

Address:	Former Royal Ear Hospital and Former Student Union Building Capper Street / Huntley Street London WC1 E 6AP		2
Application Number:	2015/1281/P	Officer: Seonaid Carr	
Ward:	Bloomsbury		
Date Received:	02/03/2015		
Proposal: Erection of a 6 storey building and excavation works to create a 3 storey basement, comprising a head and neck outpatient hospital (Class D1) following demolition of the former UCL Student Union and Royal Ear Hospital buildings.			

Background Papers, Supporting Documents and Drawing Numbers:

Supporting Documents:

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, 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; Basement Impact Assessment (Screening and Scoping) by RSK dated November 2014, Basement Impact Assessment (incorporating ground movement analysis Ref: UK14046-R01_4 by OTB Engineering dated 17th February 2014; Letter from Point 2 Surveyors dated 27 April 2015, Daylight results interrogated, Design and Access Statement – Addendum dated 27th April 2015, Flood Risk Assessment by Environmental Planning & Assessment Limited dated April 2015.

Drawings:

A1001 Existing Location Plan rev2, A1002 Existing Site Location Plan rev4 , A1003 Existing Survey Plan rev3 , A1101 Proposed Masterplan rev4 , A1102 Proposed Urban Plan rev7 , A1010 Existing Site Plans - Lower Ground rev3, A1011 Existing Site Plans - Ground Floor rev3 , A1012 Existing Site Plans - Level 1 rev3 , A1013 Existing Site Plans - Level 2 rev3 , ,A1014 Existing Site Plans - Level 3 rev3 , A1015 Existing Site Plans - Level 4 rev4 , A1016 Existing Site Plans - Roof Level revA1 , A9021 Clinical Stacking Diagram rev4 , A2021 Proposed General Arrangement Plans - Basement B3 rev4 , A2022 Proposed General Arrangement Plans - Basement B2 rev4 , A2023 Proposed General Arrangement Plans - Basement B1 rev5 , A2024 Proposed General Arrangement Plans - Ground Floor rev10 , A2025 Proposed General Arrangement Plans - Level 1 rev6 , A2026 Proposed General Arrangement Plans - Level 2 rev6, A2027 Proposed General Arrangement Plans - Level 3 rev7,A2028 Proposed General Arrangement Plans - Level 4 rev7, A2029 Proposed General Arrangement Plans - Level 5 rev7, A2030 Proposed General Arrangement Plans - Level 6 rev8, A2031 Proposed General Arrangement Plans - Roof Level rev9, A8000 Generic Typical Floor Plan rev6,A8001 Ground Floor Plan rev7, A8002 Roof Plan rev4, A1400 Sections - Keyplan rev3, A1401 Existing Site Section A-A rev4, A1402 Existing Site Section B-B rev4, A1403 Existing Site Section C-C rev4, A1404 Existing Site Section D-D rev3, A5000 Sections - Keyplan A2 rev6, A5001 Proposed Section A-A rev6, A5002 Proposed Section B-B rev, A5003 Proposed Section E-E rev6, A5004 Proposed Section C-C rev5, A5005 Proposed Section D-D rev5, A1300 Elevations - Keyplan rev3, A1301 Existing Contextual Elevations A1 rev3,A1302 Existing Elevation A-A A1 rev3, A1303 Existing Elevation B-B A1 rev2, A1304 Existing Elevation C-C A1 rev2, A1320 Elevations - Keyplan A2 rev5, A1321 Proposed Contextual Elevations rev6, A1322 Proposed Elevation A-A rev5, A1323 Proposed Elevation B-B rev5, A1324 Proposed Elevation C-C rev4, A5101 Typical Bay A - Huntley Street rev3, A5102 Typical Bay B - Huntley Street rev2, A5103 Typical Bay C - Shropshire Place rev3, A5104 Typical Bay D - Capper street rev2,A9001 CGI 01- Aerial View rev4, A9002 CGI 02- Huntley Street towards Gordon Mansions rev2, A9003 CGI 03- Huntley Street towards Cancer Centre rev3, A9004 CGI 04- Interior View rev4;

RECOMMENDATION SUMMARY: Grant conditional permission subject to Section 106 legal agreement

Applicant:	Agent:
Mr. Kieran McDaid UCL Hospitals NHS Foundation Trust	Jones Lang LaSalle 30 Warwick Street London W1B5NH

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace
Existing	<i>D1 Non-Residential Institution</i>		<i>3433.6m²</i>
Proposed	<i>D1 Non-Residential Institution</i>		<i>10,683m²</i>

OFFICERS' REPORT

Reason for Referral to Committee: This application is reported to the Development Control Committee as it is major development involving more than 1,000sqm of non-residential floorspace [Clause 3(i)] and it proposes demolition of buildings within a conservation area [Clause 3(v)].

1. SITE

- 1.1 The application site is located to the western side of Huntley Street at its southern end. The site comprises a comparatively shallow rectilinear plot south of Capper Street and north of Gordon Mansions, bounded by Shropshire Place to the west. There are two adjoining buildings on the site: the former Royal Ear Hospital and the former UCL Hospital Students' Recreation Centre to the immediate south. The former is a four-storey 1920s red brick building raised on a basement, whereas the latter is a low-rise 1950s building comprising two-storeys.
- 1.2 The site is located within Sub Area 4 of the Bloomsbury Conservation Area. The northern section of the former Royal Ear Hospital, including the Capper Street entrance elevation and attached railings, is a positive contributor to the Bloomsbury Conservation Area, whilst its southern section makes a neutral contribution as it has unresolved elevational treatment having not been built to the architect's original design.
- 1.3 There are a number of designated and non-designated heritage assets on sites immediately adjacent to the application site. These include a terrace of Grade II listed three-storey Georgian townhouses, Nos 46-70 (even), of a domestic scale with attics and basements on narrow plots, which is situated immediately opposite the site on the east side of the street within Sub Area 5 of the Bloomsbury Conservation Area.
- 1.4 There are also some buildings on adjacent sites which are recognised as positive contributors to the Bloomsbury Conservation Area. Within Sub Area 4, immediately to the west, is Shropshire House, a distinctive Art Deco interwar commercial building comprising 6 storeys.
- 1.5 Adjoining the site immediately to the south, is Gordon Mansions, and to its east is Woburn Mansions, both Council-owned residential blocks of a grand scale. Para 5.78 of the Bloomsbury Conservation Area Appraisal and Management Statement notes, "*Gordon Mansions and Woburn Mansions mark each corner of the northern side of the junction with Torrington Place. They date from the turn of the 20th century, and are highly ornamented using red brick, terracotta and stone, with projecting bays, steep roof pitches, gables and turrets. They are large-scale buildings of landmark status in views along Torrington Place and Huntley Street. They comprise five principal storeys raised on semi-basements, and two attic levels. They are of significantly different scale and character to the terraces to the north; their northern flank walls are a dominant in views along the street, and relate in scale to the institutional buildings at the northern end of Huntley Street (situated in Sub Area 3), and to the prevailing scale in Torrington Place.*"

- 1.6 With regard to surrounding land uses, to the north on the opposite side of Capper Street is the MacMillan Cancer Centre which also formed Phase III of UCLHs modernisation of their estate, to the east on the opposite side of Huntley Street is a row of 3-4 storey, Georgian terraced properties. Three of the buildings are owned by Clic Sargent and provide temporary accommodation for families of patients who require ongoing treatment at the hospital. All but one of the remainder are owned by UCLH Charity and are rented on assured shorthold tenancies, mostly to people associated with the hospital and charity. The remainder is owned by the Liver Research Trust. The terrace is Grade II listed. To the south on both sides of Huntley Street are Gordon Mansions, blocks of residential flats. To the west of the site is the 6 storey Shropshire House which has Art Deco features and accommodates commercial offices, adjacent to this within Queen's Yard is a series of 5 storey buildings which accommodate a gym and offices.
- 1.7 The Royal Ear Hospital building is currently vacant and was last used as a temporary location for UCL's Bartlett School of Architecture whilst their new building was being constructed until mid-late 2014. The former UCL student union building which forms the southern portion of the site is vacant with the exception of the basement and ground which is currently used as a control centre for the Patient Transport Service (PTS) vehicles run by UCLH and a break area for staff of PTS.

2. THE PROPOSAL

- 2.1 Planning permission is sought for the erection of a 6 storey building and excavation works to create a 3 storey basement, comprising a head and neck outpatient hospital (Class D1) following demolition of the former UCL Student Union and Royal Ear Hospital buildings.
- 2.2 The application forms Phase 5 of UCLH's proposals to modernise its estate. The proposed new building would house the ear, nose and throat outpatient hospital. These facilities are currently provided within the Eastman Dental Hospital and the Royal National Throat Nose and Ear hospital both of which are located in Gray's Inn Road. UCLH's lease on these buildings end in 2019, the buildings are outdated and require significant investment to bring them up to modern clinical standards. It is therefore proposed to provide a more efficient, replacement facility at the application site where a number of shared services should be combined.
- 2.3 The development would provide 10,683sqm of floorspace to be used as a new Ear, Nose and Throat Hospital. From ground to fifth floors the proposed building would measure 24.6m in height, the 6th floor would be set in from the main elevation of the building and rise a further 3.1m with a resulting height of 27.7m. The building would address Huntley Street 68.4m wide façade which would increase slightly in the upper levels to 68.9m. The building would occupy the entire site with a depth of 21m at ground floor and 21.7m to the upper floors.
- 2.4 The development would include a basement which would extend 16m under the ground level, to provide three levels of basement. It would have the same footprint at each level measuring 69.4m by 23.6m (maximum) resulting in 3,447sqm of floorspace across the three levels.

- 2.5 To the roof of the building would be a roof terrace that would provide some 215sqm of space for use by patients and staff.
- 2.6 The building would be construction in red brick with stone cast banding. The Huntley Street elevation would be formed of projecting bays constructed largely in glass with hit and miss brick pattern to the southern side of the bay. It is proposed to retain the crest on the existing Former Royal Ear Hospital which fronts Capper street and relocate it to the new Huntley Street entrance.
- 2.7 The main entrance to the building would be located to Huntley Street with a secondary entrance to Shropshire Place to provide a route through between these two street. To the rear of the site within Shropshire Place would be an enclosed servicing yard, which would replace the existing internal servicing yard.

3. **RELEVANT HISTORY**

- 3.1 No relevant planning history relating to the application site.
- 3.2 During the pre-application process the proposals were presented to local residents, resident groups, the CAAC and ward Councillors in a Development Management Forum which is organised and chaired by the Council.
- 3.3 The applicant engaged with the local community and interested parties via the following means:
- Four days of public exhibitions were held in July 2014.
 - Three further days of the public exhibitions were held in 2015.
 - Three meetings were held with Gordon Mansions Residents Association in August and November of 2014 and February 2015.
 - Two meetings with the Bloomsbury CAAC in July 2014 and February 2015.
 - A meeting with ward Councillor, Cllr Madlani in February 2015 to discuss a number of UCLH projects including this proposal.
- 3.4 The applicant has noted that the feedback from these consultations were generally supportive of the plans to consolidate and streamline services on site and about the proposed building elevations. Some neighbouring residents raised concern about the height of the proposed building which would be higher than the buildings currently on site.
- 3.5 Other UCLH developments within the area

Phase IV – Former Odeon site and Rosenheim Building - 2013/8192/P
Planning permission was granted in 2014 for the 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). The works have commenced on this development.

Phase III – Elizabeth Garrett Anderson Building, Huntley Street - 2008/5900/P

Planning permission was granted in 2009 for the demolition of the existing hospital building (Class C2) and erection of a 6-storey building plus two levels of basement accommodation for clinical treatment, care and research facilities comprising a new UCLH Cancer Centre. This building has been constructed and is operational.

4. CONSULTATIONS

Statutory Consultees

4.1 Thames Water – No objection subject to a condition regarding piling.

London Underground Limited – No objection subject to a condition to secure a detailed design and method statement in consultation with London Underground for all structures and use of tall plant to ensure there would be no impact on the existing London Underground infrastructure.

Historic England (Formally English Heritage) – Recommend the application is determined in accordance with national and local policy guidance, and on the basis of your specialist conservation advice.

