

13 May 2022

Planning - Development Control,
Camden Council,
Camden Town Hall,
London,
WC1H 8ND

Newsteer
Real Estate Advisers

C/O HubHub London
20 Farringdon Street
London EC4A 4AB

To Whom It My Concern,

Town and Country Planning Act 1990 (as amended)
Town & Country Planning (Development Management Procedure) (England) Order 2015

Site: Highgate West, Dartmouth Park Hill, London N19 5NX

On behalf of our client, Camden and Islington NHS Foundation Trust (hereafter "the Applicant"), Newsteer is pleased to enclose an application seeking temporary planning permission for the temporary erection of 4no. buildings to accommodate site welfare and office facilities at the Highgate Mental Health Centre, Dartmouth Park Hill, London, N19 5NX. The facilities are associated with the Camden and Islington NHS Foundation Trust (hereafter 'the Trust') New Mental Health inpatient facility currently under construction on the Whittington Hospital site on the adjacent side of Dartmouth Park Hill.

The application is submitted electronically via the Planning Portal under reference PP-11236151 and seeks full planning permission for the following: -

"Temporary planning application for the erection of 4no. temporary buildings to accommodate site welfare and office facilities associated with the Camden and Islington NHS Foundation Trust New Mental Health inpatient facility currently under construction on the Whittington Hospital site."

The draft proposals have been discussed with Kate Henry at LBC and we have agreed with Kate the information to be submitted in support of this application.

The application consists of the following documents: -

- Application Form;
- Site Location Plan (prepared by Ryder Architecture);
- Block Plan (prepared by Bam Construction);
- Composite Existing and Proposed Floor and Elevation Plans (prepared by Bam Construction);
- Covering Letter, including Planning Statement (prepared by Newsteer);
- Site Information Document (prepared by Bam Construction); and

- Arboricultural Assessment and Tree Survey (Barrell Treecare).

Site Description and Surroundings

The application Site (as indicated in red in Figure 1 below) is located at the south west of the existing Camden and Islington Highgate Mental Health Centre, known as the 'Highgate West' campus, on Dartmouth Park Hill.



Figure 1: Aerial view of Site

The Site is located within an existing service area and contains vegetation, small trees and an existing vacant container unit. There is an existing fire engine access route which follows the existing vehicular access to the Site to the south.

In terms of heritage, the Site is within the Highgate Conservation Area. Highgate Cemetery to the immediate west is a Grade I Registered Park and Garden and one of the borough's four main areas of Metropolitan Open Land. Waterlow Park to the north of the Highgate West campus is a Grade II* Registered Park and Garden.

The Site is served by an access road from the Southern Car Park. The Site benefits from a PTAL rating of 6a (with 0 being the worst and 6b being the best rating achievable) and is therefore considered to have an 'Excellent' level of public transport accessibility. Archway London Underground station is within a 10-minute walk, and Upper Holloway station serving the mainline and Highgate London Underground are both situated within a 15-minute walk. There are also a number of bus routes (including the following services: 4, 17, 41, 134, 143, 210, 263, 271, C11 and W5) which serve the Site from Dartmouth Park Hill, Magdala Avenue and Highgate Hill.

Planning History

The following planning applications associated with the Site are considered to be relevant to the proposals: -

Highgate Mental Health Centre, Dartmouth Park Hill

- 2021/4204/P: Construction of electricity substation and generator with associated tank. **Granted 27/01/2022.**
- 2018/4834/P: Erection of single storey building to facilitate inpatient suites (Class D1) including the installation of mechanical plant; erection of link to new building with associated alterations; alterations to existing car park and landscaping works to mental health centre complex. **Granted 29/03/2019.**
- 2010/2946/P: Non-material amendments to planning permission granted 28/10/09 (2009/4070/P) for the erection of a 5.2m high wire-mesh fence around perimeter of garden adjacent to block 4 of existing mental health centre (Class 2). Amendment comprises relocation of 5.2m high wire-mesh fence around perimeter of garden adjacent to block 4 due north of the raised embankment. **Granted 18/10/2010.**
- 2009/4070/P: Erection of a 5.2m high wire-mesh fence around perimeter of garden adjacent to block 4 of existing mental health centre (Class C2). **Granted 28/10/2009.**

Whittington Hospital, Dartmouth Park Hill

- P2020/0687/FUL: Demolition of the existing buildings and erection of a new 78no. bedroom mental health inpatient facility with associated landscaping and cycle parking. (Listed Building application P2020/0761/LBC also submitted). **Granted 23/06/2020.**

The above demonstrates that the Council has considered development to be acceptable at the wider Highgate West site. It also identifies the application for the Camden and Islington NHS Foundation Trust New Mental Health inpatient facility which is currently under construction on the Whittington Hospital site, located to the east of Dartmouth Park Hill and to which these proposals directly relate.

