

Royal National Throat, Nose and Ear Hospital Site

**in the London Borough of Camden
local planning authority reference: 2020/5593/P**

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Redevelopment of the site to provide a mixed use development in buildings ranging between 5 – 13 storeys in height plus basement levels comprising a new office building, a 182 bed hotel, 76 residential units with a shared private residential garden, a gymnasium, a café/restaurant space, creation of 2 new pedestrian routes, a publicly accessible open space, and associated development.

The applicant

The applicant is **330 Gray’s Inn Road Limited** and the architect is **AHMM**.

Strategic issues summary

Principle of development: The principle of the redevelopment of the site for an employment-led mixed used scheme including for residential purposes in the CAZ is supported. The Council should robustly secure the proposed affordable workspace (paragraphs 21 – 32).

Housing: 50% affordable housing by habitable room is proposed with a split of 37% Social Rent and 63% Intermediate Rent. As the tenure split does not meet Camden’s strategic target, further discussion is necessary to confirm if the scheme can follow the Fast Track Route, or whether it is subject to the Viability Tested Route. Appropriate review mechanisms and the affordability of the units must be secured (paragraphs 33 – 41).

Urban design and heritage: Camden’s Local Plan states that the entire borough is sensitive to tall buildings, and tall buildings must therefore be assessed against detailed design criteria. The applicant must demonstrate how the proposal complies with these criteria, and also the design criteria within Publication London Plan Policy D9. Notwithstanding this, the design and layout are broadly supported from a strategic perspective. Further work relating to public realm areas, active frontages and agent of change principles is required. There would be less than substantial harm to heritage assets. The public benefits in terms of affordable housing provision, affordable workspace and other public realm improvements could outweigh the harm caused, but the maximum amount of affordable housing must be agreed before this can be confirmed (paragraphs 42 – 67).

Transport: The strategic transport matters arising from this development could be compliant with the London Plan and the Mayor’s Publication London Plan, subject to further information on healthy streets, road safety audit, infrastructure improvements and mitigation measures. A Delivery and Servicing Plan and Construction Logistics Plan along with other obligations should be secured (paragraphs 68 – 83).

Sustainable development: Further information on energy, urban greening, drainage strategy, and circular economy strategy is required (paragraphs 84 – 97).

Recommendation

That Camden Council be advised that whilst the proposal is supported in principle, the application does not currently comply with the London Plan for the reasons set out in paragraph 103. Where the associated concerns within this report are addressed, the application may become acceptable in strategic planning terms.

Context

1. On 17 December 2020, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following categories of the Schedule to the Order 2008:
 - Category 1B: "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— (b) in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres."
 - Category 1C: "Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."
3. Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's website: www.london.gov.uk.

Site description

5. The 0.53-hectare application site is the former Royal National Throat, Nose and Ear Hospital (RNTNEH), located in the London Borough of Camden and close to the border with the London Borough of Islington. The site is within the Central Activities Zone (CAZ). The site is also allocated within the Draft Site Allocations Camden Local Plan (2020) for a mixed-use development including offices, housing and other uses.
6. The site is located within the Knowledge Quarter, which spans from Camden Town to Holborn and Covent Garden and is home to a world-class cluster of scientific and knowledge-based institutions and companies that specialise in areas such as life sciences, data and technology and creative industries.
7. The site is bound to the west by Gray's Inn Road, by Swinton Street to the south, Wicklow Street and Britannia Street to the north and underground railway cuttings to the east. The site is immediately adjoined by Swinton House (Point A Hotel) to the south and west, the Water Rats public house to the west on Gray's Inn Road, and to the north by UCL Ear Institute.
8. The site sits within the King's Cross St. Pancras Conservation Area (Sub Area 4) with the boundary to the Bloomsbury Conservation Area running along Swinton Street to the south. The King's Cross St. Pancras Conservation Area identifies 330 Gray's Inn Road, the Nurses' Home and the ground floor of the buildings at the rear to the RNTNEH (Wicklow Street) as 'positive contributors' to the conservation area.
9. Grade II listed former School of St Jude's Church is located to the north of the site at the junction of Britannia Street and Wicklow Street. There are a number of other Grade II listed buildings located along Swinton Street, including 51 and 53 Swinton

Street, 55-67 Swinton Street and attached railings, including the Former King's Head Public House (Numbers 61-63), 35-49 Swinton Street, 29, 31 and 33 Swinton Street with attached railings. There also other heritage assets within the wider proximity of the site.

10. The site is over-sailed by the London View Management Framework (LVMF) London Panorama 2A.1 from the summit of Parliament Hill towards St Paul's Cathedral and the LVMF 3A.1 from Kenwood Gazebo towards St Paul's Cathedral.
11. The site comprises of a series of buildings and the overall character of the immediate area is mixed in nature comprising of a mix of commercial, residential and hotel uses. With regards to townscape the built context includes a mix of former historic industrial warehouse buildings and some modern developments. The site falls within the Kings Cross and Caledonian Road Air Quality Focus Area.
12. All streets around the site are one-way clockwise and Swinton Street and the A501 Gray's Inn Road are part of the Transport for London Road Network (TLRN) Inner Ring Road. Five bus routes run along Gray's Inn Road which features a north-bound bus lane and stop opposite the site. The nearest southbound bus stop is 300 metres to the south-east on Kings Cross Road. There is a bus stand on Swinton Street across the road from the site. The closest London Underground (LU) station is King's Cross, located 256 metres to the north-west with rail services accessed some 50 metres – 150 metres further north from King's Cross railway station and St Pancras national/international station respectively. The majority of the site has a Public Transport Access Level (PTAL) of 6b (on a scale of 0 to 6b, where 6b is the highest). There are three existing cycle hire stations within easy walking distance, the nearest being some 100 metres south west on Cromer Street.

