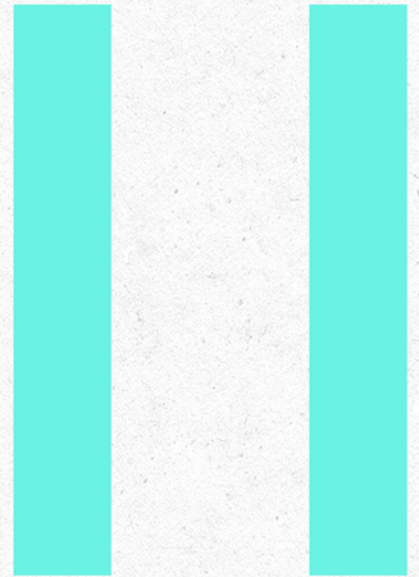
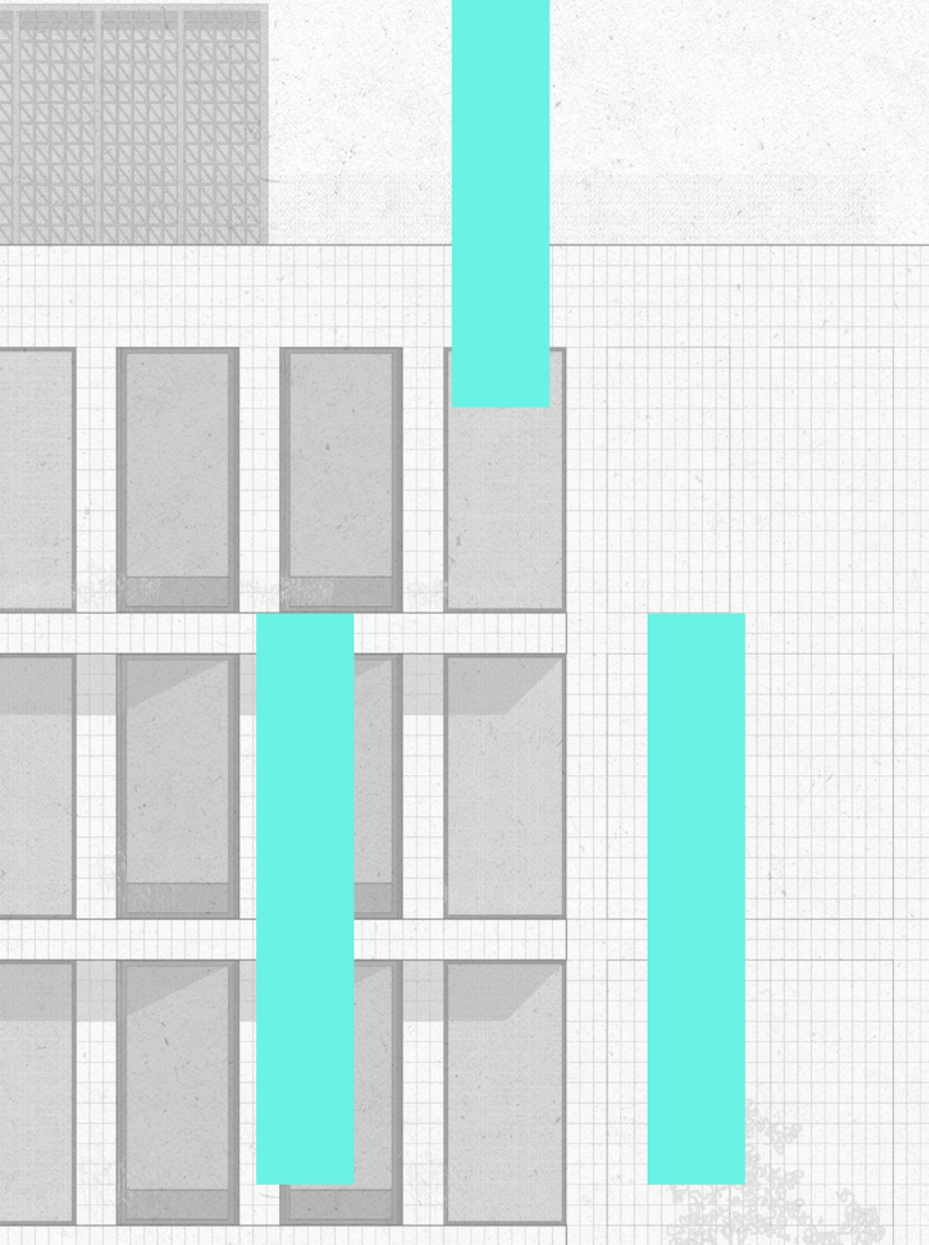


Former Car Repair Centre
70 – 86 Royal College Street
London
NW1 0TH



PLANNING STATEMENT



ROCCO VENTURES

NHS
Central and
North West London
NHS Foundation Trust

dp9 



70-86 ROYAL COLLEGE STREET, LONDON, NW1 0TH

Planning Statement

February 2020

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1.0 INTRODUCTION

- 1.1 This Planning Statement is submitted, on behalf of 'the Applicant' (Rocco Ventures Ltd) in support of an application for planning permission for the redevelopment of the following address (referred to, herein, as 'the Site'):

70-86 Royal College Street, London, NW1 0TH.

- 1.2 The full extent of the Site is identified on the accompanying Site Location Plan prepared by Ian Chalk Architects.

- 1.3 The Local Planning Authority to which this application is submitted is the London Borough of Camden ('LBC').

- 1.4 A Planning Performance Agreement ("PPA") has been entered into with LBC and a number of pre-application meetings have been held with the Planning, Design and Highways / Transport Officers accordingly.

