



256 Gray's Inn Road

A new centre for world-leading dementia and neurology research and academic excellence

Planning Statement Addendum
December 2020



University College London

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1 INTRODUCTION

- 1.1.1. Planning permission was granted in March 2020 under application ref. 2019/2879/P for the redevelopment of 256 Gray's Inn Road to provide a dementia and neurology research centre along with academic space for University College London (UCL). This Planning Statement Addendum has been prepared in connection with the planning application to amend the above permission to extend the basement of the new academic building, known as Plot 3.
- 1.1.2. The first phase of the approved development comprises the partial redevelopment of the former Royal Free Hospital (Plot 1) to deliver a world-leading medical research facility to tackle dementia and neurological diseases. Work on site is currently underway on Plot 1.
- 1.1.3. This planning application proposes small extensions to the basement of the Plot 1 building to allow for the provision of a sprinkler tank and additional plant. No further changes to Plots 1 and 2 are sought as part of this submission.
- 1.1.4. Subsequent phases of the approved development comprise the refurbishment of the Grade II listed Eastman Dental Clinic (referred to as Plot 2) and the erection of a new building on the site of the Levy Wing (referred to as Plot 3) to deliver additional academic space for UCL. This academic space will complement the University's vision for creating a world class environment for education and academic research. The proposed development would also deliver a comprehensive landscaping scheme to open up new publicly accessible spaces within the site, and new public connections across it.
- 1.1.5. This planning application relates to the proposal to extend the basement of the Plot 3 building underneath the public realm area in the centre of the site to provide two lecture theatres for the academic use. UCL has identified a requirement for larger lecture theatres than would be delivered in the approved scheme. It also reflects UCL's intention to bring the delivery of the Plot 3 basement works forward at the same time as the Plot 1 basement works to deliver the development in a more efficient and less disruptive way.
- 1.1.6. This report forms an addendum to the Planning Statement submitted with the original planning application (ref. 2019/2879/P). This addendum should be read in conjunction with the original report.

SUPPORTING DOCUMENTS

- 1.1.7. In support of this application, the following documents have been submitted to the London Borough of Camden. The application comprises:
 - Completed planning application form, prepared by WSP;
 - Completed Community Infrastructure Levy form, prepared by WSP;
 - Covering letter, prepared by WSP;
 - Planning Statement Addendum prepared by WSP;
 - Amended proposed drawings prepared by Hawkins\Brown;
 - Design and Access Statement Addendum prepared by Hawkins\Brown;
 - Heritage Statement Addendum prepared by Alan Baxter Limited;
 - Fire Strategy prepared by Buro Happold;
 - Sustainability Statement Rev 02, prepared by Expedition;

- Plot 3 Energy Statement Addendum, prepared by Hoare Lea;
- Draft Construction Management Plan Addendum, prepared by ISG;
- Transport Assessment Addendum, prepared by Momentum Transport Consultancy;
- Landscape Design Report Addendum, prepared by Plincke;
- Structural Strategy Statement Revision 1, prepared by Ramboll;
- Drainage Strategy Revision 1, prepared by Ramboll;
- Basement Impact Assessment Plots 1 and 3 (Rev 03) prepared by Ramboll;
- Flood Risk Assessment (Rev 07), prepared by Ramboll;
- Geotechnical Desk Study Plots 2 and 3 (Rev 06) prepared by Ramboll; and
- Environmental Impact Assessment Statement of Conformity prepared by Trium.

DOCUMENT STRUCTURE

1.1.8. This Statement is structured as follows:

- Section 2 - existing site and surroundings and planning history of the site;
- Section 3 - proposed development;
- Section 4 - planning policy context;
- Section 5 - community and stakeholder engagement;
- Section 6 - need for the basement extension;
- Section 7 - high quality design, landscaping and heritage;
- Section 8 – energy and sustainability;
- Section 9 – transport and accessibility
- Section 10 – residential amenity;
- Section 11 – environmental effects
- Section 12 – fire strategy;
- Section 13 – CIL and S106 contributions; and
- Section 14 – conclusions.