Conservation Area Advisory Committee

4.2 Bloomsbury CAAC

Objection, a summary of which is provided below:

- During the pre-application process we were presented with preliminary proposals. The existing building has a fine and intricate entrance facade of carved and moulded brickwork and is, quite rightly, locally listed. We were pleased to note that the proposals will retain the facades of the end entrance block and it will become a staff entrance. This should enable the retention of some of the interior reception spaces even though the lift will be replaced.
- We urged the designers to reduce the overall height of their proposal and to develop a facade treatment along Huntley Street which is less fully glazed (it seems to be a standard assumption that semi-public buildings should have completely transparent perimeters) and more imaginative than the rather mechanical bay motif which we were shown.
- We were invited back again in February this year and were appalled to see that the proposal was now to demolish the original block. The following expressed our thoughts after this meeting - in fact we walked out:
'we were extremely disappointed to discover that the revised scheme failed to preserve the really very fine existing entry facade to the original hospital. It has some extremely good carving and brickwork and is really one of the few remaining pieces of building which give a clue to the long and important medical history of the area. It seems that just about the only remnant now is the nearby Cruciform building which is (thankfully) listed. We think that the reasons given for removing the existing facade - that it would 'improve patient experience' and that it would allow a better relation to the building opposite (which is a terrible building and completely unrelated to the CA) were spurious fig-leaves for the simple fact that your client is striving to maximise the floor plate area and efficiency at the cost of the due regard to the conservation area.'

We were told that the application is due to be registered in a couple of weeks and frankly at this stage, with your proposal so far adrift from what we had hoped, it would have been a waste of our time discussing it further. We shall object strongly to the proposal.'

- As such we object strongly to the scheme primarily because of the demolition of the Capper Street entrance block which is a noted local contributor and is representative of the special historical medical character of this part of the Conservation Area. The proposed replacement is pedestrian and apparently designed to relate to the building opposite on Capper Street. This building is entirely inappropriate to the conservation area in scale, details and materials.

Local Groups

4.3 Gordon Mansions Residents Association (Submitted a 12 page detailed objection) Summarised below:

- We always made it clear during the pre-application meetings that we objected to the height of the proposed building and the assumed consequent loss of daylight and sunlight for the Gordon Mansions flats opposite. We also discussed issues of overlooking, construction and noise transmission at the party wall, design of the facades, retention of the existing decorative Capper Street façade, servicing, location and noise of plant and parking of patient transport service vehicles.
- Overdevelopment
 - In terms of size and height. The site is not big enough for all UCLH needs. The need to combine two facilities into one has led to the excessive height of the building and the excessively deep basement.
 - The increase in footfall(1,200 visitors per day) is very large concentration next to residential flats.
 - Reference has been made in the application to the height of the Cancer Centre to the north, the original large building on that site was 2 storeys less than the new building and was approved prior to the existence of the FAAP.
- Proposed height
 - The proposals are two storeys higher than the FAAP guidelines, the applicant has noted that the development will enhance all the key aspirations of the FAAP, including maintaining the parapet datum along Huntley Street to Capper Street, however this argument is just UCLH trying to justify its additional two stories, albeit set back.
 - For residents opposite on the upper levels it will appear even higher with a consequential impact on residential amenity.
 - We feel the approach for the additional two storeys is not in keeping with the spirit of the masterplanning principles for these two sites.
 - If Camden are going to allow this excessive height, it should acknowledge it is overriding the FAAP guideline, instead of re-interpreting the guidelines, which goes against the intention of the policy and which would protect residential amenity.
- Daylight and Sunlight

- There will be a very serious loss of daylight and sunlight to many of the Gordon Mansions residents.
- We disagree with the approach that has been taken as the conclusions are based against the FAAP guideline massing instead of comparing against the existing building.
- Disagree that the FAAP massing is locally accepted as a reasonable baseline, it would be fully expected that the guideline height in the FAAP would be subject to daylight and sunlight effect on neighbouring buildings.
- Of flat No.33, windows W1/149, W2/149 and W3/149 are shown to be non-habitable rooms. These are windows to a basement flats, W1 and W2 serve a living room and W3 a bedroom.
- Without advice we are not sure how to interpret the sunlight analysis. Although there is a loss to all floors there would appear to be similar substantial loss of annual sunlight hours up to 3rd floor.
- Plant noise
 - Concerned about the noise level of 44dB as the design level for all the proposed mechanical plant, we consider it is too high. Will have a detrimental affect on the Gordon Mansions flats overlooking Huntley Street. We feel the noise levels are unfair as there are different noises levels to the front and rear of the Gordon Mansions.
 - The new building will shelter the Gordon Mansions flats in Huntley Street from the noise of the existing mechanical plants of the building that are behind the site which currently affects Flats 17-30.
 - The noise assessment was undertaken 5-6pm when the rush hour traffic in Torrington Place is at its height. Huntley Street is usually relatively quiet.
 - Ask for a planning condition with a much lower permitted noise level and there are further discussions with residents and UCLH on the permitted dB level.
- Air intake grill
 - Concerned about the air intake grille at ground floor level next to the party wall with Gordon Mansions due to potential noise to the flats on both sides of Huntley street. The architect has confirmed this is for the emergency generator only and will only run during a power failure or over short test periods which is once every two months.
 - Ask for a condition that the emergency generator is only tests in weekdays during normal working hours.
 - We ask that the design noise level for the emergency plant is much less than the proposed 59dB.
- Overlooking
 - Concern about the active frontage impact on Huntley Street.
 - Appreciate confirmation via condition that the balustrade to the roof garden would be 1.8m in height.
- Outlook
 - The development would lead to loss of the long view for residents in Huntley Street which gives relief in this tight urban environment.
- Design
 - The proposed brick/bay elevational design along Huntley Street is liked by residents.

- The plant enclosure walls at the party wall with Gordon Mansions are as high as the top of the pots of the party wall chimney stacks of Gordon Mansions, this is an uneasy relationship.
- Basement
 - Concern of impact on adjacent flats. Request a condition that secures that party wall agreements are entered into for all flats in the east block, not just those along the Party wall.
 - Request confirmation that the Party wall is not used during the construction and that a separate wall independent of the Party wall for an isolation gap.
- Deliveries and Servicing
 - Concern rear rooms of Gordon Mansions will be disturbed from loading bay. 24/7 delivery hours are unacceptable, we ask that there are no deliveries between 9pm-8am, at weekends of bank holidays and vehicles switch off backing beepers and warning speakers between 7pm to 8am.
 - Concern about the servicing route given the West End Project will prevent access to the site via Capper Street.
- Patient Transport Service Parking
 - Impact must be viewed in the context of the ongoing hospital expansion. They are providing no additional on street parking. We welcome UCLH's exclusion zone we would like clarification this includes UCLH's 80 contracted PTS vehicles.
- Ambulances from other hospitals
 - Not clear whether any of the PTS ambulances we see parked around the area come from other hospitals, the proposed exclusion zone might work.
- Taxis
 - No taxis will be able to set down and pick up from the new hospital.
- Open hours
 - Grateful for confirmation of opening hours.
- Light pollution
 - Night pollution due to certain lights that will stay on we request blinds are used to prevent light pollution.
- Construction Management Plan
 - We request no Saturday working and that there are regular liaison meetings with the contractor, UCLH and local residents and residents association.

University College London

Support, a summary of which is provided below:

- The proposed development will provide a more efficient facility for patients.
- The development will have clear benefits for the health of the local population and will raise the profile of London as a centre of clinical excellence.

- The proposals will enhance and improve the area by replacing the existing buildings with a building of exceptionally high quality in design that will enhance and positively contribute to the appearance of the Bloomsbury area.
- I am conscious of the effort that has been undertaken to engage with the local community to ensure that the development is sensitive to their expectations.
- The development has my fullest support.

Trustees for the University College London Hospital Charity

Support, a summary of which is provided below:

- The development will replace the existing outdated facility to be combined into a facility to benefit the local population.
- The proposals will significantly enhance and improve the locality by replacing the old very tired existing buildings with a new high quality structure which will contribute to the appearance of the Bloomsbury area.
- UCLH Charity is a totally independent organisation and its main function is to support the development of health services, clinical research and education in the locality and we see the proposed development a very positive contribution.
- The Charity owns 26 flats in the Georgian terrace opposite and full support the proposal.

CLIC Sargent

Support, a summary of which is provided below:

- CLIC Sargent as partners of University College London Hospitals NHS Foundation Trust (UCLH) support them in the need for this type of facility. CLIC Sargent own residential properties named 'Paul's House' at 62-66 Huntley Street and provide a 'Home from Home' service where children and young people who are receiving cancer treatment, can reside with their families/carers. Treatment is provided at UCLH and Great Ormond Street Hospital.
- Due to the residential nature of our properties, concern is raised as to the impact of overlooking from windows to the new Hospital frontage to Huntley Street and request whether measures can be put in place deal with this. In addition, I understand that the Hospital will operate during normal working hours but during winter months, there is likely to be artificial light spillage across the street into neighbouring properties, therefore appropriate controls are required.
- The scale of the new building will impact on the level of daylight / sunlight to our properties. I note there is general mention of 'reduction of light but in line with planning policy', therefore request that detailed consideration is given as to light reduction to the residential properties.
- Our major concern relating to the construction works is that there is a significant health risk of aspergillus arising from demolition and ground/excavation works which would put our service users who have suppressed immune systems at particularly high risk of infection. We have raised this point with UCLH and will be further engaging with them as to impact of this and mitigation measures as part of the construction

management plan. It is therefore imperative that comprehensive health and environmental controls are put in place for the whole redevelopment project.

- In terms of the overall development programme including enabling infrastructure works within highways, it is essential that we are fully consulted on the project programme due to impact on 62-66 Huntley Street. From the information submitted in the Planning Application, Huntley Street will be the main point for site access, therefore not only is site traffic going to be a considerable issue but overall noise, disruption and disturbance from the entire works to properties in the immediate vicinity of the site.

Adjoining Occupiers

<i>Number of letters sent</i>	227
<i>Total number of responses received</i>	13
<i>Number in support</i>	0
<i>Number of objections</i>	13

4.4 A press notice was published in the Camden New Journal on 12 March 2015 expiring 02 April 2015. A site notice was displayed adjacent to the site on 16 March 2015 expiring 06 April 2015.

4.5 13 letters of objections have been received from local residents, a summary of which is provided below:

Design

- The size of the building is too high. It is higher than the guidance within the Fitzrovia Area Action Plan which would match that of the existing Royal Ear hospital building. How can the Council allow a building two storeys higher than its stated policy.
- Overdevelopment of the site, number of additional visitors (1,200 per day), will seriously disturb the quality of life for residents of Huntley Street.
- No objection to the hospital redeveloping its site however consider the proposal too much, too big, too high and has been designs flouting the planning policies of Camden Council.
- The new building will totally dwarf the Georgian terrace opposite.
- The applications makes much reference of the building being less than Gordon Mansions, the photographs and drawings are all taken from very advantageous angles where the disparity in height between buildings is not seen, this plays down the impact of the building.

Amenity

- I think it is dreadful hospitals are torn down and rebuilt without consideration to the health of residents and regard to the years of pollution that extensive works will bring. It is most unfair that this happened three times on Huntley Street along. No sooner is one project completed then the next begins.
- The levels of pollution are already height and are effecting our health and well being, the thought of having to face another extended period of demolition and construction with all the associated tensions is unbearable.

- The whole area is losing its heart, squeezed between the constantly shifting hospital and the looming university. It is unfair to residents of Gordon Mansions.
- Loss of light. The daylight survey notes that available level of light would be reduced by 70% for rooms W1/149 and W2/149, the bedroom and sitting room of my flat. The report states these rooms are out of scope of consideration as they are not residential properties, however I live in it.
- The windows are the only source of daylight for the property and that is why the two habitable rooms face this aspect. You would not be able to design and build a flat with such low light levels under other circumstances. The development would have a major impact on the quality of life for dozens of residents at basement and up to 4th floor level.
- If the development was of a more reasonable height it would not reduce light to such unacceptable levels.
- Impact on privacy(due to roof garden)
- Noise of night delivery, the loading bay is to be in use in the evenings and until midnight. This is a residential area, the delivery hours should be reduced to 9pm at the latest.
- Noise of air conditioning, air grilles should be relocated from residential spaces on Gordon Mansions and air conditioning units kept to a minimum at night.
- Extra air pollution that will be caused to work carried out.
- Overlooking from the proposed roof garden.
- If approved please can there be some respite from the constant building work.
- This doubling of space will double the size of the operations within it, increased noise and pressure on parking, which is already massively overused within the increase of ambulance use from the extended hospital use in the last year or so.
- In the past few years the street has become a never ending building site, we need a break from the noise, dust and stress of constant building work.
- The students union has historically caused a high level of noise transference into residential properties. More recently there has been water ingress from the Students Union building.

Basement

- Basement is too deep.
- The basement is as deep as the present Royal Ear Hospital is high. Deep excavation immediately adjacent to Gordon Mansions could structurally harm the building.
- I notice more and more standing water once the development has been built, this is never rectified once the building work is completed. The area in Capper Street at the corner of that and Huntley Street is particularly bad as is outside No.60-62 Huntley Street.
- Concern for subsidence and shifting involved in such a radical proposal.
- Within the BIA no indication is given as to what the practical effect on Gordon Mansions would be, although it would be serious for a classic old building and would result in cracks in brickwork, plasterwork, movement of window frames and doors. There is absolutely no reason why the leaseholders and freeholder of Gordon Mansions should be expected to tolerate any level above negligible.
- The consequence of any ground movement would undoubtedly require insurance claims, it is expected that Zurich insurance be consulted on this to make sure the buildings insurance is not voided.

