



Demolition of the existing buildings and redevelopment
for a building of 6 storeys in height including ground and 3 storeys basement,
for use a specialist head and neck facility (Class D1)

Former University College London (UCL) Student Union and Royal Ear Hospital,
Huntley Street, Bloomsbury

Planning Statement

February 2015

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1 Introduction

- 1.1 This Planning Statement has been prepared by the Jones Lang LaSalle Limited (JLL) Planning Team on behalf of University College London Hospitals NHS Foundation Trust (UCLH). UCLH is the freeholder of the Former Royal Ear Hospital Building, and a long leaseholder at the former University College London (UCL) Students' Union in Huntley Street which expires in March 2110. However, it should be noted that UCLH has an option to purchase the freehold at the Student Union building for minimum consideration.
- 1.2 The Statement has been prepared in support of UCLH's application to redevelop the site for a specialist ear, nose and throat outpatient hospital housed within a 6 storey building (including ground and a 3 storey basement below ground).
- 1.3 The proposal effectively forms Phase 5 of UCLH's wider proposals to modernise its estate. Indeed, the facility will house the ear, nose, throat, and dental outpatient facilities currently provided in the Eastman Dental Hospital (EDH) and Royal National Throat Nose and Ear (RNTNE) Hospital - both in Gray's Inn Road.
- 1.4 UCLH currently lease the RNTNE, which expires in 2019. However, both the EDH and RNTNE are outdated and are nearing the end of their useful life meaning significant investment is needed to bring them up to modern clinical standards. It is therefore proposed to provide a more efficient, replacement facility at this site where many shared services can be combined. This would make a more efficient use of clinical space, and reduce the need for patients to travel between buildings within the UCLH estate. Should planning permission be granted, the development will also enable the replacement facility to be operational ahead of the leases expiring at the RNTNE in 2019.
- 1.5 The purpose of this Planning Statement is to demonstrate why planning permission should be granted based on compliance with national, strategic and local planning policies, and the significant benefits that the scheme will deliver.
- 1.6 The Statement is structured as follows:
 - Section 2: Site Context describes the character and appearance of the site and its surroundings.
 - Section 3: Development Proposals describes the proposals in detail.
 - Section 4: Planning History considers the history of previous planning applications at the site and their relevance to this development.
 - Section 5: Pre-Application Consultation summarises the extensive pre-application consultation undertaken to date.
 - Section 6: Planning Policy Context sets out the national, strategic and local planning policy context against which this application will be assessed.
 - Section 7: Consideration of the Issues analyses the key town planning considerations and confirms that there is no material reason why planning permission should not be granted.
 - Section 8: Scheme Benefits summarises the social, environmental and economic benefits that the development will deliver.
 - Section 9: Case for Planning Permission summarises the reasons why planning permission should be granted.
- 1.7 This Statement should be read alongside the following additional documents forming part of the submission:
 - Planning application drawings by Steffian Bradley Architects in association with Pilbrow and Partners
 - Design and Access Statement by Steffian Bradley Architects in association with Pilbrow and Partners
 - Heritage Appraisal by KM Heritage

- Transport Assessment by Jacobs
- Patient Transport Servicing (PTS) Vehicle Strategy by Jacobs
- Framework Waste and Servicing Management Plan by Jacobs
- Framework Construction Management Plan by Jacobs
- Air Quality Assessment by Jacobs
- Daylight and Sunlight Report by Point2 Surveyors
- Acoustic Planning Report by Sandy Brown
- Environmental Noise Survey by Sandy Brown
- Basement Impact Assessment (BIA) by Clarke Nicholls Marcel
- Structural Condition Survey Report by Clarke Nicholls Marcel (included within the Heritage Appraisal)
- BREEAM Planning Report by Arup
- Energy Strategy by Arup
- Statement of Community Involvement by Local Dialogue

2 Site Context

2.1 This section describes the character of the site and its surroundings, as well as identifying the planning policy designations applicable to the site.

The Site

2.2 The development site is 0.14 hectares (0.36 acres) in size and rectangular in shape, and is located approximately half way along Huntley Street, which runs parallel with Tottenham Court Road to the east.

2.3 The site benefits from excellent public transport accessibility with a Public Transport Accessibility Level of PTAL 6b – the highest rating that can be achieved. Indeed, Goodge Street London Underground Station is located approximately 200m to the south with Warren Street station located some 300m to the north-west. Euston, Euston Square, Tottenham Court Road, and Kings Cross stations are also located within a short walking distance of the site; and there are numerous London Bus services available on Tottenham Court Road. A site location plan is provided in Figure 1 below.



Figure 1 – Site Location Plan

2.4 The site's principal frontage is on Huntley Street to the east. However, the rear elevation also fronts onto Shropshire Place to the west - a small 'no-through' road serving the rear of the site and properties located off Tottenham Court Road. Shropshire Place is accessed off Capper Street – a small road linking Huntley Street with Tottenham Court Road and binding the northern end of the site. The site is therefore unique (and highly constrained) insofar as it is bound on 3 sides by highways. However, the southern end of the site is bound by an attractive, 7 storey mansion block comprising residential apartments known as Gordon Mansions. A site plan is provided in Figure 2 below with the site outlined in red:



Figure 2 – Site Plan

2.5 The Former Royal Ear Hospital building occupies the northern end of the site, is 4 storeys in height (including ground) and is located on the corner of Huntley Street and Capper Street. The building was constructed in the 1920s following a significant donation from the Duveen family, and according to the accompanying Heritage Appraisal was intended to create a new hospital building “*comprising the most up-to-date ear, nose and throat hospital in the world, and to equip it with all the most modern facilities for research work to combat deafness*”. A photograph of the Royal Ear Hospital is provided in Figure 3 below



Figure 3 – Photograph of Former Royal Ear Hospital

- 2.6 However, as set out in the Heritage Appraisal, the design of the building was scaled-back significantly upon construction - omitting the balconies to Huntley Street that were originally planned, and relocating them (strangely) to the Shropshire Place elevation where they were eventually enclosed in any event. Similarly, the roof has been significantly altered since construction of the building, and the stone blocks to either side of the Capper Street elevation that once continued around to Huntley Street have been removed. The interior has also been significantly altered through the years such that there is limited fabric of architectural/historic merit remaining.
- 2.7 The building comprises a relatively attractive elevation to Capper Street comprising a stone panel and crest. However, as outlined in the Heritage Appraisal, this highlights the poor planning of the building which results in the principal elevation located on a narrow side street with the most prominent elevation on Huntley Street elevation appearing comparatively dull.
- 2.8 The Royal Ear Hospital is currently vacant. However, it was used as a temporary location for the UCL Bartlett School of Architecture whilst their new building was constructed until mid-late 2014.

2.9 The southern part of the site is occupied by the former UCL Student Union building, which was constructed in the late 1950s. It represents somewhat of an anomaly in the townscape comprising just 2 storeys in height (including ground and basement level) compared with the 6-7 storey height of surrounding buildings.

2.10 The building includes a lecture hall, squash court and bar, and served the needs of student doctors for over half a century until its closure as a student facility in 2011. The building is currently vacant apart from the use of the basement as a control centre for the Patient Transport Service (PTS) vehicles operated by UCLH, and the informal use of the ground floor as a lunch area for PTS drivers. However, should the proposed development be approved, both of these operations will be transferred to the RNTNE, further detail of which is provided later in this report. A photograph of the building with the Royal Ear Hospital shown in the background is provided in Figure 4 below:



Figure 4 – Photograph of the Former UCL Student Union

Surrounding Area

2.11 Immediately beyond Capper Street to the north, and also fronting onto Huntley Street, is the UCLH MacMillan Cancer Centre, which formed Phase 3 of UCLH's proposals to modernise its estate. It is 6 storeys in height and has a contemporary design comprised of bronze and glass construction.

2.12 Beyond this to the north is a 3 storey public house - The Jeremy Bentham - housed within a 4 storey red brick property, with the UCLH 'Phase 4' site located beyond. Planning permission was granted on 22nd September 2014 at this site for an L-shaped building of 7 storeys in height comprising approximately 35,000 sq m GEA of medical floorspace (ref. 2013/8192/P). This development is currently under construction, and will house a state-of-the-art proton beam therapy (PBT) cancer unit (the first of its kind in the UK) and day surgery facilities within the 4 storey basement, as well as much-needed inpatient beds above ground. Further detail regarding this development is provided in Section 4.

2.13 Immediately to the south of the site is an attractive red brick mansion building of 7 storeys in height known as Gordon Mansions, which comprises residential apartments. Gordon Mansions is divided into two blocks with the western building abutting the site to the south and the eastern building located immediately opposite to the south-east of the application site.

2.14 Immediately opposite the site to the east is a row of 3-4 storey, Georgian, terraced properties. These buildings (other than the Liver Institute) are predominantly owned by the UCLH Charity and Clic Sargent, the latter for use by families of patients needing ongoing treatment at the hospitals, and are Grade II listed comprising yellow brick and traditional sliding sash windows.

2.15 Located to the west of the site on the opposite corner with Huntley Street is a 6 storey Modernist-style property known as Shropshire House comprising typical Art Deco features such as Crittal-style windows and housing commercial offices. Immediately south of this in Queens Yard is a series of 5 storey buildings with limited architectural merit, occupied by a Fitness First gym and commercial offices.

2.16 As demonstrated above, there is a wide variety of land uses and building styles in the area ranging from traditional residential mansion blocks such as Gordon Mansions to commercial premises in Queens' Yard to the west; and larger scale, contemporary institutional uses such as the UCLH MacMillan Centre.

Site Specific Designations

2.17 The site falls within the following designations of the London Borough of Camden's (LBC's) adopted Policies Map (2010):

- Central London Area (CLA);
- Site Allocations F7 (Royal Ear Hospital) and F8 (Former UCL Students Union)
- Bloomsbury Conservation Area

2.18 An extract from the LBC Proposals Map is provided in Figure 5 below:

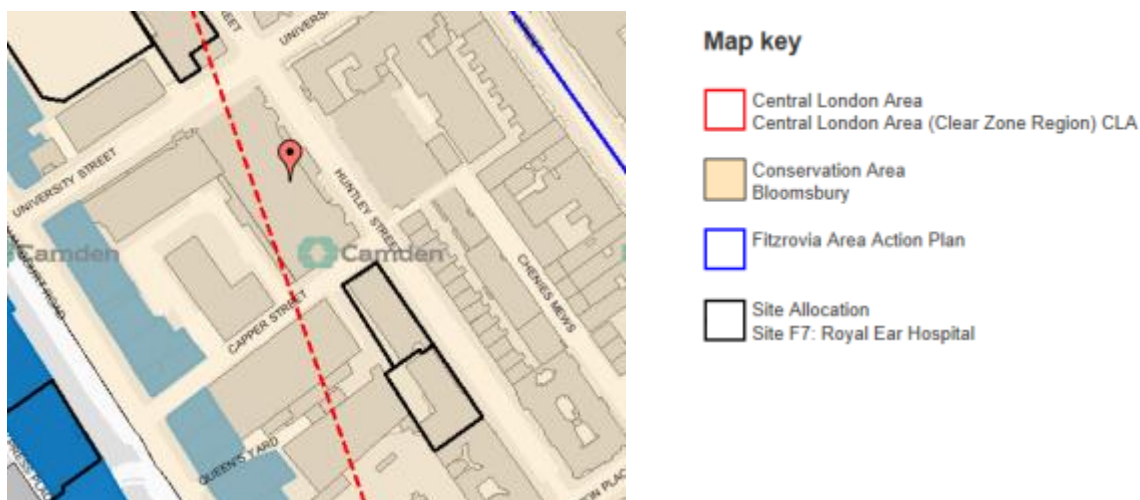


Figure 5 – Extract from the LBC Proposals Map

2.19 In addition, there are a number of listed buildings in the area, notably the Grade II listed Georgian terrace opposite the site to the east. All listed buildings in the vicinity of the site are highlighted in Figure 6 below:



Figure 6 – Listed Buildings in the Vicinity of the Site

2.20 Furthermore, neither of the buildings is included in Camden's Local List (January 2015), which identifies non-designated heritage assets that have a local architectural and/or historic importance.

