



# Transformation of the Ugly Brown Building: Health Impact Statement

A Report by Hatch  
April 2021

# Reef Group

## Transformation of the Ugly Brown Building

April 2021

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## **Appendix A - Camden Health Checklist for Planning**

# 1. Health Impact Summary

## Preamble

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- 1.1 This Health Impact Statement has been prepared by Hatch (formerly Hatch Regeneris) to accompany the application for planning permission submitted on behalf of Reef Group Limited (hereafter referred to as the 'Applicant') for the Proposed Development:
- 1.2 Demolition of the existing building (Class B1 and B8) and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use development of business floorspace (B1), 73 residential units (C3) (10xstudio, 29x1 bed, 27x2 bed 7x3 bed), hotel (C1), gym (D2), flexible retail (A1 - A4) and storage space (B8) development with associated landscaping work.
- 1.3 This permission grants consent for the use of Plot B as a nine-storey building with a single basement, which would be used as a hotel at lower levels, with office use above. The entire building was to be occupied by Ted Baker, who would operate the hotel and occupy the office space.
- 1.4 In the time since the permission was granted, changing economic circumstances and the Covid-19 pandemic mean that a hotel no longer represents the optimal use of the site. Furthermore, Ted Baker will no longer be retained as occupiers of the proposed building.
- 1.5 As a result, the applicant is now proposing a single application for the following works:
  - A new proposal for the Plot B and Plot C4 element of the site, which will remove the hotel, and create a building comprising flexible commercial space, offices, and ancillary storage, along with design and landscaping revisions.
  - Amendments to the Plot C element of the site, comprising changes to the design, to align with the revised Plot B proposal, and changes to the affordable housing provision on Plot C2, increasing the provision of affordable housing to 50.8%.
- 1.6 This application, should it be approved, will supersede permission 2017/5497/P for the Plot B and Plot C elements of the site only. This Health Impact Assessment will consider the impact of both applications in conjunction.
- 1.7 A separate application was submitted in March 2021 for amendments to the Plot A element of the Site. Documents for this application have been prepared based on a scenario in which these amendments have been implemented.

## Introduction

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- 1.8 LB Camden's Local Plan Policy C1 Health and Wellbeing states that the Council will require 'proposals for major development schemes to include a Health Impact Assessment' (HIA). This statement provides a summary of the key elements of the development plans and proposals that are of relevance to the health and wellbeing of the intended occupants, residents and visitors to the site as well as those in the wider community.
- 1.9 LB Camden's Local Plan suggests the scope of the HIA will vary depending on the scale and location of the development and that it should identify the likely health impacts of the development and include measures to improve health outcomes and address any negatives effects and inequalities.

- 1.10 The online National Planning Practice Guidance also refers to health impact assessment (HIA) as a useful tool to assess and address the impacts of development proposals (paragraph ref 53-004-20140306). The process looks at the positive and negative impacts of a development as well as assessing the indirect implications for the wider community.
- 1.11 Taking into account both local and national planning guidance, this statement considers the 11 different categories set out in the HIA tool developed by the NHS Healthy Urban Development Unit (HUDU), which influence the health and well-being of an area. These categories are broadly consistent with those set out in checklist of 'LB Camden's Planning Guidance 6: Amenity' document, which has now been superseded. However, for consistency with the previously submitted HIA, the superseded guidance has also been considered see Appendix A., It does not identify all issues related to health and wellbeing, but focuses on the built environment and issues directly or indirectly influenced by planning decisions. The 11 categories are:
- Housing quality and design
  - Access to healthcare services and other social infrastructure
  - Access to open space and nature
  - Air quality, noise and neighbourhood amenity
  - Accessibility and active travel
  - Crime reduction and community safety
  - Access to healthy food
  - Access to work and training
  - Social cohesion and lifetime neighbourhoods
  - Minimising the use of resources
  - Climate change.
- 1.12 For each category, we have considered the relevant elements of the plans and proposals for the which could impact on health and wellbeing. This is supported by references to documents upon which the judgement is based.