2 EXISTING SITE AND SURROUNDINGS

2.1 SITE DESCRIPTION AND CONTEXT

- 2.1.1. The application site at 256 Gray's Inn Road comprises a 1.207ha parcel of land bounded to the west by Gray's Inn Road, to the north by the Calthorpe Project and the New Calthorpe Estate, to the east by Langton Close, and to the south by Trinity Court and St Andrew's Gardens. There is no change to the site boundary for 2019/2879/P.
- 2.1.2. Demolition work has commenced as part of the implementation of planning permission 2019/2879/P.
- 2.1.3. There have been no other material changes in the site or its context.

2.2 PLANNING HISTORY

- 2.2.1. On 10 March 2020 full planning permission was granted for the partial redevelopment of the site including the former Royal Free Hospital (Plot 1), Eastman Dental Clinic (Plot 2), Levy Wing (Plot 3), Frances Gardner House and the Riddell Memorial Fountain to create a medical research, outpatient facility and academic (Use Class D1) floorspace (Ref: 2019/2879/P).
- 2.2.2. On 27 February 2020 Listed Building Consent was granted to enable the alterations to the listed Eastman Dental Clinic, demolition of structures at the Royal Free Hospital and Levy Wing plus relocation of the Riddell Memorial Fountain (Ref: 2019/2880/L).
- 2.2.3. A Section 73 application to planning permission 2019/2879/P was registered by the council on 23 October 2020. This application seeks amendments to Condition 2 (Approved Plans) to change the Plot 1 basement and ground floor plan. This application is awaiting determination (Ref: 2020/4919/P). The amendments proposed under application 2020/4919/P have also been included as part of the proposed amendments for this application.
- 2.2.4. A Non-Material Amendment application to planning permission 2019/2879/P was approved on 30 November 2020 to amend the description of development to remove reference to the floorspace figures and is awaiting a decision (Ref: 2020/4918/P).

3 PROPOSED DEVELOPMENT

- 3.1.1. The proposed minor amendments to Plot 1 comprise two small extensions to the basement – one at the rear to provide a sprinkler tank and one at the front beneath the Alexandra Wing. There are no changes proposed to Plot 1 above ground.
- 3.1.2. The proposed amendments Plot 3 include:
- The extension of the Plot 3 basement at both level B1 and level B2 to provide two lecture theatres - one 200 seat and one 400 seat
 - A net additional 852sqm GIA floorspace at basement level;
 - At second basement level (Level B2), a lobby is proposed which will act as a buffer and entry point to the front/base of the lecture theatres on this floor. Toilets are also provided to support the lecture theatre function in the vicinity of this lobby.
 - Additional plant and servicing equipment associated with the operation of the below ground lecture theatre spaces is proposed at Level B2 also.
 - The first basement level (Level B1) will continue to host many of the supporting functions for the facility including waste storage, plant rooms and general storage. Some of the cycle store currently at ground floor level will be relocated into this level to allow for an increase in an active frontage onto the central public space.
 - Cycle specific support facilities, including changing, lockers and showers will also be provided at Level B1 for Plot 3 occupiers only.

3.2 UPLIFT IN FLOORSPACE

- 3.2.1. The proposed development would result in an uplift of 852 sqm to Plot 3 and 252 sqm to Plot 1. The amended floorspace figures for the entire scheme are summarised in the table below.

	Existing (sqm)	To be demolished (sqm)	To be retained (sqm)	New proposed floorspace (sqm)	Total sqm (retained + proposed)
	GIA	GIA	GIA	GIA	GIA
Royal Free Hospital (Plot 1)	5,884	4,877	1,007	16,721	17,731
Eastman Dental Clinic (Plot 2)	4,704	54	4,650	160	4,810
Levy Wing (Plot 3)	5,990	5,990	0	8,081	8,081

Frances Gardner House	2,883	0	2,883	0	2,883
Totals	19,461	10,921	8,540	26,074	33,505