- 1.5 In summary, the application seeks planning permission for the following 'proposed development':

Redevelopment of the existing site to provide a healthcare facility (Classes D1/C2) comprising Basement, Ground, plus Four storeys and Rooftop gardens, pavilions and plant enclosures.

- 1.6 It is important to note, as discussed with LBC officers at pre-application stage, that the above referenced proposed development is a community health centre containing intermediate care wards. The tenant will be Central and North West London NHS Foundation Trust and the proposals will accommodate their identified need for re-housing existing local services in the immediate area. The proposal is designed to the relevant NHS design standards and has proven to accommodate the identified need. The applicant has agreed the principle of a 30 year lease to Central and North West London NHS Foundation Trust, subject to planning and agreement on the specification of the fit out works.

- 1.7 The building's main purpose is as a stepdown healthcare facility - this is an intermediate level of care for patients that are transitioning out of acute care, but are not yet ready to return home. The patient journey to recovery starts with them normally spending time in the bedrooms, but they are encouraged to join activities in the main social and activity spaces. This physical and mental activity is an important part of the recovery process for the patients. The design of the fabric of the building purposefully seeks to enhance this patient journey by providing external balcony 'potting sheds', roof gardens and roof top pavilions for patient and staff enjoyment, and the greening on the facade adds to the positive aspect from the internal spaces. Research shows that views of green spaces improves recovery rates for patients. Great effort has been made to ensure that the building design can accommodate ward layouts that ensure clear internal routes with access to daylight and well daylit rooms, balancing potential overheating. All in all we

believe that the proposed building is capable of delivering an exemplary level of care to local residents recovering from a range of operations and illnesses.

1.8 The purpose of this Planning Statement is to explain the development and provide an assessment of the proposals in the context of relevant planning policy and guidance set out in the following documents:

- The National Planning Policy Framework, 2019 ('NPPF');
- The Draft London Plan* (2019);
- The London Borough of Camden Local Plan (2017);
- The London Borough of Camden Policies Map (2019);
- Relevant Supplementary Planning Guidance ('SPG'); and
- Relevant Supplementary Planning Documents ('SPD').

1.9 *It is important to note that the Draft London Plan has undergone an Examination in Public ('EiP') with the Panel's findings published and minor amendments to the Plan made. As the Plan has been through an EiP, it is considered to have weight in the determination of all new planning applications and is considered as adopted for the purposes of this planning application. The Draft London Plan is simply referred to as the 'London Plan' for the remainder of this Planning Statement.

1.10 This Planning Statement should be read and considered in conjunction with the plans, drawings and supporting documents submitted as part of this planning application.

1.11 The applications are submitted with the following documentation as discussed and agreed with LBC during pre-application discussions:

- **Planning Application Form** prepared by DP9 Limited ('DP9');
- **Community Infrastructure Levy Form** prepared by DP9;
- **Application Drawings** prepared by Ian Chalk Architects;
- **Design and Access Statement (including Lighting Strategy)** prepared by Ian Chalk Architects;
- **Townscape, Heritage and Visual Impact Assessment** prepared by Montagu Evans;
- **Air Quality Assessment** prepared by Syntegra;
- **Noise Impact Assessment** prepared by Syntegra;
- **Daylight and Sunlight Assessment** prepared by Point 2 Surveyors;
- **Community Engagement Statement** prepared by Kanda Consulting;
- **Sustainability Statement including Energy Strategy** prepared by BDP;
- **Healthy Streets Transport Assessment** prepared by Curtins;
- **Draft Delivery and Servicing Management Plan** prepared by Curtins;
- **Interim Travel Plan** prepared by Curtins;
- **Draft Construction Management Plan** prepared by Cushman and Wakefield;
- **Structural Methodology Statement (including Basement Impact Assessment and Contaminated Land Assessment)** prepared by Heyne Tillet Steel and RSK;
- **Arboricultural Impact Assessment and Arboricultural Method Statement** prepared by Challice Consulting; and

- **Landscape Report** prepared BDP.

Consultation

1.12 A comprehensive programme of consultation has been carried out during the evolution of the development and has informed the application proposals accordingly. Consultation has involved the following key groups / stakeholders:

- LBC Planning Officers;
- LBC Design Officers;
- LBC Transport / Highways Officers;
- Secured by Design Officers; and
- Key Local Stakeholders (including local residents and businesses).

1.13 Furthermore, evolving versions of the proposed development have, twice, been presented to the LBC Design Review Panel during the course of the design evolution and pre-application process.

Scope of Report

1.14 A description of the site and surrounding area is provided within Section 2.0 and relevant planning history, pre-application discussions and context to the proposals is set out in section 3.0. A description of the proposed development is provided in Section 4.0. An evaluation of the proposals against the planning policy context is set out in Sections 5.0 and 6.0. Planning Obligations are discussed in Section 7.0 and conclusions are drawn in Section 8.0.

2.0 SITE DESCRIPTION

Site Location

- 2.1 The 0.14ha site is located between Kings Cross and Camden Town and fronts onto Royal College Street.
- 2.2 The site has a Public Transport Accessibility Level ('PTAL') of 6a which demonstrates excellent accessibility to a range of transport modes in the vicinity of the Site.
- 2.3 The Site is bound on the north side by the Golden Lion public house (which comprises residential accommodation above the public house use at ground floor level). The eastern boundary of the Site faces onto the visitor carpark of a Royal Mail distribution / parcel depot site and the southern boundary of the Site faces onto the Royal Mail site's access road.

Existing Use

- 2.4 The Site has previously been in use as a tyre and vehicle maintenance garage until July 2018 when operations ceased. The Site has been vacant since.