- It is proposed the basement is reduced to two levels or the first 20m of the basement is the same as the depth of the Gordon Mansions basement, if it is necessary is construction 20m closer to Capper Street. As such the result in damage is moved a reasonable distance away from block 17-30 of Gordon Mansions.
- The wall between 17-30 Gordon Mansions is in need of repair work and it is vital this work is carried out before the new building is contrasted.

Transport

- UCLH will go on requisitioning single yellow lines on public street. Leading to both sides of Tottenham Court Road becoming an ambulance park. The hospital are trying to address this in their application by designating Huntley Street and the surrounding area as UCLH Ambulance Parking Exclusion Zone. I think Camden should require the hospital to provide its own short-term off-street parking for ambulances on their Huntley Street campus in accordance with the aims of the West End Project to improve public realm.
- Capper Street should be reopened during certain hours to service vehicles.
- There will be caused for disabled drivers waiting all day outside Gordon Mansions making it impossible for vehicles to drop off and collect from Gordon Mansions.

Accessibility

- The proposed drawings do not show the Sheffield Stands to the front. The pavement is narrow and I fear it will not allow twin buggies or mobility scooters to pass easily along the pavement, neither will they be able to easily cross the road between the parked cars.

Proposed conditions

- Servicing hours of 8am-9pm Monday to Friday only,
- Backing beepers shall be switched off,
- Ambulance fleet should be electric vehicles,
- UCLH come back with how they will enforce the PTS ambulance parking exclusion zone,
- Engines of ambulances should not be in idle, single yellow line outside Gordon Mansions should be restricted for use for delivery and set down by residents only,
- Pigeon eradication programme should a pigeon problem arise from the small window ledges,
- The small tree to the front of the student union building should be retained or replaced if damaged during construction,
- Air condition noise is set lower than proposed with the lowest levels at night.

5. **POLICIES**

5.1 **National Planning Policy Framework 2012**

5.2 **The London Plan 2015, consolidated with alterations since 2011**

5.3 **LDF Core Strategy and Development Policies 2010**

LDF Core Strategy

CS1 Distribution of growth

CS2 Growth areas

CS3 Other highly accessible area

CS5 Managing the impact of growth and development

CS9 Achieving a successful Central London

CS10 Supporting community facilities and services

CS11 Promoting Sustainable and efficient travel

CS13 Tackling climate change through promoting higher environmental standards

CS14 Promoting high Quality Places and Conserving Our Heritage

CS18 Dealing with our waste and encouraging recycling

CS19 Delivering and monitoring the Core Strategy

LDF Development Policies

DP1 Mixed use development

DP15 Community and leisure uses

DP16 The transport implications of development

DP17 Walking, Cycling and public transport

DP18 Parking standards and limiting the availability of car parking

DP19 Managing the impact of parking

DP20 Movement of Goods and Materials

DP21 Development connecting to the highway network

DP22 Promoting Sustainable Design and Construction

DP23 Water

DP24 Securing High Quality Design

DP25 Conserving Camden's Heritage

DP26 Managing the impact of development on occupiers and neighbours

DP27 Basements and lightwells

DP28 Noise and vibration

DP29 Improving access

DP32 Air quality and Camden's Clear Zone

5.4 **Supplementary Planning Guidance**

Camden Planning Guidance (2011) (as amended 2013)

CPG1 Design

CPG3 Sustainability

CPG4 Basements and lightwells

CPG7 Transport

CPG8 Planning obligations

Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Fitzrovia Area Action Plan (2014)

6. **ASSESSMENT**

6.1 The principal consideration material to the determination of this application are summarised as follows:

- FAAP Principles;

- Land Use;
- Design and conservation;
- Basement impact;
- Neighbour amenity;
- Transport;
- Sustainability;
- Accessibility;
- Waste; and
- Section 106 obligations and CIL.

FAAP Principles

- 6.1 The Fitzrovia Area Action Plan (FAAP) was formally adopted by the Council in March 2014. The purpose of the plan is to aid in shaping the future of Fitzrovia and the western part of Bloomsbury. The aims seek to ensure that development proposals bring real benefits to the area, particularly in terms of open space, housing, affordable housing, community facilities and locally produced energy.
- 6.2 The two buildings which form this application are identified within the FAAP as opportunity sites. The Master-planning principles relevant to the site include:
- At equivalent to 3 storeys in height, 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. Development should be designed to preserve and enhance the setting of the surrounding heritage assets in particular the listed Georgian terraces opposite.
 - Behind the two sites run Queens Place and Shropshire Place, which form a quiet and pleasant route through to Tottenham Court Road and provide access to a gym and offices. Quiet enclosed pedestrian laneways and spaces provide a contrast to the noise and traffic of Tottenham Court Road and the introduction of further quiet pedestrian spaces into schemes is encouraged. Options include extending Shropshire Place south to Torrington Place, although this would be dependent on development at 1-19 Torrington Place. Queens Yard could continue directly through to Huntley Street.
 - Redevelopment of both the Royal Ear Hospital and the Medical Students' Union could address any new pedestrian routes with windows, entrances and, potentially, active frontages. The provision of new mid-block links may not be appropriate for some schemes and design solutions. Such elements should not be provided where they could prejudice the viability and functionality of these sites for their preferred uses
- 6.3 The key development principles include:
- **Land use:**
 - *The Council's preferred land use for these sites is medical / healthcare use, to help consolidate these within the northeast of Fitzrovia.*
 - **Public open space :**

- *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.*
- **Design :**
 - *The Royal Ear Hospital is identified as a 'Positive Contributor' to the conservation area and so there will be a presumption in favour of retaining the building.*
 - *Development of the Medical Students' Union building should add additional storeys in order to match the scale and massing of adjacent sites.*
 - *Development should preserve and enhance the character and appearance of the Bloomsbury conservation area, and development which causes harm to the character and appearance of the conservation area will not be permitted.*
 - *Development should not cause harm to the setting of the listed terrace opposite the site on Huntley Street.*
 - *Development should not cause harm to the residential amenity of the occupiers of nearby buildings (see also Principle 9 Residential Amenity). In addition, appropriate measures should also be taken to minimise impact on the amenity of the residential block adjoining Site 8 with regard to structure-borne noise and vibration.*
 - *Development should minimise loss of natural light and maintain adequate daylight and sunlight to properties on the east side of Huntley Street.*
 - *Development should use materials which are sensitive to the nearby listed buildings in terms of tone, colour, texture and finishes*

Land Use

- 6.4 It is understood the lawful use of both buildings are D1 (non-residential institutions), the proposed use as an outpatient hospital would also fall within the D1 use class, therefore there is no material change of use at the application site.
- 6.5 It is noted within the Fitzrovia Area Action Plan (FAAP) that the Councils preferred land use for both sites would be that of medical/healthcare uses. As the proposed use would be for an outpatient hospital it would be according with the objectives of the FAAP in respect of land use.
- 6.6 The site is located within the Central London Area and as DP1 would be relevant due to the additional floorspace being over 500sqm. The preferred land use for the site is a medical, in this case a self-contained hospital. As this would be a publically funded development with full site coverage there is practical prospect of co-locating residential and medical uses on the same footprint and furthermore creates significant constraints on the provision of new public open space. Therefore there is no policy expectation to provide residential floorspace. A substantial roof garden would be provided for hospital visitors and staff in order to offset the likely impact on local green spaces from the increased visitor numbers.
- 6.7 In light of the above there are no objections on land use grounds to the proposed development.

Design and Conservation

Context

- 6.8 The site is in the Bloomsbury CA and sits on the boundary of two sub areas of different characters. The site is within Sub Area 4 which includes the larger scale buildings of the Tottenham Court Road fringe and extends northwards along Huntley Street to include the Macmillan Cancer Hospital and UCLH Phase IV (Rosenheim and Odeon Site). On the site's southern boundary and extending to the south and east is Sub Area 3 which has a more residential character.
- 6.9 As such, northwards of Capper Street, Huntley Street has an institutional and medical character with single building frontages occupying whole urban blocks. Some are long established, including the listed Cruciform and Medical School buildings, while others such as the O'Gorman and Macmillan Buildings are 21C buildings, with UCLH Phase 4 (Odeon) also on site. The two listed medical buildings were progressive in their day and designed with a high consideration towards the quality of occupier experience and medical functionality. The cruciform plan of the Cruciform Building came from a pioneering aspiration to maximise natural light and air to all of the wards, which radiate from a central core providing an efficient and legible plan. On Capper Street, to the west of the site, is the moderne Shropshire House which presents another sizable frontage. Shropshire House is a positive contributor.
- 6.10 On Huntley Street directly opposite and to the south of the site the character is residential rather than institutional. Opposite is a row of late thirteenth 18C listed terrace properties. Gordon Mansion and Woburn Mansions, also positive contributors, sit on both sides of the street down to the junction with Torrington Place. Although clearly residential in character these richly articulated mansion blocks rise to a comparable scale to that of the institutional buildings further north on the street. Their northern gables are finished in blank secondary brickwork, which suggests that future buildings of a mansion block scale were once anticipated to replace the listed terraces and the buildings on the proposal site.
- 6.11 The listed 18C terraces are, as expected, finished in a London Stock brick. However the principle palette of Huntley Street, derived from the Cruciform Building, Medical School, existing Royal Ear Hospital, and Gordon & Woburn Mansions is red brick with stone highlights. The early 20C medical buildings recently replaced by the Macmillan Centre and UCLH phase IV were also red brick. Officers recognise that there have been concerns from the community that the 21C buildings built and approved on Huntley Street have departed from the red brick character.

The Existing Buildings

- 6.12 The site is occupied by two buildings. One is the two and three storey Student Union building which is not considered to be of merit. The other is the former Ear Hospital and is considered to be a positive contributor.
- 6.13 The former Royal Ear Hospital dates from 1926. The Conservation Area Character Appraisal highlights that the building has a finely detailed entrance façade which

faces Capper Street, constructed in red brick with vertical ribbing. It has neo-Tudor influences in the form of a stone entrance surround and stone projecting bay window rising through the upper three floors. The building also reflects this part of Bloomsbury's role as one of London's most important medical district.

- 6.14 It is important to note that officer's only consider the northern end of the building to make a positive contribution to the conservation area. The main body of the building, which fronts Huntley Street and Shropshire Place, is of significantly less architectural merit and detailing quality than the Capper Street end bay described in the paragraph above. This is mostly due to the building not being constructed as originally intended in 1920's with 'last minute' removal from the elevations of external sun decks which were not replaced by alternative architectural interest. The building was not designed with the same radical forward-thinking considerations that one sees on the earlier Cruciform building, and the decision not to build the medically progressive sun decks limits its medical interest further.
- 6.15 The existing building of the former Royal Ear hospital measures 36.7m in width as it addresses Huntley Street. The section which is considered to be a positive contributor is 6m wide as it addresses Huntley Street, returns along Capper Street for the full depth of the building at 13.4m and then onto Shropshire Place for a further 6m. The whole building has a Gross External Area (GIA) of 466.8sqm the positive contributor forms 79.5sqm of this as such 17% of the building is a positive contributor. In terms of the entire site (including the Students Union building) 11% is a positive contributor.

Demolition

- 6.16 The proposal seeks to demolish and replace both the buildings on the site. The demolition of the Student Union Building is acceptable in principle. As a positive contributor, the demolition of the former Royal Ear hospital has had to be justified in line with NPPF and Camden policies. In this regard officers have considered the degree of harm the demolition causes to the Bloomsbury Conservation Area (a designated heritage asset) and to the building itself (an undesignated heritage asset), whilst considering the degree to which the proposal, through its contextual design merit, preserves or enhances the character or appearance of the CA, and therefore mitigates the harm to the CA.
- 6.17 During the pre-application process the initial presumption was the retention of the façade of the Capper Street elevation. However as the pre-application discussions evolved it became apparent that the retention of this element of the building would not be practical in providing a hospital which would function efficiently for its future users. The retention of the building was not considered practical due to the internal layout, provision of 4 patient lifts to accommodate the number of users, the provision of the basement would be compromised and would have therefore limited the level of clinical floor space that could have been provided below ground subsequently reducing the efficiency of the plate. As such the applicant changed their approach to the development of the site to include the demolition of the entire building.
- 6.18 In assessing the demolition, officers must first give consideration to whether the resultant harm to the CA and to the building itself is 'substantial harm' or 'less than

substantial harm'. An unlisted building that makes a positive contribution to a conservation area is individually of lesser importance than a listed building. The extent to which its removal harms a conservation area is derived by how important and integral it is to the character and appearance of the CA. Justification for its demolition must be proportionate to the relative significance of the building and its contribution to the significance of the conservation area as a whole.