4 PLANNING POLICY CONTEXT

- 4.1.1. The planning policy context remains much the same as at the time of determination of planning permission 2019/2879/P, as set out in section 6 of the Planning Statement supporting the original application. The development plan for the purpose of the determination of the planning application remains as before:
- London Plan with minor alterations (2016);
 - Camden Local Plan (2017);
 - Policies Map (2017); and
 - Site Allocations Plan (2017);
- 4.1.2. The notable developments in planning policy context since the determination of planning permission 2019/2879/P have been:
- The draft replacement London Plan has progressed and carries more weight in the determination process. Examination hearings were held in 2019 and the Plan was submitted to the Secretary of State on 17 December 2019. On 13 March 2020 the Secretary of State wrote to the Mayor setting out his concerns of the Intend to Publish version of the Plan. On 24 April 2020 the Mayor responded to the Secretary of State. Adoption of the New London Plan anticipated in 2021.
 - There have been some changes to the National Planning Policy Framework and Planning Policy Guidance. These changes are not considered to be of particular relevance to the determination of this application.

5 COMMUNITY AND STAKEHOLDER ENGAGEMENT

- 5.1.1. UCL and its appointed contractor, ISG, have been liaising with local stakeholders through the Community Liaison Group, which was set up in connection with the delivery of the development. There have also been ongoing discussions with the Calthorpe Community Gardens and New Calthorpe Estate about specific aspects of the delivery of the development.
- 5.1.2. In advance of the submission of this application, a leaflet was issued to local residents and organisations to inform them of the proposed amendments to planning permission 2019/2879/P. The leaflet was sent to the members of the Community Liaison Group, and approximately 250 addresses within the vicinity of the site, including Calthorpe Community Gardens, New Calthorpe Estate, and properties within Wren Street, Langton Close, Pakenham Street, Cubitt Street, Ampton Street and parts of Grays Inn Road and Heathcote Street.
- 5.1.3. Engagement will continue through the Community Liaison Group.

6 NEED FOR BASEMENT EXTENSIONS

- 6.1.1. The proposed extensions to the Plot 1 basement are required to facilitate the Fire Strategy for the building and would accommodate a sprinkler tank and additional plant. These areas would not be generally accessible and would not affect the occupancy of the building.
- 6.1.2. The proposed extension to the Plot 3 basement would provide additional academic floorspace.
- 6.1.3. There has been no change to the relevant planning policy context, which is strongly supportive of the growth of higher education facilities, notably:
- London Plan Policy 3.18 (Education facilities);
 - London Plan Paragraph 3.107;
 - New London Plan Paragraph 4.17.1;
 - Local Plan Policy C2 (Community facilities); and
 - Local Plan Policy E1 (Economic development).
- 6.1.4. The need for additional academic floorspace for UCL was set out in the Academic Needs Report that supported the original application. This identifies that the number of students at UCL is projected to grow by 48% by 2034 with the number of staff projected to grow by 28% compared to 2017/18. The projected need is for between 30% to 42% growth in floorspace to 2034 equating to a need for 138,000 sqm to 196,500 sqm of additional academic floorspace.
- 6.1.5. The opportunities to use UCL's existing buildings and sites more efficiently has been assessed as part of their emerging estate strategy. These opportunities are constrained by the complexity and location of the estate, the majority of which is within and around Bloomsbury, and by the degree to which the existing floorspace is already intensively used – which goes beyond UCL's space standards. There is a planned pipeline of development projects which are anticipated to deliver some of the total projected additional academic floorspace, such as at UCL East in Stratford. However, there is still a significant shortfall against the projected need. Even with the planned pipeline of development projects and the opportunities to use the existing buildings more efficiently, there is a need to deliver an additional 138,000 sqm to 196,500 sqm of non-residential academic floorspace by 2034.
- 6.1.6. UCL has identified a need for larger lecture theatres than would be delivered with the 2019/2879/P permission. Due to the demand for the use of the lecture theatres within Plot 3 and the anticipated use of the lecture theatre/seminar space within Plot 1, it would not be feasible for students within the Plot 3 academic building to rely on regular use of the Plot 1 space.
- 6.1.7. The extension of the Plot 3 basement under the public realm would make efficient use of the site to provide additional academic floorspace, without increasing the massing of the buildings above ground.
- 6.1.8. Securing the larger lecture theatres required by UCL would assist in bringing forward this component of the development, and would contribute to the wider need for additional academic floorspace for UCL.