Existing Buildings

- 2.6 The Site is occupied by a two-storey building, forecourt and parking areas. The existing building is comprised of two brick built interlinked blocks. To the southern part of the Site there is a separate square brick enclosure which was, historically used as a tyre store.
- 2.7 The site has most recently been in use as a tyre and car servicing/repair centre.
- 2.8 The existing floor area of the buildings on site is 644sqm GIA and 705sqm GEA.
- 2.9 Further details and images of the existing Site (and the history of the Site) are set out in the accompanying Design and Access Statement ('DAS') prepared by Ian Chalk Architects.

Site Surroundings

- 2.10 Immediately adjacent to the site to the rear and south east (as set out above) is a Royal Mail distribution / parcel depot site. This site is allocated for redevelopment in the LBC Site Allocations Plan (2013). This site is, therefore, likely to see redevelopment proposals in the medium-term. The LBC Site Allocations Plan envisages, in broad terms, that this particular site is suitable to come forward as a mixed use commercial and residential development.
- 2.11 To the north of the Site (directly north of Pratt Street) is the St Pancras Commercial Centre. This site was recently granted approval, at planning committee, for redevelopment (demolition of existing buildings and erection of a mixed-use scheme ranging in height from 5-7 storeys). The planning application (reference 2019/4201/P) was approved at LBC Planning Committee in January 2020.

- 2.12 On the opposite side of Royal College Street the character is more residential and the scale and grain is mixed including large late 20th century housing and some surviving 19th century development.
- 2.13 The broader area comprises a mix of residential, commercial and institutional uses. The site is within the Knowledge Quarter, which is the focal point for one of the greatest knowledge clusters anywhere in the world, located in the area around Kings Cross, the Euston Road and Bloomsbury. This includes the new Francis Crick Institute nearer to Euston Road and there is a lot of interest in further international medical research institutions and companies creating bases in the local area.
- 2.14 A further detailed and comprehensive assessment of the wider site context (in terms of land uses, building heights and architectural styles) is set out in detail in the accompanying DAS prepared by Ian Chalk Architects.

Policy Designations

- 2.15 The Site is not designated on the LBC Policies Map (2019).

Heritage Assets

- 2.16 The Site is not located within a conservation area however the Regents Canal Conservation Area lies to the east of the Site and the Kings Cross Conservation Area is situated to the south east of the Site.
- 2.17 There are no statutory listed buildings within the Site. There are a number of listed buildings located within the wider context as identified within the accompanying Townscape, Heritage and Visual Impact Assessment prepared by Montagu Evans.
- 2.18 The Golden Lion public house, that lies adjacent to the Site to the north, is a locally listed building.

3.0 PLANNING HISTORY AND PRE-APPLICATION PROCESS

Relevant Planning History

3.1 The planning history of the Site is limited and relates to small, minor modifications to the existing Site and buildings within it. The full planning history is set out, in Table 1, below and it can be seen that there have been no relevant applications for the comprehensive redevelopment of the Site:

Reference	Description	Decision
PE9800492	<i>The formation of a new entrance and alterations to a link building by the replacement of a door and windows with a roller shutter both in the west elevation.</i>	Granted 27/08/1998
J12/10/D/36899	<i>The redevelopment of the site by the erection of a single storey with mezzanine building and associated parking provision for use as a tyre service depot for the storage, supply and fitting of tyres, batteries, exhausts and other vehicle fitments</i>	Granted 24/10/1983
J12/10/D/29538	<i>Retention, for a further limited period, of the petrol filling station Managerial Training Centre.</i>	Limited Period 23/01/1980
J12/10/D/23896	<i>Retention for a further limited period of the petrol filling station managerial training centre.</i>	Limited Period 17/02/1977
J12/10/D/22953(R)	<i>Redevelopment to provide a part seven, part three storey building comprising petrol filling station, light industrial premises, 14 flats and a shop.</i>	Granted 17/02/1977
J12/10/D/18322	<i>Retention for a further limited period of the petrol filling station managerial training centre.</i>	Limited Period 05/04/1974

Table 1: Planning History

Pre-Application Process

3.2 A PPA has been entered into with LBC and throughout 2019 a detailed pre-application process with LBC's planning and technical officers has been undertaken. Furthermore, iterations of the Proposed Development have been presented to the LBC Design Review Panel on two occasions.

3.3 In addition to the above formal pre-application process, a further comprehensive programme of consultation has been carried out during the development of the proposed scheme which has informed the application proposals. Consultation has involved the local residents and stakeholders, as set out in full in the accompanying Statement of Community Involvement prepared by Kanda, accordingly.

- 3.4 All comments received during the aforementioned pre-application process have been carefully considered and the Proposed Development has been through many iterations to find the best solution for the site, the user and the context. Further details of the design development, which responds to pre-application comments and feedback, can be found in the accompanying DAS prepared by Ian Chalk Architects.

4.0 PROPOSED DEVELOPMENTDescription of Development

4.1 The full description of the proposed development is as follows:

Redevelopment of the existing site to provide a healthcare facility (Classes D1/C2) comprising Basement, Ground, plus Four storeys and Rooftop gardens, pavilions and plant enclosures.

Proposed User

4.2 The tenant will be Central and North West London NHS Foundation Trust and the proposals will accommodate their identified need for re-housing existing local services in the immediate area. The proposal is designed to the relevant NHS design standards and has proven to accommodate the identified need. The applicant has agreed the principle of a 30 year lease to Central and North West London NHS Foundation Trust, subject to planning and agreement on the specification of the fit out works.

Proposed Floor Areas

4.3 The proposed development comprises 7,377 sqm GIA and 8,172 sqm GEA.

Access

4.4 Entry to the building is via the footway on Royal College Street. Level access and thresholds will be provided to all entrances and throughout to all areas and all floors. Horizontal circulation is level throughout the whole of the building once inside. Vertical circulation is to be provided through the introduction of a new passenger lift serving all floors.

