green and brown roofs which will enhance the ecological value of the Site.

5.117 At the heart of the landscape strategy (refer to Design and Access Statement) lies ecology and biodiversity measures. Habitats to be created include:

- Species rich planting at both on green roofs; and
- Brown roofs.

Air Quality

5.118 The Site is located within an Air Quality Management Area. The Air Quality Statement prepared by Air Quality Consultants notes that the air quality for future users has been assessed at a number of worst-case locations within the proposed development. The report concludes that concentrations of PM10 and PM2.5 will remain below the objectives at all existing receptors in the assessment year and that in the case of nitrogen dioxide, the annual mean concentrations are predicted to be above the objective at worst-case locations on the façades of all floors of the proposed development. The report noted that the building and transport related emissions associated with the proposed development are below the relevant benchmarks. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral.

5.119 The overall air quality impacts of the development, with mitigation in place are judged to be insignificant.

Noise

5.120 Assessment has been carried out of the likely significant impacts arising from noise associated with the demolition and construction activities related to the Development and, of its operation and occupation.

5.121 The Noise Assessment prepared by Hoare Lea sets out the detailed assessment of noise for both the construction and operational phases of the development. This concludes that there is likely to be an increase in noise on roads surrounding the Site due to construction traffic which should, in the main, be of negligible impact.

5.122 The Noise Assessment concludes that appropriate internal noise levels can be met for neighbouring residential units.

Access and Inclusion

- 5.123 Under the Disability Discrimination Act 1995 as amended, there is a general duty on all Local Authorities to prepare a Disability Equality Scheme to show how the Authority is meeting its general duty in the above Act.
- 5.124 In addition to this, the Supplementary *Planning Guidance – Planning for Equality and Diversity in London* (2007) was published by the GLA to encourage developers and planners to consider equalities issues in their schemes. This guidance states that since the Planning and Compulsory Purchase Act (2004) there has been a move away from a traditional, land-use based system to spatial planning. This (it states) “*brings together and integrates policies for the development and use of land with other policies and programmes which influence the nature of places and how they function*”.
- 5.125 The Document goes on to identify the spatial planning issues that can contribute to meeting the needs of communities experiencing disadvantage and social exclusion. Those of particular relevance to the proposed scheme include: urban design and public realm; accessible, inclusive and safe environments, access to employment and training opportunities; access to open space and recreational areas; and provision of social infrastructure and community facilities.
- 5.126 Policy 3.8 of the London Plan states that the Mayor will require all future development to meet the highest standards of accessibility and inclusion. The principles of inclusive design include ensuring that new development can be used easily by as many people as possible without undue effort, separation or special treatment. In line with policy 3.8, an Access Statement has been prepared and submitted as part of the Design and Access Statement which sets out in detail, the general arrangements for approaching the development in terms of arriving and parking, entering and circulating internal and external common areas along with other considerations where relevant.
- 5.127 The Development has been designed with access issues in mind and the Design and Access Statement provides information on the provisions within the proposals for mobility impaired persons, in accordance with relevant national, strategic and local policies.

Secured by Design

- 5.128 The Development have been designed in accordance with best practice Secured by Design Principles. As set out within the Design and Access Statement, consideration is given to the Site in relation to crime prevention and includes a number of key objectives in relation to access and movement, structure, surveillance, physical protection and management and maintenance.

6.0 CONCLUSIONS

- 6.1 The Development will deliver a new building which brings knowledge, technology and patients together in one place speeding up the ‘bench to bedside’ process of developing new treatments. The building would give our medical and scientific experts the facilities and access to patients they need to:
- understand and read genetic codes more quickly;
 - develop gene and cell therapies to treat genetic conditions;
 - use stem cells to regenerate organs or tissues; and
 - manufacture new medical devices Most importantly, it will bring breakthroughs and cures for rare diseases closer with every passing day.
- 6.2 The proposals have been subject to a comprehensive consultation exercise involving presentations to LB Camden and key consultees such as local residents and amenity groups. The issues raised by these groups have been considered and incorporated in the development of the final proposals, where practicable.
- 6.3 The Development has been subject to detailed assessment against national, regional and local planning policy and guidance and has been found to be in accordance with the development plan and other material considerations.
- 6.4 In particular, it will deliver the following policy objectives and benefits:
- The development comprises a sensitively designed scheme which addressed the complexities and constraints and opportunities of the Site;
 - The development optimises regeneration opportunities of a brownfield Site in a central location;
 - The development is located in close proximity to a range of public transport opportunities and can be expected to contribute towards a reduction in the need to travel by private transport;
 - The development would create new buildings of architectural quality which would act as a high quality benchmark for future integrated and sustainable schemes in this part of the Borough;
 - The proposals have been designed to relate positively to the local townscape and will provide buildings of the highest architectural quality.
 - The energy and sustainability proposals for the building ensure that the buildings will meet and the requirement of local and strategic planning policy; and
 - The development is sensitive and responsive to existing residential amenity.
- 6.5 In conclusion, the Proposed Development would deliver an exemplary, sustainable and economically viable development which would have many regenerative and economic benefits for the Site and immediately surrounding area in line with NPPF, London Plan and LB Camden planning objectives.