7 HIGH QUALITY DESIGN, LANDSCAPING & HERITAGE

- 7.1.1. High quality design and the need for it is advocated at all levels of planning policy. Adopted and emerging planning policy, including the London Plan and Camden Local Plan seek to ensure that high quality design is provided on all development sites in London. This is due, in part, from a desire to improve the character and quality of an area and the way it functions through design.
- 7.1.2. The proposals have been designed to a high quality with equal and inclusive access to the lecture theatres on both basement levels in mind. The general arrangement has also been amended to allow for a more active frontage within the Plot 3 ground floor which improves the relationship between this building and the central public space.
- 7.1.3. These revisions will improve the wing's connection with the central courtyard and in turn create a positive and active focal point. Further details are set out in the **Design and Access Addendum**, prepared by Hawkins\Brown.
- 7.1.4. In terms of landscaping, the quantum of proposed trees will be retained through adjusting their layout, realigning the revised tree pit geometry, and placing the trees along the centreline of the structures. Despite constructing a double basement under the trees, these will still grow and mature. Overall, the amendments to the landscape design are minimal and the same high quality of public realm will be delivered. Further details are set out in the **Landscape Statement**, prepared by Plincke. The updated landscaping proposals are also shown on the proposed plans.
- 7.1.5. The proposed amendments to Plot 1 and Plot 3 would not change the high quality design characteristic of the approved scheme and would maintain accordance with Camden Local Plan policies G1 and D1 as well as London Plan policies 7.4 and 7.6.
- 7.1.6. As demonstrated in the **Heritage Statement Addendum**, prepared by Alan Baxter, the amendments sought under this application will not cause any impact on the settings of nearby heritage assets and would have no impact on the less than substantial level of harm identified in the original Heritage Statement. The amendments would comply with paragraph 196 and 197 of the NPPF and paragraphs 7.41, 7.44 and policy D2 of the Camden Local Plan.

8 ENERGY & SUSTAINABILITY

ENERGY

- 8.1.1. The **Energy Statement Addendum** has been prepared by Hoare Lee, to provide a technical response to Stage 3 design changes and update the site wide energy strategy to take into consideration the extension to the Plot 3 basement.
- 8.1.2. The additional floorspace proposed would increase the energy demand from the development and the design team has strived to find improvements to the energy savings identified in the approved Energy Strategy.
- 8.1.3. The addendum document demonstrates that despite the increase in floorspace, it is possible to deliver a slight improvement on carbon emissions:
- As approved the Plot 3 building achieves a carbon reduction of 24.6% (SAP 10) and as proposed this would increase slightly to 24.7%.
 - At a site wide level the carbon emission reduction would improve slightly from 22.9% to 23% (SAP 2012) and 14.4% to 14.7% (SAP 10).
- 8.1.4. The addendum document demonstrates that the proposed amendments to the approved scheme would comply with policy 5.2 of the London Plan and policies CC1, CC2 of the Camden Local Plan.

SUSTAINABILITY

- 8.1.5. A **Sustainability Statement Addendum** has been prepared by Expedition in connection with the Plot 3 amendments.
- 8.1.6. Table 1 of the Addendum sets out the changes that have occurred to the Sustainability strategy as a result of the proposed changes. There would be no significant change to the sustainability of the scheme and there would be:
- Slight reduction to the Plot 3 PV area to 235sqm and annual electrical output;
 - Slight improvement to the Plot 3 and site wide Carbon Dioxide Savings;
 - Carbon offset figure updated to £123,400;
 - Small increase in the number of cycle parking spaces to 318 short stay and 371 long stay spaces; and
 - No change in BREEAM rating target (Excellent).
- 8.1.7. The development retains an exemplary sustainable approach to the design process and addresses local planning requirements. The proposals remain in accordance with policies CC1, CC2 and CC3 of the Camden Local Plan as well as policies 4A 1-4A.18 of the London Plan and emerging policies GG6, SI3 and SI7 of the Draft New London Plan.