Car Parking

4.5 One disabled car parking bay will be located within the ground floor servicing yard for use by staff of the Proposed Development.

4.6 An additional new on-street disabled bay is also proposed, however, discussions with LBC on the location of this bay are ongoing. Any on-street bay would fall outside of the planning application boundary and does not form part of the planning application proposals.

Cycle Parking

4.7 A total 70 cycle parking spaces are proposed (60 long stay and 10 short stay spaces). 12 of the spaces will be located within a storage room in the basement, accessed from an appropriately sized lift. 52 cycle parking spaces will be located in a cycle store within the demise of the building (including the 10 short stay spaces), which will be accessed via a segregated access point to the servicing yard. In addition, three Sheffield stands will be

located within the servicing yard, accommodating up to six cycles and potentially larger, accessible and cargo cycles.

Deliveries and Servicing

4.8 It is proposed that deliveries and servicing will take place within the Site boundaries.

Landscaping

4.9 A series of private gardens and planted spaces within the building. These include a third-floor seating terrace, a rooftop podium garden and a series of planted balconies at multiple levels. The Proposed Development also comprises greening to the building facade and balconies.

4.10 In association with the Proposed Development there is also a desire to enhance the public realm along Royal College Street. These proposed improvements include:

- Repaving works to the area of street adjacent to the site; and
- Planting of additional street trees along Royal College Street.

4.11 It should be noted that the proposed public realm enhancements set out above are shown, for illustrative purposes, within the application submission material. Planning permission is, however, not sought for these works as they fall outside of the planning application boundary. It is envisaged that, should planning permission be granted for the Proposed Development then there would be a S106 Legal Obligation for the Applicant to progress the design and delivery of these public realm enhancement works accordingly.

Sustainability

4.12 From the outset sustainability has formed a fundamental part of the approach adopted by Ian Chalk Architects in designing and shaping the Proposed Development. Some key elements are summarised below (please refer to the accompanying Sustainability Statement, prepared by BDP, for the complete set of sustainability initiatives):

- Designed to meet BREEAM Excellent requirements;
- Designed to achieve a 36% reduction in carbon emissions against Building Regulations;
- Renewable energy technology provided in the form of roof top PV panels;
- Incorporation of soft landscaping, a green roof and a blue roof;
- Recycling / re-use of demolition waste materials;
- Planting of additional street trees (improving the ecological value of the site);

5.0 PLANNING POLICY CONTEXT

The Decision Making Framework

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.

5.2 The development plan for the purposes of the determination of this planning application comprises the following documents:

- The London Plan (2019);
- The London Borough of Camden Local Plan (2017);
- The London Borough of Camden Policies Map (2019);

Material Considerations

5.3 The National Planning Policy Framework, 2019 ('NPPF');

5.4 There are a number of supplementary planning guidance ('SPG') / supplementary planning documents ('SPD') that are not afforded development plan status but are material considerations in the determination of this planning application. Relevant SPGs and SPDs have been considered during the design evolution of the proposed development accordingly.

6.0 PLANNING POLICY ASSESSMENT

Principle of Land Use

- 6.1 LBC Local Plan Policy E2 seeks to protect premises or sites that are suitable for continued business use. Local Plan Policy E2 notes that LBC will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:
- a) the site or building is no longer suitable for its existing business use; and
 - b) that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time
- 6.2 LBC Local Plan Policy C1 seeks to improve and promote strong, vibrant and healthy communities through ensuring a high quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. The policy also notes that the Council will support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements (part d).
- 6.3 LBC Local Plan Policy H1 identifies self-contained housing as the priority land use of the Local Plan. The policy expects the maximum reasonable provision of housing that is compatible with any other uses needed on site.
- 6.4 The principle of the loss of the existing use at the Site (tyre and vehicle maintenance garage) and the proposed new use (healthcare facility) have been discussed, in depth, with LBC officers during the pre-application stage.
- 6.5 The Site, due to declining need for car servicing within central London, is now closed to the public and the business is no longer operating at the Site.
- 6.6 It is recognised that the proposed development does not comply with LBC Local Plan Policy E2 insofar as no evidence has been submitted to suggest the site is incapable of continued Class B2 use, or another similar or alternative type of business use. Furthermore, the proposals do not include the provision of self-contained housing, which is the priority land use of the Local Plan, in line with Policy H1.
- 6.7 It has, however, been discussed, and agreed, with LBC officers, during the pre-application stage that this is a unique scenario in that the proposals will house a healthcare facility (tenant to be Central and North West London NHS Foundation Trust) which is in accordance with the aspirations LBC Local Plan Policy C1. This position is reflected in pre-application written advice received from the LBC that states *"the Council is supporting of relocating existing healthcare facilities from St Pancras Hospital South Wing to enable redevelopment of that particular site to occur ... this is on the basis that the proposals are fully supported by the NHS/CCG"*.
- 6.8 In order to demonstrate that the proposals are fully supported by the NHS/CCG, LBC officers requested that this formal planning application should clearly explain:

- a) *How the proposals relate to the redevelopment of the South Wing at St Pancras Hospital (e.g. are all the facilities proposed in the new building currently located in the South Wing? How much of the South Wing will be freed up if the proposals are allowed? How do the proposals relate to the wider redevelopment of St Pancras Hospital?)*
- b) *At what stage are the discussions with the NHS/CCG?*
- c) *What other sites were considered and why were they discounted?*
- d) *Information about who the proposed facilities will serve (e.g. Camden residents?) and whether this differs from the existing situation.*

6.9 The Central and North West London NHS Foundation Trust have responded to the aforementioned questions with their letter at Appendix 1 of this Planning Statement.

