



**REGENERIS**

# Transformation of the Ugly Brown Building: Health Impact Summary

A Final Statement by Regeneris Consulting

March 2018

March 2018

[www.regeneris.co.uk](http://www.regeneris.co.uk)

# Contents Page

---

|           |   |          |
|-----------|---|----------|
| <b>1.</b> | <b>Health Impact Summary</b>                                  | <b>1</b> |
|           | Preamble  | 1        |
|           | Introduction  | 1        |
|           | Access to healthcare services and other social infrastructure | 3        |
|           | Housing quality and design                                    | 3        |
|           | Access to open space and nature                               | 4        |
|           | Air quality, noise and neighbourhood amenity                  | 5        |
|           | Accessibility and active travel                               | 5        |
|           | Crime reduction and community safety                          | 5        |
|           | Access to healthy food  | 6        |
|           | Access to work and training                                   | 6        |
|           | Social cohesion and lifetime neighbourhoods                   | 7        |
|           | Minimising the use of resources                               | 7        |
|           | Climate change  | 7        |
|           | Summary   | 8        |



# 1. Health Impact Summary

## Preamble

---

- 1.1 This Health Impact Summary has been prepared by Regeneris Consulting to accompany the application for planning permission submitted on behalf of Reef Estates Limited (hereafter referred to as the 'Applicant') for the proposed Transformation of the Ugly Brown Building development (hereafter referred to as the 'Proposed Development').
- 1.2 "A planning application, for the redevelopment of the Ugly Brown Building, was submitted to the London Borough of Camden in September 2017. The application is currently pending (ref: 2017/5497/P).
- 1.3 During the course of determination, a number of further design sessions have been held with London Borough of Camden Planning, Design and Conservation Officers. During these sessions officers have made a number of suggestions as to how the scheme might be refined. Furthermore, comments from a range of third parties have also been received during the determination process.
- 1.4 In order to address the aforementioned comments, revisions have been made to the scheme accordingly. This Health Impact Summary provides an assessment of the revised scheme, submitted to the London Borough of Camden in March 2018, and supersedes the original Health Impact Summary submitted in September 2017.
- 1.5 The Description of the Development proposed is as follows:
- 1.6 *"Demolition of the existing building and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use business floorspace (B1), residential (C3), hotel (C1), gym (D2), flexible retail (A1-A4) and storage space (B8) development with associated landscaping work".*

## Introduction

---

- 1.7 LB Camden's Local Plan Policy C1 Health and Wellbeing states that the Council will require 'proposals for major development schemes to include a Health Impact Assessment' (HIA). This statement provides a summary of the key elements of the development plans and proposals for the transformation of the Ugly Brown Building that are of relevance to the health and wellbeing of the intended occupants, residents and visitors to the site as well as those in the wider community.

- 1.8 LB Camden's Local Plan suggests the scope of the HIA will vary depending on the scale and location of the development and that it should identify the likely health impacts of the development and include measures to improve health outcomes and address any negatives effects and inequalities. It refers to LB Camden's Planning Guidance 6: Amenity document which includes an 'NHS Camden Health Checklist for Planning' covering a range of health and wellbeing related topics (see Appendix A).
- 1.9 The online National Planning Practice Guidance also refers to health impact assessment (HIA) as a useful tool to assess and address the impacts of development proposals (paragraph ref 53-004-20140306). The process looks at the positive and negative impacts of a development as well as assessing the indirect implications for the wider community.
- 1.10 Taking into account both local and national planning guidance, this statement considers the 11 different categories set out in the HIA tool developed by the Healthy Urban Development Unit (HUDU), which influence the health and well-being of an area. These categories are broadly consistent with those set out in checklist of 'LB Camden's Planning Guidance 6: Amenity' document. It does not identify all issues related to health and wellbeing, but focuses on the built environment and issues directly or indirectly influenced by planning decisions. The 11 categories are:
- Housing quality and design
  - Access to healthcare services and other social infrastructure
  - Access to open space and nature
  - Air quality, noise and neighbourhood amenity
  - Accessibility and active travel
  - Crime reduction and community safety
  - Access to healthy food
  - Access to work and training
  - Social cohesion and lifetime neighbourhoods
  - Minimising the use of resources
  - Climate change.
- 1.11 For each category, we have considered the relevant elements of the plans and proposals for the transformation of the UBB which will impact on health and wellbeing. This is supported by references to documents upon which the judgement is based.