- 6.19 The applicant's Heritage Assessment considers that the demolition of the positive contributor "does not lead to 'substantial' harm or any significant level of 'less than substantial' harm to the Bloomsbury Conservation Area, or any other heritage assets" and, "that the Capper Street fragment of the overall former Royal Ear Hospital makes a modestly positive contribution to the character and appearance of the Bloomsbury Conservation Area. This contribution is to a very specific part of the overall conservation area and even to the sub-area within which it is located. It is our view that its retention is not essential for the preservation of overall character and appearance."
- 6.20 Officers recognise that positive contributor is a relatively small element which does not have a particularly prominent location in the Conservation Area. It also sits in a sub area, and streets which have a mix of buildings; Georgian, Victorian, Edwardian, inter-war, post war, and 21C. As such while its contributes to the character and appearance of the CA and the setting of listed buildings through its architectural quality, material palate, and historical medical use, it does not have a specific integral relationship with neighbouring buildings which is necessary to the completeness of the whole.
- 6.21 Officers consider that the demolition of the Capper Street end of the former Royal Ear Hospital will result in less than substantial harm to the Conservation Area. In such circumstances NPPF paragraph 134 applies. Its states "*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*".
- 6.22 Officers consider that demolition of the Capper Street end will result in substantial harm to the building itself. In such circumstances NPPF paragraph 135 applies. It states "*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*".
- 6.23 An additional consideration is the statutory test of whether the proposal preserves or enhances the character or appearance of the conservation area. As set out in the design section later, the replacement building is considered to be a high quality and contextual design which preserves the character and appearance of this part of the Conservation Area. Additionally it has been designed to maintain characteristics which are recognised as making the Royal Ear Hospital a positive contributor, including its brick and stone facades and the concentration of a medical character around Huntley Street. Also, the carved stone crest located above the entrance on Capper Street, would be retained and relocated to the Huntley Street elevation of the building, thereby preserving this historic feature of the existing

building. Therefore, whilst the loss of the Royal Ear Hospital does cause some harm to the CA, the quality and character of the replacement results in the harm being mitigated.

- 6.24 Section C of Conserving Camden's Heritage Policy DP25 states *"In order to maintain the character of Camden's conservation areas, the Council will: prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention"*. As above, the mitigating qualities of any replacement building which through its design preserves or enhances character and appearance must be considered alongside the harm resulting from demolition. Any remaining harm must then be balanced against the exceptional circumstances of public benefit.
- 6.25 In applying the NPPF and DP25, it is necessary to establish the public benefit. Officers consider that the proposal does have an acceptable level of public benefit. The proposed development would result in a new public hospital which would be a substantial public benefit to both the local and wider population. The site currently accommodates two underused buildings, one of which is vacant and the other used by the PTS of UCLH for a break area and contact centre. These two buildings would be replaced by a modern medical facility, bringing the site back into public use.
- 6.26 Furthermore the proposed hospital would cater for all ages from babies to adults who have medical problems which require services for ear, nose, throat and dental. The proposed hospital would bring the facility to the UCLH campus, thereby providing a more efficient hospital facility. In addition, should patients require other medical facilities, they would be in close proximity.
- 6.27 The proposed design aims to make life comfortable for patients. An entirely new design uncompromised in its plan and form by a retained building element, would achieve high levels of internal and external legibility and ease of operation for the 1000 patients using the facility per day. It also allows the hospital to most effectively co-locate services to treat patients quickly without the need to relocate to another space, reduce the time a patient spends in the new facility, redesign the pathways and flows to reduce the need for patients to have multiple appointments and enhance the overall patient experience.
- 6.28 In summary, the loss of the positive contributor would result in some limited harm to character and appearance of the conservation area, the designated heritage asset, and harm to the building itself which is an undesignated heritage asset. On balance it is accepted that the provision of a new building, which internally provides the facility that a modern hospital requires would optimise the viable use of the site and provide a significant public benefit for the Borough, and this is considered to outweigh the loss of the positive contributor.

Proposal

- 6.29 The proposed design is collaboration between two architectural practices. One, with an expertise in hospital buildings, has designed the interior layouts; the other

has designed the high quality and contextually responsive façade. Officers consider that, as a bespoke façade requiring a considered level of detailed resolution, an architect experienced and recognised as having exceptional ability in delivering the high quality detailing and package information be retained by the client to provide the detailed design information relating to the external envelope throughout the post planning RIBA stages. This recognises the complex and bespoke nature of the façade, and the commitment necessary towards quality expected from any new building that replaces a positive contributor. This is to be secured by S106 legal agreement.

- 6.30 The proposal is considered by officers to be a high quality and contextually responsive design which employs an architectural vocabulary and material palette which balances the institutional and residential characters of this part of the CA successfully.

Height and Massing

- 6.31 Both sites are recognised as opportunity sites within the FAAP. The Key Development Principles section states that *“Development of the Medical Students’ Union building should add additional storeys in order to match the scale and massing of adjacent sites”*. The Masterplanning Principles section 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”*. This principle presumes that the Royal Ear Hospital is retained and applies the previous principle of matching scale and mass of adjacent sites within that context.
- 6.32 However with a scheme involving the demolition of the Royal Ear Hospital, the building no longer forms a contextual reference. Therefore to determine an acceptable scale and mass, officers have looked at the scale and massing of adjacent buildings that will remain and form the long term context of the proposal. In this regard the buildings to the south and north, which sit alongside the proposal in Huntley Street views, are the most relevant. These are Gordon Mansions and Macmillan Cancer Centre. Shropshire House, which is one storey higher than the existing Ear Hospital will also sit with the proposal in Capper Street views. The listed terrace of Georgian houses sit opposite rather than adjacent to the proposal. Officers consider that while the proposal is taller than the terraces, by responding in its design to the prevailing historic scale and character on Huntley Street, it preserves the setting of the listed structures.
- 6.33 The proposal matches the scale and massing, and responds to the character, of the adjacent Gordon Mansion building with which it would form a complete street frontage. The proposal is formed of a four storey body, which sits slightly lower than the ridge height of Gordon Mansions, plus two setback storeys which respond to the two storey mansard zone at the top of Gordon Mansions. The parapet of the proposal’s final recessed floor is set at 51.860 AOB which matches that of the mansard ridge of Gordon Mansion set at 51.870.
- 6.34 Within Gordon Mansions’ two storey mansard zone, elements of the main brick façade rise full height to form gables and turrets without stepping back. The

mansard itself, finished in slate, is very steep and not far off vertical. It also has large dormers. So although Gordon Mansions employ materials and aesthetics that express a roof form, the mansard zone is not significantly recessive in bulk and mass terms. However the top two storeys of the proposal have been designed to step back to a greater degree, by 1.2m at fourth floor and 2m at fifth floor. So while the proposal matches the height of Gordon Mansions, from the street the more recessive form of the upper storeys will result in a lesser sense of mass and scale than its neighbour.

- 6.35 If one compares this to the Royal Ear Hospital, the parapet of the proposal's main façade to Huntley Street terminates 1.5m lower than the parapet on the existing. The two setback storeys then rise a further 7.5m.
- 6.36 The entrance and lift core are located at the north end of the building, closest to the institutional end of the street and away from the residential end. This element rises full height to terminate the composition at the junction with Capper Street, again taking reference to the taller corner turrets of Gordon Mansions. Across Capper Street is the Macmillan Cancer Centre and the more vertical expression at this end also responds to the scale and massing of this adjacent building. In plan, the proposed Huntley Street building line is located so that the main façade and the projecting bay windows again align and take reference from those of Gordon Mansions.
- 6.37 At roof level the proposal has some areas of plant, plus the lift and stair of the main core rise to provide access to a roof garden. The plant is 3.2m tall and correlates with the chimney zone on Gordon Mansions, which also has some small roof access enclosures of a similar height. The plant is located in two areas, both set back out of view from Huntley Street. One is a linear form along Shropshire Place. The other is a triangle shape at the south end which has been shaped to minimise impact on outlook from residential properties from Gordon Mansions east block. The roof garden sits between the two plant enclosures.

Layout and detailed design

- 6.38 The ground floor places the public spaces to the north, with service spaces to the south resulting in an elevation to Huntley Street which is visually open along three quarters of its length, but solid next to the residential blocks to the south. From the street pedestrians will be able to see through the building and into Shropshire place where a second set of entrance doors are placed. The main entrance is marked by an entrance canopy and with the stone crest from the existing building preserved and located next to the doors. Lifts, café, reception etc will be located to be clearly visible on arrival. A condition would secure a method statement for the removal, restoration and reinstatement of the crest.
- 6.39 The FAAP aspires to have an open route through the site to Queens Yard and Shropshire Place, but recognises that this may not be achievable, stating that *"Such elements should not be provided where they could prejudice the viability and functionality of these sites for their preferred uses"*. The visual openness of the ground floor and the permeability through the building reception has gone a long way to achieving the masterplanning principle whilst recognising the functional needs of the use.

- 6.40 The consultation floors above have been arranged with the waiting areas along the Huntley Street side, with the benefit of natural light, and consultation rooms to the centre of the plan. This is a pioneering approach to hospital planning which reverses the traditional approach of placing consulting rooms on the outside, whilst making patients wait in poorly lit central areas. The failure of this approach was that privacy blinds were continuously lowered in the consulting rooms so that no-one benefited from natural light.
- 6.41 The waiting areas are in a continuous space which folds into eight projecting bay windows. These bays provide more intimacy and form to the internal space, but also respond strongly to the language of the neighbouring resident blocks. The bays are of a canted shape; with the southern chamfer finished in hit-and-miss brickwork with glazing behind, and the northern chamfer just glazing. This provides the building with a more solid brick character when viewed from the southern domestic brick character end of the street. It also provides shading to the south sun-light and provides a privacy screen in the direction of the residential properties to the south.
- 6.42 The Capper Street end has hit-and-miss brick fins which provide a screening role as before, but with more vertical proportions that express the use behind and provide a strong bookend to the Huntley Street elevation. The Capper Street/Shropshire Place corner contains the staircase, and this has been given a curved corner in dialogue with the curved corner of Shropshire House opposite. Texture will be given to this stair, with every other brick recessed. A full height window is provided in Capper Street at the end of the waiting room corridor. Three ducts placed centrally in the façade twist by 45 degrees above 3rd floor and taper, forming brick chimneys reminiscent of the Elizabethan era, the period which inspired some of the detailing of the existing building. The Shropshire Place elevation follows the language established on the Huntley Street side, but without projecting bays.
- 6.43 Materially the building is composed of red brick with recon stone bands, which respond to the existing building and the character of mansion blocks further south in Huntley Street. The double stripe string line expressed on the proposed building can be seen on both Gordon Mansions and Ridgmount Gardens, but also respond well to the linear expression on the Modern Shropshire House.
- 6.44 Officers consider the building to be characterful and imaginative responsive to context whilst having a layout driven by progressive functionality and user experience which results in a building that will be legible and easy to use. In doing so it expresses much of the aspirational spirit found in best medical buildings such as the listed Cruciform Building.

Setting of listed terraces

- 6.45 The FAAP recognises that a proposal of greater height than the terraces is acceptable. The prevailing character and appearance of Huntley Street is of large scale, red brick buildings of the late 19C/early 20 and it appropriate that the scale, character and material finish of the proposal derive from this prevailing character.
- 6.46 Historic England Guidance on the setting of heritage assets states "*Setting in urban areas, given the potential numbers and proximity of heritage assets, is therefore*

intimately linked to considerations of townscape and urban design and of the character and appearance of conservation areas. The character of the conservation area, and of the surrounding area, and the cumulative impact of proposed development adjacent, would suggest how much impact on the setting should be taken into account". The listed terrace is considered by officers not to have any stand-alone setting consideration beyond that which would be assessed as part of conservation area townscape, character and appearance.

- 6.47 The proposal has a positive townscape relationship with the street as a whole drawing strongly on the language of the positive contributor, Gordon Mansions. Although taller than the terraces, the proposal uses a historically sensitive brick and stone aesthetic with a domestic scale of modulation which officers consider sits comfortably across from the listed terrace and does not compromise its setting.

Summary

- 6.48 The proposed building is a high quality and well considered design. The building responds in its material and forms to the residential character of the southern end of Huntley Street whilst clearly being legible as a public building. Officers recognise that this is a difficult aesthetic balance to strike and consider that the building is a highly successful solution that will enhance the character of the conservation area. Whilst a building recognised as a positive contributor will be lost, the proposal maintains the existing medical character, maintains the red brick and stone character, and is considered to be of an architectural calibre to match that of the existing Capper Street elevation and be an enhancement over the existing Huntley and Shropshire Place elevations.

