



Jonathan McClue  
Planning Department  
Camden Council  
Camden Town Hall  
WC1H 8ND

14 April 2021

Dear Jonathan,

## **EASTMAN DENTAL HOSPITAL - SECTION 73 APPLICATION FOR AMENDMENTS TO PLOT 1**

On behalf of our client, University College London, we are pleased to enclose an application seeking a minor material amendment to planning permission LPA Ref: 2019/2879/P, dated 10 March 2020, as amended by 2020/5791/P.

In addition to this covering letter, the application comprises:

- Completed planning application form, prepared by WSP;
- Completed Community Infrastructure Levy form prepared by WSP;
- Amended proposed drawings prepared by Hawkins\Brown;
- Design & Access Statement Addendum prepared by Hawkins\Brown;
- Heritage Statement Addendum prepared by Alan Baxter;
- Environmental Impact Assessment Statement of Conformity prepared by Trium
- Gable Condition Survey Report prepared by PAYE; and
- Fire Strategy Letter prepared by Buro Happold

For clarity the full list of approved drawings, subject to change and the proposed drawing list are included in **Appendix 1**.

The requisite planning application fee of £234 has been paid to the council via the Planning Portal.

## **Background**

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.

Full planning permission 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 Riddell Memorial Fountain to create a medical research outpatient facility and academic floorspace was granted on 10 March 2020 (Ref: 2019/2879/P).

Demolition work has commenced as part of the implementation of planning permission 2019/2879/P.

Application 2020/5791/P, which received a resolution to grant planning permission at committee on 25 March, will amend 2019/2879/P to extend to the Plot 3 basement, along with smaller extensions at the front and rear of the Plot 1 basement.

A further standalone application (Ref: 2021/0336/P) has also been submitted to provide two new electricity substations to the rear of the site.

## Planning Policy Context

The planning policy context remains largely the same as at the time of determination of planning permission 2019/2879/P.

The London Plan was adopted in March 2021. There are relatively few changes from the Intend to Publish version of the London Plan that was a material consideration in the determination of 2019/2879/P. The adoption of the London Plan 2021 is not considered to raise any new issues or considerations in the context of the changes proposed in this minor amendment application.

The remainder of the development plan for the purpose of the determination of the planning application remains as at the determination of 2019/2879/P:

- Camden Local Plan (2017);
- Policies Map (2017); and
- Site Allocations Plan (2017)

Since the determination of planning permission 2019/2879/P, there have also 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 assessment of the minor amendments proposed as part of this application.

## Proposed Development

The need for amendments to Plot 1 has arisen from technical coordination following the grant of planning permission and through further discussions with the user group, the contractor, specialist façade advisors, the design team, London Fire Brigade and London Borough of Camden Planning, Conservation and Design officers. These are minor amendments that require small changes to the approved internal arrangements and elevations for Plot 1, but do not materially affect the overall appearance or nature of the approved development. They do not increase the amount of floorspace or change the scale and massing of the building. These are minor amendments in the context of the development as a whole and would be largely unnoticeable, both in isolation and cumulatively.

The proposed amendments can be summarised as follows:

- Lecture theatre east façade – internal rearrangement to create a single large flexible space capable of being used as a lecture theatre or seminar space, with associated external alterations;
- East façade updates – changes to the location of doors and fire exits on this elevation;
- North west corner façade – change of detailing to align the treatment of the northwest corner of Plot 1 with the southwest corner;
- Façade level changes – changes to the internal floor and ceiling heights with no change to the overall height;
- Firefighting lift – incorporation of an additional lift required to meet the fire strategy and to provide equitable access around the building; and

- Alexandra Wing demolition and construction methodology – clarification on the proposed methodology for demolition and restoration to deliver the approved form of development for the Alexandra Wing.