## Access to healthcare services and other social infrastructure

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- 1.13 The existing site does not currently provide any social, health or community infrastructure and the Proposed Development is not seeking to provide any new social, health or community infrastructure.
- 1.14 The total number of proposed residential units has not changed as part pf the updated proposal however, there has been an increase in the proportion of affordable dwellings. This uplift could increase the total population yielded from the development however, this increase would be marginal therefore, the previous assessment remains valid. The **impact of the Proposed Development on access to healthcare and other social infrastructure**, such as education, is included as part of this assessment and is **still considered to be neutral**. It can be summarised as follows:
- Within 2km of the Proposed Development there are 31 GP surgeries, with 185 FTE GPs serving circa 283,265 registered patients. This equates to 1,530patients per FTE GP,

which is below the Camden CCG average of 2,011. It is estimated the Proposed Development will generate a population of around 120 which will increase the average patient: GP ratio for GP surgeries within 2km to 1,532 (0.1%).

- There are 62 primary schools within 2 miles of the site the capacity of these schools has been reassessed as part of this update and the current capacity<sup>1</sup> stands at 19,386 pupils, giving rise to a surplus of 1,980 school places (10.3%). It is estimated the Proposed Development would generate a primary school pupil yield<sup>2</sup> of 6, all of which could be absorbed within the current capacity of local primary schools.
- There are 28 secondary schools within 3 miles of the site with a current capacity of 29,500 and 26,525 pupils giving rise to a surplus of 2,975 (10.1%). It is estimated the Proposed Development would generate a secondary school pupil yield<sup>3</sup> of 4, all of which could be absorbed by existing surpluses.

- 1.15 In line with LB Camden's SPG, the Proposed Development will be required to pay Community Infrastructure Levy monies which are to be spent by the Local Authority on such necessary infrastructure.

## Housing quality and design

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- 1.16 The Design and Access (D&A) Statement (2017), addendums (2018 and 2021) confirms that dwellings have been designed to meet London Plan (2016) design guidance and that Building Regulations Approved Document 'M' is complied with. As part of the detailed design each building will be reviewed in detail and where applicable will take into account BS8300.
- 1.17 The Proposed Development **responds positively to local housing needs** with the provision of 73 new homes, all of which will be additional, and which include a mix of studio, and 1-3-bedroom flats. The mix of housing also includes 33 affordable 1, 2- and 3-bedroom flats (which equates to 50% of total floor area) comprising both social rented and intermediate tenures to offer the maximum number of family units. It will also comprise a total 8 wheelchair adaptable and accessible apartments, 5 of which will be within the private housing element.
- 1.18 The Sustainability and Energy Statement (Max Fordham, June 2017) confirms the use of enhanced building fabric, efficient mechanical and electrical systems will be proposed. However, the Max Fordham document is being superseded for Plot A and Plot B by revised Energy Statements produced by KJ Tait. Despite, this update the use of district heating systems will still help to achieve the CO<sub>2</sub> reductions required under the London Plan.

## Access to open space and nature

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- 1.19 The D&A statement (2017) and addendums (2018 and 2021) confirm the existing site does not contain any open space or access to natural space including the canal frontage and there is a shortfall of public space in the surrounding area. The **Proposed Development responds positively** to this and includes the provision of open space in the form of a central public open square, 100m of accessible canal-side space and a 'retail' street providing pedestrian links across the site. This provision will increase access to a range of different types of open space and provide new opportunities for social interaction and physical activity. The open space

<sup>1</sup> Based on Dept. for Education, School Capacity: Academic Year 2017 to 2018

<sup>2</sup> Estimated using the GLA play space calculator

<sup>3</sup> Estimated using the GLA Play Space Calculator

provision will be integrated with existing and new pedestrian routes, rights of way and will help to link the site with its surrounds.