Basement impact

- 6.49 Policy DP27 and CPG4 state that developers will be required to demonstrate with methodologies appropriate to the site that schemes for basements maintain the structural stability of the building and neighbouring properties; avoid adversely affecting drainage and run-off or causing other damage to the water environment; and avoid cumulative impact upon structural stability or water environment in the local area.
- 6.50 The proposed basement would extend 16m under the ground level, to provided three levels of basement. It would have the same footprint at each level measuring 69.4m by 23.4m (maximum) resulting in 3,447sqm of floorspace across the three levels.
- 6.51 A Basement Impact Assessment (BIA) has been submitted in support of the application. The assessment is formed of four reports produced by different companies. The reports have all been prepared by engineers with the relevant qualifications.
- 6.52 The BIA has been independently reviewed by LBH Wembley who have assessed the report and consider it to accord with DP27, raising no objection to the information provided.

6.53 Site investigations comprised of two cable percussive boreholes within the existing basements to over 40m depth, six small diameter percussive boreholes to depths of up to 4m and three hand dug trial pits to expose the existing foundations. These were monitored six times during the period of December 2014 to February 2015.

Groundwater

6.54 The screening stage identified the following points which needed to be taken forward to the scoping stage:

- The site is located directly above an aquifer.
- The proposed basement will extend beneath the water table surface.

6.55 Taking these points forward to the scoping stage it is identified that if a basement extends into the underlying aquifer it may affect the groundwater flow regime.

6.56 With regard to the water table, groundwater flow may be altered by the proposed basement. Changes in flow regime could potentially cause the groundwater levels within the zone encompassed by the new flow route to increase or decrease locally. For existing nearby structures the degree of dampness or seepage may potentially increase as a result of changes in groundwater level.

6.57 It is noted within the impact stage of the BIA that the basement will be encapsulated within a secant bored pile wall around its full perimeter. As the piles interlock and extend into the London Clay aquitard this will exclude groundwater flow from the works in the short term. In the long term the basement structure will incorporate a waterproofing layer and internal reinforced concrete walls which further enhance the water resistance of the basement. Using such a method of construction will ensure that there will be no change in groundwater levels.

Stability

6.58 The screening stage identified the following points which needed to be taken forward to the scoping stage:

- The site is within an aquifer (see the groundwater section above).
- The proposed basement will extend beneath the water table such that dewatering may be required during construction.
- The site is within 5m of a highway or pedestrian right of way.
- The proposed basement will significantly increase the differential depth of foundations relative to the neighbouring properties.

6.59 As noted within the groundwater section above, the basement would excavate beneath the water table. Dewatering can cause ground settlement. The zone of settlement will extend for the dewatering zone, and thus could extend beyond a site boundary and affect neighbouring structures. Conversely an increase in water levels can have a detrimental effect on stability.

6.60 At the impact assessment stage of the BIA it was noted that vertical ground movements due to unloading as a result of demolition and excavation and loading due to structural loads have been assessed using geotechnical software. No adjoining structures assessed falls above Category 2 (slight) of the Burland Scale. As such the ground movement would be in accordance with the preferred level set out in CPG4.

Surface flow and flooding

6.61 The screening stage identified the following points which needed to be taken forward to the scoping stage:

- The site is in an area known to be at risk of surface water flooding, or is at risk from flooding, for example because the proposed basement is below the static water level of a nearby surface water feature.

6.62 The scoping stage advised that a Flood Risk Assessment (FRA) should be undertaken. An FRA was undertaken as part of the BIA. It is noted that the levels and horizontal topography of the site and its relative distance from the nearest surface depression (Farringdon Road along the line of the former fleet river) and open fluvial watercourse (River Thames) indicates there is a very low risk from surface flooding from fluvial sources.

Independent Review

6.63 The BIA provided was independently reviewed by LBH Wembley. LBH Wembley have confirmed that the submission demonstrates in sufficient detail accordance with DP27 and no objection is raised to the proposed basement development.

Basement conclusion

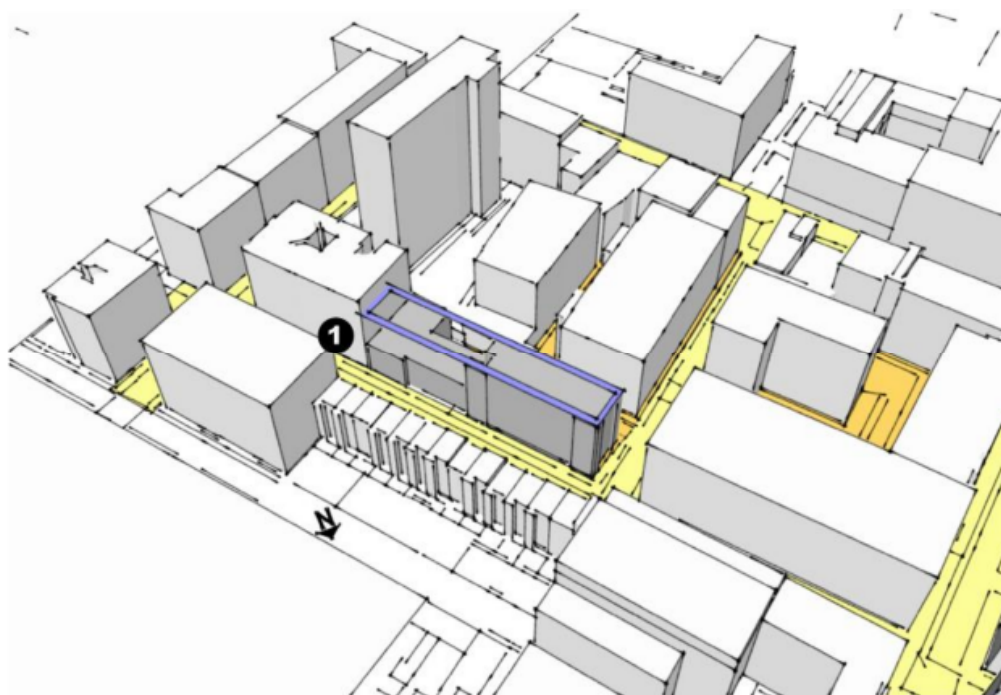
6.64 It is considered that the proposed basement excavation would not cause harm to the built and natural environment and would not result in flooding or ground instability. A condition would be used to secure details of the drainage system prior to commencement of the development. It is recommended that a basement construction plan is secured via S106 legal agreement to include a requirement for monitoring of the works during construction and also that the applicant uses reasonable endeavours to reduce the impact of the basement development. A construction management plan would also be secured via a S106 legal agreement to ensure the development would not cause undue harm to local amenity. Therefore the development would accord with the objectives of Policy DP27.

Neighbour amenity

6.65 Policy CS5 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. Furthermore, Policy DP26 seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of neighbouring residents. This includes privacy, overlooking, outlook and implications on daylight and sunlight.

6.66 The site is located in an area with substantial residential properties to the south, formed of two mansion blocks on either side of Huntley Street. The Gordon Mansions west is adjacent to the application site and would not experience any impact on residents' light, outlook or privacy. Gordon Mansions East is located to the opposite of Huntley Street directly opposite Gordon Mansions West. Directly opposite the application site is a terrace of 13 Georgian properties. Three are owned by Clic Sargent and provide temporary accommodation for families of patients who require ongoing treatment at the hospital. The daylight/sunlight amenity experienced for such temporary as such they are not permanent residents and would not be afforded the same level of protection as permanent residential neighbours. Nine of the remaining 10 are owned by the UCLH Charity and are rented on assured shorthold tenancies, mostly to people associated with the hospital and charity. The remainder is owned by the Liver research Trust.

6.67 The FAAP Master-planning Principles for the site recognise that the Student Union building is one of the lowest in the area and that a taller building is appropriate in this location. The FAAP indicates an acceptable height for a new building on this site, which is shown in the diagram below. It does not state within the FAAP that this is the maximum height that could be accommodated on site.



6.68 Officers consider that there is a strong basis for accepting the FAAP guideline as the minimum height that an acceptably designed development should rise to. Therefore the FAAP principles have accepted that there will be an impact on neighbour amenity for any development up to this guideline level. Officers therefore consider that the primary focus of reviewing the impact on residential amenity should be on assessing the impact of *additional* floors above the guideline height. As the existing low Student Union building is an unusual situation within this otherwise dense inner London area, officers have agreed that the applicant can use the height set out in the FAAP as the baseline to measure the impact of the proposed development on levels of sunlight and daylight.

- 6.69 It is acknowledged that a number of residents within the Gordon Mansions blocks do not agree with this approach. However the relationship between the proposed building and the properties to the east is not be dissimilar to the relationship between the facing Gordon Mansions blocks, both of which rise seven storeys above ground level.
- 6.70 Although the proposed development would not meet the requirements of the BRE guidelines in respect of some windows, it is important to note the BRE standards are guidance. Paragraph 26.3 of DP26 notes that the Council will take into account the standards recommended by the BRE but it does not bind the development to adhering to said guidance. This is addressed in more detail below.

Daylight and sunlight

- 6.71 It is important to note that due to the low height of the Student Union building, the existing light levels received by some neighbouring properties are better than would normally be expected in such a location, where it is commonplace for buildings either side of the street to be of similar heights.
- 6.72 The applicant has provided a daylight and sunlight report in support of the application. Within the report the following properties have been surveyed:
- 48-68 Huntley Street(evens)
 - 75 Huntley Street
 - 31-75 Gordon Mansions (eastern block of Gordon Mansions)
- 6.73 The applicant has provided figures for :
- Comparing the proposal with the existing buildings
 - Comparing the proposal with a notional building which is the height of the FAAP guideline (the eaves of the existing Royal Ear Hospital). The submitted daylight assessment is mainly focused on this comparison. This is referred to as the '*FAAP model*'.
- 6.74 The applicant has used the Vertical Sky Component (VSC) to test levels of daylight. If the VSC is greater than 27% then enough sunlight should be received by the windows. Should windows fail the 27% level it is acceptable to have a reduction from the existing level of daylight to no less than 80% its former value. Together with this the applicant has undertaken a No Sky Line (NSL) to determine windows that will receive direct skylight and those that cannot. With regard to sunlight, it is dependent on window orientation in relation to the new development. The Annual Probably Sunlight Hours (APSH) test can assess sunlight. If the APSH has a reduction of 0.8 times its former value then occupants are likely to notice an impact. The applicant has assessed 184 windows of the buildings noted above.
- 6.75 When the proposed building is compared to the FAAP model, 147 out of 184 (80%) affected neighbours' windows would pass the Vertical Sky Component (VSC) assessment. In other words the impact of the additional two floors on the site

(above the Ear Hospital eaves level) on the daylight to 147 of the 184 windows would not be noticeably worse than if the proposal reached only to the FAAP model height. Of the 37 windows which failed, the loss of light would be between 20-29.9%. The BRE guidance notes that a loss of 20% would not be noticed by occupants.

- 6.76 Looking specifically at daylight using the NSL assessment and comparing the FAAP massing against the proposed development 65% of windows would continue to receive a suitable level of daylight.
- 6.77 In respect of sunlight, 120 rooms which face within 90 degrees due south and also face the site have been considered as part of the assessment. When considering the FAAP massing against the proposed development, only 6 windows would not meet the BRE guidance. As such 95% of the windows surveys would continue to receive good levels of sunlight.
- 6.78 There have been a number of objections received with regard to the results shown within the daylight and sunlight report not identifying the specific rooms which windows serve. This is due to the assessor not accessing the individual flats. However all windows have been assessed regardless of whether they serve habitable rooms or not, in essence they have all been assessed as though they are habitable rooms. The applicant has provided a table of all windows served and their results in both VSC and NSL.
- 6.79 It is also important to note that the proposed building would be no closer to Gordon Mansions East than Gordon Mansions West.
- 6.80 In conclusion, officers are mindful that due to the high levels of daylight and sunlight received by some residential properties any increase in height on site would lead to some off of light. However development of the site is necessary and expected as set out within the FAAP, the issue is what extent of loss is acceptable. Officers have given careful consideration to the additional loss of light as a result of the extra height above the FAAP guideline and conclude that the proposed development would not result in a loss of daylight or sunlight to neighbouring residents to an extent that would result in demonstrable harm to their amenity.

Outlook and sense of enclosure

- 6.81 With regard to the impact on the Georgian terrace located to the opposite side of Huntley Street, the proposed development would be sited 14m from the Georgian Terrace. It is considered the relationship would not be uncommon within the streets of Bloomsbury. As noted above, to the south of the application site the Gordon Mansions blocks rise 7 storeys above ground level on both sides of Huntley Street. Therefore any occupiers in the lower levels of these blocks would experience a similar view to what the occupiers of Nos. 46-70 Huntley would as a result of the development.
- 6.82 In respect of the impact on the Gordon Mansions residents, given the angle at which the Gordon Mansions block located to the south of the application site, all views of the development would be at an angle and are not considered to cause harm to the amenity of neighbouring residents.

