



# *The Heath & Hampstead Society*

P.O. BOX 38214 LONDON NW3 1XD

The Society examines all Planning Applications relating to Hampstead, and assesses them for their impact on conservation and on the local environment.

## **To London Borough of Camden, Development Control Team**

Planning Ref: 2014/6845/P

Address: Royal Free Hospital, Pond Street, NW3

Description: New Institute of Immunology.(Pears Building) 2<sup>nd</sup> comment

Case Officer: Charles Thuaire

Date: 16 January 2016

We write further to our original comments dated 24 November 2014, following sight of the report commissioned by local residents from Dr De Freitas on the applicants' Basement Impact Assessment.

You will recall that we expressed doubts on the submitted BIA, noting that it was incomplete and needed more work done on it, in view of the special circumstances arising from the proximity of Grade 1 listed St Stephens Church; see our para 6.

In view of the importance and urgency of the project, and its distinguished team of engineering and other expert designers, we expected the applicants to respond to your call for additional investigation and assessment. It now appears that no effective response has been made, possibly due to a change in the applicants' project management team. They appear to be expecting to receive a Permission subject to a S.106 Agreement relating to basement impact.

If this is the case, we must protest and object in the strongest terms.

LDF Policy DP 27, and CPG 4 call for the presentation of an acceptable Basement Impact Assessment before decisions to grant Planning Permission are made, not after. There are no references to the possibility of such fundamental matters being relegated to a S.106, the insecurity of which is well-known.

Now, in the light of Dr. De Freitas's report, which sets out in meticulous detail the nature of the site and its relationship to St Stephens Church, and the shortcomings of the submitted BIA, we must call on you to insist on this matter being settled before a Permission is considered.

It seems that the applicants' engineering team are not only dismissing the LDF requirements on DP27 as some sort of technicality that can be overcome later, when they can find time to consider it, but also, much more importantly, are not taking the matter seriously.

Dr De Freitas's report makes it crystal-clear that there are many design and construction issues which must be taken very seriously indeed. The stability of St

Stephens Church must not be taken lightly, and we urge you to demand that a new and acceptable BIA is presented immediately, before any decisions on granting any Permission are considered.

It is well-known from previous occasions where such matters are not properly dealt with at Planning stage, the initiative passes beyond public control and into the hands of the developer and his agents. All effective opportunities to lay down Policy requirements are thus lost; a S.106 Agreement is no substitute. In view of the significant areas of concern we, and others, have identified, and the widespread public concern, we must call on you to address the problem now, before considering granting any Permission.

All our other comments of 24 November 2014 stand.

Please stand firm on this vital issue, and obtain an acceptable BIA.