2.21 Notwithstanding this, the Royal Ear Hospital is listed on page 131 of the FAAP as being a 'positive contributor' to the Bloomsbury Conservation Area. This statement is essentially taken from the Bloomsbury Conservation Area Appraisal (BCAA), which states at paragraph 5.50 that "the former Royal Ear Hospital, dating from 1926, situated on the west side of Huntley Street makes a positive contribution to the Conservation Area. The building has a finely detailed entrance façade facing Capper Street: constructed from a red brick with vertical ribbing, it has neo-Tudor influences in the form of a stone entrance surround and stone projecting bay". It is therefore clear that the Capper Street elevation is the key feature underpinning the status of this building as a 'positive contributor'. Conversely, the Student Union building is not mentioned at all in the document.

2.22 As identified in the Policies Map, both of the buildings are collectively identified for redevelopment. Further detail on this is provided in the FAAP where both sites are advocated for a comprehensive development to provide medical / healthcare facilities. The document also sets out a series of key principles that any new development must endeavour to provide including:

- Additional storeys in order to match the scale and massing of adjacent sites;
- Materials which are sensitive to the nearby listed buildings in terms of tone, colour, texture and finishes;
- Adequate daylight and sunlight to properties on the east side of Huntley Street;
- Preserve and enhance the setting of the surrounding heritage assets in particular the listed Georgian terraces opposite;
- New pedestrian routes with windows, entrances and, potentially, active frontages; and,
- Potential extension of Shropshire Place south to Torrington Place, although this would be dependent on development at 1-19 Torrington Place.

2.23 These principles are illustrated in the below diagrams taken from the FAAP:

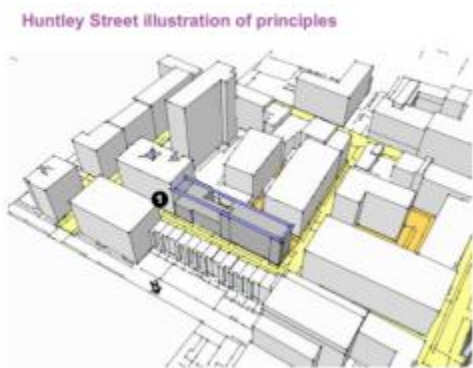


Figure 7 – Indicative FAAP Massing Diagram for the Site



Figure 8 – Indicative Proposed Site layout

3 Development Proposals

- 3.1 As outlined in Section 2, the proposed development will comprise a new, specialist ear, nose and throat outpatient facility (Class D1 hospital use) consolidating a number of uses currently existing in the EDH and RNTNE. This will enable a more efficient use of clinical services. Indeed, the co-location of services within a single building will help reduce trips by patients between various buildings within the UCLH estate.
- 3.2 UCLH currently lease the RNTNE, which expires in 2019. However, both the EDH and RNTNE are outdated and are nearing the end of their useful life meaning significant investment is needed to bring them up to modern clinical standards. It is therefore proposed to provide a more efficient, replacement facility at this site where many shared services can be combined. Should planning permission be granted, this would also enable the replacement facility to be operational ahead of the leases expiring at the RNTNE in 2019.
- 3.3 As set out above the building will operate as an outpatient facility meaning no overnight hospital beds would be provided within the scheme. The building would therefore operate during normal working hours only with the exception of cleaning, some staff working late in the evenings, and servicing deliveries.
- 3.4 A total of 250 staff expected to work in the building, with an average of 1,000 patients expected to visit the building per day.

Site Layout and Appearance

- 3.5 The footprint of the proposed building will occupy the vast majority of the site, with the yard to the rear of the Student Union building being infilled to provide an internal servicing area accessed off Shropshire Place.
- 3.6 The building will be accessed via pedestrian entrances on both Huntley Street and Shropshire Place, which have been specifically aligned following discussion with LBC officers in order to enable a visual link from Huntley Street through to Tottenham Court Road. The aim of this is to help enliven Shropshire Place, which despite providing pedestrian access through to Tottenham Court Road, primarily acts as a service road serving the rear of the site and Queen's Yard. As outlined in Section 2, this linkage is also a key objective of the FAAP and is discussed further in Sections 5 and 6.
- 3.7 The ground floor will be set back from the site boundary and upper floors in order to provide some animation to the elevations, and enable a widening of the pavement in both Huntley Street and Shropshire Place. The stone crest provided to the Capper Street elevation of the building will also be re-provided adjacent to the pedestrian entrance within this recess in order to define the entrance to the building.
- 3.8 The building will rise to a total of 6 storeys in height including ground level and a 3 storey basement, albeit with an enclosure provided at roof level at the northern and southern ends of the building only and housing plant and machinery. This responds to the height of the Phase 3 building to the north and Gordon Mansions to the south.
- 3.9 With regards to the external appearance of the building, it will be constructed of red brick with horizontal re-constituted stone banding to define each floor. The red brick will accord with the materials found at Gordon Mansions to the south (and numerous other buildings in the area), with the stone banding representing a contemporary expression of the horizontal detailing present throughout Bloomsbury.
- 3.10 The main body of the building will incorporate 8 x 3 metres high canted bays located along the Huntley Street frontage on each of the upper floors. These have been designed to appear more solid when viewed from the residential areas towards the south of Huntley Street through the use of perforated red brick panels on the southern side of the bays and the remainder of the bays incorporating glazing to create a more institutional appearance when viewed from the north. The perforated brick will also act as both a shading brise soleil element whilst generating a dappled rhythm of natural light cast along the main circulation space.
- 3.11 By contrast, the upper levels of the building will consist of light metal panels articulated by full height glazed bays. These will generate a double-height reading over levels 4 and 5, which will be recessed from the edge of the building by 1.3m in order to soften the visual impact.

- 3.12 The red brick and horizontal stone banding continues on the Shropshire Place elevation, albeit with a lighter articulation in order to reflect the status of this elevation in relation to Huntley Street. However, a single column of bays will be provided above the servicing entrance at the end of Shropshire Place in order to provide a degree of visual interest.
- 3.13 The Capper Street elevation is defined by a textured red brick pattern set between horizontal stone banding as found on the other elevations. This brick pattern terminates at level 5 to reveal a glazed lantern, activating the upper levels of the façade and providing a marker at night. The elevation also comprises three articulated brick chimneys that reinforce the concept of a hand-crafted high quality arts and craft building, and act as a clear marker locating the hospital in long and oblique views.
- 3.14 Similarly, the defining corner of Capper and Huntley Street is articulated by full height perforated brick brise soleil screens angled at 45 degrees. The main body of this corner terminates at level 5 (as opposed to level 4 on the remainder of the elevation) to emphasise the predominant verticality of the chimneys with the Capper Street façade defined by a recessed corner glazed element.
- 3.15 At roof level, a garden will be provided for use by patients, staff and visitors to the building. This will comprise a timber decked seating area and feature planting, the precise details of which UCLH are happy to agree with LBC at the post-determination stage.
- 3.16 Finally 30 photovoltaics panels will be provided on the western side of the roof, as well as CHP, in order to enhance the sustainability credentials of the scheme.
- 3.17 An image of the scheme is provided in Figure 9 below:



Figure 9 – Verified View of the Development

Internal Layout

- 3.18 The pedestrian entrances off Huntley Street and Shropshire Place will lead directly to an open-plan reception area and café provided in the northern half of the building. This will be visible through the windows at ground floor level along the northern part of the elevation in order to provide animation to the street scene – another objective of the FAAP.
- 3.19 As outlined above, the southern half of the ground floor plan will comprise an internal vehicular servicing area for bulk deliveries and clinical waste accessed directly off Shropshire Place, as well as ‘back of house’ facilities such as the waste and general storage, WCs, and plant.
- 3.20 Moving through the building, patients will rise to the upper floors using the lift and/or stairs provided at the northern end of the building. Once they have reached the correct floor, patients will then be directed to one of the seating areas located within 8 bays along the Huntley Street frontage where they will be subsequently called to a treatment room.

3.21 Treatment rooms will be provided in groups of 6 ‘pods’ located in a linear fashion through the length of the building, and accessed from corridors between. Staff will occupy the space in the western part of the building fronting Shropshire Place, with the treatment rooms acting as the meeting place between the patients located in the eastern part of the building fronting Huntley Street. As explained in the accompanying Design and Access Statement, this layout is a ground-breaking principle known as “on-stage / off-stage” outpatient organisation where the physician and staff access the treatment rooms via a secondary corridor from a central team hub.

3.22 Similarly, the basement levels will accessed via the lift and stairs provided at either end of the building and will provide a mixture of uses including procedural rooms, CT Scan and X-ray rooms as well as an associated waiting area, staff breakout area, cycle storage for 50 staff cycles and adjacent locker, showers and changing facilities for staff.

3.23 A floor space schedule for the scheme is provided in Table 1 below, and shows the scheme will comprise 11,826 sq m GEA of floor space in total:

	GEA	GIA
LEVEL 6	334	309
LEVEL 5	1090	1036
LEVEL 4	1159	1105
LEVEL 3	1283	1225
LEVEL 2	1283	1225
LEVEL 1	1283	1225
GROUND	1164	1117
LEVEL -1	1410	1147
LEVEL -2	1410	1147
LEVEL -3	1410	1147
TOTAL	11826	10683

Note:
 GEA: Gross External Area is the area of a building measured externally at each floor level.
 GIA: Gross Internal Area is the area of a building measured internally at each floor level, including the cores, shafts and risers, etc. Excluding not covered areas.
 NIA: Net Internal Area is the clear departmental area, clinical space available.

Table 1 – Floor Space Schedule

Parking and Servicing

3.24 Clinical waste vehicles will access the site along Shropshire Place and will drive into the building at the southern end of the street where waste and bulk deliveries can be loaded/unloaded within the confines of the building envelope at night-time only. This contrasts with the existing arrangement whereby vehicles load or unload in the street at any time of day, which can cause disturbance to the existing neighbouring residential and commercial properties. However, because of the highly constrained nature of the site it is proposed for other service vehicles to access the site via a designated space to be provided in Shropshire Place, again during night-time hours.

3.25 In line with LBC’s car-free policy in the Central London Area, no general car parking is proposed on site for staff or visitors. However, those choosing to drive to site will either make use of the existing off-street parking provision or utilise on-street parking available in the area.

3.26 Furthermore, no disabled parking provision will be supplied on-street as agreed with LBC Highways Officers. Instead, disabled drivers will continue to be able to obtain dispensation permits to allow them to park their vehicles on the local road network, as permitted, for up to 3 hours. This aligns with the existing arrangement whereby single yellow lines outside the site permit disabled parking.