- 1.20 The open space will be welcoming and accessible for all. The D&A statement (2017) and addendums (2018 and 2021) confirms it has been designed to allow step-free access across the site to ensure accessibility to the landscape for people with varying mobility requirements. A part M accessibility route is available at three entrances to the site and the landscape will also be designed to be accessible for the visually impaired.
- 1.21 Playable space will be provided within the public realm for the under 5-year olds. The Landscape Statement prepared by Fabrik Chartered Landscape Architects (2018) confirms there is sufficient play provision within the appropriate distances for the 5-11 year olds and the over 12-year olds.

## Air quality, noise and neighbourhood amenity

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- 1.22 An updated Outline Construction Management Plan has been prepared by Waterman (April 2021) which sets out measures that will be employed to reduce noise, air and dust pollution during the construction phase.
- 1.23 Air Quality and Noise Assessment reports have also been prepared by Waterman setting out the construction and operational impacts of the Development on Air quality and noise. Where appropriate, mitigation measures will be included as part of the Development.

## Accessibility and active travel

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- 1.24 The site has a PTAL rating of 6B (the highest rating achievable) with mainline and tube stations including Kings Cross, St Pancras, Euston and Camden Town together with local bus routes. The design proposals have been developed in accordance with London Plan (2016) Policy 7.2 and relevant best practice standards. The D&A statement (2017) and addendums (2018 and 2021) confirm the **Proposed Development will make a positive contribution to accessibility and active travel** as follows:
- Direct, barrier free, pedestrian routes through the site connecting with consented bridge locations along the canal and linking up with pedestrian and cycle routes.
  - A shared basement allowing the site to be vehicle-free at ground level
  - Plots A and C are car-free (with the exception of mandatory disabled parking for residents of Plot C) and the number of car parking spaces on Plot B (commercial) is significantly reduced despite more than doubling the population of the building
  - Provision of over 800 secure, covered cycle storage spaces across the site for residents and occupants and around 100 short stay cycle spaces across the public realm for visitors
  - Dropped curbs and step-free access to allow wheelchair and buggy access to and from and across the site

## Crime reduction and community safety

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- 1.25 The **Proposed development incorporates elements to help Design Out Crime** (DOC). The proposals have been designed in consultation with the DOC officer for the Metropolitan Police and directly address types of crime and anti-social behaviour that are relevant to the local area. The D&A statement (2017) and addendum (2018) outlines the key DOC elements as follows:

- Active frontages, over-looking habitable rooms and natural surveillance
- Limitation of blind corners, natural recesses and enhanced sight lines across the site
- Loading bay located at grade level, isolated basement stairs from upper levels, lift security and controlled building access
- 24 hour registered CCTV and uniform lighting wherever possible
- 24-hour concierge within private residential entrance

## Access to healthy food

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- 1.26 The proposed Development includes provision of flexible commercial space including food and beverage space. The occupiers of the space are yet to be confirmed but the space has been designed to facilitate a variety of end-users, including local and smaller operators and to complement existing uses in the surrounding area rather than compete. This type of provision will help to avoid a concentration of one particular type of retailer, such as hot food takeaways.

## Access to work and training

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- 1.27 The Regeneration Statement prepared by Hatch confirms the **Proposed Development will make a positive contribution to both temporary construction and permanent employment and opportunities** as well as training opportunities within the local area. An average of 680 temporary FTEs per year within the construction sector are likely to be generated during the construction phase and up to 3,700 long term gross additional FTEs across a range of sectors and occupations once the Development is operational.
- 1.28 The Proposed Development includes provision of flexible workspace, which will accommodate a range of uses for small and medium sized enterprises as well as start-up businesses.
- 1.29 The Regeneration Statement prepared by Hatch indicates the Applicant and partners will support a number of projects within LBC and will work with LBC to ensure jobs and training opportunities for local people are maximised through Section 106 contributions for apprenticeships and training

## Social cohesion and lifetime neighbourhoods

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- 1.30 The Proposed Development will make a **positive contribution to social cohesion** by reinforcing the identity of the area through building, street and space design, as well as by increasing the connectivity levels with the surrounding area and reducing the extent to which the existing Site is severed from its surrounds.
- 1.31 The Proposed Development includes a wider mix of uses than currently existing on the site including office, retail, leisure and residential uses. Recommendations from the Lifetime Neighbourhood guidance are addressed throughout the Design and Access and addendum statement.