## LECTURE THEATRE EAST FAÇADE

Changes are proposed to the internal layout of Plot 1 to create a single space in the southeast corner of the building that is capable of being used as either a lecture theatre or seminar space. The approved plans show this area of the building as being used for two seminar rooms whereas the proposed plans show the area being used for one larger lecture theatre. Associated changes are proposed to the façade on the eastern elevation to conceal servicing equipment. Ceramic back painted glass would be used to screen this area from view.

This proposed space would be flexible with moveable walls so it can be used as a seminar space, lecture theatre and exhibition area, or a combination of these. The Design and Access Statement Addendum provides views into and out of the building to demonstrate the level of activity and visual interest that would be achieved with this arrangement. It also shows how public art could be used to create interest.

## EAST FAÇADE UPDATES

The proposed amendments to the eastern façade stem from changes to the two entrances on this elevation in response to the fire strategy and user requirements. In response to pre-application discussions, a minor change to the spacing of the fins on the façade is proposed in order to allow the introduction of a wider door without interrupting the rhythm of the façade.

Care has been taken to ensure the spacing of the fins on the façade maintains a façade grid that ensures efficient internal lab layouts and ensures a pleasant working environment for researchers.

The Design and Access Statement provides views of the proposed amendments to the eastern elevation which demonstrate that the changes would not be noticeable. The inset doorway is considered to provide a simple entrance/egress which aligns with the fire strategy. The safety and security of this area would be actively managed through surveillance and lighting.

## NORTH WEST CORNER FAÇADE

Minor changes are proposed to the materials and detailing in northwestern corner of the Plot 1 building in order to replicate the arrangement in the southwestern corner of the building. It would also create a more successful relationship with the northern link bridge that connects it with the Alexandra Wing. Changes include adjustments to the brick spacing on the link bridge and changes to the stone banding profile at level 02.

The Design and Access Statement Addendum includes an updated image of the northwestern corner and illustrates the limited degree of change.

## FAÇADE LEVEL CHANGES

Due to the operational requirements of UCLH some changes are proposed to the floor levels within the Plot 1 building. The floor to floor height between ground and first floors would increase, but there would be reductions at other levels and no overall increase in the parapet height of the building.

The change would create taller ceilings within the UCLH consultation rooms. The windows to the consultation rooms would remain at a high level to prevent views onto Calthorpe Community Gardens.

The Design and Access Statement Addendum includes updated images of the northern elevation which demonstrate the limited degree of change.

## ADDITIONAL FIREFIGHTING LIFT

Further work by UCL's fire consultant and consultation with the London Fire Brigade has identified the requirement for a second firefighting lift within the Plot 1 building. Furthermore, in order for UCL to provide equality of access to all parts of the building, it is necessary to provide a lift within the retained Alexandra Wing. It is proposed to meet both requirements by providing a firefighting lift within the southern part of the Alexandra Wing.

As shown in the Design and Access Statement Addendum, the implications of providing an additional lift are largely confined to the internal layout within the Alexandra Wing.

Following pre-application discussions, the applicant and its design team has worked hard to minimise the external implications of the incorporation of the firefighting lift. The lift overrun has been incorporated internally within the southern pediment gable and there would be no external lift overrun. The plant required to service the lift has been proposed within the basement, removing the need for roof top plant. Changes in levels have been incorporated internally within the building to remove the need for an external access ramp. The only external change associated with the additional firefighting lift would be the incorporation of a small vent in the gable of the southern pediment that faces back towards the new Plot 1 building. This is a necessary change and one that is minor in the context of the need to provide an additional lift in order to both provide equitable access around the building and to meet up to date fire strategy requirements.

## ALEXANDRA WING

The form of development approved under 2019/2879/P involves the retention of the Alexandra Wing, with additions in the form of single storey extensions on the shoulders of the building and the reinstatement of the southern pediment. The reinstatement of the southern pediment is to be a scholarly restoration of the original design, using materials to match the existing.