3.27 Similarly, PTS vehicles will continue to drop-off outside the site in Huntley Street within 2 designated spaces on the western side of the road as is currently the case. However there will be fewer PTS vehicles and ambulances because, as outlined in Section 2, the PTS control centre will no longer operate from the site if the development is approved.

3.28 Construction is intended to commence in 2016 in order that the building can be operational prior to the expiration of the leases at the RNTNE in 2018. Indeed, a failure to deliver the development within this timeframe will result in the existing facilities needing to vacate these buildings with nowhere for them to relocate.

3.29 More detailed information regarding the design, layout, appearance, parking and servicing arrangements for the proposed development can be found in the accompanying Design and Access Statement and transport reports.

4 Planning History

4.1 This Section outlines the planning history relating to the application site as well as other relevant developments approved in the surrounding area.

Site Planning History

4.2 We have carried out an analysis of the planning history for the site on the LBC web site.

4.3 There is no planning history relating to the Student's Union.

4.4 An application was approved on 3rd April 1995 for the “erection of a disabled access ramp to Capper Street entrance” at the Former Royal Ear Hospital (ref. 9500611). However, this application is not considered relevant to the proposed development.

4.5 More recently, an application was submitted on 29th May 2014 in relation to the entirety of the site, for a Certificate of Immunity from Listing (COIL, ref. 485317). On 10th December 2014 English Heritage approved the Certificate, hence determining that the buildings are not worthy of listing. In their report, English Heritage drew the following conclusions:

Royal Ear Hospital

- “The overall composition does not respond to the opportunity offered by this prominent corner site”.
- “While notable for its state-of-the art medical facilities, the hospital was not innovative in planning terms, and much of the original layout has been lost, including the ‘silence room’”.
- “Decorative treatment was confined to the main entrance hall, the remainder, as would be expected, was functional in character and has been considerably altered”.
- “While possessing townscape interest for the good north elevation, and of some historical significance in the context of the inter-war growth of UCH as a centre of medical excellence, the special interest required for listing is lacking”.

Former UCL Student Union

- “In comparison to [other] examples, and in the broader context of late-1950s higher-education and recreational buildings, the UCH building is of only modest architectural interest. The interior bar fittings may have some claim to rarity; in addition there are a number of original features in the late Festival of Britain spirit, but these are not of such quality to warrant listing”.
- “Overall, the high level of architectural interest required for listing post-war buildings is lacking”.

4.6 A copy of the decision and report from English Heritage is provided in [Appendix 1](#).

Nearby Developments

Phase 4 Development – Grafton Way and Huntley Street

4.7 As set out in Section 2, planning permission was granted on 22nd September 2014 for the following development at the Former Odeon Site and Rosenheim Building in Grafton Way and Huntley Street respectively (ref. 2013/8192/P):

“Redevelopment of the former Odeon site and demolition of the Rosenheim Building to provide a Proton Beam Therapy (PBT) cancer treatment facility and day surgery facilities in 4 levels of basement; inpatient medical facilities and a ground floor retail unit (175 sq m approximate GIA) in a 7 storey development above ground (34,596.5 sq m GIA in total) including roof plant, a new pedestrian

entrance on corner of Grafton Way and Huntley Street, a new service entrance on Huntley Street, a ground floor drop-off area off Grafton Way, and three roof gardens; and the relocation of the oxygen tanks to University Street frontage inside a new enclosure”.

- 4.8 This development is currently at the early stages of construction, and will house a state-of-the-art proton beam therapy (PBT) cancer facility (the first of its kind in the UK) within the 4 storey basement, as well as much-needed inpatient beds and day surgery facilities.
- 4.9 The building will occupy the north and north-eastern half of the urban block bound by Grafton Way (north), University Street (south), Huntley Street (east), and Tottenham Court Road (west), with a tiered roof garden for use by patients and staff located on in the centre of the site.
- 4.10 An image of the scheme is provided in Figure 10 below:



Figure 10 – Computer-Generated Image of the Phase 4 Scheme taken from the junction of Grafton Way and Huntley Street

West End Project

- 4.11 The West End Project – a transport and public realm improvement scheme - is designed to transform the Tottenham Court Road area into one of London’s premier commercial, cultural and academic districts.
- 4.12 The scheme will cost approximately £41 million, and aims to improve safety, reduce congestion and pollution, widen pavements, improve access to public transport and provide further areas of open space.
- 4.13 A public consultation on the project took place in June to August 2014, and the results were presented at the Council Cabinet meeting in January 2015. Cabinet gave approval for the project to proceed therefore construction is anticipated to begin in summer 2015. It will be delivered in phases and completed by 2018 in time for the opening of Crossrail, by which time Tottenham Court Road station will have nearly twice the number of visitors as Heathrow every day.
- 4.14 The West End Project is relevant to the Phase 5 project as it will introduce two-way working to much of the highway network surrounding the site, which needs to be taken into consideration in planning the transport and servicing arrangements at the site during both the operational and construction phases. Indeed, the key changes are outlined below:
- *Gower Street* - Two-way working would be introduced throughout and the Euston Road slip contraflow bus lane will become an all traffic route. Grafton Way would remain one-way westbound, with the addition of an eastbound contraflow cycle lane.
 - *Huntley Street* – This road would remain one way south bound with Huntley Street’s western footway (north of University Street) widened whilst retaining sufficient carriageway width for one-way traffic. A contra-flow cycle facility is also planned for the entire length of Huntley Street.

- *Capper St* - This will be closed at the junction with Tottenham Court Road to become a 'Pocket Park'. Tottenham Court Road will become two-way but with restricted access on certain sections to just buses, taxis and bicycles.
- *Chenies Mews* - Proposed to become a one way cul-de-sac with one way southbound vehicle entrance permitted from Huntley Street (via the north of Chenies Mews) and two way access permitted via Torrington Place (via the south of Chenies Mews). Vehicles entering Chenies Mews from the south would be required to perform a U turn to exit the street.
- *Shropshire Place* - Proposed to become a shared surface for pedestrians, linking Shropshire Place with Tottenham Court Road via Queen's Yard.

4.15 Further information on the West End Project is provided in the accompanying Transport Statement.

5 Pre-Application Discussions

5.1 This section outlines the extensive pre-application consultation that has taken place with LB officers, as well public consultation and local stakeholders.

Pre-Application Consultation with London Borough of Camden (LBC)

5.2 Numerous pre-application meetings have been held with Planning, Highways and Urban Design officers at LBC. The outcome of these meetings is summarised below:

- Pre-Application Meeting on 9th June 2014 – This initial pre-application meeting involved presentation of the scheme to the Planning Officer Gavin Sexton, as well as Conservation Officer Catherine Bond, Design Officer Ed Jarvis and Highways Officer Zoe Trower. Officers supported the principle of the redevelopment of the site but advised that the proposals should consider the retention of the Capper Street façade of the former Royal Ear Hospital, and stated the massing and design should be developed further. The project team rebutted the suggestion of retaining the Capper Street façade on the grounds that it is a relatively attractive element on an otherwise unremarkable building, and provides legibility issues for the scheme on account of being arguably more prominent than the proposed entrance on Huntley Street.

In addition, the Highways Officer advised that LBC does not support reliance on the public highway and the initial proposal for off-site consolidation of servicing, therefore it should be demonstrated that there is no other alternative option. However, the team highlighted the highly constrained nature of the site and therefore the ability to accommodate this request.

- Design Workshop Meeting on 24th June 2014 – This design meeting was held with the Planning Officer Gavin Sexton, as well as the Conservation Officer Catherine Bond and Design Officer Ed Jarvis. The meeting sought to provide an overview of the design following revisions from the initial meeting with officers. Officers advised that the revised design was moving in the right direction and the architects had clearly sought to address officers' previous comments. Officers again advised that they would prefer the retention of the Capper Street façade, and further consideration should be given to the façade detail and choice of materials.
- Highways Workshop Meeting on 15th July 2014 – This meeting focused on developing the parking, access and servicing strategy for the development. The team were advised to consider the impacts on the surrounding residential amenity. It was also agreed that cycle parking should be accommodated on-site.
- Design Council (formerly CABE) meeting on 17th September 2014 – This meeting involved a 30 minute presentation by the project team to a panel of well-known London architects hand-picked by the Design Council. The meeting was also attended by planning and design officers from LBC. Written feedback stated that “*the internal organisation and the new “on-stage/off-stage” concept [...] are to be applauded*”, as well as commending the provision of two cores and the provision of staff breakout areas. The intention of the development to better “*define the character of Queen’s Yard and promote this space as an attractive destination in Bloomsbury*”, and the proposed height and scale of the building were also supported. However, the Design Council advised that further work was required on the elevations in order to ensure the internal layout married with the external appearance. In light of this, further work was carried out on the façade, as well as close collaboration with LBC officers through a series of additional design workshops, which has culminated in the proposal submitted as part of this application.
- Highways Workshop Meeting on 10th December 2014 – This highways meeting discussed the revised access strategy in which the highly constrained nature of the site (and therefore its ability to meet all planning policy requirements) was once again highlighted to officers. Officers specifically advised that due to issues with PTS vehicles parking in the local area, a long term PTS strategy should be provided to give assurance that the scheme would not exacerbate the problem. Advice following the meeting advised the specific points that would need to be addressed in the application submission, which have been incorporated into the accompanying Transport Statement.
- Design Workshop Meeting on 9th January 2015 - This meeting reviewed the proposed design following amendments made to address the comments from the previous design meeting in December. Officers were generally pleased with how the design was progressing, however further detail was requested including information regarding the proposed new Capper Street elevation.

- Pre-Application Meeting 2 on 13th January 2015 – This meeting was attended by the Planning Officer Gavin Sexton and served as an overview of the key outstanding items that needed to be resolved prior to submission. As Highways and Heritage Workshops were arranged for the following day this meeting focussed on other technical matters, principally daylight and sunlight in which the preliminary results of the assessment were presented to officers and considered broadly acceptable.
- Heritage Workshop on 14th January 2015 – In this meeting, which was attended by the Planning Officer Gavin Sexton, Conservation Officer Catherine Bond, and the Design Officer Ed Jarvis, the merits of removing the entirety of the Royal Ear Hospital Building as opposed to retaining the Capper Street elevation as part of the scheme were discussed in detail. In this meeting officers advised they were pleased with the design of the proposed scheme, and considered it likely it could form the basis of a justification for the removal of the façade. However, the Conservation Officer advised a full justification would need to be provided in the Heritage and Design and Access Statement, which is provided as part of this submission.
- Highways Workshop on 14th January 2015 – In this meeting the final draft parking, servicing and drop-off proposals were agreed with officers. Namely, the provision of disabled parking on single yellow lines in Huntley Street, PTS drop-off spaces (again on Huntley Street), a servicing bay in Shropshire Place, waste deliveries within the building via the proposed servicing entrance, and cycle parking within the basement of the building with some provision for visitors at street level. Officers also commented that the scheme will need to demonstrate that there is a short and long term solution for the PTS control centre located on the site in order that LBC has assurances that PTS vehicles will not use the area surrounding the site for parking between collecting patients. The project team assured officers that this would be provided as part of the submission and the matter is discussed in detail later in this report, and in the accompanying PTS report.