- 6.83 Residents' existing views of the BT Tower from their windows and glimpsed views from the street would be obstructed by the development, however these views are not designated or protected view and their loss is not considered to raise sufficient concern to justify requiring a reduced building height on the site.
- 6.84 The development would alter the outlook experienced by existing neighbouring occupiers however it is not considered to be to an extent which would harm the amenity of existing residents given it is a similar relationship experienced by a number of existing residents within the locality.

Privacy

- 6.85 In respect of privacy, the east elevation of the building would be formed of projecting bays which would face the Georgian Terrace to the east. There are a number of windows within the existing facades of the building which face the Georgian Terrace. The proposed new building would be increasing the level of glazing to the elevation of what will be public building. Internally the bays would serve waiting areas where patients would wait for their appointments as such the flow of people would be relatively transient. As noted above there is 13m between the application site and the opposite terrace, whilst a general rule of thumb is 18m to prevent overlooking, it is considered that the situation is not uncommon in terms of development on either side of the Road.
- 6.86 Furthermore it is also important to note that the building would only be open to patients Monday to Friday 9am until 6pm and therefore the majority of the activity in the building will be during normal working hours. During the evenings and weekend there would be no patients on the premises thereby ensuring existing residents amenity would be safeguarded during such times.
- 6.87 In respect of the impact on the residents of Gordon Street Mansions, the southern side of the bay windows would be formed of hit and miss bricks which would screen views out of the proposed buildings, thereby preventing views to the properties within Gordon Street Mansions, which should be noted, are at an oblique angle.
- 6.88 In respect of the roof terrace, at its closest point it would be 20m from the residents of Huntley Street, as such it would not lead to a loss of privacy for these resident.
- 6.89 As such it is considered that the proposed development would not result in a detrimental loss of privacy to neighbouring residents.

Noise

- 6.90 Policy DP28 sets out within Table E noise levels from plant and machinery acceptable in relation to sensitive windows, such as residential properties. It is expected that noise at 1m external to a sensitive façade should be at least 5dB below the lowest background noise level. Should the noise have a distinguishable discrete continuous note or distinct impulses it should be at least 10dB below the lowest background noise level.
- 6.91 Due to the nature of the use, the applicant needs to provide emergency plant to serve life-safety equipment and is not a back-up generator as noted by some

objectors. This plant would run only during an emergency or during testing which is normally once a week during day time hours. The plant would only operate as long as the emergency required. It is proposed this would be set at 10dB above the lowest background noise level due to the nature of the plant. DP28 does not include a measurement for such emergency plant.

- 6.92 Plant would be located at basement level 3 and to the roof of the new building within plant enclosures. The building has been design to ensure that plant areas would not share a party wall with the neighbouring Gordon Mansions block so that there would be no vibration transfer between buildings.
- 6.93 Objection has been received from neighbouring residents on the location of the noise measurements and that they are not representative of the Gordon Mansions residents. The applicant has noted that the locations chosen were done so to be representative of the local residents while being secure and safely accessible. Officers consider that the noise measurement meters were acceptably located to both the front and rear of the development site.
- 6.94 The Council's Environmental Health officer have review the proposed development and raises no objection subject to conditions that any noise from external plant shall be 5dB lower than the lowest existing background noise level. The officer had also requested a condition regarding a Construction Management Plan, however this will be secured via Section 106 legal agreement given the scale of the development and the level of excavation involved. The Council's Environmental Health officer is very aware of the concerns of Gordon Mansions given previous development within the area and has reviewed the contents of the application is supportive of the development.

Transport

- 6.95 The application site located in Central London south of Euston Road between Tottenham Court Road and Gower Street. It has a Public Transport Accessibility Level (PTAL) of 6b (excellent).
- 6.96 There is currently a service yard to the rear of the site that provides for Patient Transport Services (PTS) vehicles. However, there is no private car-parking or cycle parking available on-site. The applicant states that servicing currently takes place on-street, as the rear service yard is not easily accessible due to the constraints of Shropshire Place, although it is noted that access can be made to the rear of this site.

Transport Assessment

- 6.97 A full Transport Assessment (TA) has been submitted in connection to this development as it is considered to generate significant travel demand. The TA submitted covers a number of specific transport issues raised during the pre-application discussion in connection to the proposals.
- 6.98 As indicated in the TA a significant amount of change and development is currently taking place around this area, involving the Councils West End Project and UCLH directly on other phases coming forward. These proposals will significantly change

the focus of the public highway onto more sustainable modes of transport and reconfiguration of the operation and layout of the highway network.

Trip Generation

- 6.99 The methodology is considered appropriate. During the course of the application further information was provide to take into account the cumulative impact of the development.
- 6.100 The trip generation assessment predicts that the proposed development would accommodate 1,000 patients and 250 staff per day. Using the existing site figures, this details that there are likely to be in the region of 2,500 two-way trips would be undertaken during a typical day. Of these patients it is expected that 3.4% would arrive via taxi, 5.4% would arrive by car (without a blue badge) and 2.6% would arrive by car and qualify for a parking dispensation permit as they have a blue badge such a permit would allow them to park on a single yellow line.
- 6.101 The TA indicates that sufficient capacity on-street will be available on completion of the West End Project and UCLH Phase 4 to accommodate these addition trips that will be generated as a result of this development and others within the area. It is noted that this analysis is a snap-shot of proposals at this moment in time based on current kerb side capacity.

Travel Plan

- 6.102 UCLH has a voluntary campus wide (i.e. all the UCLH sites in the area) Travel Plan. The Travel Plan aims to reduce the number of servicing trips to UCLH campus through the Neutral Vendor Scheme and encourage and promote staff, patients and visitors to use sustainable modes of transport.
- 6.103 However, given that each of the sites operates in a slightly different context relating to specific patient requirements it is recommended that a site specific Travel Plan will be required for this site that will be incorporated into the wider campus Travel Plan update already agreed to be undertaken.
- 6.104 We would also seek to secure a financial contribution of £6.002 to cover the costs of monitoring and the Strategic Travel Plan over a 5 year period. This would need to be secured through the S106.
- 6.105 Transport for London encourages developers to use the TRiCS/TRAVL database for trip generation predictions. We will require the applicant to undertake a TRiCS/TRAVL after study and provide TfL and Camden with the results on completion of the development. TfL would then be able to update the TRiCS/TRAVL database with the trip generation results for the various use categories associated with this development. The necessary after surveys and results should be secured by condition as part of the Travel Plan review and monitoring process.

Cycle Parking

- 6.106 In connection to cycle parking standards, the Council refers to the London Plan and this states that 1 storage or parking space is required for every 5 staff for C2

use classed as long-stay and a further provision for short stay at 1 space per 30 staff. Therefore a total of 50 cycle parking spaces are required for this development in connection to long stay and a further 12 spaces for short-stay mainly in connection to visitors and patients. The applicant has put forward proposals for 50 long-stay spaces at basement level B1 and 12 short stay spaces to be provided on the forecourt area on Huntley Street.

6.107 It has been noted in the analysis undertaken for the existing site in Grays Inn Road that 12 patients already cycle to appointments, therefore it is welcomed that 12 short-stay spaces are being provided. In context of the location, to avoid impacting the public highway and creating a hazard to vulnerable pedestrians the layout to provide 6 Sheffield stands has been outlined on drawing A2024.

6.108 A cycle parking area is shown in the proposed basement. This is designed to be accessed via the goods lift to be step-free and the lift is sufficiently sized to accommodate a bicycle. A staff changing area is also detailed that is considered to provide showers and lockers to support the level of cycle of staff to this site.

6.109 To ensure the provision of 50 long-term spaces and 12 short-term spaces a condition is recommended that details of these are provided.

Off-street car parking

6.110 In context of this site, it is noted that this development does not meet the Council's parking standards as there would be no operational or visitor parking on site. In response to this position the following management plans are being secured via the S106 to minimise and manage the impact of this proposal on the highway network. This includes addressing how UCLH issue dispensation permits estate wide to reduce the impact of private parked vehicles. These plans are discussed in more detail below and include:

- Patient Transport Service Impact Plan
- Blue Badge and dispensation permit management plan
- Parking Management Plan
- Servicing Management Plan

Patient Transport Service (PTS) Impact

6.111 The TA analyses the existing hospitals in Grays Inn Road and concludes that no more than 12 PTS movements are required per day to serve existing patient numbers and that on an accumulation basis no more than two PTS vehicles will be undertaking patients transfers at one time. Officers note that there is capacity for two PTS bays outside MacMillan Cancer Centre which would be able to accommodate the need created by this development. As a result no additional on-street ambulance provision is required.

6.112 There have been some objections received from neighbouring residents with regard to PTS vehicles being parked along Tottenham Court Road and other local streets. As this application forms one of the latter applications of UCLHs plans to modernise its estate within the present Masterplan, it is considered necessary that the UCLH Trust look at the management of PTS vehicles across their entire estate

and more effectively manage the impact of PTS vehicles on the public highway to minimise parking and dwell times wherever practical. A PTS Management Plan would be secured via a Section 106 legal agreement.

6.113 UCLH own the site on Gray's Inn Road which is used by PTS vehicles. It is not clear what UCLH's longer term intentions are for this site and it is expected it may be sold at some point in the future. Therefore the s106 would secure an updated PTS Management Plan prior to any change in ownership or occupation of the Gray's Inn Road premises. This must identify an alternative location for PTS vehicles. The aim of the plan would be to ensure that in the long term the management of the PTS vehicles would not be reliant on the public highway for parking.

Blue badge and parking management

6.114 In context of the impact of blue badge vehicles the TA has sought to undertake an analysis of the surrounding roads incorporating kerb side space marked with single yellow lines.

6.115 From on-site observations and in a review of the parking survey there remain some concerns that the level of kerbside capacity is potentially being over-estimated on average by 30 percent. It is considered that the increase in demand for kerb side vehicle parking for this site will impact other parts of the highway network not traditionally exposed to long-term on-street parking impacts, such as Torrington Place, Chenies Mews and Ridgemount Gardens which the Council has concerns about.

6.116 This analysis continues to be reliant on the public highway to support the hospital operations and as considered above the calculations bring into question whether the existing single yellow line markings could support such an impact. Therefore, there is a general concern that the information in the submitted TA has underestimated the impacts to conclude that there would be a negligible impact and there is spare capacity to accommodate any increased vehicle movements.

6.117 The Council has aspirations to continue with the improved public realm in this area to widen the footways prioritise the contra-flow cycle lane, especially adjacent to this new hospital to enhance the patient experience. Thus, the single yellow line being relied upon to support the hospital is unlikely to be available beyond 2019, follow completion of the West End Project.

6.118 Therefore it is recommended that UCLH Trust review the estate wide operation and management of dispensation parking permits. An estate wide blue badge and dispensation management plan would be secured in the S106. The plan would cap the number of badges in order to align the Trust's issuance of blue badge permits with the Council's planned improvements to promote and support sustainable modes of transport. UCLH Trust will be required to submit a Parking Management Plan, secured via a Section 106 legal agreement. This would require the Trust to undertake an estate wide review of the operation and management of dispensation parking permits to reduce the number of permits issued and prioritise all the

existing off-street parking spaces before dispensations are issued for on-street parking.

- 6.119 This will ensure that if there is a need for additional blue badge parking at a later date the plan will be a mechanism by which the Council will advise UCLH Trust to investigate ways on which blue badge parking can be accommodated on its own estate in the first instance, should on-street be considered an alternative option then the UCLH Trust will have to cover the cost of feasibility, design, consultation and implementation of any future changes to the public highway.