## Access to healthcare services and other social infrastructure

---

- 1.12 The existing site does not currently provide any social, health or community infrastructure and the Proposed Development is not seeking to provide any new social, health or community infrastructure.
- 1.13 The **impact of the Proposed Development on access to healthcare and other social infrastructure**, such as education, is included as part of this assessment and is **considered to be neutral**. It can be summarised as follows:
- Within 2km of the Proposed Development there are 33 GP surgeries, with 188 GPs (150 FTE GPs) serving circa 258,400 registered patients. This equates to 1,718 patients per FTE GP, which is below the Camden CCG average of 2,011. It is estimated the Proposed Development will generate a population of around 120 which will increase the average patient:FTE GP ratio for GP surgeries within 2km to 1,723 (0.3%).
  - There are 62 primary schools within 2 miles of the site with a current capacity<sup>1</sup> of 19,822 pupils, giving rise to a surplus of 436 school places (2%). It is estimated the Proposed Development would generate a primary school pupil yield<sup>2</sup> of 6, all of which could be absorbed within the current capacity of local primary schools.
  - There are 29 secondary schools within 3 miles of the site with a current capacity of 30,723 and 27,467 pupils giving rise to a surplus of 3,256 (10.6%). It is estimated the Proposed Development would generate a secondary school pupil yield<sup>3</sup> of 4, all of which could be absorbed by existing surpluses.
- 1.14 In line with LB Camden's SPG, the proposed Development will be required to pay Community Infrastructure Levy monies which are to be spent by the Local Authority on such necessary infrastructure.

## Housing quality and design

---

- 1.15 The Design and Access (D&A) Statement (2017) and addendum (2018) confirms that dwellings have been designed to meet London Plan (2016) design guidance and that

<sup>1</sup> Based on Edubase school census data January 2016

<sup>2</sup> Estimated using the GLA play space calculator

<sup>3</sup> Estimated using the GLA Play Space Calculator

Building Regulations Approved Document 'M' is complied with. As part of the detailed design each building will be reviewed in detail and where applicable will take into account BS8300.

- 1.16 The Proposed Development **responds positively to local housing needs** with the provision of 73 new homes, all of which will be additional, and which include a mix of studio, and 1-3 bedroom flats. The mix of housing also includes 20 affordable 1, 2 and 3 bedroom flats (which equates to 35% of total floor area) comprising both social rented and intermediate tenures to offer the maximum number of family units. It will also comprise a total 8 wheelchair adaptable and accessible apartments, 5 of which will be within the private housing element.
- 1.17 The Sustainability and Energy Statement (Max Fordham, June 2017) confirms the use of enhanced building fabric, efficient mechanical and electrical systems and the use of district heating systems will help to achieve a 35% reduction of Part L, as required by the London Plan (2016) and that the element of carbon savings met by renewables is 7.4%.

## Access to open space and nature

---

- 1.18 The D&A statement (2017) and addendum (2018) confirms the existing site does not contain any open space or access to natural space including the canal frontage and there is a shortfall of public space in the surrounding area. The **Proposed Development responds positively** to this and includes the provision of open space in the form of a central public open square, 100m of accessible canal-side space and a 'retail' street providing pedestrian links across the site. This provision will increase access to a range of different types of open space and provide new opportunities for social interaction and physical activity. The open space provision will be integrated with existing and new pedestrian routes, rights of way and will help to link the site with its surrounds.
- 1.19 The open space will be welcoming and accessible for all. The D&A statement (2017) and addendum (2018) confirms it has been designed to allow step-free access across the site to ensure accessibility to the landscape for people with varying mobility requirements. A part M accessibility route is available at three entrances to the site and the landscape will also be designed to be accessible for the visually impaired.
- 1.20 Playable space will be provided within the public realm for the under 5 year olds. The Landscape Statement prepared by Fabrik Chartered Landscape Architects (2018) confirms there is sufficient play provision within the appropriate distances for the 5-11 year olds and the over 12 year olds.

