Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London WC1A 1JR (2021/2954/P)

Thank you for the opportunity to comment on the above planning application. This response from NHS North Central London CCG addresses the healthcare impact of the development proposal.

The planning application is for a mixed-use scheme which includes 29 residential units and 1,463 sqm (GIA) of flexible town centre floorspace at ground floor level falling within Class E.

The site is allocated in Camden’s Draft Site Allocations Plan (2020) and Policy HCG3 (‘1 Museum Street’) supports the comprehensive redevelopment of the site with a mix of commercial and residential uses. The planning statement (April 2021) states that the ground Class E uses at ground floor level could include retail, food and other uses which provide an active frontage and vitality. This could include Class E(e) medical or health services.

A health impact assessment (April 2021) submitted with the planning application considers the impact of the development on primary healthcare. However, paragraph 4.48 only considers the impact on one GP practice - Covent Garden Medical Centre. Whilst located in Camden the practice is contracted to provide GP services by North West London CCG. Of equal distance from the site is the Museum Practice at 58 Great Russell Street.

Museum Practice is in cramped premises on the lower ground floor of a listed mansion block. There is no lift and so DDA access is compromised, and the internal configuration is not optimal. All clinical space at the premises in utilised.

The CCG is looking at options to increase capacity, including an extension at lower ground level or to relocate the practice to new modern premises.

The health impact assessment notes (on page 34) that the proposed development will provide 1,463sqm of flexible Class E space, which could be used to provide social infrastructure if required.

Clause a. of Camden’s Local Plan (2017) Policy C2 Community facilities states that the Council will seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments.

Camden Planning Guidance on Developer Contributions (March 2019) states that planning obligations will be used for local infrastructure requirements directly related to a development site.

The CCG would welcome the opportunity to secure a new health facility as part of the development as a s106 planning obligation. We note that the proposed Class E floorspace is split into relatively small units within the Museum Street, Vine Lane, High Holborn, and West Central Street buildings.

The current premises provide 250 m2 of floorspace including 4 clinical rooms and the CCG would require approximately 350m2 of shell and core space at DV assessed rent capable of accommodating 5 clinical rooms to support the forecast increased patient list size of 6,500. The current premises are rented from the local authority at a subsidised rate and so a significant uplift in rent would be unaffordable.

Alternatively, a s106 financial contribution could be secured to mitigate the impact of the development and contribute towards providing additional capacity at the current Museum Practice premises.

Using the proposed housing mix stated in the Planning Statement (Table 3.1), the HUDU Planning Contributions Model calculates a s106 requirement of £14,980.