6.10 Furthermore, it should be stressed that the proposed use will provide employment for circa 455 people. The previous use, by comparison, provided accommodation for only 5 people.

6.11 Whilst the proposed development doesn't comply with LBC Local Plan Policies E2 and H1, the proposed land use is acceptable given this unique opportunity to re-house a healthcare facility, operated by Central and North West London NHS Foundation Trust, within the community it currently serves. Furthermore, the proposed development is in accordance with LBC Local Plan Policy C1. In conclusion, LBC officers have confirmed that they are in agreement with this position and would be supporting of the proposals "*on the basis that they allow the redevelopment of St Pancras Hospital South Wing to occur and are fully supported by the NHS/CCG*".

Design and Townscape

Overarching Design

6.12 Good design is central to all objectives of the London Plan. Policies contained within Chapter 3 of the London Plan set out a series of overarching design principles for development to achieve by addressing its layout, height and massing and elevations.

6.13 LBC Local Plan Policy D1 sets out that LBC will seek to secure high quality design in development and will require that development:

- Respects local context and character;
- Preserves or enhances the historic environment and heritage assets in accordance with "Policy D2 Heritage";
- Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- Is of sustainable and durable construction and adaptable to different activities and land uses;
- Comprises details and materials that are of high quality and complement the local character;

-
- Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;
 - Is inclusive and accessible for all;
 - Promotes health;
 - Is secure and designed to minimise crime and antisocial behaviour;
 - Responds to natural features and preserves gardens and other open space;
 - Incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping;
 - Incorporates outdoor amenity space;
 - Preserves strategic and local views;
 - For housing, provides a high standard of accommodation; and
 - Carefully integrates building services equipment.
- 6.14 Local Plan Policy D1 emphasises that LBC will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 6.15 CPG1 (Design) sets out further detailed guidance in respect of LBC design requirements for new developments.
- 6.16 The aforementioned design related policies and guidance have been carefully considered by the scheme architects, Ian Chalk Architects, as set out within the accompanying DAS. Furthermore, iterations of the proposed development were presented to LBC Design Officers and the LBC Design Review Panel. The proposed development has been refined to respond to comments accordingly. Scheme refinements are explained in detail in the accompanying DAS. It should also be noted (as demonstrated within the DAS) that the scheme has been designed to consider the scheme at the St Pancras Commercial Centre and to respond to the likely future redevelopment of the adjacent Royal Mail site. The proposed design creates a building that faces to the rear as well as the front, to allow future integration with the Royal Mail site as requested by LBC officers during pre-application discussions.
- 6.17 The proposed revisions to the scheme during the course of determination have been well received by both LBC officers and the LBC Design Review Panel.
- 6.18 LBC have stated, in their formal pre-application response, that they *“welcome the way in which the applicant and their team have responded to comments on the design”* and *“Overall, it is considered that the proposed new building would fit well in the streetscene and would respect its local context”*.
- 6.19 LBC officers also comment that *“the design of the building is considered to be of a high quality with good detailing and articulation of the facades”* and *“The creation of an active frontage is welcomed (e.g. through putting office and meeting rooms and the main entrance lobby at the front of the building)”*.
- 6.20 The LBC Design Review Panel commented, in response to the second presentation that

“The panel is impressed by changes made to the scheme design for 70-86 Royal College Street since the previous review. The panel considers the internal planning is much improved: it welcomes the revision to the ambulance drop off area and the addition of the projecting planted spaces / balconies”.

- 6.21 In summary, it is considered that the Proposed Development provides a scheme of the highest architectural quality, in terms of appearance, layout and massing and will contribute positively to the immediate streetscene and environment. The proposed development responds to pre-application comments and accords with the relevant regional and local design policies.

Townscape and Heritage

- 6.22 The ‘Overarching Design’ Section above considers the design of the proposed development in respect of its impact on the immediate streetscene and environment. It is also, however, important to consider the impact of the proposed development on the wider heritage assets in the area and the associated townscape implications.
- 6.23 In respect of heritage assets London Plan Policy H1 sets out that proposed developments should conserve the significance of heritage assets and should identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 6.24 Local Plan Policy D1 sets out that LBC require development to preserve or enhance the historic environment and heritage assets.
- 6.25 Local Plan Policy D2 sets out that LBC will preserve and enhance Camden’s heritage assets and will not permit the loss of or harm to a designated heritage asset including conservation areas unless it can be demonstrated that the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss.
- 6.26 A Townscape, Heritage and Visual Impact Assessment (‘THVIA’) has been prepared by Montagu Evans and accompanies the planning application submission.
- 6.27 The impacts of the proposed development, from a Townscape perspective have been assessed in full in the accompanying report prepared by Montagu Evans. The report concludes that the proposed development is of a high architectural quality with positive impacts upon many views

Landscaping

- 6.28 As noted, Policy D1 parts (j) and (k) require developments to respond to natural features and to incorporate high quality landscape design and maximise opportunities for greening, for example through planting of trees and other soft landscaping. Policy A2 also seeks to secure new and enhanced open space and Policy A3 seeks to protect and secure additional trees and vegetation.
- 6.29 A series of private gardens and planted spaces within the building. These include a third-floor seating terrace, a rooftop podium garden and a series planted balconies at multiple

levels. The Proposed Development also comprises greening to the building facade and balconies.

6.30 In association with the Proposed Development there is also a desire to enhance the public realm along Royal College Street. These proposed improvements include:

- Repaving works to the area of street adjacent to the site; and
- Planting of additional street trees along Royal College Street.