## Air quality, noise and neighbourhood amenity

---

- 1.21 An Outline Construction Management Plan has been prepared by Waterman (June 2017) which sets out measures that will be employed to reduce noise, air and dust pollution during the construction phase.
- 1.22 Air Quality and Noise Assessment reports have also been prepared by Waterman setting out the construction and operational impacts of the Development on Air quality and noise. Where appropriate, mitigation measures will be included as part of the Development.

## Accessibility and active travel

---

- 1.23 The site has a PTAL rating of 6B (the highest rating achievable) with mainline and tube stations including Kings Cross, St Pancras, Euston and Camden Town together with local bus routes. The design proposals have been developed in accordance with London Plan (2016) Policy 7.2 and relevant best practice standards. The D&A statement (2017) and addendum (2018) confirms the **proposed Development will make a positive contribution to accessibility and active travel** as follows:
- Direct, barrier free, pedestrian routes through the site connecting with consented bridge locations along the canal and linking up with pedestrian and cycle routes.
  - A shared basement allowing the site to be vehicle-free at ground level
  - Plots A and C are car-free (with the exception of mandatory disabled parking for residents of Plot C) and the number of car parking spaces on Plot B (commercial) is significantly reduced despite more than doubling the population of the building
  - Provision of over 800 secure, covered cycle storage spaces across the site for residents and occupants and around 100 short stay cycle spaces across the public realm for visitors
  - Dropped curbs and step-free access to allow wheelchair and buggy access to and from and across the site

## Crime reduction and community safety

---

- 1.24 The **proposed development incorporates elements to help Design Out Crime (DOC)**. The proposals have been designed in consultation with the DOC officer for the Metropolitan Police and directly address types of crime and anti-social behaviour that are relevant to the



local area. The D&A statement (2017) and addendum (2018) outlines the key DOC elements as follows:

- Active frontages, over-looking habitable rooms and natural surveillance
- Limitation of blind corners, natural recesses and enhanced sight lines across the site
- Loading bay located at grade level, isolated basement stairs from upper levels, lift security and controlled building access
- 24 hour registered CCTV and uniform lighting wherever possible
- 24 hour concierge within private residential entrance

## Access to healthy food

---

- 1.25 The proposed Development includes provision of up to 5,858 sq m GIA of flexible retail space including food and beverage space. The occupiers of the space are yet to be confirmed but the space has been designed to facilitate a variety of end-users, including local and smaller operators and to complement existing uses in the surrounding area rather than compete. This type of provision will help to avoid a concentration of one particular type of retailer, such as hot food takeaways.

## Access to work and training

---

- 1.26 The Regeneration Statement prepared by Regeneris confirms the **Proposed Development will make a positive contribution to both temporary construction and permanent employment and opportunities** as well as training opportunities within the local area. An average of 680 temporary FTEs per year within the construction sector are likely to be generated during the construction phase and up to 3,400 long term gross additional FTEs across a range of sectors and occupations once the Development is operational.
- 1.27 The Proposed Development includes provision of flexible work space, which will accommodate a range of uses for small and medium sized enterprises as well as start-up businesses.
- 1.28 The Regeneration Statement prepared by Regeneris indicates the Applicant and partners will support a number of projects within LBC and will work with LBC to ensure jobs and training opportunities for local people are maximised through Section 106 contributions for apprenticeships and training

## Social cohesion and lifetime neighbourhoods

---

- 1.29 The Proposed Development will make a **positive contribution to social cohesion** by reinforcing the identity of the area through building, street and space design, as well as by increasing the connectivity levels with the surrounding area and reducing the extent to which the existing Site is severed from its surrounds.
- 1.30 The Proposed development includes a wider mix of uses than currently existing on the site including office, retail, leisure and residential uses. Recommendations from the Lifetime Neighbourhood guidance are addressed throughout the Design and Access and addendum statement.