9 TRANSPORT AND ACCESSIBILITY

- 9.1.1. A **Transport Assessment Addendum** (TAA) has been prepared by Momentum Transport Consultancy in connection with the planning application to amend the original permission to extend the basement of the new academic building, known as Plot 3 as well as the small extensions to Plot 1.
- 9.1.2. The Transport Assessment Addendum sets out the following:
- The updated proposals include the provision of 318 short stay and 371 long stay cycle parking spaces an (additional 8 short-stay and 6 long-stay spaces);
 - No additional delivery & servicing trips are forecast under the consolidation scheme;
 - No additional waste storage is required; and
 - The updated proposals are anticipated to produce negligible impacts on local highway, public transport and cycling infrastructure.
- 9.1.3. The proposed changes would comply with policies A1, T1, T3 and T4 of the Camden Local Plan and will have a minimal impact on the surrounding transport network whilst promoting and encouraging the use of sustainable modes of transport.
- 9.1.4. The proposed basement lecture theatres would be fully accessible and there would be no change in the accessibility or inclusivity of the site as a result of the proposed amendments. This complies with Policy 7.2 of the London Plan and Policy D2 of the Draft New London Plan.

10 RESIDENTIAL AMENITY

- 10.1.1. Camden Local Plan Policy A1 (Managing the impact of development) states that the council will seek to protect the quality of life of occupiers and neighbours and development proposals must not cause unacceptable harm to amenity. The factors considered include visual privacy, outlook; sunlight, daylight and overshadowing; artificial lighting levels; transport impacts; impacts of the construction phase; noise and vibration levels; odour, fumes and dust; microclimate; contaminated land; and impact upon water and wastewater infrastructure.
- 10.1.2. Furthermore, Policy A5 (Basements) requires basement developments to demonstrate that there will be no harm to the amenity of neighbouring properties.

CONSTRUCTION

- 10.1.3. Policy A1 of the Camden Local Plan refers to the use of construction management plans to manage the effects of the construction phase.
- 10.1.4. The original planning application was supported by a Draft Construction Management Plan prepared by a construction advisor. Following the appointment of ISG as the contractor for the delivery of Plot 1, a detailed Construction Management Plan has been agreed under obligation 4.5.3 of the s106 agreement attached to planning permission 2019/2879/P.
- 10.1.5. A **Draft Construction Management Plan (CMP) Addendum** has been prepared by ISG to set out how the proposed amendments to Plot 1 and 3 affect the detail and conclusions of the approved Construction Management Plan.
- 10.1.6. The Draft CMP Addendum sets out the following:
- Site construction durations are not impacted by this proposal to enlarge the basement space;
 - No changes are planned for the site operating hours, and will remain in line with the standard working hours for construction sites in Camden;
 - The main issues remain as per the original submission;
 - The additional works will not have a negative impact on vehicle movement, noise and vibration any greater than that estimated at submittal of the first CMP;
 - Sensitive/affected receptors will be given extra consideration throughout; and
 - It has been predicted that the noise readings will remain at the original CMP levels throughout the works as previously expected.
- 10.1.7. This concludes that the proposed amendments to the original scheme will have a minimal impact on the CMP with extra consideration being given to sensitive receptors.

CONTAMINATION

- 10.1.8. An updated Geotechnical Desk Study for Plots 2 and 3 has been prepared.

WATER AND WASTEWATER

- 10.1.9. Updated versions of the **Flood Risk Assessment (FRA)** and **Drainage Strategy Report** have been prepared by Ramboll UK Limited to consider the risks of various sources of flooding to the site and the consequent risk of flooding to downstream receptors from the proposed development as a result of surface water runoff.

- 10.1.10. The FRA addendum concludes that the small extensions to the basements at Plot 1 and 3 would not have any effect on flood risk.
- 10.1.11. The overall drainage strategy remains the same as the approved scheme and the proposed surface water discharge rate and attenuation methods are unchanged. However due to the extension of the Plot 3 basement into the courtyard the attenuation tank is required to be co-ordinated with the structural slab below.
- 10.1.12. Foul water flow rates have marginally increased due to the additional facilities in the basement extension and as such the foul water network has been adjusted to suit the proposals. The proposed extension has also resulted in the need to remove the manholes from the courtyard and route the drainage within the above ground network.
- 10.1.13. Both reports suggest that the amendments to the original scheme will cause minimal impacts from the conclusions of the FRA.