6.31 It should be noted that the proposed public realm enhancements set out above are shown, for illustrative purposes, within the application submission material. Planning permission is, however, not sought for these works as they fall outside of the planning application boundary. It is envisaged that, should planning permission be granted for the Proposed Development then there would be a S106 Legal Obligation for the Applicant to progress the design and delivery of these public realm enhancement works accordingly.

6.32 The proposed development, in respect of landscaping, therefore complies with relevant planning policy and guidance accordingly.

Trees

6.33 An Arboricultural Impact Assessment and an Arboricultural Method Statement, prepared by Challice Consulting Ltd, accompany the Planning Application submission. The reports set out that a tree to the rear of the Site ('T1') and a street tree to the front of the Site ('T2') are proposed to be removed. The two trees proposed to be removed are Category C trees (i.e. trees of low quality and value). Street Tree 'T3' to the front of the Site is a Category B tree (tree of moderate quality and value) and is proposed to be retained. The accompanying documents prepared by Challice Consultancy Ltd set out the proposed and requisite tree protection measures in respect of this retained tree accordingly.

6.34 As set out above, there is a desire to deliver public realm enhancements including the planting of additional street trees to Royal College Street. It is considered that the planting of an additional number of street trees would suitably mitigate the removal of the two low quality trees and would represent an enhancement by comparison to the existing situation.

6.35 The proposed development, in respect of trees and landscaping, therefore complies with relevant planning policy and guidance accordingly.

Access

6.36 Local Plan Policy C6 sets out that LBC will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities and CPG6 (Amenity) sets out that LBC will seek to ensure the highest standards of access and inclusion in Camden's built environment and public realm.

6.37 The accompanying Design and Access Statement, prepared by Ian Chalk Architects, sets out the numerous measures to ensure the development is accessible and inclusive. As

such, the proposed development is in accordance with the relevant planning policy and guidance accordingly.

Transport

Transport Assessment

- 6.38 Local Plan Policy A1 sets out that LBC will seek to protect the quality of life of occupiers and neighbours and will consider transport impacts of developments.
- 6.39 Policy A1 (h) and (i) requires the Council to consider the transport impacts of development through the use of Transport Assessments.
- 6.40 A Transport Assessment which models and assesses trip rates for all elements of the existing use and the proposed development has been prepared by Curtins and accompanies the planning application submission accordingly.
- 6.41 The Transport Assessment concludes that the proposed development proposals will result in a significant decrease in vehicular trips by comparison to the existing use. The proposed development will, therefore, result in a positive impact on the surrounding highway network and for pedestrians or cyclists travelling along Royal College Street and is considered to comply with the relevant planning policy and guidance accordingly.

Car Parking

- 6.42 Local Plan Policy T2 sets out that LBC will limit the availability of parking and require all new developments in the borough to be car-free (with the exception of spaces designated for disabled people where necessary and / or parking spaces required for essential operational or servicing needs).
- 6.43 In this instance the proposed development is car free with the exception of one disabled parking space located on site (within the ground floor servicing yard for use by staff of the Proposed Development). The proposed development, in respect of car parking provision, therefore complies with relevant planning policy and guidance accordingly.
- 6.44 It should also be noted that there is an aspiration from the proposed tenant to deliver, in due course, an additional new on-street disabled bay in addition to the one bay being provided on-site. Discussions with LBC on the location of this bay are ongoing. This additional on-street bay is not fundamental to the proposed use of the Site. Any on-street bay would fall outside of the planning application boundary and does not form part of the planning application proposals.

Deliveries and Servicing

- 6.45 Local Plan Para. 6.9 states that *“To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever possible”*.

6.46 It is proposed that deliveries and servicing will take place within the Site boundaries, as set out within the accompanying Delivery and Servicing Plan, prepared by Curtins.

6.47 The proposed development, in respect of deliveries and servicing, therefore complies with relevant planning policy and guidance accordingly.

Cycle Parking

6.48 Local Plan Policy T1 sets out that LBC will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan.

6.49 The London plan requires 1 long stay cycle space to be provided per 5 Full Time Equivalent (FTE) members of staff and one short stay space per 30 FTE members of staff. It is anticipated that up to 298 members of staff will be on site at one time. This equates to 60 long and ten short stay cycle spaces.

6.50 As set out in the accompanying Transport Assessment, prepared by Curtins, 70 cycle parking spaces are to be provided which complies with the relevant policy accordingly. 12 of the proposed spaces will be located within a storage room in the basement, accessed from an appropriately sized lift. 52 cycle parking spaces will be located in a cycle store within the demise of the building (including the 10 short stay spaces), which will be accessed via a segregated access point to the servicing yard. In addition, three Sheffield stands will be located within the servicing yard, accommodating up to six cycles and potentially larger, accessible and cargo cycles.

6.51 The cycle parking provision exceeds the minimum requirement set out in the London Plan and, therefore, the proposed development, in respect of deliveries and servicing, therefore complies with relevant planning policy and guidance accordingly.

Energy and Carbon Reduction

6.52 London Plan Policy SI 2 sets out an energy hierarchy (Be lean, Be clean, Be green, Be seen) within which development proposals should seek to minimise carbon dioxide emissions. Policy SI 2 sets out that major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. Furthermore, a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on site, any shortfall should be provided, in agreement with the borough, either:

- 1) Through a cash in lieu contribution to the borough's carbon offset fund, or
- 2) Off-site provided that an alternative proposal is identified and delivery is certain.

6.53 LBC Local Plan Policy CC1 sets out that LBC will require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable. LBC will require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met.

6.54 As set out in the accompanying Energy Strategy Report, prepared by BDP, the proposed development will achieve, in respect of carbon, a reduction of at least 35 per cent beyond Building Regulations. A carbon off-setting payment, in accordance with the London Policy will also be payable and will be secured under a S106 Legal Agreement.