## Minimising the use of resources

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- 1.32 The Proposed Development has been designed to respond to and enhance the context in which it sits. It significantly increases the efficiency of the existing Site and will provide a greater quantum and variety of uses than currently exists.



- 1.33 The Sustainability and Energy Statement (Max Fordham, June 2017) confirms the Development expects to achieve a BREEAM 'Excellent' rating for non-residential parts of the scheme. However, the Max Fordham document is being superseded for Plot A and Plot B by revised Energy Statements produced by KJ Tait. Despite, this change the BREEAM Excellent target is still applicable and the use of enhanced building fabric, efficient mechanical and electrical systems and district heating systems will still help to achieve the CO2 reductions required under the London Plan.

## Climate change

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- 1.34 The Sustainability and Energy Statement (June 2017, Max Fordham and January 2020, KJ Tait) sets out details of how the Proposed Development **responds positively to climate changes issues**. This can be summarised as follows:
- Onsite renewables and responsible sourcing of construction materials
  - Biodiverse roofs to enhance biodiversity and provide rainwater attenuation
  - An energy strategy which targets a reduction over current 2013 Building Regulations
  - Potential to connect to district heating system and highly insulated building fabric to reduce unnecessary heat loss
  - Enhanced building fabric performance, including external shading and reduce solar gain and glare.

## Summary

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- 1.35 The HIA suggests, at this stage, no significant health impacts resulting from the development have been identified and that the Proposed Development will likely have a neutral or positive impact across all 11 categories set by the NHS HUDU. The HIA has identified a number of positive health impacts which can be summarised as follows:
- **Improved access to open space and nature:** the Proposed Development includes the provision of open space as well as access to the canal frontage and will provide new opportunities for social interaction and physical activity as well as connect the site with its surrounds.
  - **Improved accessibility and travel:** the Proposed Development will make a positive contribution to accessibility and active travel and will provide direct, barrier free pedestrian routes linking to existing pedestrian and cycle routes, dropped curbs and step-free access, vehicle free at ground level and 800 cycle spaces.
  - **Access to work and training:** the Proposed Development will provide both temporary construction and permanent job opportunities across a range of sectors, as well as providing business space for SMEs and start-ups. Where possible, the local training and employment opportunities will be maximised through strong levels of community engagement.

# Appendix A - Camden Health Checklist for Planning

A.1 Whilst the NHS Camden Health Check is no longer a LBC requirement and has been superseded by the NHS Healthy Urban Development Unit (HUDU) Healthy Urban Planning Checklist, Table A1 has been updated for completeness.

Table A1: NHS Camden Health Checklist for Planning				
Issue address	to Included in proposal/development	Provide details (Evidence from proposals)	Further action required	Relevant LDF policies
<b>1.0 HEALTHCARE FACILITIES AND SERVICES</b>				
1.1 Will the development increase demand on existing primary and secondary care health services	Yes	The total number of proposed residential units has not changed as part of the updated proposal however, there has been an increase in the number of affordable dwellings. This increase in affordable housing could increase the total population yielded from the development however, this increase would be marginal therefore, the previous assessment remains valid.		Core strategy policies, CS11, CS15, CS16 and Development Policies DP15, DP17, DP31
<b>2.0 PHYSICAL ACTIVITY</b>				
2.1 Do the proposals maximise physical activity opportunities? (Active travel; leisure facilities; access to green and open spaces; HomeZones; schools; business; Olympics etc.)	Yes	The Proposed Development includes the provision of open space in the form of a central public open square, playable space within the public realm, and 100m of accessible canal-side space.		Core Strategy policy CS17
<b>3.0 CRIME AND COMMUNITY SAFETY</b>				
3.1 Have measures been taken to ensure that the proposals will not have a negative impact	Yes	The Proposed Development incorporates elements to help Design Out Crime, designed in consultation with the DOC officer. The key elements are active frontages with natural surveillance; limitation of blind corners; 24 hour		Core Strategy policy CS17