Public Consultation

5.3 In addition to the above, extensive public consultation has taken place with local residents, businesses, and other stakeholders as outlined below:

- Public Exhibitions on 7th, 8th, 9th and 10th July 2014 – Invitations to the exhibition were issued to local residents, amenity groups and businesses in the area, as well as local Councillors, UCLH staff and patients. The exhibitions were held at varying locations over the 4 day period including the UCL Student Union building (the site), the RNTNE and the EDH in Grays Inn Road. The exhibition outlined the initial proposals and designs for the centralisation of services to Huntley Street. Members of the design team were on hand to answer any queries, and feedback forms were provided to enable individuals to communicate their views to the team.
- Public Exhibition on 14th, 15th and 16th January 2015 – The same individuals and amenity groups were identified to attend the exhibition as was the case for the first exhibition. The exhibition provided greater detail on the proposed development, which incorporated feedback from the first public exhibition, and included detailed indicative images and floor plans for the building. A similar format to the first exhibition was followed.
- Developers Briefing on 6th November 2014 - Members of the development team attended a Development Management Forum meeting. All Development Control Committee Members and Bloomsbury Ward Members were invited to the briefing. The Forum was well attended by Councillors and provided a useful opportunity for members of the development team to answer questions and provide an introduction to the scheme.
- Meetings with Gordon Mansions Residents' Association (GMRA) on 12th August and 11th November 2014, and 12th February 2015 - As residents of this building have the potential to be most significantly impacted by the development, the project team established early lines of communication with residents via the Chairman for the Association. The GMRA were kept up to date with any changes to the scheme, and as such were provided with updated scheme drawings.
- Bloomsbury Conservation Area Advisory Committee (BCAAC) on 3rd July 2014 and 11th January 2015 - The project met with BCAAC on two occasions to discuss with them the design concept, and how the building is designed to reflect and enhance the Conservation Area. The group were given the opportunity to view models and power point presentations reflecting the evolution of the design of the proposed building.

5.4 More detailed information on the public consultation process, including the feedback received, can be found in the accompanying Statement of Community Involvement.

6 Planning Policy Context

6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the Development Plan unless 'material' considerations indicate otherwise. In this context, the statutory Development Plan comprises the following:

- *The Replacement London Plan (LP, July 2011)*. The LP is the spatial development strategy for London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. London boroughs' local plans must be in general conformity with the LP, and its policies guide decisions on planning applications by Councils and the Mayor of London.

In 2013 the Draft Further Alterations to the London Plan (FALP) were published and released for consultation. This culminated in an Examination in Public (EiP) by an independent Government Inspector in September 2014 and the subsequent release of the Inspector's report in early December 2014.

On 15th December 2014, the Mayor wrote to the Secretary of State for Communities and Local Government to give his response to the Inspector's recommendations and to enclose a copy of the FALP as he intends to publish it. The Secretary of State has up to six weeks within which to respond to the Mayor, following which the FALP will be considered by the London Assembly.

Accordingly, the FALP is expected to be adopted in its current form by March 2015, and will therefore be in place by the time any decision is made on this application.

- *The LBC Core Strategy (CS, November 2012)*. The Core Strategy sets out the overarching principles guiding development in the Borough over the next 10-15 years.
- *The LBC Development Polices Document (DPD, November 2012)*. This document sets out detailed planning criteria that LBC use to determine applications in order to achieve the vision of the Core Strategy.
- *LBC Site Allocations Document (September 2013)*. This document identifies land and buildings for future development.
- *Fitzrovia Area Action Plan (FAAP, March 2014)*. This document has been prepared by LBC to deal with the impact of continued development pressure on Fitzrovia and help shape future development within the area. As set out in Section1, both of the existing buildings at the site are 'Opportunity Sites' where LBC advocates development for healthcare uses.

6.2 LBC is under a legal duty to have regard to all material considerations. This includes national planning policy guidance, local Supplementary Planning Guidance documents (SPGs), and emerging policy documents. Other documents that have been considered in addition to the Statutory Development Plan are listed below:

National Guidance

- *National Planning Policy Framework (NPPF, March 2012)*. This is the Government's national planning policy guidance note. It replaces all previous individual, topic based Planning Policy Statements.
- *National Planning Practice Guidance (NPPG, 2013)*. This document provides more detailed guidance in relation to the policies set out in the NPPF.

Regional Guidance

- *The Replacement London Plan Sustainability Statement (July 2011)*. This expands on the energy/sustainability policies contained in the Replacement London Plan.

- *The London Strategic View Management Framework SPG (March 2012)*. This provides the policy framework for managing the impact of development on key panoramas, river prospects and townscape views.

Local Guidance

- *Bloomsbury Conservation Area Appraisal (BCAA, April 2011)*. This document explains in detail the special character of the Conservation Area, and the rationale for designating the area as such.
- *Camden Planning Guidance (CPG, September 2011)*. The CPG provides specific advice and information on how LBC will apply planning policies relating to issues such as design, amenity space, daylight/sunlight and privacy.
- *Camden's Local List (Local List, January 2015)*. This is a list of buildings and features of local historic/architectural importance, which has been compiled and released for consultation in light of feedback from the local community. The document does not include either of the existing buildings, or any other features existing at the application site.

7 Planning Policy Appraisal

7.1 This section demonstrates how the proposed development complies with the relevant planning policies contained in the documents outlined in Section 6.

Principle of Development

7.2 At the heart of the NPPF is a presumption in favour of sustainable development. Indeed, the document states at paragraph 14 that *“at the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking”*. The document explains that there are three dimensions to sustainable development: economic, social and environmental.

7.3 As set out below and in Sections 8 and 9 of this Statement, the proposed development will, by its very nature, comply with all of these principles and is therefore considered sustainable development:

- *Social* - The development will comprise new clinical outpatient facilities that will support the health and well-being of the wider population.
- *Environmental* - The proposal will protect and enhance the natural, built and historic environment through the provision of a building of exceptional design on land that is largely vacant and therefore under-used. In addition, the proposed building will contribute environmentally through the provision of roof gardens to ‘green’ the site, and achievement of a BREEAM ‘Excellent’ rating.
- *Economic* - The scheme will deliver a specialist hospital building for the treatment of ear, nose and throat disorders; hence building on the healthcare hub already established in this part of Bloomsbury and consolidating London’s position as a global centre of excellence.

7.4 In addition, paragraph 16 of the NPPF states that local authorities should *“encourage the effective use of land by reusing land that has been previously developed (brownfield land)”*. Clearly, this development complies with this by making a more efficient use of two existing and under-used buildings, which are not suitable for modern use.

7.5 In accordance with the NPPF, policy CS1 of the Core Strategy states that *“the Council will focus Camden’s growth in the most suitable locations, and manage it to make sure that we deliver its opportunities and benefits and achieve sustainable development”*. However, as outlined above, the development will comply with the principles of sustainable development and be located in the Central London Area where new development is directed. It would therefore comply with policy CS1.

7.6 With regards to a medical use in this location, policy 2.1 of the London Plan and FALP states that *“the Mayor and the GLA Group will, and all other strategic agencies should, ensure: that London retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art”*. Policy 3.17 of the London Plan and FALP also states that *“development proposals which provide high quality health and social care facilities will be supported”*.

7.7 Core Strategy policy CS16 supports this approach, stating that LBC will seek to improve the health and well-being of the borough through the following:

- c) *“support the provision of new or improved health facilities, in line with NHS London’s plans to consolidate and modernise its facilities;*
- d) *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”*.

7.8 Finally, as identified in Section 2, the site is allocated in recently adopted FAAP for clinical / healthcare use. The principle of the proposed development is therefore accepted.

Planning policies at strategic and local level direct clinical uses to this location (and this site in particular), as well as supporting the provision of key medical facilities such as this, which will help retain and enhance London's role as a global centre for medical excellence.

Building Design

7.9 Core Strategy policy CS14 seeks a high standard of design that respects the local context and character.

7.10 Policy DP24 of the DPD expands on this stating that *"the Council will require all developments [...] to be of the highest standard of design and will expect developments to consider [...] character, setting, context and the form and scale of neighbouring buildings [...] the character and proportions of the existing building, where alterations and extensions are proposed"*.

7.11 The site is located within the 'Ridgmount Gardens Character Area' of the FAAP, which is defined by long parallel blocks and terraces. Buildings in this area include Georgian terrace housing and Victorian/Edwardian mansion blocks. Although with specific regard to the site, the FAAP advises that *"development should use materials which are sensitive to the nearby listed buildings in terms of tone, colour, texture and finishes"*.

7.12 As explained earlier in this report, the design of the proposed development has been the subject of considerable consultation with LBC Planning, Conservation and Design officers; as well as with local residents and amenity groups and the Design Council.

7.13 With regards to the layout of the building, the development will extend into the yard to the rear of the Student Union building, therefore making maximum use of the site, as well as further forward of the existing building line. This will better enclose Shropshire Place to give a greater sense of place, and reinforce/re-establish the existing building line in Huntley Street.

7.14 However, a variety of techniques have been employed to help break up the increased scale of development on the site including setbacks at ground floor level and on the upper two storeys (tripartite massing), the use of canted bays along the length of the Huntley Street elevation, a taller glazed element with spire at the northern end of the elevation, and the use of varying materials in different textures. Indeed traditional materials such as red handmade brick and stone will be used, and contemporary takes on features found in the surrounding area such as string courses, bays and tripartite massing have been incorporated into the design, therefore drawing on the inventive brick buildings characteristic of the area.

7.15 The result is a building which sits well in, and is a positive addition to, the existing streetscape as demonstrated clearly in the accompanying CGIs. This view shared by UCLH's heritage consultant who considers *"the proposed development is clearly and confidently contemporary, while at the same time being directly allusive and responsive to its historic context"*.

7.16 In addition, the ground floor plan has been designed to provide meeting and dining areas, which through the use of glazing at ground floor level, will animate the building for passers-by and maximise light to the building. As advocated by the FAAP, this will improve the permeability of the site by enabling a visual link through to Tottenham Court Road via Shropshire Place and Queen's Yard.

7.17 The main entrance has also been carefully located, being positioned on Huntley Street which is the principal frontage to the building. It will be clearly defined through the use of a contemporary, but discreet, entrance canopy and the repositioning of the stone crest from the original Capper Street façade adjacent to the entrance.

7.18 Further details of the design of the scheme and the materials proposed are provided in the accompanying Design and Access Statement.

The proposed development will comprise an exceptional design befitting of the specialist ear, nose and throat facility provided within, which has been the subject of considerable consultation with LBC officers and the local community and takes account of buildings and materials used in the local area. As advocated by the FAAP, the development will also enable active ground floor frontages and a visual link through to Tottenham Court Road.

Scale and Height

7.19 Page 128 of the FAAP states that *“the Medical Students’ Union building is one of the lowest in the area. In townscape terms a higher building is appropriate here, similar in height to the existing adjacent Royal Ear Hospital, however this is dependent on rights to light of the terraced houses on the opposite side of Huntley Street”*.