Details of this proposal

13. The proposed scheme seeks full planning permission for part demolition, part retention, part extension of existing buildings and redevelopment of the site as below:
 - Retention of 330 Gray's Inn Road, a two storey extension above and erection of two new buildings, one with a height of 13 storeys and the second with a height of eight storeys plus upper and lower ground floors for use as a hotel including a cafe, restaurant and a covered courtyard;
 - Erection of a 7 storey building plus upper and lower ground floors for office use including a public cafe;
 - Erection of a 5 storey building plus upper and lower ground floors for residential use (32 units – Block A);
 - Erection of a 10 storey building plus lower ground and basement floors for use as residential (44 units – Block B) and affordable workspace;
 - A public courtyard fronting Wicklow Street and two new public routes from Swinton Street and Gray's Inn Road connecting to Wicklow Street through the public courtyard;
 - Residential amenity garden, a gymnasium, new basement; rooftop and basement plant; servicing; cycle storage and facilities; refuse storage; landscaping and other ancillary and associated works.
14. A breakdown of existing and proposed uses is outlined in table 1 below:

Use	Existing floorspace GIA (sq.m.)	Proposed floorspace GIA (sq.m.)	Net change
Hospital (D1)	12,811	-	-12,811
Office (E)	-	13,275	+13,275
Affordable workspace (E)	-	748	+748
Gym (F2)	-	1,476	+1,476
Residential (76 units – C3)	-	8,187	+8,187
Hotel (182 rooms – C1)	-	9,427	+9,427
Total	12,811	33,113	+20,302

Table 1: Existing and proposed floorspace by land use

Case history

15. A pre-application meeting with GLA officers was held on 18 June 2020 (ref: GLA/4577a) for this site. The advice note stated that a mixed-used redevelopment scheme in this location could be supported, subject to the applicant demonstrating that the site has been optimised for residential use. The meeting covered strategic issues with respect to principle of development, affordable housing, heritage, strategic views and urban design and transport. Matters relating to energy, flooding and sustainable drainage, urban greening and the circular economy were addressed in the issued advice note.

Strategic planning issues and relevant policies and guidance

16. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Camden Local Plan (2017) and, the 2016 London Plan (Consolidated with Alterations since 2011).
17. The Report of the Examination in Public of the draft London Plan was published in October 2019, and the Intend to Publish London Plan version (December 2019) was subsequently submitted to the Secretary of State. On 13 March and 10 December 2020 the Secretary of State issued the Mayor with directions under Section 337 of the Greater London Authority Act 1999.
18. On 21 December 2020 the Mayor submitted to the Secretary of State his Publication London Plan with amendments designed to address these directions. This is the most up to date version of the Mayor's London Plan and should be taken into account as a material consideration on the basis described in the NPPF.
19. The following are also relevant material considerations:
- The National Planning Policy Framework;
 - National Planning Practice Guidance;
 - Draft Camden Site Allocations Local Plan (February 2020);
 - Letter from the Secretary of State to the Mayor of London dated 29 January 2021 formally confirming that the version of the London Plan that was sent to him on 21 December 2020 contains the modifications necessary to conform with all the previously issued directions under section 337 of the GLA Act 1999.

20. The relevant issues and corresponding policies are as follows:

- Good Growth *London Plan; Mayor's Publication London Plan;*
- World City role *London Plan; Mayor's Publication London Plan;*
- Economic development *London Plan; Mayor's Publication London Plan;*
- Central Activities Zone *London Plan; Mayor's Publication London Plan;*
Central Activities Zone SPG;
- Visitor infrastructure *London Plan; Mayor's Publication London Plan;*
- Social infrastructure *London Plan; Mayor's Publication London Plan;*
Social Infrastructure SPG;
- Housing *London Plan; Mayor's Publication London Plan;*
Housing SPG; the Mayor's Housing Strategy; Play and
Informal Recreation SPG; Character and Context SPG;
- Affordable housing *London Plan; Mayor's Publication London Plan;*
Affordable Housing and Viability SPG;
- Urban design *London Plan; Mayor's Publication London Plan;*
Character and Context SPG; Housing SPG;
- Strategic views *London Plan; Mayor's Publication London Plan;*
London View Management Framework SPG;
- Heritage *London Plan; Mayor's Publication London Plan;*
- Inclusive access *London Plan; Mayor's Publication London Plan;*
Accessible London: achieving an inclusive environment
SPG;
- Sustainable development *London Plan; Mayor's Publication London Plan;*
Sustainable Design and Construction SPG; Mayor's
Environment Strategy;
- Transport *London Plan; Mayor's Publication London Plan; the*
Mayor's Transport Strategy;
- Air quality *London Plan; the Mayor's Environment Strategy;*
Control of dust and emissions during construction and
demolition SPG.

Principle of development

Social infrastructure

21. The application site was formerly occupied by the RNTNEH. In October 2019 University College London Hospitals opened a new hospital in Huntley Street to house the RNTNEH and the Eastman Dental Hospital. The former hospital closed in September 2020 and all services were transferred to the new Royal National ENT and Eastman Dental Hospitals on Huntley Street.
22. London Plan Policy 3.16 seeks to protect and enhance social infrastructure provision, including health facilities and resists proposals which would result in the loss of social infrastructure in areas of defined need for that type of facility without realistic proposals for re-provision. Policy S1 of the Publication London Plan also protects social infrastructure on this basis, or unless the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services. Policy S2 of the Publication London Plan builds upon Policy S1 and specifically relates to health and social care facilities; requiring boroughs to identify and address local health and social care needs within their Development

Plans in consultation with Clinical Commissioning Groups and other NHS and community organisations, through regular assessment. The policy provides support for the provision of high-quality new and enhanced facilities to meet an identified need. The supporting text recognises that regeneration proposals provide an opportunity to reconsider the optimal use of sites and that hospital reconfigurations are examples of where more intensive and better use of a site can lead to improved facilities or the release of surplus land to meet other priorities.