Servicing Management Plan

- 6.120 There is an existing undercover service yard to the rear accessed from Shropshire Place. A new service yard would be provided in the building to minimise noise and reliance on the highway. This will facilitate all servicing requirements via large vehicles, for smaller and more infrequent deliveries existing available kerb side space that remains available could (subject to any future changes to the public highway) facilitate servicing from Huntley Street, Capper Street or Mortimer Market.
- 6.121 The submitted servicing management plan seeks to undertake servicing over the full 24 hour period rather than the traditional day period for the larger specialist deliveries. As the servicing yard would be totally enclosed within the building any noise as a result of unloading and loading goods into vehicles would not be heard from outside of the building. This would result in no significant impact on neighbour amenity in respect of noise. A condition will be added to ensure that between 9pm to 8am no white noise (reversing) beepers or any other warning noise will be used on servicing vehicles to ensure neighbouring residents would not be disturbed by servicing during the night time hours.
- 6.122 The proposed servicing strategy will complement the West End Project proposals to close Capper Street (at the Tottenham Court Road junction) and introduce a new pocket park. This would prevent access to Capper Street from Tottenham Court Road during the day. Night-time servicing is therefore supported as it allows Shropshire Place to be prioritised for pedestrians and cyclists during the day time.
- 6.123 This approach is not considered to cause significant harm as the areas to the north and west of the site which are predominately commercial or connected to the UCLH Trust directly. This approach also minimises the impact of large delivery vehicles travelling at peak congested times on the highway network and is considered to support the UCLH Trust by way of ensuring more predictable journey times. The impact on neighbour amenity has been assessed above.
- 6.124 UCLH Trust are actively examining facilities management consolidation. It is recommended that the existing delivery numbers are used as a limit, capped to no more than 9 vehicles per day for vehicles over 7.5 tonnes. A revised Servicing Strategy and Management Plan would be secured by s106, to take account of this. The numbers presented in the service plan indicate in excess of 12 vehicles being required to service this site (12,000sqm). When compared to the much larger MacMillan Centre and PBT sites, which both advised that no more than 11 vehicles

would be required to service these hospitals (sites size up to 35,000sqm). It is considered that capping the overall number of service vehicles to the existing 9 vehicles is reasonable and in keeping with policy to minimise large vehicles, especially in a constrained area such as Shropshire Place.

- 6.125 The applicant will be required to provide a full Servicing Management Plan which will include a cap of servicing vehicles numbers and would be secured by way of a Section 106 legal agreement. With the applicant the applicant has only provided part of the wider estate document relating to servicing. As such a full SMP will be secured as part of this application.

Level Plans

- 6.126 The levels of the new building need to be designed such a way that any newly created forecourt area drains away from the public highway and that this ties into the existing footway around the building line to the carriageway so that no central drainage channel is required. The S106 associated with this application should also include an obligation that requires the applicant submits plans demonstrating interface levels between development thresholds and the Public Highway to be submitted to and approved by the Highway Authority prior to implementation.

Demolition Management Plan (DMP)

- 6.127 A DMP has been submitted as part of the application, in its current state this is in draft form and a final draft would be secured via a Section 106 legal agreement. The plan would be required to include:
- Start and end dates of various phases of demolition
 - Pre-commencement engagement and consultation with the local community
 - Liaise with other site contractors working on other sites within the locality
 - Detail of the number, frequency and size of vehicles that will attend the site during demolition.
 - Control measures for pest control, dust, noise, vibration, lighting, delivery locations,
 - Restriction of hours of work and all associated activities audible beyond the site boundary to 0800-1800hrs Mondays to Fridays and 0800 -1300hrs on Saturdays,
 - Advance notification to neighbours and other interested parties of proposed works and public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works.
 - The routes that vehicles will take to and from site
 - Details of any required waiting and loading suspensions/dispensation.
 - Access points to the site.
 - Details of hoarding lines and scaffolding to be placed on the public highway.
 - Details of any required storage on the public highway of materials and waste.
- 6.128 These issues will be required to be agreed ahead of the commencement of any works on site. This will be secured via a Section 106 legal agreement.

Construction Management Plan

6.129 A draft CMP has been submitted in support of the application, however the content of the CMP needs to be agreed in full with the Transport Strategy and Network Management Teams. The Section 106 will secure agreement on the CMP prior to the commencement of works on site. The CMP will need to consider the cumulative impacts of work in the locality such as the West End Project, UCLH Phase 4 and works connected to UCL.

Footway improvements

6.130 As described in the submitted TA there will be an increase in trips to this site. Most of the trips will be redirected from the Grays Inn Road sites which currently hold many of the UCLHs ear and nose treatment functions. According to the submitted TA, peak hour trips (10am to 11am) will increase to around 595 from a negligible level. Therefore improvements works to the pedestrian environment around the building are required to mitigate the impact of the increased number of pedestrians. This work would include:

- Repaving the footway around the perimeter of the site and repaving the footway on the opposite side of the road along the section of Huntley Street that runs past the site;
- Widening and carriageway re-levelling adjacent to the site on Huntley Street;
- Removal of the single yellow line markings to facilitate the contra-flow cycle movements;
- Relocation of the signs;
- Street lighting at the junction of Capper Street and Tottenham Court Road as part of the servicing access strategy;
- Resurfacing of Huntley Street adjacent to the site and as well as Capper Street, works will also include the installation of a revised surface treatment in Shropshire Place.

6.131 It is estimated these works would cost £240,000 and would be secured via the Section 106 legal agreement.

6.132 In order to mitigate the impact of the increase in trips this development will generate, and to tie the development into the surrounding urban environment, a financial contribution should be secured to:

- Subject to consultation, seek to upgrade Shropshire Place to a more shared surface finish,
- Feasibility study to review access strategy and look at potential to facilitate Traffic Management Order (TMO) changes: including but not limited to double yellow lines on Huntley Street and changes to Shropshire Place,
- Feasibility study to also include Capper Street j/w Tottenham Court Road including TMO and monitoring provision to facilitate after-hours access,

6.133 The financial contribution would be secured via a Section 106 legal agreement. This is estimated to be £160,882.

Highways Approval in Principle

6.134 The proposal includes basement level development adjacent to a highway for the three elevations of Shropshire Place, Copper Street and Huntley Street where the basement excavation could affect the structural stability of the public highway. The development will require highways consideration, the approval in principle will speed up this process. As such it will be secure in the S106 and will carry a cost of £4,500 plus the submission of the report to the Highway Structural team prior to commencement of development

Sustainability

Energy

- 6.135 London Plan Policy requires this development to follow the energy hierarchy, and to achieve a 35% reduction in CO₂ emissions beyond the Part L 2013 baseline. At present the development would achieve a 15.6% reduction in CO₂ emissions, this is significantly lower than the London Plan requirement.
- 6.136 Energy efficiency is the first stage of the energy hierarchy and as such should be prioritised. The proposed energy efficiency measures will reduce emissions by 12.1%. The proposed fabric u-values and air tightness could be improved upon to further reduce CO₂ emissions. Following initial review the applicant reran the Part L energy model with improvements to the U values however this have a negative affect reducing the emissions by 11.4%. This is due to the reduction in the U-values on the fabric reducing the heating demand, but increasing the cooling demand. As the building will operate predominately in cooling mode. Lowering U-value and air permeability will result in a net increase in Heating + Cooling demand [MJ/m²]. It is therefore considered that reducing U-values is not an appropriate option for this scheme.
- 6.137 Decentralised energy is the second stage of the energy hierarchy. The applicant is proposing to connect to the UCL district heat network, however as UCL cannot guarantee to provide heat under all operating conditions UCLH phase 5 will also install on site CHP to ensure they have a constant supply of heat. This is estimated to reduce CO₂ emissions by a further 12 tonnes CO₂/yr (equivalent to an additional 3.2%). The CHP proposed would meet the annual heat load by 65%.
- 6.138 In respect of renewable energy, PVs have been identified as the most suitable technology for this development. A 7kWp array is proposed on the roof. This will reduce emissions by a further 0.3%. This is some distance from Camden's CPG3 requirement of a 20% reduction in CO₂ emissions through renewable technologies. There appears to be additional roof area available on the site (see below). On the plans provided it is considered there is opportunity to install further PVs to the northern and southern sections of the roof to improve the reduction in CO₂. It is recommended that such details are secured via condition.
- 6.139 As the development falls short of the London Plan target a carbon offset, a financial contribution should be sought via a Section 106 legal agreement to make this scheme policy compliant. Based on the figures in the energy statement, without any

amendments a contribution of £224,100 would be required. Should there be an improvement to the PV provision this figure would be reduced.

BREEAM

- 6.140 The applicant has provided a pre-assessment which demonstrates that the development would achieve an Excellent rating will be accordance with our policy requirements. To ensure this meeting is met, a plan will be secure via a Section 106 legal agreement, requiring the usual sub targets for energy, water and materials.

Flood Risk

- 6.141 This development is not in an area identified to be at risk of flooding, however to meet London Plan requirements the development should reduce run off rates to achieve a greenfield rate of run off wherever feasible, by following the drainage hierarchy. As an absolute minimum, a 50% reduction in run off rates should be achieved through the use of SuDS.
- 6.142 The applicant has provided a Flood Risk Assessment, the report addresses the issue of providing surface water drainage. The existing site is entirely hard-surfaced and thus its redevelopment will not increase run-off volumes or flows from the land area involved. If a surface water attenuation tank was provided within the scheme this would require pumping as it would have to be located a basement level (level 3). The applicant have noted that there is limited reasoning to provide an attenuation tank within the scheme, given the significant clinical requirements and the minimal effect that it would have upon the run-off. Officers have considered this and accept that it would not be beneficial to have an attenuation tank within the scheme.
- 6.143 London Plan Policy 5.13 advises that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so. The applicant considered that on this occasion it is considered it would not be practical to provide an attenuation tank on site.
- 6.144 Officers' have reviewed the information provided within the application and given the site is not located in an area at risk of flooding and as the existing site is hard standing it is considered acceptable not to provide an attenuation tank due to the limited benefit this would bring to the site.

Air Quality

- 6.145 Given the central London site location, existing levels of air quality exceed the EU limits for NO₂. Modelling demonstrates that this exceedance will occur on all facades at all levels. As such it is proposed that all windows will be fully sealed to protect occupants from the poor levels of air quality. Mechanical ventilation is proposed.

- 6.146 Ventilation air inlets have been located as high as possible on the Western façade, Shropshire place at levels 4 and 5 which is away from the main road and on the opposite side of the building from the CHP flue. Details of the air inlets are highlighted on the architectural drawings Level-04 and Level-05. No NO₂ scrubbing has been investigated to date from an MEP perspective. However, it is anticipated that NO₂ scrubbing is unlikely to be required given the predicted marginal exceedance of the annual mean air quality objective determined in the air quality assessment.
- 6.147 The exact CHP engine specification is currently unknown, however the air quality statement confirms that this will comply with the Mayors Band B NO_x emission limits of 95mg/Nm³ as set out in the sustainable design and construction SPG. To ensure accordance with this standard, a condition is recommended which required full details of the CHP.
- 6.148 The development will meet the London Plan requirement for air quality neutral.
- 6.149 The risk of dust impacts has been classified as 'medium'. The relevant mitigation measures associated with medium risk sites are listed within the AQA (in line with GLA details). These will be secured through the Construction Management Plan as part of the Section 106(question 35 of the CMP pro-forma).
- 6.150 Since the initial submission the applicant has completed Camden's Air Quality checklist. This has been reviewed by the Council's Sustainability officer and considered acceptable.

Accessibility

- 6.151 As a new public building, the council would anticipate the highest level of access and inclusive design to be adopted to satisfy planning policy DP29 and the Building Regulations. The applicant is proposing revolving doors and pass doors to both the Huntley Street and Shropshire Place elevations of the building, although this does not provide one access point for all, the applicant has agreed that the pass doors could be automatic to ensure anyone could pass freely through these entrances, this would be secured via condition.

Waste

- 6.152 There is a central waste store located at ground floor level, waste would be transported to the internal servicing bay for collection by refuse lorries. However to ensure a suitable waste management plan is employed details will be secured via condition.

Planning obligations and CIL

Economic Development

Economic development officers have requested that the following be secured in order to maximise the opportunities to local residents and businesses afforded by the development the following will be secured via a Section 106 legal agreement:

- Target of 20% local recruitment.
- All construction vacancies and work placement opportunities to be advertised exclusively with the Kings Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- A specified number (to be agreed) of construction work placement opportunities of not less than 2 weeks each during development
- A specified number (to be agreed) of work experience placements at University College London Hospitals (UCLH) following the completion of the building.
- 1 construction apprentice per £3million of build costs with support fee of £1,500 per apprentice as per clause 8.17 of CPG8.
- At least 1 supplier capacity building workshop/Meet the Buyer event to support Camden SMEs to tender for construction contracts in relation to the development.
- To provide a local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

Further obligations

- Demolition and Construction Management Plan
- Basement Construction Plan
- Patient Transport Services Plan
- Blue Badge and Parking Dispensation Permit Plan
- Servicing Strategy and Management Plan
- Level Plans
- Sustainability Plan
- Retention of architects throughout the detailed design phase
- Travel Plan

Financial Contributions

- Carbon Offset - £224,100
- Highways improvements - £400,882
- Highways Approval in Principle - £4,500

Community Infrastructure Levy (CIL)

Due to the charitable status of UCLH officers consider the development would not be CIL liable. The applicant will be required to complete the relevant forms to certify they will not be CIL liable.