## Minimising the use of resources

---

- 1.31 The proposed Development has been designed to respond to and enhance the context in which it sits. It significantly increases the efficiency of the existing Site and will provide a greater quantum and variety of uses than currently exists.
- 1.32 The Sustainability and Energy Statement (June 2017, Max Fordham) confirms the Development expects to achieve a BREEAM 'Excellent' rating for non-residential parts of the scheme. The Statement also confirms a 35% reduction of Part L across the Development, as required by the London Plan (2016), due to the use of enhanced building fabric, efficient mechanical and electrical systems and the use of district heating.

## Climate change

---

- 1.33 The Sustainability and Energy Statement (June 2017, Max Fordham) sets out details of how the proposed Development **responds positively to climate changes issues**. This can be summarised as follows:
- Onsite renewables and responsible sourcing of construction materials
  - Biodiverse roofs to enhance biodiversity and provide rainwater attenuation
  - An energy strategy which targets a 35% reduction over current 2013 Building Regulations
  - Potential to connect to district heating system and highly insulated building fabric to reduce unnecessary heat loss

- Displacement ventilation and deep reveals to external walls to provide shading and reduce solar gain and glare.

## Summary

---

1.34 The HIA suggests, at this stage, no significant health impacts resulting from the development have been identified and that the proposed Development will likely have a neutral or positive impact across all 11 categories set by the HUDU. The HIA has identified a number of positive health impacts which can be summarised as follows:

- **Improved access to open space and nature:** the proposed Development includes the provision of open space as well as access to the canal frontage and will provide new opportunities for social interaction and physical activity as well as connect the site with its surrounds.
- **Improved accessibility and travel:** the proposed Development will make a positive contribution to accessibility and active travel and will provide direct, barrier free pedestrian routes linking to existing pedestrian and cycle routes, dropped curbs and step-free access, vehicle free at ground level and 800 cycle spaces.
- **Access to work and training:** the proposed Development will provide both temporary construction and permanent job opportunities across a range of sectors, as well as providing business space for SMES and start-ups. Where possible, the local training and employment opportunities will be maximised through strong levels of community engagement.

# Appendix A - Camden Health Checklist for Planning

| Table A1: NHS Camden Health Checklist for Planning   |                                   |  |                         |  |
|--|-----------------------------------|--|-------------------------|--|
| Issue to address   | Included in proposal/ development | Provide details (Evidence from proposals)  | Further action required | Relevant LDF policies  |
| <b>1.0 HEALTHCARE FACILITIES AND SERVICES</b>  |                                   |  |                         |  |
| 1.1 Will the development increase demand on existing primary and secondary care health services  | Yes                               | Impact of the Proposed Development is considered to be neutral. Within 2km of the Proposed Development there are 1,718 patients per FTE GP, which is below the Camden CCG average of 2,011. It is estimated the Proposed Development will generate a population of around 120 which will increase the average patient:FTE GP ratio for GP surgeries within 2km to 1,723 ( increase of 0.3%). |                         | Core strategy policies, CS11, CS15, CS16 and Development Policies DP15, DP17, DP31 |
| <b>2.0 PHYSICAL ACTIVITY</b>   |                                   |  |                         |  |
| 2.1 Do the proposals maximise physical activity opportunities? (Active travel; leisure facilities; access to green and open spaces; HomeZones; schools; business; Olympics etc.) | Yes                               | The Proposed Development includes the provision of open space in the form of a central public open square, playable space within the public realm, and 100m of accessible canal-side space.  |                         | Core Strategy policy CS17  |
| <b>3.0 CRIME AND COMMUNITY SAFETY</b>  |                                   |  |                         |  |
| 3.1 Have measures been taken to ensure   | Yes                               | The proposed development incorporates elements to help Design Out Crime, designed in consultation  |                         | Core Strategy policy CS17  |