23. GLA officers understand that the application site is surplus land which has been purchased by the applicant due to the relocation of RNTNEH to a new facility at Huntley Street. The re-provision of the current social infrastructure in new, modern, fit for purpose facilities in the local area, as part of a wider public service transformation plan, has released the site to enable the delivery of new homes, including affordable housing, which will contribute towards meeting London's strategic housing need. Therefore, in this instance, the loss of the social infrastructure is accepted, and the proposal satisfactorily addresses the requirements of London Plan Policy 3.16 and Policies S1 and S2 of the Publication London Plan.

Central Activity Zone (CAZ) and optimising housing delivery

24. London Plan Policies 2.10 and 2.11 and Policies SD4 and SD5 of the Publication London Plan supports growth of office floorspace and other uses including civic, community, social and residential uses within the CAZ. London Plan Policy 4.5 and Policy E10 of the Publication London Plan seek to support the visitor economy as well as the needs of businesses and leisure visitors to the capital and highlight a strategic demand for new serviced accommodation in London.
25. London Plan Policy 4.2 and Policy E1 of the Publication London Plan support the provision of new and refurbished office space and mixed-use development which would improve the quality, flexibility, and adaptability of London's office stock. These policies specifically seek to increase office supply within the CAZ to accommodate the projected additional demand for 3.5 million sqm of floorspace between 2016 and 2041 identified in Table 6.1 of Policy E1.
26. The Mayors Affordable Housing and Viability SPG and Policy H1 of the Publication London Plan seek to optimise the potential for housing delivery on surplus public sector owned sites.
27. The site is allocated (Policy IDS15 – 330 Gray's Inn Road) within the Draft Site Allocations Camden Local Plan (2020) for a mixed-used development to include offices and other uses related to the knowledge and innovation economy, and permanent self-contained homes (indicative capacity of 130 homes).
28. The redevelopment of this surplus NHS site for a mixed-use development to include office use, a hotel, residential units and public amenity space responds positively to the Mayor's Publication London Plan policies in support of the strategic functions of the CAZ to increase employment capacity. The proposal would optimise the development potential of the site in an area well connected to public transport and is strongly supported in principle.

Affordable and SME workspace

29. Policy E2 of the Publication London Plan seeks to ensure that development proposals for a larger quantum of B Use Class floorspace consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small,

and medium sized enterprises, and that these proposals deliver office space that is fit for purpose. Policy E3 of the Publication London Plan supports provision of affordable workspace at rents maintained below the market rate for that space.

30. Given the site’s location within the Knowledge Quarter, two floors within the main office building have been designed to provide lab enabled space to accommodate the needs of a life science company. The provision equates to roughly 21% of the overall floorspace of the proposed office. The proposal also includes 748 sq.m. (GIA) of affordable workspace, which is 5% of the total proposed office space. In addition, the proposed office space is designed to be used by single and/or multiple tenants, which provides some flexibility for the proposed office to be used by small and medium sized enterprises.
31. The provision of 5% affordable workspace is welcomed, however, given the site’s location within the Knowledge Quarter and the capacity of office floorspace the applicant is encouraged to improve the quantum of affordable workspace and engage further with the Council to address any local affordable workspace requirements. In addition, the applicant should clarify affordability of the proposed lab enabled space and further set out its strategy for providing permanent workspace that would be suitable for start-up and SMEs. The applicant should agree the rent levels with the Council and this provision should be secured in line with Policy E3 of the Publication London Plan.

Principle of development – conclusion

32. In summary, the principle of the proposed employment-led mixed use redevelopment within the CAZ, comprising a significant quantitative increase and qualitative enhancement to the existing office and commercial floorspace, including new public routes, as well as residential use is strongly supported.

Housing

33. The scheme would provide 76 residential units. The residential floorspace will be provided in two blocks, A and B. Block A will be delivered as 100% affordable housing. The proposed unit mix is outlined in Table 2 below:

Tenure	Studio	1Bed	2Bed	3Bed	total units	total habitable rooms	% by unit	% by habitable room
Social Rent	-	-	1	6	7	34	42%	50%
Intermediate Rent	-	18	7	-	25	57		
Private	16	11	15	2	44	90	58%	50%
Total	16 (22%)	29 (36%)	23 (32%)	8 (10%)	76	181	100%	100%

Table 2: Proposed unit and tenure mix

Affordable housing

34. London Plan Policy 3.9 seeks to promote mixed and balanced communities by tenure and household income and Policy 3.12 seeks to secure the maximum reasonable amount of affordable housing. Policy H5 of the Publication London Plan

and the Mayor’s Affordable Housing and Viability SPG set a strategic target of 50% affordable housing, and a ‘threshold approach’ whereby schemes meeting or exceeding a specific threshold of affordable housing (in this case 50% on public sector land) by habitable room without public subsidy and which meets other criteria are not required to submit viability information to the GLA, nor would the application be subject to a late stage review mechanism.