Sustainability

6.55 LBC Local Plan Policy CC2 sets out a non-domestic development of 500 sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new development from 2019.

6.56 As set out in the accompanying Sustainability Report, prepared by BDP, the proposed development has been designed to meet BREEAM Excellent accordingly and the proposed development is, therefore, policy compliant in this respect.

Overheating / Cooling

6.57 London Plan Policy sets out that major development proposals should reduce the potential for internal overheating and reliance on air conditioning. This sentiment is echoed in the LBC pre-application response letter that states that *“Policy CC2 of the Local Plan discourages comfort cooling and CPG Energy Efficiency and Adaptation notes that air-conditioning will only be permitted where thermal modelling demonstrates a clear need for it after all preferred measures are incorporated in line with the London Plan cooling hierarchy”*.

6.58 The accompanying Energy Statement, prepared by BDP, sets out, as summarised in Table 2 below, the measures that have been taken to minimise overheating:

	Cooling hierarchy	Response
1.	Minimise internal heat generation through energy efficient design	Highly insulated hot water pipework to minimise heat gain through hot water distribution.
2.	Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls	<ul style="list-style-type: none"> • Solar control glazing. Work has been done to define the amount of fritted glass needed to prevent overheating and avoid the usage of cooling in patients’ bedrooms. • Deep horizontal projecting planters and potting sheds to create an overhang across ward bedrooms and dayrooms • Metal mesh panel acting as a solar screen
3.	Manage the heat within the building through exposed internal thermal mass and high ceilings	<p>Thermal mass will be provided from walls, floors and ceiling.</p> <p>A balance between exposed thermal mass and acoustic requirements will be sought</p>
4.	Passive ventilation	Due to noise pollution openable windows cannot be provided
5.	Mechanical ventilation	Mechanical ventilation with heat recovery is provided in most spaces of the building
6.	Active cooling systems (ensuring they are the lowest carbon options).	High performance ASHP/Chiller is provided for the offices, meeting rooms, nursing stations, dayrooms and pavilions in order to meet the cooling loads

Table 2

- 6.59 The measures set out above have greatly reduced the risk of overheating across the site. Unfortunately, there remains a small part of the Site (the day rooms and communications rooms) that does still require mechanical cooling as the scheme is currently presented. It was explained during pre-application discussions that in order to prevent overheating in this small part of the site without mechanical cooling then the glazing to these areas would need to be significantly reduced in size. It was agreed that this would not be practical as this would result in a significant reduction in daylight penetration to these spaces and also inhibit views out, impacting on the mental wellbeing and recovery time of patients. Further shading measures, including the projecting planting shelves and vertical planting trellises have been added to further reduce solar gain.
- 6.60 In summary, the proposed arrangement (minimal mechanical cooling to a small part of the site) is as efficient and sustainable as possible given the specific circumstances of the Site and the nature of the tenant. As such, it is considered that, in respect of overheating / mechanical cooling, the proposed development complies with relevant planning policy and guidance accordingly.

Impact on Amenity

Visual Privacy / Outlook

- 6.61 Local Plan Policy A1 sets out that in seeking to protect the quality of life of occupiers and neighbours, LBC will consider visual privacy and outlook in the design of developments.
- 6.62 As set out in the accompanying Design and Access Statement, prepared by Ian Chalk Architects, there are a number of measures that help manage privacy. These include the angled bays that direct views northwards, the frit pattern to the lower and upper portions of all the windows (partly provided to reduce solar gain) and the external grilles to opening windows (again this is partly to reduce solar gain and provide safety).
- 6.63 The topic of overlooking was considered, during pre-application discussions with LBC officers. The LBC pre-application response concludes that “On balance, it is not considered that the level of overlooking from the windows in the new building towards nearby residential properties would be unduly harmful”.
- 6.64 Given the carefully considered design, and the conclusions reached during pre-application discussions, it is, therefore, considered that the proposed development, in respect of visual privacy / outlook complies with relevant planning policy and guidance accordingly.

Light Spill

- 6.65 The written pre-application advice letter sets out that details of external lighting for the building should be provided with the formal planning application. It is also important that the rooftop pavilions do not cause harm to neighbouring residential amenity as a result of lightspill in the evenings. The design of the lighting for the ambulance drop-off area should also be carefully designed so as to limit the impact on neighbouring properties.

- 6.66 The design of the lighting has been carefully considered as set out in the accompanying DAS prepared by Ian Chalk Architects. It is considered, as demonstrated in this DAS, that the proposed development (and associated lighting) can perform suitably without causing harm to neighbouring residential amenity.

Daylight / Sunlight

- 6.67 LBC Local Plan Para 6.5 sets out that to assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will consider the most recent guidance published by the Building Research Establishment.
- 6.68 A detailed Daylight and Sunlight Report, prepared by Point 2 Surveyors, has been prepared and accompanies the planning application submission accordingly. The Report assesses how the Proposed Development affects the daylight and sunlight amenity to residential properties surrounding the Site. The full schedule of properties that have been assessed is set out at Paragraph 7.1 of the accompanying Daylight and Sunlight Report.
- 6.69 The Report concludes that, overall, the proposed scheme has been designed well to best address daylight and sunlight to surrounding properties and considered wholly acceptable, from a daylight and sunlight perspective, in the context of the Site.
- 6.70 The proposed development, in respect of noise, therefore complies with relevant planning policy and guidance accordingly.