7.20 Accordingly, an “illustration of principles” diagram is provided indicating the potential increase in height that could be achieved. This is provided in Figure 7 and is replicated again in Figure 11 below:



Figure 11 – Indicative FAAP Massing Diagram for the Site

7.21 It is therefore clear that the principle of a taller building on the site is accepted.

7.22 As is evident from the accompanying drawings, the proposed building will be greater in height than the massing illustrated in the above diagram. However, as explained in the Design and Access Statement, the building will adopt tripartite massing and include a variation in building heights (the centre of the building reduces in height) as is the case at the Gordon Mansions building to the south.

7.23 The upper two floors will also be set back significantly from the edge of the lower floors (1.3m) in order to reduce the visual impact of the building, with the total height of the structure being lower than the adjacent MacMillan Cancer Building (Phase 3) and Gordon Mansions.

7.24 As illustrated in the CGIs provided as part of the application, this results in the scheme sitting very comfortably within the surrounding streetscape. In fact, the building clearly reinforces the urban fabric by infilling the space above the Student Union and re-establishing the building line.

7.25 Notwithstanding this, we would point out that the FAAP diagram is clearly labelled as an “illustration of principles” only, and is not therefore considered an exact stipulation of what should be delivered on the site.

7.26 We also note that the FAAP states that an increased the mass and height of development at the site is subject to the daylight/sunlight impact on the terraced houses opposite being acceptable. However, as outlined below, the development will have an acceptable impact in this respect.

7.27 Further details of the scale and height of the scheme is provided in the accompanying Design and Access Statement.

The proposed development will increase the height of development at the site as advocated in the FAAP. It is noted the height of the building will be greater than the indicative massing provided in the document. However, this is an illustration of principles only, and in any event the Design and Access Statement and Daylight/Sunlight report show the impact on the townscape and daylight/sunlight received to adjacent residential properties will be acceptable. The development is therefore considered to comply with the FAAP.

Removal of Existing Buildings / Impact on Bloomsbury Conservation Area

7.28 As set out in Section 2, neither of the existing buildings are listed or included in LBC's recently published Local List. However, the former Royal Ear Hospital is identified in the BCAAC as being a 'positive contributor' to the Bloomsbury Conservation Area on account of the Capper Street elevation.

7.29 Paragraph 138 of the NPPF states that *"the loss of a building which makes a positive contribution to the significance of the Conservation Area should be treated as substantial harm or less than substantial harm, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole"*.

7.30 Accordingly, paragraph 133 states that *"where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- *the nature of the heritage asset prevents all reasonable uses of the site; and*
- *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use" [our emphasis].*

7.31 However, paragraph 134 states that *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use" [our emphasis].*

7.32 As set out earlier in this Statement, the proposed development involves the removal of both of the existing buildings at the site. However, the accompanying Heritage Appraisal concludes at paragraphs 5.18 and 5.19 that *"the scheme does not in any way cause substantial harm to heritage assets"*. Furthermore, it advises that *"we do not believe that the demolition of the existing buildings has the potential to result in any level of harm to heritage significance greater than a low level of less than substantial harm [...] Quite the opposite applies – the character and appearance of the conservation area and the setting of the listed building will be enhanced"*.

7.33 Section 5 of the Appraisal considers the design of the scheme in detail, and outlines the rationale for the above conclusion, which is summarised in the quotes provided below:

- *"The proposed development is clearly and confidently contemporary, while at the same time being directly allusive and responsive to its historic context"*.
- *"The scale and massing of the proposed development is consistent with that of the majority of Huntley Street, and helps to create a coherent building line on its western side"*.
- *"Brick is used in the scheme as a reference to the predominant material of the conservation area. The use of bays and string courses echoes in a contemporary way - without pastiche imitation - the Edwardian aesthetic qualities of Gordon Mansions and Woburn Mansions. The use of perforated brick screens as one aspect of the bay design lends visual interest as well as being a practical feature of the elevation design. The design of the northern end of the scheme - where the existing Capper Street fragment will be removed - reflects the relatively greater formality of this end of the existing building, thus preserving the presence on Capper Street of a prominent element of the hospital site, albeit in new form. The detailed design of elevations and roofs is similarly respectful and contextual"*.

- “The scheme displays evident skill in making new architecture of integrity in a historic area”.
- “The scheme will certainly alter the site and the character and appearance of the conservation area, but will do so in a positive and enhancing way”.

7.34 Accordingly, the Heritage Appraisal assesses the scheme in light of paragraph 134 of the NPPF (as set out above), and advises that the public benefits of providing the proposed specialist ear, nose and throat facility clearly outweigh what harm might be caused by the loss of the Capper Street elevation. Poignantly, the Appraisal also states at paragraph 5.20 that “there are few more evidently beneficial ways in which this site could be developed”.

7.35 In view of the above it is clear that the proposed development complies with the policies of the NPPF in respect of assets making a positive contribution to Conservation Areas. By virtue of this, the proposed development also complies with policy DP25 of the DPD, which seeks to preserve and enhance the character and appearance of Conservation Areas.

When assessed against the provisions of the NPPF, it is considered that the proposed development will give rise to a low level of “less than substantial harm” to the Bloomsbury Conservation Area, which in any event would be significantly outweighed by the clear public benefits of this specialist ear, nose and throat facility. The development therefore complies with the NPPF and policies CS14 and DP25 of the CS and DPD respectively.

Impact on Residential Amenity

Privacy

7.36 DPD policy DP26 states that LBC will protect the quality of life of neighbouring residential occupiers and neighbours by only granting permission for development that does not cause harm to amenity.

7.37 The CPG, which provides guidance on how LBC’s planning policies should be applied, expands on this and states that to ensure there is no loss of privacy there should normally be a minimum distance of 18m between the windows of facing developments.

7.38 The development will be located approximately 15m from the terraced properties opposite, which is slightly below this figure. However, as set out in Section 2, these properties are owned by UCLH Charity, Clic Sargent and the Liver Institute, the latter for use by families of UCLH patients.

7.39 The proposed building will also be in use during normal working hours only with the exception of any staff working late and/or limited cleaning and servicing operations.

7.40 We would also point out that there is an established relationship between the two Gordon Mansions buildings located opposite each other on Huntley Street, which results in two facing residential uses.

7.41 In view of the above, it is therefore considered that the relationship between the property is acceptable taking into the specific circumstances at both the site and surrounding properties

It is considered that the relationship of the proposed development with surrounding properties is acceptable taking into account the individual circumstances of the site, and the established distances between buildings on opposite sides of the street. The development therefore complies with policy DP26 and the provisions of the CPG.

Daylight and Sunlight

7.42 Policy DP26 of the DPD states that LBC will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity, including loss of daylight and/or sunlight.

7.43 A daylight and sunlight report has been provided as part of the application, which assesses the impact of the development on windows within the terraced properties opposite and the south-eastern Gordon Mansions building. This assessment has been carried out in line with the Building Research Establishment (BRE) "Site Layout and Planning for Daylight and Sunlight: A Guide to Good Practice" document, which provides detailed, industry-standard guidance on this issue.

7.44 In light of the FAAP, which accepts the height and mass of development on the site will increase significantly, the scheme has been assessed against two benchmarks – the existing situation and the indicative massing shown in the FAAP.

7.45 When compared against the FAAP massing, the report demonstrates that 80% of the windows assessed will achieve a level of daylight compliant with the BRE guidelines, and the remaining 20% will fall into 20-29.9% loss range, which the guidelines deem will be either imperceptible by residents or negligible.

7.46 With regards to sunlight, and when compared against the FAAP indicative massing, 95% of the rooms will comply with the BRE guidelines.

7.47 As set out in the report the compliance rates for the scheme when compared against the existing situation at the site are lower. However, measuring the scheme against the FAAP massing is considered a more appropriate measure considering this increased mass has been accepted in the recently adopted FAAP.

7.48 It should also be noted, again as set out in the daylight and sunlight report, that the Gordon Mansions building which has been assessed as part of this exercise faces its sister block immediately opposite, which is greater in height than the proposed development. The relatively low height of the existing Student Union building also enables an unusually low existing baseline conditions against which to measure the daylight/sunlight impact of the scheme.

There will be a daylight/sunlight impact on residents owing to the unusual existing baseline condition at the site. However, when compared against the FAAP massing (which will inevitably result in a greater height and scale of development on the site), very few properties would be adversely affected beyond the levels permissible under the BRE guidance. The development is therefore considered to comply with policy DP26.

Traffic Generation

7.49 Policy DP21 of the DPD states that *"the Council will expect works affecting highways to [...] avoid disruption to the highway network and its function"*.

7.50 The accompanying Transport Statement includes a detailed analysis of anticipated traffic movements, and concludes that development proposals would not increase the amount of traffic at the site.

7.51 Furthermore the Transport Statement takes into account the West End project proposals, and demonstrates that the development will not impact on the proposals to reconfigure the traffic arrangements on the surrounding streets.

The development will not give rise to an increase in traffic movements, and taking into the potential West End project proposals is not considered to have an adverse impact on traffic flows in the area. The development is therefore considered to comply with policy DP21.

Car Parking

7.52 Policy DP18 of the DPD states that *"the Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area [...] and other areas within Controlled Parking Zones that are easily accessible by public transport"*.

7.53 In accordance with policy DP18 and policy CS11, the accompanying Transport Statement states that the development would be car free and LBC have confirmed their support for this approach.

7.54 With regards to disabled parking, no designated on-street parking will be provided. Instead, disabled drivers (which is estimated to equate to approximately 26 vehicles per day) can continue to obtain dispensation permits to allow them to park on the surrounding road network for up to 3 hours, which is considered sufficient for patients visiting the site.

7.55 The Transport Statement demonstrates there is sufficient capacity to accommodate this level of parking in the surrounding area and has identified that, at present, 44% of disabled vehicles park for longer than the allotted 3 hour period, which is not permitted. However, clearly this is an enforcement issue to be addressed by LBC as the local highway authority.

7.56 It should also be noted that, owing to the highly constrained nature of the site, disabled parking cannot be accommodated on-site as to do so would result in a significant proportion of the ground floor being used as parking. This would also result in a blank elevation at ground floor level, which would have an adverse impact on the street scene and would clearly constitute poor urban design.

The development provides no car parking for staff, patients or visitors to the building in line with LBC's car-free policy. Furthermore, disabled parking would be on-street as is currently the case. Indeed, parking surveys have demonstrated there is existing parking capacity in the area to accommodate this.

Cycle Parking

7.57 The FALP states that hospital buildings should provide 1 cycle space per 5 staff. Therefore, based on 250 staff occupying the building per day, this equates to 50 staff cycle parking spaces. Accordingly, 50 spaces will be provided within the basement of the development, where changing and shower facilities will also be provided.

7.58 With regards to visitor cycle parking, it is advised that 1 cycle space should be provided per 30 staff for visitor use, equating to 8 visitor spaces based on 250 staff. Sheffield stands have therefore been provided on the western footpath of Huntley Street providing 12 spaces, which clearly exceeds the cycle parking requirements.

7.59 The development is therefore considered to be fully compliant with planning policies in respect of cycle parking.

The development is fully compliant with the staff cycle parking standards, and exceeds the visitor cycle parking standards, set out for a hospital building in the FALP.

Waste and Servicing

7.60 Policy DP19 of the DPD states that the servicing needs of developments must be met on site.

7.61 Again, as with disabled parking, servicing cannot be accommodated on-site as to do so would result in the vast majority of the ground floor being used as parking. It would also result in a blank elevation at ground floor level, which would have an adverse impact on the street scene and would clearly constitute poor urban design.