35. Policy H6 of the Publication London Plan and the Mayor’s SPG sets out a preferred tenure split for market housing schemes of at least 30% low cost rent (social or affordable rent, significantly less than 80% of market rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority taking into account relevant Local Plan policy. Camden Council’s Local Plan (2017) also sets a strategic target of 50% affordable housing across the borough with a tenure split of 60% social rent and 40% intermediate product.
36. The applicant is proposing to provide 32 affordable units (91 habitable rooms), equating to 42% by unit or 50% by habitable room and comprising 7 Social Rent units and 25 Intermediate Rent units (a tenure split of 37:63 by habitable room). The overall affordable housing offer of 50% is supported as a starting point. On the basis that the development provides the minimum 30% element of low-cost rent, the scheme could be eligible to follow the Fast Track Route, however this would depend on the Council confirming that it can accept the proposed tenure split. Noting that the proposal does not meet Camden Council’s strategic target to achieve 60% social rent, further discussions with the Council and GLA are necessary to confirm whether the proposed tenure split is appropriate in this instance, based on identified need. If the scheme cannot follow the Fast Track Route, then the scheme will be subject to the Viability Tested Route, and the financial viability provided by the applicant will be robustly scrutinised by the GLA and the Council, and the scheme would be subject to early and late stage viability reviews.
37. The applicant is proposing to provide Social Rent units which is supported by the GLA. Confirmation is required that the affordable units would comply with the Mayor’s affordability definitions and criteria which should then be robustly secured in a Section 106 agreement. Further information on which Registered Provider(s) the applicant proposes to use to deliver the affordable housing should be provided prior to Stage 2.
38. The intermediate housing will be provided as intermediate rent. The applicant has provided the following affordability criteria for intermediate rent.

Unit Type	Weekly Rent	Annual Household Income
1B2P	£185	£34,475
2B3P	£215	£39,913
2B4P	£250	£46,589
2B4P	£323	£59,962 (c. £30K per room)

Table 3: Proposed affordability criteria

39. The proposed household income requirements for this product are within the Council and GLA requirements and will be accessible to households on income of between £30,000- £40,000 per annum. Accommodation for sharers will also be provided, with up to a £60,000 per annum income cap. This is welcomed. The applicant should note that for intermediate housing products to be considered

affordable, the combined rent and service charge should be no greater than 40% of net household income. In addition, intermediate rented products must, as a minimum, be affordable to households on incomes below £60,000 a year. These affordability requirements should be secured in any Section 106 agreement, in accordance with London Plan Policy 3.10, Policy H6 of the Mayor's Publication London Plan and the Mayor's Affordable Housing & Viability SPG.

Housing choice

40. London Plan Policy 3.8 and Policy H10 of the Mayor's Publication London Plan encourage a full range of housing choice. Policy H10 states that boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. The proposal includes a range of residential units as set out in Table 2 above. 32% of the units are two bedroom and 10% of the units are three bedrooms, while 19% of the total affordable units are three bedrooms. The proposal provides a range of units suitable for the location of the site. This is supported.

Children's play space

41. London Plan Policy 3.6 and Policy S4 of the Mayor's Publication London Plan seek to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child. The proposal would provide 190 sq.m. of dedicated play space for all ages on-site, based on the development's child yield in line with the requirements of the Shaping Neighbourhoods: Play and Informal Recreation SPG. This is welcomed. The Council should ensure that the play space would not be segregated by tenure and is accessible by all residents by way of securing a condition or appropriate planning obligations.

Urban design

42. Good design is central to all objectives of the London Plan and the Mayor's Publication London Plan. Policies contained within chapter seven of the London Plan, and chapter the of the Publication London Plan set out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

Site Layout

43. The scheme has evolved positively through pre-application advice and the design team have worked to address the key issues raised, including a clear approach to defining key pedestrian routes. The ground floor layout successfully integrates with the proposed courtyard on Wicklow Street. The inclusion of publicly accessible routes from Gray's Inn Road and Swinton Street strengthens the site's integration with pedestrian routes to the north and enhance permeability through the site which is strongly supported. Activity generated by the proposed gym and the presence of front doors to duplexes along Swinton Street will also enhance the quality of the public realm and add activity to this street.

44. The overall design, layout and landscaping of the proposed public space and residential courtyard within the site would be of a high quality; the visualisations and landscape strategy submitted by the applicant demonstrate that the scheme would provide a legible public space which would respond positively to the character and context of the surrounding area, whilst also providing enhanced permeability. Further clarity is required on the management of public access through the passageway and how the public spaces will function at night. The applicant is

encouraged to follow the principles and the best practice guidance set out in the Public London Charter.

45. The proposed improvements to Wicklow Street frontage are welcomed, however, the ground floor level of the proposed office building, affordable workspace and residential entrance lacks active frontages along this side of the site. The applicant is encouraged to further enhance active frontages along Wicklow Street.

Tall buildings, height, massing and architectural quality

46. London Plan policy 7.7 and Policy D9 of the Publication London Plan set out the criteria against which tall and large buildings should be assessed and establish support for the development of tall buildings where they create attractive landmarks enhancing London's character, and help to provide a catalyst for regeneration, where they are acceptable in terms of design and impact on their surroundings. Policy D9 paragraph B3 specifically states that tall buildings should only be developed in locations that are identified as suitable in development plans. The policy also states that tall buildings should be of exemplary architectural quality, reinforce the spatial hierarchy of the local and wider context, and aid legibility and wayfinding, avoiding harm to heritage assets. Camden's Local Plan Policy D1 outlines that all of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against a set of design criteria having regard to the context of the surrounding area, heritage assets and contribution to pedestrian permeability and improvements to public accessibility.
47. GLA officers note that whilst the heights of the new buildings are greater than those of the existing buildings in the immediate surroundings, the tallest element of the hotel building at 13 storeys would be set back from street level behind the existing retained building fronting Gray's Inn Road and would have a slender appearance. The 10 storeyed residential building would be positioned towards the eastern side adjacent to the railway tracks and would also have a slender appearance with a series of set backs. The proposed massing of the 7 storeyed office building and 5 storeyed residential building fronting Swinton Street would complete the street frontages and appropriately step down in scale to the lower-rise terraces to the east. Given the context of the surrounding area, which comprises substantially scaled buildings of varied heights, the height of proposed development could therefore be acceptable in this location, however, the applicant must demonstrate how the proposal complies with the criteria set out in Local Plan Policy and the design criteria set out in Policy D9 of Publication London Plan.
48. The architectural quality of the proposal would be of a high standard and the design has evolved following a detailed pre-application process of engagement and design review involving Camden Council. The materiality of the buildings has been well-considered in relation to its immediate and wider context. The articulation of each building is well-proportioned which responds positively to the immediate and wider townscape. The set backs at upper floors reduces the bulk of the buildings and maximises daylight and sunlight within the public spaces. The proposed materials compliment the historic context of the site and the surrounding area and adds dynamism to the architecture. GLA officers are of the view that the design and architectural quality of the proposed development is of high quality, which would integrate well within the surrounding development.