|  |     |  |  |   |
|--|-----|--|--|---|
| that the proposals will not have a negative impact on crime and community safety? (Licensed premises; drugs & alcohol; road traffic injuries; etc.)                                  |     | with the DOC officer. The key elements are active frontages with natural surveillance; limitation of blind corners; 24 hour registered CCTV and uniform lighting; 24 hour concierge; and loading bay at grade level.   |  |   |
| <b>4.0 HOUSING</b>   |     |  |  |   |
| Do the proposals include housing which is: affordable, in mixed use developments; mixed tenure (private, affordable, social); different sizes, accessible and suitable for all ages. | Yes | The proposed development responds positively to local housing needs with the provision of 73 additional new homes. They are a mix of sizes, with 35% of all total floor area being affordable, comprising both social rented and intermediate tenures. There will be 8 wheelchair adaptable and accessible apartments.   |  | Core Strategy policy CS6 and Development Policies DP1-9 |
| <b>5.0 EMPLOYMENT AND TRAINING</b>   |     |  |  |   |
| 5.1 Do the proposals provide employment and training opportunities for local people?   | Yes | An average of 680 temporary FTEs per year within the construction sector are likely to be generated during the construction phase and up to 3,400 long term gross additional FTEs across a range of sectors. The proposed development includes provision of flexible and market space for small and medium sized enterprises. The Applicant and partners will support a number of projects within LBC and work with LBC to ensure training opportunities |  | Core Strategy policy CS8 and Development Policy DP13    |

|   |     |   |  |  |
|---|-----|---|--|--|
|   |     | for local people are maximised through Section 106 contributions.   |  |  |
| <b>6.0 EDUCATION</b>  |     |   |  |  |
| 6.1 If education facilities are provided, will they be designed to include wider community use and include green and open space?                          | Yes | Education facilities not to be provided- it is estimated that the proposed development will generate a primary and secondary school pupil yield that can be absorbed by existing surpluses.   |  | Core Strategy policy CS10  |
| <b>7.0 NEIGHBOURHOOD AND BUILDING DESIGN</b>  |     |   |  |  |
| 7.1 Do the proposals include: accessible street designs for older people and people with mobility problems; and garden allotments or play areas?          | Yes | Dropped curbs and step-free access across the site. Playable space will be provided within the public realm for under 5-year olds. There already exists sufficient play provision within appropriate distances for 5-11 year olds and over 12 year olds.            |  | Core Strategy policies CS14 and CS15                                       |
| 7.2 Do the proposals ensure that buildings are designed to maximise physical activity (positioning of stairwells, shower rooms, secure cycle parking etc) | Yes | Direct, barrier free, pedestrian routes through the site connecting with consented bridge locations along the canal and linking with pedestrian and cycle routes. Plots A and C are car free and provision of over 800 secure cycle storage spaces across the site. |  | Core Strategy policies CS11, CS16 and Development Policies DP6, DP17, DP14 |
| <b>8.0 CLIMATE CHANGE AND SUSTAINABILITY</b>  |     |   |  |  |
| 8.1 Do the proposals  | Yes | Air Quality and Noise Assessment report has been prepared by  |  | Core Strategy  |

|  |     |   |  |   |
|--|-----|---|--|---|
| mitigate against a negative impact on the environment (noise & air quality; renewable energy; contaminated land; waste management etc.)          |     | Waterman which set out measures to reduce noise, air and dust pollution during the construction phase. The Sustainability and Energy Statement confirms the development expects to achieve a BREEAM 'Excellent' rating for non-residential parts of the scheme. There will be onsite renewables and responsible sourcing of materials, biodiverse roofs, and an energy strategy targeting a 35% reduction over current 2013 Building Regulations. |  | Policy CS13 and Development Policy DP22 |
| <b>9.0 FOOD</b>  |     |   |  |   |
| 9.1 Do the proposals include provision of affordable and nutritious food outlets, food growing and limit the proliferation of fast-food outlets? | Yes | Proposed development includes provision of up to 5,858 sq m GIA of flexible retail space including food space. The space has been designed to facilitate local and smaller operators and complement existing use, to avoid a concentration of a particular retailer such as fast-food outlets.  |  | CS16                                    |
| <b>10.0 WIDER ASSESSMENT</b>   |     |   |  |   |
| 10.1 Have the health impacts been considered, as part of any other assessment? (SEA, HIA, IIA, EIA etc)  | Yes | Health Impact Assessment  |  |   |



**REGENERIS**

[www.regeneris.co.uk](http://www.regeneris.co.uk)

London: 0207 336 6188

Manchester: 0161 234 9910