7.62 However, in order to ensure servicing takes place off the main public highway, servicing will be carried out in Shropshire Place. Indeed, an internal servicing bay will be provided off Shropshire Place for clinical waste collections and bulk deliveries, and will be used during night-time hours only. The intention of this is to ensure that these deliveries, which can take longer than the deliveries of standard goods, are loaded/unloaded within the confines of the building. This area will be closed off with a shutter door to ensure any noise is contained within the building.

7.63 Other service vehicles will load and unload from a designated servicing bay to be provided on Shropshire Place again for use during night-time hours only. However, any vehicles accessing either of these servicing bays will be required to reverse into Shropshire Place from Capper Street via Huntley Street and then exit Shropshire Place by turning right back into Capper Street (a left hand turn would be prohibited under the West End Project proposals). All of these manoeuvres will be overseen by a qualified supervisor employed by UCLH at their own cost.

In accordance with policy DP19 of the DPD, the development will provide a comprehensive servicing solution for the building, which will minimise reliance on the public highway as far as possible considering the highly constrained nature and modest size of the site.

Patient Transport Service Vehicles (PTS)

7.64 PTS vehicles are small vans or ambulances used to transport patients between buildings on the UCLH estate.

7.65 At present, the Student Union building is used as the PTS control centre and by PTS drivers during their lunch breaks.

7.66 Clearly, the redevelopment of the site will result in the relocation of the PTS control centre, and prevent PTS drivers from utilising the site for breaks. Some PTS vehicles will need to visit the proposed development. However, there will be an overall net reduction to the number of PTS vehicles visiting/parking outside the site.

7.67 Notwithstanding this, and due to concerns that the development may involve a displacement of PTS vehicles from the site which could saturate parking in the surrounding area, UCLH has arranged for an alternative parking location for PTS vehicles. This is intended to limit the number of PTS vehicles parking in the area surrounding the site.

7.68 The solution involves the RNTNE being used for the PTS control centre until the lease expires at the buildings in 2019. The RNTNE has ample parking for PTS vehicles, the drivers of which will be instructed to use this area for their lunch breaks, overnight parking, and parking between drop-offs and pick-ups only.

7.69 In addition, a further option will be available to smaller PTS vehicles, which will be able to utilise the surface parking at 250 Euston Road (there is currently restricted access to this car park for larger vehicles) - a short distance from the main UCLH campus. An 'exclusion zone' will also be employed in the area surrounding the site, where drivers will be instructed not to park.

7.70 With regards to provision for PTS vehicles visiting the proposed development, 2 designated bays are proposed on Huntley Street which is considered sufficient to serve the development. Again, this is an improvement on the existing situation where no designated bays exist. As with servicing and disabled parking it would also not be possible to accommodate these within the confines of the development owing to the relatively small size and constrained nature of the site.

The development will provide sufficient parking for the number of PTS vehicles required for the development, and will provide a comprehensive solution for PTS parking more generally.

Basement Impact

7.71 Policy DP27 of the DPD states that a Basement Impact Assessment (BIA) is required as part of applications involving a basement in order to demonstrate that the structure would not cause harm to the built and natural environment and local amenity and does not result in flooding or ground instability.

7.72 A BIA accompanies the planning application and has drawn the following conclusions:

- The design of the piling walls for the basement will accord with the relevant industry guidance to ensure ground instability does not occur;
- Subject to a good level of design and construction as set out in the report, ground movement associated with the demolition, construction and excavation of the basement will have "little impact" on adjacent buildings;
- There will be no change in groundwater levels as a result of the development;

- Water ingress to the basement will be prevented through the use of a waterproofing layer and internal reinforced concrete walls; and,
- There is a low risk of surface flooding due to the distance from the nearest watercourse.

It is therefore considered the development will have an acceptable impact on ground stability, movement, and flooding, and will comply with policy DP27.

Energy

7.73 Policy 5.2 of the London Plan requires all new developments to achieve a 40% reduction to the carbon emissions rates set out in the 2010 Building Regulations. However, this was amended in 2014 to a 35% improvement on the Building Regulations 2013, although the standards are broadly equivalent to one another.

7.74 In order to achieve this target, policies 5.6 and 5.7 of the London Plan advise that developers must include provision for Combined Heat and Power (CHP) and renewable forms of energy in developments where possible.

7.75 Policy DP22 also states that LBC will expect “non-domestic developments of 500 sq m of floor space or above to achieve “Very Good” in BREEAM assessments and “Excellent” from 2016”.

7.76 A BREEAM report has been provided as part of the application and demonstrates that the development will achieve BREEAM “excellent”, which in any event is an internal NHS requirement. The development will therefore comply with policy DP22.

7.77 In addition, the accompanying Energy Strategy states that a carbon reduction of 11% can be achieved. This would be delivered through the provision of 30 photovoltaic panels on the roof of the development and a 70kW(e) CHP engine, which will be connected to the Gower Street Heat and Power District Heating System operated by UCL.

7.78 As set out in the Energy Strategy, the carbon reductions are 24% short of the 35% target set out in the London Plan. Other renewable technologies have been comprehensively assessed to determine if they are viable for the scheme. However, as set out in the Energy Strategy none of them are feasible. UCLH would therefore be prepared to provide a payment in lieu on ‘without prejudice basis’, as has been accepted for other schemes in the area, and we would welcome further discussions with officers on this issue.

In accordance with local and strategic policies, the development will achieve BREEAM “Excellent; and will deliver carbon reductions through the use of photovoltaic panels on the roof of the development, CHP and other passive design measures.

Noise

7.79 Policy DP28 of the DPD relates to noise and vibration, and states that LBC will not grant permission for development which generates noise pollution and/or does not cause harm to amenity of local residents as a result of the demolition and construction phases.

7.80 However, an Acoustic Report accompanies the planning application and demonstrates that noise from the proposed plant will be designed such that it complies with LBC’s noise standards.

7.81 The report also states that the development could result in a ‘canyon effect’ result in increased noise levels arising from a nearby low level roof. However, it concludes that any increase will not be significant.

The impact of the development in terms of noise is not considered to be significant, and as such will comply with policy DP28 of the DPD.

Air Quality

7.82 Policy DP32 of the DPD states that LBC “will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality”.

7.83 The accompanying Air Quality Assessment concludes that “providing the mitigation measures are in place and appropriately managed during the construction phase, it is concluded that the proposed development is suitable for from an air quality perspective”.

The impact of the proposed development in terms of air quality is considered to be acceptable, and as such will comply with policy DP32 of the DPD.

Provision of Open Space

7.84 The FAAP states when referring to the redevelopment of the application site that “development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided on an identified site in the vicinity”.

7.85 Firstly, it is debatable whether the proposed use will increase the use of public open space. Indeed, although the buildings lie largely vacant at present, they would have had a large number of students visiting them when fully operational. The Royal Ear Hospital in particular has only recently ceased being used as a temporary location for the UCL Bartlett School of Architecture whilst their new building is constructed.

7.86 Notwithstanding this, the provision of public open space on the site is not considered an appropriate townscape response. Indeed, it would not make the most efficient use of a brownfield site as advocated by national, strategic and local planning policies. The space would also be of relatively poor quality being overshadowed by surrounding buildings of 6-7 storeys in height; and would be at odds with the building line and layouts in the area, which involves properties constructed right up to the pavement edge.

7.87 Notwithstanding this, it is proposed (subject to the necessary funding being secured by UCLH) to provide a roof garden in the proposed development, which would be accessible to staff and patients. The space would be at an elevated level on the roof of the building, and is therefore a far more appropriate position for open space as a greater amount of light will be provided. The garden will also provide a pleasing outlook for residents of the terraced properties opposite and residents of Gordon Mansions building to the south-east of the site.

7.88 In addition, this form of open space provision complies with the guidance contained in the “Fitzrovia Open Space and Urban Realm Study” produced in 2012 for LBC by Urban Initiatives, which states that “in Fitzrovia, and London as a whole rooftop space is grossly under-utilised. Whilst rooftop space can be both private (for residents and workers of the building only), and public (accessible to anyone, even if only part of a membership agreement or community group) the benefits can be felt either way due to private rooftops relieving pressure on existing open spaces”.

If funding can be secured for the roof garden, it will provide a high quality landscaped area for use by patients and their visitors and staff for quiet contemplation. This will provide an attractive outlook for occupiers of surrounding properties and help relieve the pressure of the development on surrounding open space.

Planning Obligations

7.89 All new development in LBC is potentially liable for a Community Infrastructure Levy (CIL) contribution to both the Mayor of London and LBC. However, healthcare uses are exempt from CIL. No CIL contribution is therefore payable for the proposed development.

7.90 Notwithstanding this, we are aware that LBC may seek contributions to mitigate the impact of the development on infrastructure in the immediate area, and would welcome early discussions on this issue.

No CIL contribution is required, but UCLH would welcome early discussions regarding the requirement for any contributions to mitigate the impact of the development on the local area

Construction Impact

7.91 Policy DP28 of the DPD states that LBC “*will seek to minimise the impact on local amenity from the demolition and construction phases of development*”.

7.92 Similarly, policy DP20 states that LBC “*will expect development that would generate significant movement of goods or materials by road, both during construction [to] seek opportunities to minimise disruption for local communities through effective management, including through the optimisation of collection and delivery timings and the use of low emission vehicles for deliveries*”.

7.93 A Framework Construction Management Plan has been provided as part of the application, which uses LBC’s standard proforma document. A contractor has not yet been appointed for the project. However, the Plan states that a number of measures are envisaged in order to reduce the impact on the local community and highway network:

- The appointed contractor will be a member of the ‘Considerate Contractors’ scheme;
- Construction and demolition will take place during LBC’s standard construction hours, including no work being carried out on Sundays or bank holidays;
- No vehicles will be using the public highway for waiting as 4 vehicles can be stored on-site at any time;
- No road closures will be required in association with the works;
- Servicing and deliveries will be strictly controlled by the site manager, as well as trained traffic marshalls and banksmen;
- Construction employees will be encouraged to use public transport to minimise the use of local parking facilities;
- Noise surveys will be carried out prior to construction commencing and during the works to ensure minimal disturbance to local residents and businesses;
- Dust monitoring, wheel washing, damping down of lorries will take place to minimise dust.

7.94 In addition, UCLH will arrange through their communication consultant regular meetings with local residents and amenity groups to ensure they are kept aware of the progress on site and have an opportunity to raise any points of concern.

A comprehensive scheme of measures is proposed in order to minimise disruption to the local community and highway network as a result of the construction of the development. In addition, UCLH has taken into account the upcoming highways works proposed as part of the West End Project as well as other nearby development projects such as the development of the former Odeon site/Rosenheim Building to the north. It is therefore considered that the construction impact of the development will be acceptable.

8 Scheme Benefits

8.1 The tangible benefits of the proposed development in social, economic and environmental terms are listed below.

Social and Community Benefits

- Provision of a state-of-art, specialist hospital building for the treatment of ear, nose and throat disorders – The development will provide a specialist ear, nose and throat facility, which unlike the existing facilities at the EDH and RNTNE will meet the most recent clinical and technological standards. This will have clear benefits for the health of the local population, and will raise the profile of London, LBC and this part of Bloomsbury as a centre of clinical excellence.
- More efficient use of clinical resources – At present there is considerable duplication of facilities at the EDH and RNTNE. Consolidating the two uses into a single more efficient building will make a most efficient use of hospital resources, and will likewise release the existing buildings for a more appropriate replacement use.
- Reduced patient journeys – As outlined above, the consolidation of services into one building will reduce the need for patients to travel between various buildings on the UCLH estate, hence reducing patient movements and enhancing their clinical experience. For example, patients will be able to attend their routine appointment, as well as an x-ray and/or scan if required, all within the same building.