Fire safety

49. A fire statement has been submitted with the application. The fire statement provides information on means of escape, building materials, passive and active fire safety measures. The fire statement outlines that a fire evacuation lift would be provided in each building in accordance with Policy D5 of the Publication London Plan. These measures are welcomed; however, the applicant should provide an amended fire statement which sets out how the proposal meets the requirements of Policy D12 of the Publication London Plan, and provide details of location of the fire evacuation lifts as well as means of escape. The agreed fire statement should then be secured by condition.

Inclusive design

50. London Plan Policy 7.2 and Policy D3 of the Publication London Plan require that all new development achieves the highest standard of accessible and inclusive design. These policies seek to ensure that all new development can be used easily and with dignity by all.

51. Level access would be provided to all of the proposed residential, office and visitor floorspaces and facilities with lift access provided to all floors. Measures are proposed to mediate level changes across the site, suitably addressed by providing public lifts providing wheelchair access and to enable those with mobility issues to move through the site in a safe and convenient manner.

52. The proposals provide 10% of the total number of residential units to meet the requirements for wheelchair user dwellings. For the hotel accommodation the proposal would provide 5% of the rooms as wheelchair accessible and a further 5% as wheelchair adaptable should a demand arise. Policy E10 of the Publication London Plan requires that 10% of rooms are delivered as fitted out wheelchair accessible units from the outset or that 15% of new bedrooms are accessible rooms in accordance with British Standard BS8300- 2:2018. The proposal would provide 5% of the rooms as wheelchair accessible rooms from the outset which would fall short of the target threshold of 10% of the units as accessible units. The applicant should further justify why all the identified rooms cannot be accessible from the outset, and how "demand" would be assessed and addressed in order to secure an increase in the future.

Residential Quality

53. London Plan Policy 3.5 and Policy D6 of the Publication London Plan promote quality in new housing provision, with further guidance provided in the Mayor's Housing SPG. The proposal includes two residential blocks. Block A comprises of all affordable housing and contains seven duplex units for affordable rent with front doors off Swinton Street. The bedrooms and bathrooms for the duplex units are located on the lower ground floor with a lightwell and rooflight to provide daylight into these habitable rooms. It is understood that the proposed layout of the duplex units has been designed in consultation with the Council to strike a balance between maximising daylight/sunlight for the residential courtyard as well as residential units. Whilst this is not an ideal layout, given the site constraints and level changes, this is accepted in this instance, however, the applicant should demonstrate that adequate evacuation measures have been incorporated in the design to address flood and fire risk. Gallery access has been designed for the upper level units to maximise dual aspect units. This is welcomed.

54. Block B comprises of all private units. All apartments larger than studios have dual or triple aspect. North facing single aspects have been avoided where possible with the exception of one single north facing studio apartment at first floor level. This unit would have an adequate internal floorspace with inset balcony and would have access to the shared residential courtyard.
55. The Council should further assess the application to ensure that the proposed residential units would comply with the minimum space standards and would receive acceptable daylight and sunlight. The Council should further ensure that the shared amenity space is accessible by all residents and not separated by tenure. This should be appropriately secured by condition or planning obligations.

Agent of change

56. The application site adjoins the Water Rats public house and UCL Ear Institute, which contains specialist research facilities. The application site is also adjacent to railway cuttings. In accordance with Policy D13 'Agent of Change' of the Publication London Plan, the Agent of Change principle places the responsibility on the proposed development for mitigating impacts on the existing noise generating and noise sensitive activities.
57. The applicant's submission has identified potential sources of noise, including plant noise, and noise from the highway and railway cuttings. The submission outlines that the built fabric and internal acoustic environment of the scheme has been provided with acoustically rated windows specified to achieve internal sound levels in line with British Standards (BS) 8233 and World Health Organisation guidance and standards. A solid wall screen for the residential courtyard has been incorporated within the design to shield against the railway cutting noise to provide residents quieter outdoor amenity space.
58. The majority of the balconies have been oriented to face the residential courtyard; however, it is noted that some private balconies would face the railway cuttings and/or be sensitive to noise from the adjacent highway. In addition, the proposed residential units are likely to experience elevated noise levels with open windows. The applicant should demonstrate whether any additional design features can be included to ensure that residential units can benefit from adequate noise levels with open windows.
59. In addition, the applicant should demonstrate how the proposal would be mitigated from noise generating activities at the UCL Ear Institute and the Water Rats public house, to allow this existing important research facility and live music venue to continue operations unabated by noise complaints from the occupiers of the proposed development. The Council should consider securing a noise management plan for long term management of the scheme to ensure that established uses around the site remain viable.