BASEMENT AND STRUCTURAL

- 10.1.14. A **Basement Impact Assessment (BIA) Addendum** has been prepared by Ramboll UK in to consider the impacts of the basement extensions at Plot 1 and 3.
- 10.1.15. The BIA concludes that based on the work undertaken it has been demonstrated that the impact of the basement construction on surrounding structures can be mitigated through design and construction methods and there would be no significant effect of the proposed extensions relating to subterranean groundwater flow, surface flow and flooding and slope stability. A ground movement assessment undertaken confirms that any damage to neighbouring assets can be limited to 'very slight'.
- 10.1.16. A **Structural Strategy Statement Addendum** has also been prepared by Ramboll UK to outline the structural methodology for the historic and listed buildings on the site, including the structural implications of the proposed works and the methodology for the protection of the historic fabric during the works.
- 10.1.17. The Structural Strategy Statement suggests that proposed amendments to the original scheme will have minimal structural impacts to nearby buildings.

11 ENVIRONMENTAL EFFECTS

- 11.1.1. As an EIA development, the original planning application was accompanied by an Environmental Statement, coordinated by Trium. Trium has prepared an **EIA Statement of Conformity letter** to accompany this amendment application. The proposed amendments have been reviewed in the context of noise and vibration, air quality and socio-economics. Archaeology and ground conditions have also been re-considered despite being scoped out of the original Environmental Statement.
- 11.1.2. This concludes that the proposed amendments will not make any material difference to the assessments and conclusions in the original Environmental Statement. They do not give rise to any materially different or additional likely significant environmental effects, both in the context of the development as a whole and cumulatively. Therefore, no further EIA work or the submission of further environmental information is required. The Environmental Statement remains valid and an appropriate EIA for the redevelopment proposed at 256 Gray's Inn Road.

12 FIRE STRATEGY

- 12.1.1. Draft Policy D11 (Fire safety) of the New London Plan requires all major development proposals should be submitted with a Fire Statement. A **Stage 3 Fire Strategy** has been prepared, which covers the requirements in Policy D11 (Fire safety) relating to construction, means of escape, safety features and access for fire personnel. A formal Fire Strategy will be prepared for approval through the Building Regulations process.

13 CIL AND S106 CONTRIBUTIONS

CIL

- 13.1.1. The CIL charging rates for health and education uses are zero for both MCIL2 and Camden CIL. This applies to all additional floorspace proposed so there would be no CIL payable in respect of the proposed development.

S106

- 13.1.2. A deed of variation to the s106 agreement will be required to bind the s106 agreement obligations to the new planning permission for the amended scheme. It is anticipated that the following details will need to be varied:
- Planning application references throughout;
 - Amend description at 2.40 to remove specific floorspace (amended under 2020/4918/P); and
 - Plans 2 and 3 showing basement levels

14 CONCLUSIONS

- 14.1.1. This Planning Statement Addendum has been prepared by WSP in connection with the proposed amendments to the development at 256 Gray's Inn Road comprising an extension to the Plot 3 basement to provide two lecture theatres at and small extensions to the Plot 1 basement to accommodate a sprinkler tank and additional plant.
- 14.1.2. The proposed extensions would make more efficient use of the site and would not compromise the high quality of design in the approved scheme in any way. The updated Design and Access Statement, Heritage Statement and Landscape Statement demonstrate that the proposals would still deliver high quality design and world class floorspace for UCL and aspects such as landscaping in the Plot 3 courtyard will be deliverable, whilst positively improving the active frontage on the ground floor of Plot 3.
- 14.1.3. The effects associated with the proposed basement extensions have been fully assessed, with the submission of updated documents, including the Basement Impact Assessment, Structural Statement and Drainage Strategy. The updated assessments do not identify any material adverse effects associated with the proposed extensions to the basements.
- 14.1.4. Where necessary, amendments have been made to respond to the additional floorspace being created, such as the provision of additional cycle parking, and looking for opportunities to increase the energy efficiency of the Plot 3 building to maintain and improve the overall level of carbon emissions reductions.
- 14.1.5. Overall, there are no material adverse impacts of the proposed amendments. The proposed development continues to accord with the development plan, and the material considerations weigh heavily in favour of granting planning permission.



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