

29 April 2020

Head of Planning
London Borough of Camden
5 Pancras Square
c/o Town Hall
Judd Street
London
WC1H 9JE

Submitted Electronically via Planning Portal

Dear Sir / Madam,

**Covid-19 Works – Application for Time-Limited Planning Permission
Installation of Oxygen Tanks**

Royal Free Hospital, Pond Street, London, NW3 2QG

It is with pleasure that, on behalf of our client the Royal Free London NHS Foundation Trust, we submit to you this application for a time-limited planning permission.

Background

As you will be aware the United Kingdom is facing an unprecedented demand for healthcare services as a result of the Covid-19 (Coronavirus) pandemic and facilities such as the Royal Free Hospital and its staff are on the front line in responding to this.

When it became apparent that people in the UK might be affected by this illness, the Trust adapted facilities within the Hospital to provide sufficient capacity to deliver specialised care. Working together the NHS has thus far provided capacity in excess of that needed to accommodate patients.

As knowledge of the virus has developed over the past weeks it has become apparent that oxygen therapy can be a key part of the treatment of patients. However, the consequential demand for additional medical gas in these circumstances goes far beyond what is needed as a matter of course, even in a major facility such as the Royal Free Hospital. Consequently, the Royal Free Hospital made an application to NHS England for additional oxygen supply in order to provide further capacity and resilience for the treatment of patients.

This application has been successful and going forward, the North Central London ('NCL') plans for critical care surge capacity would see the Royal Free Hospital site playing a key role in the response to Covid-19, providing support to its partners across NCL and taking a disproportionate number of patients due to its expertise and ability to care for patients needing a wide range of therapies (e.g. renal replacement therapy).

Indeed, the Royal Free Hospital is one of the few sites in the country prioritised by NHS England/Improvement for works of this nature.

The Trust is therefore in the process of installing two additional oxygen tanks on site to provide this further capacity and resilience.

Appearance and Safety of the Tanks

The dimension of the tanks (or vessels) are set out on the attached document 'Datasheet LITS 3_Linde Gas Standard_10148759_Rev. 008'. The appearance of the tanks is shown on 'TD004_Vessel brochure_206255_0109'.

The location of the tanks has been selected having regard to the recommended safety distances provided by the supplier (shown on Document A-SE_TD052_3.0 (Safety distances for liquid oxygen storage, 2,000 to 20,000 litres net liquid capacity)).

The Need for Planning Permission

You will be aware that the Government has recently introduced temporary permitted development rights by way of The Town and Country Planning (General Permitted Development) (Coronavirus) (England) (Amendment) Order 2020 ('the Order'). These allow health service bodies (such as the Trust) to undertake certain types of development to respond to

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Covid-19 without having to seek express planning permission. Any such development may only remain in place until 31 December 2020.

Unfortunately the oxygen tanks that are needed at the Royal Free and their location do not meet the conditions set out in the Order, hence this application for planning permission. For example they will be more than "6 metres above ground where any part of the new building is within 10 metres of any boundary of the land" (see A.1. (d) (i) of <http://www.legislation.gov.uk/ukksi/2020/412/made>).

Given the urgency of the situation some works have already taken place, for example the preparation of an area for footings. We hope that you will understand that such works have been carried out simply because of the great urgency of this situation.

Because the oxygen tanks are needed for a specific purpose this application is for a time-limited consent. Nobody knows how long this situation will continue or whether there will be further 'waves' of illness. Consequently we are applying for permission for the same period as that granted by the Order, that is until 31 December 2020. If in due course it transpires that an enhanced oxygen supply is needed for a longer period the Trust will come back to the Council at the earliest opportunity to discuss this.

Key Planning Considerations / Planning Justification

The tanks would be installed on an area of incidental landscaping that is close to the western boundary of the site in the vicinity of what is known as the 'Rowland Hill Entrance'. In respect of the usual planning considerations that would be taken into account for proposals such as this we note that:

- no floorspace is created by the proposal;
- no trees would be affected by the installation of the tanks;
- it is intended that the land would be re-planted once the tanks are removed;
- there would be no loss of car parking; and
- the tanks would not create any noise or give off any odours.

In that context and as we see it, the sole issue would be the visibility of the tanks. However, this is not a 'sensitive' location (eg from a heritage point of view).

In terms of the principle of development, **Policy C1** (*Health and wellbeing*) of Camden's 2017 Local Plan supports the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements. The provision of these tanks is a direct response to both NHS England and NICE guidance for the treatment of Covid-19.

Application Submission

Given the scale of this proposal a Design and Access Statement is not needed. The planning justification is set out above.

We therefore enclose:

- the application form incorporating Certificate A;
- CIL additional information form;
- Drawing 20-1798-SL-001A (Site Location Plan);
- Drawing 20-1798-SL-002A (Site Layout);
- SC12201 Rev 2 Drawing (Bulk Oxygen System Layout);
- Document A-SE_TD052_3.0 (Safety distances for liquid oxygen storage, 2,000 to 20,000 litres net liquid capacity);
- Datasheet LITS 3_Linde Gas Standard_10148759_Rev. 008 (tank dimensions);
- TD004_Vessel brochure_206255_0109; and
- photographs of the location of the proposed tanks (attached to this letter).

[REDACTED]

We trust that this information is sufficient to enable you to determine this application and we hope that, given the circumstances, you will be able to positively determine this application as soon as you are able to do so.

Should you have any queries in relation to this matter please do not hesitate to contact Paul Burley at this office.

Yours faithfully,

[REDACTED]

Montagu Evans LLP