Strategic views

60. With respect to strategic views, London Plan Policies 7.11 and 7.12 and Policies HC3 and HC4 of the Publication London Plan identify strategically important views of St Paul's Cathedral and state that development should not harm and seek to make a positive contribution to the characteristics, composition and landmark elements of these views. The site falls within the LVMF London Panorama 2A.1 from the summit of Parliament Hill towards St Paul's Cathedral and within the LVMF 3A.1 from Kenwood Gazebo towards St Paul's Cathedral. The Townscape, Visual Impact and Built Heritage Assessment (TVIBH) submitted by the applicant outlines

that the height of the proposal does not breach the defined height threshold of +68.7m AOD and includes verified views, which demonstrate that the proposed development would be concealed from view by intervening development at King's Cross. GLA officers consider the proposals would not harm the characteristics and composition of these protected views or the ability to appreciate St Paul's Cathedral from these views.

Heritage

61. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should "*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*". In relation to conservation areas, special attention must be paid to "*the desirability of preserving or enhancing the character or appearance of that area*". If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties.
62. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Policy HC1 of the Publication London Plan, as well as London Plan Policy 7.8, state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
63. The submitted TVIBH considers the significance of the heritage assets and provides 25 verified views to demonstrate the impact of the development on the identified heritage assets. The existing buildings of the application site makes some positive contribution to the heritage significance of the King's Cross St Pancras Conservation Area (KCSPCA). In particular Swinton House, the Water Rats, and 330 Gray's Inn Road form an important and varied group of buildings, which are of architectural and historical interest within the KCSPCA. The proposed development seeks to preserve the historic 330 Gray's Inn Road building as a reference to the historic RNTNEH hospital. The restoration of its main frontage, removing obtrusive additions and sensitively refurbishing and extending the building, will enhance its contribution to the townscape as part of a group of positive contributors to the KCSPCA. Nevertheless, the loss of other existing positive contributors fronting

Wicklow Street and their replacement with modern development of greater scale would alter the contribution of the setting to the significance of the KCSPCA and would amount to harm. This harm is considered to be less than substantial.

64. The proposed development, in particular the hotel building, would be highly visible within the KCSPCA as well as in the background of a number of listed buildings, including Grade II listed School of St Jude's Church. Whilst due to an increase in height, the proposal would make a change to the visual setting of this conservation area, it would not obscure the visibility of any landmark or listed buildings in the conservation area or alter the ability to appreciate the character of townscape that demonstrate the significance, development and evolution of this conservation area. As such, due to the increased height of the buildings, a degree of less than substantial harm towards the lower end of the scale is therefore caused to the significance of the heritage assets by virtue of the visibility of the development within their settings.
65. With regards to impact on Bloomsbury Conservation Area and the listed buildings along Swinton Street, the office and residential building rises to a broadly similar height as Swinton House and continues the street frontage at a similar scale as that of the terraces and listed buildings opposite the site. The proposed development along this side of the site would be consistent with the existing character of the listed buildings and would improve the built quality of the existing site. As such, it is considered that the proposal would not cause harm to the significance and setting of Bloomsbury Conservation Area and the listed buildings contained within it. Furthermore, due to the separation distance which exists between the proposed development and wider heritage assets within the proximity of the site, the proposed development would be viewed in conjunction with the existing built form and intervening views of the proposed buildings would not harm the significance of wider heritage assets.
66. Having analysed the assessment contained in the TVIBHA and having had regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF in relation to heritage assets, GLA officers consider that the proposal would result in less than substantial harm to the KCSPCA.
67. In accordance with paragraph 196 of the NPPF, where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In carrying out this balance, in accordance with the statutory requirements, great weight and importance should be attached to harm to designated assets. The scheme includes some public benefits in terms of the delivery of high quality buildings and improved public realm, including provision of affordable housing. However, as noted above the affordable housing proposals do not currently meet strategic tenure split requirements and further discussions are necessary to determine whether the scheme provides the maximum level of affordable housing. Until this exercise is completed officers are unable to conclude on the public benefits arising from the scheme and therefore the balance of these benefits against the less than substantial harm. The applicant is encouraged to strengthen its public benefit offer, which could further include additional social rented accommodation, an increased level of affordable workspace and other local benefits such as local employment/apprenticeship schemes required by the Council.

Transport

Healthy Streets and vision zero

68. The Healthy Streets analysis and Active Travel Zone (ATZ) exercise submitted covers the appropriate key destinations and routes and acceptably describes how the proposed development delivers against key policy criteria of safe, convenient and attractive travel by non-car modes. These proposals to further improve permeability should be explored, including 24 hour access through the site. In addition to this carriageway changes and public realm improvements should be explored, and this should be discussed further with TfL.

Access and servicing

69. A newly aligned access to the site will be provided from Swinton Street. A satisfactory capacity and design to serve all commercial uses has been demonstrated as well as in respect of deliveries and refuse collection associated with residential uses.
70. A Servicing Management Plan should be secured by condition to manage impact on the TLRN. Furthermore, the Council is urged to exercise flexibility with the permitted servicing hours and considers that night-time activity should be acceptable in this central London location.
71. A Stage 1 Road Safety Audit (RSA) advises that waiting restrictions should be amended to manage the new access. This is acceptable in principle but will be subject to further design work and will be delivered through Traffic Order consultation.

Road space: future plans, network impact and mitigation

72. TfL is proposing to deliver improvements on the northern section of Gray's Inn Road in 2024 during Phases 2 or 3 of Kings Cross gyratory improvements. A 20mph speed limit, additional trees and widened footways, alongside improvements to bus priority will be included as part of improvements. Given the increased pedestrian demand from this development TfL requests a financial contribution to help timely delivery of this project, which should be discussed further with TfL.
73. In addition, it is considered that the redundant ambulance bays on Gray's Inn Road should be reallocated for pedestrians or to enhance bus/cycle facilities, rather than a taxi rank. This should be discussed further with TfL.