Images in the original Design and Access Statement showed the restored pediment being added on top of the existing façade. Following a review of the condition of the existing façade, and in the context of demolition work around this section of façade, it has become apparent that it would be unsafe to retain the first floor section of the façade due to its poor condition. As shown in the Design and Access Addendum, it is necessary to remove the existing façade down to first floor level and then to reinstate the southern pediment as per the approved drawings above this. The removed material will be reviewed to assess what could be reused as part of the reinstatement, along with materials to match the existing as per the approved elevations. Details on the condition of the façade and the need to remove this section are contained in the Gable Condition Survey Report prepared by PAYE Stonework and Restoration Ltd, specialists in the restoration of historic facades.

The Heritage Statement Addendum prepared by Alan Baxter notes that the existing material will be retained and re-used as far as practically possible and replace like-for-like where needed, and that

the southern pediment will be rebuilt and restored as per the approved scheme. Alan Baxter concludes that the proposals will not result in any additional harm to the retained Alexandra Wing, the conservation area or nearby heritage assets relative to the previously identified as part of the initial application.

To provide greater clarity on the proposed methodology for delivering the approved form of development for the Alexandra Wing, we are submitting additional plans showing the extent of demolition.

## **Planning Assessment**

### **DESIGN**

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.

The proposals have been designed to a high quality and are required as a result of ongoing technical review and coordination whilst also ensuring the updated design meet a number of statutory, safety and operational requirements. Further details are provided in the Hawkins\Brown Design and Access Statement Addendum.

The proposed amendments to Plot 1 would not materially change the high quality design aesthetic of the approved scheme and would maintain accordance with the Camden Local Plan policies G1 and D1 as well as Policy D1 of the New London Plan.

### **HERITAGE**

A Heritage Statement Addendum has been prepared by Alan Baxter to assess the proposed changes to Plot 1 and this report demonstrates that the proposed amendments are negligible to minor in nature and would have a neutral impact on the significance of the Alexandra Wing and the setting of nearby listed buildings and the conclusions of the original Heritage Statement that there would be less than substantial harm to heritage assets still applies.

There would be no diminishing of the substantial public benefits of the proposed development, and these would continue to outweigh the harm to heritage assets.

The amendments would comply with paragraph 196 and 197 of the NPPF and paragraphs 7.41 and 7.44 and Policy D2 of the Local Plan.

### **ENVIRONMENTAL EFFECTS**

As an EIA development, the original planning permission 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 built heritage and townscape and visual impact.

This concludes that the proposed amendments would not make any material difference to the assessments and conclusions in the original ES. 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 ES remains valid and an appropriate EIA for the redevelopment proposed at 256 Gray's Inn Road.

## FIRE STRATEGY

The proposed amendment would provide an additional fire firefighting lift into Plot 1, Policy D11 (Fire Safety) of the New London Plan requires all major development to be submitted with a Fire Statement. Buro Happold have prepared a letter explaining the type of lift proposed and the discussions that have occurred with London Fire Brigade. A formal Fire Strategy would be prepared for approval through the Building Regulations process.

## CONCLUSIONS

The need for amendments to Plot 1 has arisen from further detailed design development and technical coordination following the grant of planning permission and through further discussions with the users, the contractor, specialist façade advisors, London Fire Brigade, LB Camden Planning, Design and Conservation officers and the design team. These are minor amendments that require small changes to the approved internal arrangements and elevations for Plot 1, but do not affect the overall appearance or nature of the approved development. They do not increase the amount of floorspace or change the scale and massing of the building. These are minor amendments in the context of the development as a whole and would be largely imperceptible, both in isolation and cumulatively.

The impact of the proposed alterations have been proportionately assessed with the submission of updated documents including the Heritage Statement Addendum, a Design & Access Statement Addendum and a letter on fire strategy. An EIA conformity letter has also been submitted to demonstrate that the alterations would have no additional environmental effect.

Overall there are no material adverse impacts of the proposed amendments and the proposals accord with the development plan and material considerations would weigh in favour of granting planning permission.

In the meantime, please do not hesitate to contact me or Simon Roberts should you have any queries.

Yours sincerely



Anna Stott  
Principal Planner