Noise

- 6.71 Local Plan Policy A4 sets out that the Council will seek to ensure that noise and vibration is controlled and managed. The policy sets out that LBC will not grant planning permission for developments likely to generate unacceptable noise and vibration impacts.
- 6.72 Local Plan Policy A4 also sets out that the LBC will not grant planning permission for noise sensitive uses to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided. Similarly, London Plan Policy D13 (Agent of Change) places “the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development”. Policy D13 proceeds to state that “Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them”.
- 6.73 A Noise Impact Assessment, prepared by Syntegra Consulting supports the planning application submission.
- 6.74 The report sets out that the only noise generation from the proposed development is that of the plant equipment. Whilst the exact plant is not yet known, the report sets out target noise target (10db below background noise levels, to which the plant should comply). The intention is to comply with these target levels and it is envisaged that an appropriately worded planning condition would control this. The report concludes that providing plant complies with the target noise criteria then the proposed development would have no

adverse impacts on any existing or future noise sensitive receptors in the vicinity of the site.

- 6.75 In respect of internal noise levels within the proposed development, and the Agent of Change Principle, it should be noted that, through careful consideration of the building envelope (façade build up, glazing and ventilation) the proposed development should avoid future occupants being exposed to harmful levels of noise from either existing or proposed uses in the vicinity of the Site (or from noise generated from proposed plant equipment within the Site).
- 6.76 The proposed development, in respect of noise, therefore complies with relevant planning policy and guidance accordingly.

7.0 DRAFT HEADS OF TERMS*Planning Obligations*

7.1 CPG 'Developer Contributions' (2019) has been considered as part of this application and will be used in considering any obligations, to be secured by a S106 Legal Agreement. At this juncture, it is considered that the scope of requisite planning obligations is narrow and should only comprise the following draft set of the Heads of Terms are provided without prejudice below:

- Pedestrian, Cycling and Environmental ('PCE') improvements contribution;
- Delivery of public realm enhancements and replacement / additional street trees;
- Carbon offsetting payment in lieu.

8.0 CONCLUSIONS

8.1 This Planning Statement is submitted, on behalf of 'the Applicant' (Rocco Ventures Ltd) in support of an application for planning permission for the redevelopment of the Site.

8.2 In summary, the application seeks planning permission for the following proposed development:

Redevelopment of the existing site to provide a healthcare facility (Classes D1/C2) comprising Basement, Ground, plus Four storeys and Rooftop gardens, pavilions and plant enclosures.

8.3 The proposed development is a community health centre containing intermediate care wards. The tenant will be Central and North West London NHS Foundation Trust and the proposals will accommodate their identified need for re-housing existing local services in the immediate area.

8.4 The building's main purpose is as a stepdown healthcare facility - this is an intermediate level of care for patients that are transitioning out of acute care, but are not yet ready to return home.

8.5 This Planning Statement has assessed the Proposed Development against the provisions of the Development Plan, supplementary planning guidance and national planning policy. It is considered that overall, the proposals accord in all material respects with the relevant policies. Furthermore, it is considered that the proposed improvements deliver significant benefits as summarised below:

- Bringing a vacant site back into active use;
- Facilitates redevelopment of St Pancras Hospital (southern wing);
- Ensures that the relocated function from the St Pancras Hospital is retained within the London Borough of Camden;
- Building design creates an enhanced patient journey to recovery;
- Creates an enhanced street scene; and
- Provides a reduction in vehicular trips to and from the Site.

8.6 Given that the Proposed Development complies with the Development Plan, it is considered that the Proposed Development should be approved without delay.

APPENDIX 1

22nd January 2020

Kate Henry
Senior Planning Officer
Regeneration and Planning
London Borough of Camden
5 Pancras Square
London
N1C 4AG

Dear Kate

Further to our meeting in December please see below answers to the questions you had about the involvement of Central and North West London NHS Foundation Trust in the planning application for 70-86 Royal College Street.

How do the proposals relate to the redevelopment of the South Wing at St Pancras Hospital (e.g. are all the facilities proposed in the new building currently located in the South Wing? How much of the South Wing will be freed up if the proposals are allowed? How do the proposals relate to the wider redevelopment of St Pancras Hospital?).

The proposed site would accommodate all services currently located within South Wing, therefore releasing South Wing back to Camden and Islington NHS Foundation Trust for consideration as part of their planning. This would therefore release the dependency of having occupants within South Wing and the impact this has on the wider Camden and Islington NHS Foundation Trust Programme.

At what stage are the discussions with the NHS/CCG?

A review of the options has been undertaken in partnership with the STP's and CCG's, which established that this site should be pursued.

What other sites were considered and why were they discounted?

A range of alternative options have been considered including remaining on site, other NHS sites including the Whittington, as well as Local Authority spaces / sites. None provided the amount of space or location required.

Please provide information about who the proposed facilities will serve (e.g. Camden residents?) and whether this differs from the existing situation.

This is as per the existing with rehabilitation beds which are at least 90% occupied and form a key part of the North London Partners (formerly NCL STP) Discharge to Assess pathway. The site also delivers community-based rehabilitation services. Both CCGs are committed to the principle of Intermediate Care taking place as close to home as possible, and are actively reviewing capacity, demand and operating models. Although not an acute site, there are consultant rotations across Royal Free and UCLH and the Specialist Registrars and FY2s are part of the UCL Care of the Elderly training programme therefore any future option must maintain close proximity with both Acute Hospitals. St Pancras Intermediate Care wards is part of a pathway from 3 major acute sites within the local geography (UCLH, Royal Free and Whittington) and also regularly admits patients from St Marys and Chelsea and Westminster. Proximity to each site is important whilst the service maintains its identity as community provision. Also unique is the service operates at least 3 wards which gives an economy of scale allowing a richer skill mix and therefore patients who are more unwell.

If you require any additional information please do not hesitate to contact me.

Yours Sincerely



Jo Wilson
Director of Operations.