Parking

74. The proposal for a car-free development is strongly supported in this highly accessible location. Clarification is sought on the final number and location of the disabled persons car parking.
75. Proposed long stay cycle parking meets the minimum quantum in line with Policy T6 of the Publication London Plan, with 5-10% a mix of Sheffield stands, half-height stands and ground fixings to accommodate non-standard/adapted bikes and encourage inclusive cycling. Short stay cycle parking is provided in accordance with Policy T6 and positioned across the site near its entrances; these are supplemented by existing Sheffield stands located on Swinton Street (5 stands) and Gray's Inn Road (3 stands). This is welcomed. Detailed plans of the storage and a requirement

to maintain and retain cycle spaces for the life-time of the development should be secured by condition.

Trip generation/mode share

76. The largest mode increase is in walking, with an additional 1174 two-way pedestrians over the whole day. There is a net reduction in car passenger and taxi movements as part of the development proposals. The methodology and data appear robust.

Public transport

77. Given the large choice of bus routes locally and the proximity of King's Cross Station and other routes on Euston Road and recent contributions to capacity secured from other development, TfL does not seek any mitigation for additional bus trips.

78. Net underground trips for the proposed development have been assigned to the various Underground lines as requested, based on NUMBAT data obtained from TfL. The forecast of a net increase of approximately 114 two-way Underground trips during the AM peak and 116 during the PM peak is acceptable.

Infrastructure protection

79. As noted above, the site adjoins a London Underground (LU) cutting. Details of any load change / ground movement (GMA / Impact Assessment), foundations and any works that could be a risk adjacent to this open section of the railway must be discussed and agreed prior to determination with LU Infrastructure Protection directly.

80. As outlined in paragraph 58, further clarification is required in relation to agent of change principles of any open inset balconies fronting railway cutting in the Wicklow Street building and where buses operate on a 24-hour basis on Swinton Street and Gray's Inn Road

Construction logistics and travel plan

81. The framework Construction Logistics Plan (CLP) does not cover the greater level of detailing and programming required by TfL. Given the need to protect the operation of TLRN, bus and rail infrastructure further discussion with TfL is required. Developer funding/mitigation for the impacts will be sought through the Section 278 process in line with recent development.

82. The CLP should also seek to minimise the impact the development has on Cycle superhighway 6 which crosses Gray's Inn Road at Sidmouth Street to the south as well as other key pedestrian and cycle routes such as the planned segregated cycle route on Gray's Inn Road.

83. An acceptable framework Travel Plan for all land uses has been submitted. The applicant has expressed interest in funding limited cycle hire memberships for residents and/or office users to encourage cycling using the two nearby existing docking stations. This should be further clarified and secured appropriately in discussion with TfL.

Sustainable development

Energy strategy

84. Based on the information provided, the domestic element of the proposed development is estimated to achieve a reduction of 12.6 tonnes per annum (17%) and the non-domestic element of the proposed development is estimated to achieve a reduction of 62.1 tonnes per annum (10%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. The applicant should note that the London Plan includes a target of a minimum 15% improvement on 2013 Building Regulations from energy efficiency for non-domestic element. The applicant should therefore model additional energy efficiency measures to meet the EE target.
85. The applicant should confirm whether WWHRs are to be included within the Hotel as this is expected to have a real world benefit and should be included for the proposal.
86. The applicant is proposing to install Photovoltaic (PV) panels which is supported. The on-site savings from renewable energy technologies should be maximised generally but particularly given the shortfall in on-site carbon emissions savings.
87. Further information in relation to carbon reporting, estimated energy cost, overheating, natural ventilation, capacity for future connection to a District Heating Network, the proposed ASHP systems, and carbon offsetting is required. The applicant should confirm the carbon shortfall in tonnes CO₂ and the associated carbon offset payment that will be made to the borough.
88. The Whole Life-Cycle Carbon Assessment (WLC) provided by the applicant is welcomed. The applicant should provide further information in relation to WLC reduction estimates, mass of reusable/recyclable materials, and decarbonised embodied carbon from the Assessment 2 results.
89. Full details of the energy assessment and WLC have been provided to the applicant and the Council.

Circular economy

90. Policy SI7 of the Mayor's Publication London Plan requires major applications to develop Circular Economy Statements. The applicant has summarised the strategic approach to the project and has provided supporting narrative in the Circular Economy Statement. The applicant should provide additional information in relation a Pre-Demolition Audit, Recycling and Waste Reporting and residual waste that is destined for landfill, a Bill of Materials including kg/M² and recycled content for the proposed new elements of the building, operational waste, plans for implementation, an end-of-life strategy for the building, and a Post Completion Report. These details should be provided prior to determination of the application. Full details have been provided to the applicant and the Council.

Urban greening and biodiversity

91. The applicant has calculated the Urban Greening Factor (UGF) of the proposed development as 0.22, which does not meet the target set out in Policy G5 of the Mayor's Publication London Plan. The applicant should therefore review the urban greening proposed, seeking to improve the quality or quantity, to increase the proposed UGF. The UGF calculation includes 58 sq.m of semi natural vegetation which is explained as being 'woodland' in the Public Realm Planning Report. No information is provided regarding the proposed 'woodland'. Given the scale of the proposal it is unlikely that the proposed planting would constitute semi-natural vegetation. It is requested that further information is provided when the UGF is

reviewed and confirmed. The extent of green roofs across the site should also be reviewed, ensuring that opportunities for intensive green roofs have been maximised.

92. London Plan Policy 7.19 and Policy G6 of the Publication London Plan state that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The applicant should provide evidence how the proposed development secures a net biodiversity gain. If biodiversity net gain is not achievable on the site the applicant should review opportunities for biodiversity offsetting in consultation with the borough.

Sustainable drainage and flood risk

93. The site is in Flood Zone 1 but is located within a Critical Drainage Area (CDA). A Flood Risk Assessment (FRA) has been submitted. The FRA adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewer, groundwater, and artificial sources, which are considered to be low. The approach to flood risk management for the proposed development generally complies with London Plan policy 5.12 and Policy SI.12 of the Publication London Plan.