Environmental Benefits

- Use of under-used, brownfield land – The proposal will make use of a site in the heart of central London, which as outlined earlier in this report is considerably under-used. Indeed both buildings are largely vacant, and the Student Union in particular is somewhat of an anomaly in the townscape being just 2 storeys in height – a rarity in central London.
- Repairing the urban fabric – The scheme will repair the urban fabric by replacing the existing buildings (which are currently set back from the predominant building line in Huntley Street and lower in height than surrounding buildings), with a development that is consistent with the building heights and lines prevailing in the area. This will contribute positively to the environmental quality of the area, and in turn will enhance the character and appearance of Bloomsbury Conservation Area.
- Provision of roof gardens – The proposed roof garden (which is subject to UCLH securing the necessary funding), will provide much-needed greenery in this otherwise urbanised environment, and will provide a pleasant outlook for residents of the terraced properties opposite and Gordon Mansions to the south-east of the site. It will also provide a pleasant seating area for quiet contemplation at an elevated level away from surrounding traffic noise for staff, patients and their visitors.
- Provision of ancillary ground floor café - The proposed development will include an ancillary café in the ground floor reception area for use by staff and patients to the building. This will help activate the street frontage in both Huntley Street and Shropshire Place.
- Exceptionally high quality design – As outlined in the accompanying Design and Access Statement, the development will deliver an exceptional design using very high quality, traditional materials. This will accord with the traditional appearance of the residential buildings opposite and to south of the site, whilst the contemporary manner in which they are employed will ensure the building also marries with the more modern institutional buildings located to the north. Considering the relatively unattractive appearance of the existing buildings, this will result in a significant enhancement to the appearance of the site, the surrounding area and Bloomsbury Conservation Area.
- Improved permeability and local way-finding - The development will include pedestrian entrances to both Shropshire Place and Huntley Street, which been deliberately aligned to ensure that passers-by and patients/visitors to the building will perceive a physical

and visual link from Huntley Street through to Tottenham Court Road via Queen's Yard/Shropshire Place. This will significantly improve the permeability of the site and local way finding, and is a key objective of the FAAP in relation to the development of this site.

- Enhanced public realm improvements to Shropshire Place – Although Shropshire Place does not fall within UCLH's ownership, the layout of the development has been deliberately designed to allow for the public realm in this road to be enhanced in the future, which is another key objective of the FAAP. The intention is that this will further encourage the use of Queen's Yard as a pedestrian through-route from Tottenham Court Road.
- Provision of sustainable technologies – As outlined earlier in this report, the proposed development will meet the BREEAM 'Excellent' standard, hence giving rise to minimal carbon emissions. This is a significant enhancement to the existing buildings at the site, which by virtue of their historic construction are very energy inefficient.
- Improved biodiversity – If funding is secured by UCLH, the proposed development will include a roof garden, which will result in a significant enhancement to the biodiversity currently found on the site. Indeed, the existing buildings provide no green space whatsoever.
- Minimal car parking – In line with LBC's policy on parking and the highly sustainable location of the site, the proposed development will have no car parking, hence giving rise to minimal traffic movements. This will have obvious benefits for the air quality and traffic congestion in the surrounding area.
- Provision of a holistic solution to PTS vehicle management – As outlined earlier in this report, the proposed development will necessitate the relocation of the PTS control centre currently located in the Student Union building, and will prevent PTS drivers from occupying the building during their lunch breaks as is currently the case. Indeed, it is proposed to relocate the PTS control centre to the EDH as an alternative off-street location (with the RNTNE as an interim location prior to the lease expiring in 2019), and vehicle drivers instructed to use the parking areas at these buildings as a waiting area between the pick-up and drop-off of patients. Together with a designated 'exclusion zone' employed in the area around the site, it is considered this will reduce the number of PTS vehicles parking in the surrounding streets.
- Improved acoustic relationship with Gordon Mansions – The proposed development will involve infilling the yard to the rear of the Student Union building. This will ensure that any servicing taking place in Shropshire Place will not cause disturbance to residents of Gordon Mansions as is currently the case. In addition, the proposed development will be constructed as a separate building adjacent, but in very close proximity to, the party wall with the adjoining Gordon Mansions building. This should therefore result in a significant improvement to noise levels currently experienced by residents occupying flats adjoining the boundary. Indeed, the existing building shares a party wall with Gordon Mansions.

Economic Benefits

- Provision of a state-of-art, specialist hospital building for the treatment of ear, nose and throat disorders – The development will provide a specialist ear, nose and throat facility, which unlike the existing facilities at the EDH and RNTNE will meet the most recent clinical and technological standards. This will have clear benefits for the health of the local population, and will raise the profile of London, LBC and this part of Bloomsbury as a centre of clinical excellence.
- Increased expenditure in LBC – The proposed clinical uses will result in significant staff and patients to LBC. In turn, they will utilise shops and services within the local area (and potentially other parts of the borough), hence increasing local expenditure..
- Expansion of UCLH – The proposed scheme provides modernisation and improvement of UCLH's medical provision ensuring that UCLH remains at the forefront of health care.
- Significant investment – The proposals represent a significant financial investment in the health sector benefitting LBC, London and the UK generally. As outlined above, the proposed development also moves this important facility into LBC as the existing facilities at the EDH and RNTNE are located in the London Borough of Islington.

9 Case for Planning Permission

9.1 As set out in Section 7 of this Planning Statement, the NPPF makes a presumption in favour of sustainable development and refers to this as the “golden thread” running through the new planning system. In respect of decision-making, the document goes on to state that this means:

“approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:

— any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

— specific policies in this Framework indicate development should be restricted”.

9.2 In respect of this development, this Statement demonstrates that:

- The removal of the existing buildings and their replacement with a replacement clinical use is supported in this central London location at all levels of planning policy;
- The building comprises an exceptional design befitting of the specialist ear, nose and throat facility provided within, which has been the subject of considerable consultation with LBC officers and the local community and takes account of buildings and materials used in the local area;
- The proposed development will repair the urban fabric resulting in a building that is better aligned to the height and building line found at surrounding properties;
- The loss of the Capper Street elevation is acceptable as it will result in a low level of “less than substantial harm” to the Royal Ear Hospital. In any event, any harm caused will be outweighed by the significant public benefits of the building. Accordingly, the development will preserve and enhance the Bloomsbury Conservation Areas and the setting of nearby listed buildings;
- The impact on the local highway and public transport network will be negligible;
- The development will reduce carbon emissions as far as possible, incorporating measures for CHP and renewable energy forms in line with the relevant policies of the London Plan;
- The development will have an acceptable impact on existing and future occupiers of surrounding properties in terms of privacy and daylight/sunlight;
- The development will provide car and cycle parking in line with LBC’s policies in this respect and will have an acceptable impact on the local highway network;
- Clinical waste and bulk deliveries will take place on site, and within the confines of the building in line with LBC’s policies in this respect;
- Sufficient parking will be provided immediately outside the site for PTS vehicles, disabled drivers, and other servicing and deliveries and will be managed by UCLH;
- The PTS control centre currently located at the Student Union building will be relocated to the RNTNE/EDH, with smaller vehicles also able to park at 250 Euston Road, hence resulting in a net reduction in PTS vehicles visiting the site and providing a comprehensive solution to the issue of PTS parking in the area;

- The proposed basement will have an acceptable impact on the structural stability of neighbouring properties and ground in the surrounding area;
 - The development will have an acceptable impact on the surrounding area in terms of noise; and,
 - The development will have an acceptable impact on air quality.
- 9.3 In accordance with paragraph 14 of the NPPF, it is therefore clear that the proposed development will comply with the vast majority of planning policies contained in the development.
- 9.4 In respect of daylight and sunlight, there will be some transgressions at Gordon Mansions to the south-west of the site when assessed against the FAAP massing. However, only a very small proportion of the rooms will not achieve compliance with the BRE guidelines, which the guidelines deem would have an imperceptible or negligible impact.
- 9.5 In addition, with regards to the indicative height stipulated for this site in the FAAP, it is highlighted in the document as being for illustrative purposes only and a detailed assessment of the proposed development has shown that there is no significant adverse daylight, sunlight and/or townscape impact resulting from the height proposed as part of this development.
- 9.6 In light of this, and in accordance with paragraph 14 of the NPPF, it is therefore clear that any daylight/sunlight impacts and height of the development will not “significantly or demonstrably” outweigh the considerable social, environmental and economic benefits of the scheme outlined in Section 8 of this Statement.
- 9.7 The proposed development therefore complies with the provisions of the NPPF (specifically paragraph 14), and the policies of the development plan. Consequently, it is clear that planning permission should be granted.

Appendix 1 – Certificate of Immunity from Listing Decision (December 2014)



ENGLISH HERITAGE

Miss Emily Cochrane
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30 Warwick Street
London
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Our Ref: 1420852
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philip.seely@english-heritage.org.uk

10 December 2014

Dear Miss Cochrane,

The former Royal Ear Hospital, and University College Hospital Medical School Student's Recreation Centre, London Borough of Camden

As you will know from our earlier letters we have been considering adding the above building to the List of Buildings of Special Architectural and Historic Interest, as a result of your application to issue a Certificate of Immunity (COI) for it.

We have now taken into account all the representations made and completed our assessment of the building. Having considered our recommendation, the Secretary of State for Culture, Media and Sport has decided not to add COI Case: The former Royal Ear Hospital and University College Hospital Medical School Students' Recreation Centre, London Borough of Camden to the List.

Accordingly we can confirm that the Secretary of State hereby certifies that he does not intend to list the building.

Under section 6(2) of the 1990 Act, the effect of this certificate is to preclude the Secretary of State from listing COI Case: The former Royal Ear Hospital and University College Hospital Medical School Students' Recreation Centre, London Borough of Camden for a period of five years from the date of issue (being the date of this letter), and to preclude the local planning authority from serving a Building Preservation Notice (BPN) on the building during that period.

I attach a copy of our advice report, prepared for the Department for Culture, Media and Sport (DCMS), which gives the principal reasons for this decision.

Please do not hesitate to contact me if I can be of any further assistance. More information can also be found on our website at www.english-heritage.org.uk.

Yours sincerely,



ENGLISH HERITAGE

P.F.E Seely

Philip Seely
Designation Co-ordinator - South

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Data Protection Act 1998

Your personal details, along with the other information you have provided and information obtained from other sources, will be retained by English Heritage for administrative purposes and, where applicable, for future consideration. English Heritage will not release personal details to a third party if the disclosure would contravene the Data Protection principles.

Freedom of Information

English Heritage is subject to the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 which provide a general right of access to information we hold. We may provide the information you have supplied in response to a request made under this legislation, subject to any exemptions which apply. English Heritage will consult with external parties as necessary prior to releasing information.

Case Name: COI Case: The former Royal Ear Hospital and University College Hospital Medical School Students' Recreation Centre, London Borough of Camden

Case Number: 1420852

Background

An application for a Certificate of Immunity has been received in respect of the former Royal Ear Hospital, and the former University College Hospital Students' Recreation Centre.