on crime and community safety? (Licensed premises; drugs & alcohol; road traffic injuries; etc.)		registered CCTV and uniform lighting; 24-hour concierge; and loading bay at grade level.		
<b>4.0 HOUSING</b>				
Do the proposals include housing which is: affordable, in mixed use developments; mixed tenure (private, affordable, social); different sizes, accessible and suitable for all ages.	Yes	The Proposed Development responds positively to local housing needs with the provision of 73 additional new homes. They are a mix of sizes, with 50 of all total floor area being affordable, comprising both social rented and intermediate tenures. There will be 8 wheelchair adaptable and accessible apartments.		Core Strategy policy CS6 and Development Policies DP1-9
<b>5.0 EMPLOYMENT AND TRAINING</b>				
5.1 Do the proposals provide employment and training opportunities for local people?	Yes	An average of 680 temporary FTEs per year within the construction sector are likely to be generated during the construction phase and up to 3,400 long term gross additional FTEs across a range of sectors. The Proposed Development includes provision of flexible and market space for small and medium sized enterprises. The Applicant and partners will support a number of projects within LBC and work with LBC to ensure training opportunities for local people are maximised through Section 106 contributions.		Core Strategy policy CS8 and Development Policy DP13
<b>6.0 EDUCATION</b>				
6.1 If education facilities are provided, will they be designed to include wider community use and include	Yes	Education facilities not to be provided- it is estimated that the Proposed Development will generate a primary and secondary school pupil yield that can be absorbed by existing surpluses.		Core Strategy policy CS10

green and open space?				
<b>7.0 NEIGHBOURHOOD AND BUILDING DESIGN</b>				
7.1 Do the proposals include: accessible street designs for older people and people with mobility problems; and garden allotments or play areas?	Yes	Dropped curbs and step-free access across the site. Playable space will be provided within the public realm for under 5-year olds. There already exists sufficient play provision within appropriate distances for 5-11 year olds and over 12 year olds.		Core Strategy policies CS14 and CS15
7.2 Do the proposals ensure that buildings are designed to maximise physical activity (positioning of stairwells, shower rooms, secure cycle parking etc)	Yes	Direct, barrier free, pedestrian routes through the site connecting with consented bridge locations along the canal and linking with pedestrian and cycle routes. Plots A and C are car free and provision of over 800 secure cycle storage spaces across the site.		Core Strategy policies CS11, CS16 and Development Policies DP6, DP17, DP14
<b>8.0 CLIMATE CHANGE AND SUSTAINABILITY</b>				
8.1 Do the proposals mitigate against a negative impact on the environment (noise & air quality; renewable energy; contaminated land; waste management etc.)	Yes	Air Quality and Noise Assessment report has been prepared by Waterman which set out measures to reduce noise, air and dust pollution during the construction phase. The Sustainability and Energy Statement confirms the development expects to achieve a BREEAM 'Excellent' rating for non-residential parts of the scheme. There will be onsite renewables and responsible sourcing of materials, biodiverse roofs, and an energy strategy targeting a reduction over current 2013 Building Regulations.		Core Strategy Policy CS13 and Development Policy DP22
<b>9.0 FOOD</b>				
9.1 Do the proposals include provision of affordable and	Yes	Proposed Development includes provision of flexible commercial space including food space. The space has been designed to facilitate local and smaller		CS16

nutritious food outlets, food growing and limit the proliferation of fast-food outlets?		operators and complement existing use, to avoid a concentration of a particular retailer such as fast-food outlets.		
<b>10.0 WIDER ASSESSMENT</b>				
10.1 Have the health impacts been considered, as part of any other assessment? (SEA, HIA, IIA, EIA etc)	Yes	Health Impact Assessment		

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