7. **CONCLUSION**

- 7.1 The development of a new hospital, consolidating the UCLH Ear, nose and throat hospitals accords with the policy and priorities for the redevelopment of this site. The demolition of the Former Royal Ear Hospital, which is not listed, would be justified by the public benefits accrued from the development proposals. The replacement proposed building is a high quality and well considered design which responds in its material and forms to the residential character of the southern end of Huntley Street whilst clearly being legible as a public building. Officers consider

that the building strikes a highly successful balance between these differing local townscape characters and will result in an enhancement to the character and appearance of the conservation area. The building would be of an architectural calibre that matches the Capper Street elevation which it replaces and would be an enhancement over the existing Huntley and Shropshire Place elevations.

- 7.2 It is acknowledged that there will be an impact on surrounding resident amenity, however the existing building heights on site are unusually low and any significant development on the site would result in some impact on local amenity. It is considered that the building is sufficiently well designed that the additional two storeys above the FAAP guideline height would not cause significant further harm to neighbour amenity.
- 7.3 The proposals would also have an impact on local transport and highway conditions. However the proposals for PTS, Facilities Management (servicing) and Blue Badge parking mitigation, which would be prepared at a strategic level by UCLH, secured by s106 legal agreement, would acceptably mitigate the potential impacts. The CMP would also address the potential cumulative effects in the context of the UCLH campus in terms of traffic and parking pressures on the network, and indeed keeping in mind other strategic projects and change in this area.
- 7.4 Maximising the renewable and sustainable energy opportunities within the site constraints has been demonstrated.
- 7.5 The proposals would optimise the use of the site by replacing underused buildings with a patient-focused specialist medical facility. The public benefits would be significant and the potential impacts would be subject to appropriate and acceptable mitigation secured through conditions and planning contributions.
- 7.6 Planning Permission is recommended subject to a S106 Legal Agreement.

8. **LEGAL COMMENTS**

- 8.1 Members are referred to the note from the Legal Division at the start of the Agenda.

Condition(s) and Reason(s):

- 1 The development hereby permitted must be begun not later than the end of three years from the date of this permission.

Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 Detailed drawings, or samples of materials as appropriate (providing on site), in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:
- a) Details including sections at 1:10 of all windows (including jambs, head and cill), ventilation grills and external doors;
 - b) A 3m by 3m freestanding sample panel of the hit and miss brickwork demonstrating the proposed colour, texture, face-bond and pointing;
 - c) A sample of the curved brickwork as the building corners Capper Street and Shropshire Place;
 - d) A 3m by 3m sample panel of the facing brickwork demonstrating the proposed colour, texture, face-bond and pointing;
 - e) Details of the balustrade to surround the roof garden, including sections at 1:10 and a sample of the glass.
 - f) Manufacturer's specification details of all other facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site).

The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.

Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 and DP25 of the London Borough of Camden Local Development Framework Development Policies.

- 3 Prior to the commencement of any works of demolition of the Former Ear Hospital, a method statement for the preparation, removal, repair and re-instatement of the crest to the Capper Street elevation shall be submitted to and approved in writing by the Council. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: In order to safeguard the special architectural and historic interest of the Crest in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

- 4 The external noise level emitted from plant, machinery or equipment at the development hereby approved shall be lower than the lowest existing background noise level by at least 5dBA, by 10dBA where the source is tonal, as assessed according to BS4142:2014 and in reference to report 14275-R04-B, dated 17 February 2015 at the nearest and/or most affected noise sensitive premises, with all machinery operating together at maximum capacity. Any additional steps to mitigate noise shall be taken and all approved details shall be implemented prior to occupation

of the development and thereafter be permanently retained.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

- 5 Prior to occupation of the building, all plant within and on the roof of the development, shall be provided the necessary acoustic and vibration isolation and sound attenuation in order to accord with the conclusions and the recommendations of the Acoustic Planning Report and associated Noise and Vibration documents hereby approved. All such measures shall thereafter be retained and maintained in accordance with the manufacturers' recommendations.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26 and DP28 of the London Borough of Camden Local Development Framework Development Policies.

- 6 Prior to occupation of the building, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of the building and permanently retained thereafter.

Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policy CS18 of the London Borough of Camden Local Development Framework Core Strategy and policies DP26, DP28 of the London Borough of Camden Local Development Framework Development Policies.

- 7 No loading or unloading of goods, including fuel, by vehicles arriving at or departing from the premises shall be carried out otherwise than within the curtilage of the building.

Reason: To avoid obstruction of the surrounding streets and to safeguard amenities of adjacent premises in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policy DP16 of the London Borough of Camden Local Development Framework Development Policies.

- 8 Prior to laying the lowest basement slab, plans and details of the cycle storage area at basement level B1 for 50 cycles and details of the supporting facilities including showers, changing areas and lockers shall be submitted to and approved by the local planning authority. The approved facility shall thereafter be provided in its entirety prior to the first occupation and permanently maintained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities for long-stay users of the building in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and

policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

- 9 Prior to occupation of the building, plans and details of cycle parking for 12 cycles to be provided on the forecourt area on Huntley Street details shall be submitted to and approved by the local planning authority. The approved cycle parking shall thereafter be provided in its entirety prior to the first occupation and permanently maintained thereafter.

Reason: To ensure the development provides adequate cycle parking facilities for long-stay users of the building in accordance with the requirements of policy CS11 of the London Borough of Camden Local Development Framework Core Strategy and policy DP17 of the London Borough of Camden Local Development Framework Development Policies.

- 10 Prior to first occupation of the buildings, detailed plans showing the location and extent of photovoltaic cells to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.

Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CS13 of the London Borough of Camden Local Development Framework Core Strategy and policy DP22 of the London Borough of Camden Local Development Framework Development Policies.

- 11 Prior to laying the lowest basement slab, full details of the proposed CHP including manufacturers specification shall be submitted to and approved in writing by the local planning authority. The specifications shall demonstrate that NO_x emissions associated with the CHP will be <95m²/Nm³. The CHP shall be installed in accordance with the approved details and thereafter maintained.

Reason: To comply with London Plan Sustainable Design and Construction SPG and to protect the amenity of neighbours in accordance with Policies CS5 of the London Borough of Camden Core Strategy and DP26 of the London Borough of Camden Local Development Framework Development Policies.

- 12 The demolition hereby permitted shall not be undertaken before a contract for the carrying out of all of the works of redevelopment of the site has been made.

Reason: To protect the visual amenity of the area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP25 of the London Borough of Camden Local Development Framework Development Policies.

- 13 No reversing white-noise beepers or any other noise emitting equipment or devices shall be used on vehicles entering or exiting the servicing bay on Shropshire Place between the hours of 9pm to 8am daily.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

- 14 Prior to occupation of the hereby approved building, full details of hard and soft landscaping and means of enclosure of all un-built, open areas shall be submitted to and approved by the local planning authority in writing. Such details shall include the landscaping works for the roof garden, which shall be provided in full prior to the occupation of the building. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved.

Reason: To ensure that the development achieves a high quality of landscaping which contributes to the visual amenity and character of the area in accordance with the requirements of policy CS14 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

- 15 All hard and soft landscaping works shall be carried out in accordance with the approved landscape details by not later than the end of the planting season following completion of the development or any phase of the development, prior to the occupation for the permitted use of the development or any phase of the development, whichever is the sooner. Any trees or areas of planting which, within a period of 5 years from the completion of the development, die, are removed or become seriously damaged or diseased, shall be replaced as soon as is reasonably possible and, in any case, by not later than the end of the following planting season, with others of similar size and species, unless the local planning authority gives written consent to any variation.

Reason: To ensure that the landscaping is carried out within a reasonable period and to maintain a high quality of visual amenity in the scheme in accordance with the requirements of policy CS14 and CS15 of the London Borough of Camden Local Development Framework Core Strategy and policy DP24 of the London Borough of Camden Local Development Framework Development Policies.

- 16 The roof shall not be used as a terrace between the hours of 21:00 - 08:00.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

- 17 Prior to commencement of development, other than site clearance, the following details shall be submitted for approval in writing by the council in conjunction with London Underground in respect of the following

- provide details on all structures
- provide details on the use of tall plant.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2011 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

- 18 No impact piling shall take place until a piling method statement, prepared in consultation with Thames Water or the relevant statutory undertaker, detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works, has been submitted to and approved in writing by the local planning authority. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground water utility infrastructure.

- 19 In the event that additional significant contamination is found at any time when carrying out the approved development it must be reported in writing immediately to the local planning authority. An investigation and risk assessment must be undertaken in accordance with the requirements of the Environment Agency's Model Procedures for the Management of Contamination (CLR11), and where mitigation is necessary a scheme of remediation must be designed and implemented to the satisfaction of the local planning authority before any part of the development hereby permitted is occupied.

Reason: To protect future occupiers of the development from the possible presence of ground contamination arising in connection with the previous industrial/storage use of the site in accordance with policy CS5 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

- 20 Prior to layout the first lowest basement slab, plans and scale 1:50 and supporting information detailing of the accessible features and facilities shall be submitted for approval by the Local Planning Authority in writing. This includes external features such as hard landscaping surface treatments including bollards and pedestrian entry doors The approved features and facilities shall be installed prior to occupation and maintained thereafter.

Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy CS6 of the London Borough of Camden Local Development Framework Core Strategy and policy DP6 of the London Borough of Camden Local Development Framework Development Policies.

- 21 Before the relevant part of the development commences a scheme detailing the internal and external lighting proposals and predicted lighting levels and any mitigation required to ensure there is no adverse impact on neighbouring properties or the highway shall be submitted to and approved by the local planning authority. The approved scheme shall be installed prior to occupation and remain in place for the lifetime of the development.

Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies CS5 and CS7 of the London Borough of Camden Local Development Framework Core Strategy and policy DP26 of the London Borough of Camden Local Development Framework Development Policies.

- 22 The development hereby permitted shall be carried out in accordance with the following approved plans: A1001 Existing Location Plan rev2, A1002 Existing Site Location Plan rev4 , A1003 Existing Survey Plan rev3 , A1101 Proposed Masterplan rev4 , A1102 Proposed Urban Plan rev7 , A1010 Existing Site Plans - Lower Ground rev3, A1011 Existing Site Plans - Ground Floor rev3 , A1012 Existing Site Plans - Level 1 rev3 , A1013 Existing Site Plans - Level 2 rev3 , ,A1014 Existing Site Plans - Level 3 rev3 , A1015 Existing Site Plans - Level 4 rev4 , A1016 Existing Site Plans - Roof Level revA1 , A9021 Clinical Stacking Diagram rev4 , A2021 Proposed General Arrangement Plans - Basement B3 rev4 , A2022 Proposed General Arrangement Plans - Basement B2 rev4 , A2023 Proposed General Arrangement Plans - Basement B1 rev5 , A2024 Proposed General Arrangement Plans - Ground Floor rev10 , A2025 Proposed General Arrangement Plans - Level 1 rev6 , A2026 Proposed General Arrangement Plans - Level 2 rev6, A2027 Proposed General Arrangement Plans - Level 3 rev7, A2028 Proposed General Arrangement Plans - Level 4 rev7, A2029 Proposed General Arrangement Plans - Level 5 rev7, A2030 Proposed General Arrangement Plans - Level 6 rev8, A2031 Proposed General Arrangement Plans - Roof Level rev9, A8000 Generic Typical Floor Plan rev6,A8001 Ground Floor Plan rev7, A8002 Roof Plan rev4, A1400 Sections - Keyplan rev3, A1401 Existing Site Section A-A rev4, A1402 Existing Site Section B-B rev4, A1403 Existing Site Section C-C rev4, A1404 Existing Site Section D-D rev3, A5000 Sections - Keyplan A2 rev6, A5001 Proposed Section A-A rev6, A5002 Proposed Section B-B rev, A5003 Proposed Section E-E rev6, A5004 Proposed Section C-C rev5, A5005 Proposed Section D-D rev5, A1300 Elevations - Keyplan rev3, A1301 Existing Contextual Elevations A1 rev3,A1302 Existing Elevation A-A A1 rev3, A1303 Existing Elevation B-B A1 rev2, A1304 Existing Elevation C-C A1 rev2, A1320

Elevations - Keyplan A2 rev5, A1321 Proposed Contextual Elevations rev6, A1322 Proposed Elevation A-A rev5, A1323 Proposed Elevation B-B rev5, A1324 Proposed Elevation C-C rev4, A5101 Typical Bay A - Huntley Street rev3, A5102 Typical Bay B - Huntley Street rev2, A5103 Typical Bay C - Shropshire Place rev3, A5104 Typical Bay D - Capper street rev2, A9001 CGI 01- Aerial View rev4, A9002 CGI 02- Huntley Street towards Gordon Mansions rev2, A9003 CGI 03- Huntley Street towards Cancer Centre rev3, A9004 CGI 04- Interior View rev4.

Reason: For the avoidance of doubt and in the interest of proper planning.