Sustainable drainage

94. The drainage strategy provides an assessment of the existing and proposed runoff rates and the required attenuation storage to restrict surface water runoff to the greenfield runoff rate (2.0 l/s) for the 1 in 100 year event plus a 40% allowance for climate change.
95. The drainage strategy assesses a drainage hierarchy which includes discharge to soakaways, watercourses, and sewers only. The drainage strategy should assess the drainage hierarchy as per Policy SI.13 of the Publication London Plan, which places rainwater harvesting at the top of the hierarchy. The applicant's submission makes reference to rainwater collection for irrigation purposes. Further commitment to fully incorporate rainwater harvesting into the design should be provided.
96. Attenuation is proposed to be provided within an attenuation tank in the basement, which is pumped off site. Pumping is not a sustainable solution to surface water discharge and should be avoided. Site constraints created by development design is not considered sufficient justification. The applicant is encouraged to re-visit the drainage strategy to incorporate attenuation volume above ground where possible. In terms of SuDS, the drainage strategy mentions inclusion of green roofs, however these are not clearly identified on the proposed scheme plans. No other SuDS are proposed. The Sustainability Statement mentions rainwater harvesting and permeable paving, which should be included within the drainage strategy. Further consideration should be given to sustainable, above ground, green SuDS to meet the water quantity, water quality, biodiversity, and amenity requirements as per the CIRIA SuDS Manual. The applicant should submit the London Sustainable Drainage Proforma.

Water efficiency

97. The proposed dwellings will have a maximum indoor water consumption of 105 l/person/day, compliant with London Plan Policy 5.15 and Policy SI.5 of the Publication London Plan. The non-residential components of the development will target a minimum BREEAM rating of 'Excellent' in line with Policy SI.5 of the Publication London Plan. Water consumption will be offset through the provision of

rainwater collection for irrigation purposes; however, no details are provided. The applicant should provide details of the type of rainwater harvesting system proposed, which can be integrated with the surface water drainage system to provide a dual benefit. In addition, a water meter and leak detection system is proposed to be included. This should be secured by an appropriately worded condition. Full details have been provided to the applicant and the Council.

Environmental issues

Air quality

98. An appraisal of the transport statement has shown the proposed development is not likely to produce sufficient additional traffic to lead to perceptible impacts on local air quality. However, the proposed development will include an emergency diesel generator, which has been assessed qualitatively. The impacts are described as 'not significant'. This conclusion should be further appraised by the Council.
99. The assessment has identified exceedances of the air quality objectives. Mitigation has been recommended in the form of MVHR, which will be required in order to ensure future occupants are not exposed to poor air quality. The proposed development is 'air quality neutral', and thus complies with London Plan Policy 7.14 and Policy S1.1 of the Publication London Plan. The following conditions are recommended:
- Prior to commencement of works, a scheme of mitigation recommended in the air quality assessment, to ensure acceptable air quality for future occupants/residents, should be approved by the LPA and implemented in full (London Plan Policy 7.14 (B), Publication London Plan Policy SI 1 (B)).
 - Construction phase NRMM must comply with the NRMM Low Emission Zone emissions standards for the Central Activities Zone. (London Plan Policy 7.14 (B) (b) and Publication London Plan Policy SI 1 (D)).
 - Mitigation measures applicable to a high risk construction site must be written into an Air Quality and Dust Management Plan (AQDMP) and implemented in full during the construction phase, in line with the Control of Dust and Emissions during Construction and Demolition SPG. (London Plan Policy 7.14 (B) (b) and Publication London Plan Policy SI 1 (D)).

Local planning authority's position

100. Camden Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

101. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate

his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

102. There are no financial considerations at this stage.

Conclusion

103. London Plan and Publication London Plan policies on the CAZ, office use, visitor infrastructure, affordable housing, heritage, urban design, inclusive access, transport and sustainable development are relevant to this application. Whilst the principle of the development is strongly supported, the application does not yet fully comply with the London Plan and Publication London Plan. The following changes might, however, lead to the application becoming acceptable in strategic planning terms:

- **Principle of development:** The principle of the redevelopment of the site for an employment-led mixed used scheme including for residential purposes in the CAZ is supported. Council should robustly secure the proposed affordable workspace.
- **Housing:** 50% affordable housing by habitable room is proposed with a split of 37% London Affordable Rent and 63% Intermediate Rent. As the tenure split does not meet Camden's strategic target, further discussion is necessary to confirm if the scheme can follow the Fast Track Route, or whether it is subject to the Viability Tested Route. Appropriate review mechanisms and the affordability of the units must be secured.
- **Urban design and heritage:** Camden's Local Plan states that the entire borough is sensitive to tall buildings, and tall buildings must therefore be assessed against detailed design criteria. The applicant must demonstrate how the proposal complies with these criteria, and also the design criteria within Publication London Plan Policy D9. Notwithstanding this, the design and layout are broadly supported from a strategic perspective. Further work relating to public realm areas, active frontages and agent of change principles is required. There would be less than substantial harm to heritage assets. The public benefits in terms of affordable housing provision, affordable workspace and other public realm improvements could outweigh the harm caused, but the maximum amount of affordable housing must be agreed before this can be confirmed.
- **Transport:** The strategic transport matters arising from this development could be compliant with the London Plan and the Mayor's Publication London Plan, subject to further information on healthy streets, road safety audit, infrastructure improvements and mitigation measures is required. A Delivery and Servicing Plan and Construction Logistics Plan along with other obligations should be secured.
- **Sustainable development:** Further information on energy, urban greening, drainage strategy, and circular economy strategy is required.

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