Asset(s) under Assessment

Facts about the asset(s) can be found in the Annex(es) to this report.

Annex	List Entry Number	Name	Heritage Category	EH Recommendation
1	N/A	The Former Royal Ear Hospital	Listing	Do not add to List
2	N/A	The Former University College Hospital Medical School Students' Recreation	Listing	Do not add to List

Visits

Date	Visit Type
10 July 2014	Full inspection

Visits

Date Visit Type
10 July 2014 Full inspection

Context

The former Royal Ear Hospital, and the former UCH Students' Recreation Centre are the subject of development proposals by UCH to provide new medical facilities. The site is within the Bloomsbury Conservation Area. The scheme proposes to retain the facade of the former hospital, which is considered to make a positive contribution to the conservation area. The former recreation centre would be entirely demolished.

Assessment

CONSULTATION

The owner's representative, who is also the applicant, the local authority and Historic Environment Record were consulted. No substantive comments were received.

DISCUSSION

In assessing the former Royal Ear Hospital, regard is paid to English Heritage's Listing Selection Guide for Health and Welfare buildings (2011), which advises that pre-1840 general hospitals and pre-1868 hospitals with pavilion plans will be listable unless heavily altered. Greater selection is required for later examples

because of the vast increase in numbers. Architectural interest, planning, and intactness will be crucial considerations. Good Modernist inter-war hospitals and health centres, and those that reflect major innovations in medical practice, are eligible. This does not preclude listing of those designed in historicist styles - typically neo-Georgian, or variants of Wren or Tudor - that remained in favour well into the 1930s, but in practice few examples from that genre are listed.

For post-war buildings generally, particularly careful selection is required. In assessing the former students' recreational centre, regard is paid to the Listing Selection Guides for Culture and Entertainment and for Educational Buildings (2011).

THE FORMER ROYAL EAR HOSPITAL

The building's north façade to Capper Street has considerable panache, but this architectural quality diminishes markedly with the east elevation. This can be attributed in part to revisions to the original design, which incorporated balconies to accentuate the central bays, and to the loss of detail at parapet level, but the overall composition does not respond to the opportunity offered by this prominent corner site. While notable for its state-of-the art medical facilities, the hospital was not innovative in planning terms, and much of the original layout has been lost, including the 'silence room'. Decorative treatment was confined to the main entrance hall, the remainder, as would be expected, was functional in character and has been considerably altered. In sum therefore, while possessing townscape interest for the good north elevation, and of some historical significance in the context of the inter-war growth of UCH as a centre of medical excellence, the special interest required for listing is lacking.

CONCLUSION

The former Royal Ear Hospital does not meet the criteria for listing. A Certificate of Immunity should therefore be granted.

REASON FOR DESIGNATION DECISION

The former Royal Ear Hospital is not recommended for listing, and a Certificate of Immunity from listing should therefore be granted, for the following principal reasons:

- * Architectural interest: the north façade is impressive but the prominent east elevation is of distinctly lesser quality and diminishes the overall claim to special interest;
- * Planning interest: while notable for its state-of-the art medical facilities, the hospital was not innovative in planning terms, and much of the original layout has been lost, including the 'silence room'.

THE FORMER UCH MEDICAL STUDENTS' RECREATION CENTRE

Student recreational facilities often form part of larger higher-education buildings or complexes, and will be assessed accordingly; for stand-alone buildings, intrinsic design quality and interiors of interest will be the principal consideration. Comparators include the University of London Students' Union, Malet Street (designed by Adams, Holden & Pearson in 1939 but completed in 1955, unlisted), comprising a swimming pool, gymnasium, badminton court and a large assembly hall; and the Indian Students' YMCA in Fitzroy Square (Ralph Tubbs 1952, Grade II) which is notable for its suite of bold and innovative interiors. In comparison to these examples, and in the broader context of late-1950s higher-education and recreational buildings, the UCH building is of only modest architectural interest. The interior bar fittings may have some claim to rarity; in addition there are a number of original features in the late Festival of Britain spirit, but these are not of such quality to warrant listing. Overall, the high level of architectural interest required for listing post-war buildings is lacking.

CONCLUSION

The former UCH Medical Students' Recreation Centre does not meet the criteria for listing. A Certificate of Immunity should therefore be granted.

REASON FOR DESIGNATION DECISION

The former UCH Students' Recreation Centre is not recommended for listing, and a Certificate of Immunity from listing should therefore be granted, for the following principal reasons:

- * Architectural quality: an architecturally undistinguished example of late-1950s design;
- * Interiors: while retaining a number of original features, most notably the bar fittings, these are not of such quality as to warrant listing.

Countersigning comments:

Agreed. We have carefully considered both the former Royal Ear Hospital and the University College Hospital Medical School Students' Recreation Centre against the listing criteria for their building type. We note the impressive nature of the north façade of the former Royal Ear Hospital but conclude that in toto neither it nor the Recreation Centre are of special interest and therefore Certificates of Immunity from Listing should be issued.

V. Fiorato, 17th October 2014

Annex 1

Factual Details

Name: The Former Royal Ear Hospital

Location: The former Royal Ear Hospital, Capper Street,
County District District Type Parish
Greater London Authority Camden London Borough Non Civil Parish

History

The Royal Ear Hospital originated as the Dispensary for Diseases of the Ear, founded in 1816 by Dr John Harrison Curtis. The hospital occupied several properties in Soho until 1904 when it moved into its first purpose-built premises in Dean Street, changing its name to the Royal Ear Hospital. Following incorporation into the Ear Nose and Throat (ENT) Department of University College Hospital (UCH) in 1920, the hospital sought new premises closer to other UCH departments in Bloomsbury. A site in Huntley Street occupied by All Saints National Schools was acquired in 1924 with a gift of £15,000 from the hospital's chairman, Geoffrey Duveen, in memory of his father Henry Duveen, the art dealer; Duveen also meeting most of the construction costs. The new hospital was built in 1925-7 to the design of Wimperis and Simpson and comprised 42 beds, private wards, out-patients' treatment, as well as teaching facilities. New facilities, including operating theatres and a Finsen light and electrical department for the treatment of rhinolaryngological tuberculosis, were added in 1928. As reported in *The Times* (28 February 1928) the hospital embodied all the latest improvements in hospital construction and equipment, designed not only to provide the most modern and complete treatment but also specialist facilities for research. The basement contained a sound-proofed 'silence room' for aural tests and experiments.

As originally proposed, the east elevation to Huntley Street comprised a series of recessed balconies for recuperating patients at first and second-floor levels, but these features were shifted to the rear elevation due to concerns about the effects of street noise, and the eventual design was less elaborate overall. In the late 1980s UCH and the Middlesex Hospital merged, and in 1997 their respective ENT departments joined with the Royal National Throat Nose and Ear Hospital in Grays Inn Road. The Huntley Street building became a psychiatric unit, and has been occupied by the Bartlett School of Architecture since 2012.

Details

The building has a rectangular plan with a long elevation facing east onto Huntley Street, and a short return elevation, comprising the main entrance, facing north in Capper Street. It is four storeys high above a basement, faced in red brick with stone dressings. The north elevation has bold flanking pilasters which are stepped back at top-floor level, and a set-back parapet; the entrance has a deeply recessed roll-moulded stone surround with diamond paterae. A foliated console supports a canted stone oriel with mullioned windows, bearing a cartouche inscribed ROYAL EAR HOSPITAL / UNIVERSITY COLLEGE HOSPITAL / DUVEEN MEMORIAL / MC MXX VI. The diamond motifs are repeated in stone features surmounting the parapets, and in the oriel.

The 11-bay frontage to Huntley Street is a symmetrical composition, the broader end bays breaking forward slightly with stone mullion-and-transom windows and leaded steel casements. Entrances are placed in the penultimate bays to either end; the central first-floor window is accentuated by a stone architrave with a bracketed cornice and balconet with iron balustrade. The windows are otherwise modern metal replacements of the pivoting steel originals. The parapet, originally set-back, has been rebuilt flush with the wall plane; the end bays have lost the stone terminations that complemented the main elevation. The rear elevation, faced in brown brick, has been much altered, the recessed balconies infilled with glazing. The three entrances have original panelled mahogany doors. The building is enclosed by iron area railings.

The internal plan comprised a central entrance with a stair and lift to the right (north) office to the left. Surgical and consulting rooms were located at ground floor, male and female wards at first and second respectively; at third floor level was a childrens' ward and further surgical rooms. This layout has undergone considerable modification. The silence room no longer survives.

The entrance hall wall is clad in Travertine and has an arched alcove, originally for a plaque, a coved ceiling and enriched plaster cornice. The stair well has a wrought-iron lift enclosure; the stair a simple wall-mounted handrail. The wards and clinical areas were finished with plain plaster walls and terrazzo floors. Areas of terrazzo flooring survive, while more may be concealed by later finishes. Original flush panelled doors have largely been replaced.

Selected Sources

Books and journals

Richardson, H, *English Hospitals 1660-1948: A Survey of their Architecture and Design*, (1998), 120-124

Map

National Grid Reference: TQ2951082068



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Annex 2

Factual Details

Name: The Former University College Hospital Medical School Students' Recreation

Location: The former University College Hospital Medical School Students' Recreation Centre, Huntley Street, County District District Type Parish
Greater London Authority Camden London Borough Non Civil Parish

History

Described in the planning application as an 'assembly hall and day house', the University College Hospital Medical School Students' Recreation Centre was designed by John Y Hamilton of Cluttons in 1958 and built shortly after. It occupied a cleared bomb site adjacent to the Royal Ear Hospital (1926-7) on the west side of Huntley Street. The facilities included an assembly hall and bar, with rooms above presumably for additional meeting space.

Details

The building has a steel frame faced in brown brick with stone dressings and slate mansard roof with inset dormers. The style reflects the Scandinavian influence on inter-war civic design with Festival of Britain touches in the decorative detail.

The north part, comprising the bar and meeting rooms above, is rectangular in plan, aligned north-south, two storeys high with a mansard attic and basement. The elevation of six bays, the entrance bay at the south end is broader with additional narrow side windows. The pilastered entrance has glazed panelled doors with horizontal metal rails. Windows are in square openings with narrow projecting stone surrounds; top-hung steel casements with margin lights.

The assembly hall is aligned east-west forming an L-plan with north block. It is one main storey over a basement, the front part incorporating a shallow upper floor, with a full-height auditorium at the rear. The front elevation is set forward and has three large pilastered windows; above these are three narrow horizontal windows lighting the upper floor. The basement areas and entrance steps have a diamond-pattern metal balustrade.

The entrance hall has flush panel doors with curved triangular steel handles and splayed architraves. The bar has built-in furniture comprising curved wooden seating with integral shelves, a timber bar servery faced with Vitrolite panels, and bar back. The stair has a steel balustrade with attached solid panels, and a cranked handrail.

The assembly hall has a stage to the rear (west). The walls of the auditorium are clad in narrow timber boarding, as is the ceiling which slopes upward from the stage, and the proscenium arch. At the rear of the auditorium is a projection box. A squash court has been formed at first-floor level. The upper-floor rooms throughout the building are utilitarian in character.

Selected Sources

Map
National Grid Reference: TQ2953082036



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