The Proposed Development

The Applicant seeks full planning permission for the erection of 4no. temporary buildings (up until December 2023) to accommodate site welfare facilities at Highgate West, Dartmouth Park Hill, London, N19 5NX. The facilities are in connection with the Camden and Islington New Mental Health inpatient facility, which is currently under construction on the Whittington Hospital site. The facilities are currently located in an existing building on Vorley Road, Archway, London, under a lease agreement with the London Borough of Islington ('LBI'). However, due to LBI's aspirations to bring forward development at this location, the Trust have been issued with notice that the lease will terminate in July, and therefore arrangements are urgently needed to relocate the facilities, albeit on a temporary basis until the end of 2023.

Securing a suitable location for the office and welfare facilities is essential to ensure the ongoing construction of the New Mental Health inpatient facility, which is of critical importance across

Camden and Islington, as it is linked to the objectives of the wider strategic Project Oriel and development of St Pancras Hospital.

The description of development for which full planning permission is sought is as follows:

"Temporary planning application for the erection of 4no. temporary buildings to accommodate site welfare and office facilities associated with the Camden and Islington NHS Foundation Trust New Mental Health inpatient facility currently under construction on the Whittington Hospital site."

The location of the proposed development is the south west corner of the existing Highgate Mental Health Centre which falls within the London Borough of Camden. Specifically, the proposed development consists of 4no. cabins, stacked as two-storey units to a height of 5.6 meters. The total floorspace across the cabins is 384 sqm. The proposals require building across an existing service area, the removal of 1no. existing, vacant cabin, the loss of 2no. trees, pruning, and the reconfiguration of the fire engine route in order for it to be retained. Please see the supporting document provided by Bam Construction on the operations.

This covering letter should be read in conjunction with the associated plans and submission documents listed above, including the Welfare Options pack which sets out the several other options which have been explored and why these had to be discounted.

The Site is the only feasible option for Bam Construction and is therefore critical to ensuring the construction of the new mental health facility can continue.

Relevant Planning Policy and Guidance

A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are statutory Development Plans which seek to guide the decision-making process. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

In this case, for the purposes of determining planning applications at the Site, the Local Development Plan comprises:

- London Plan (2021);
- Camden Local Plan (2017); and
- Camden Site Allocations Plan (2013).

Relevant policies relating to the proposals are referred to where appropriate in **Appendix A**.

The National Planning Policy Framework ('NPPF'), National Planning Policy Guidance ('PPG') and both the Mayor's as well as LBC's Supplementary Planning Guidance / Documents are also considered to be material considerations.

Planning Considerations

The material considerations in terms of the key issues pertinent to this application, are:

- Principle of Development;
- Loss of Existing Uses;
- Principle of Proposed Uses;
- Heritage;
- Trees;
- Impact on amenity; and
- Transport.

Principle of Development

As stated in Section 4, at the heart of the NPPF is the presumption in favour of sustainable development (**Paragraph 11**) which states that planning permission should be approved where proposals accord with the Development Plan *without delay*.

Furthermore, **Paragraph 119** of the NPPF requires the effective use of land with substantial weight to be given to the value of using sustainable brownfield land for identified needs. This is also supported in London Plan **Policy GG2**, **Policy D3** and **Policy S1** and Local Plan **Policy G1** which all promote making the best use of brownfield land.

The Site is located at the existing Highgate Mental Health Centre, located in a well-established area of London with good access to public transport services. The development in this location therefore adheres with London Plan **Policy GG2** and Local Plan **Policy C2**, and **Policy T1**.

As the Site is located on the wider Highgate Mental Health Centre and contains existing development in the form of a vacant cabin, it is therefore considered acceptable for temporary development in principle, subject to the other relevant policies of the Development Plan.

Loss of Existing Uses

The proposals are required to temporarily locate the site welfare and office facilities associated with the Camden and Islington NHS Foundation Trust New Mental Health inpatient facility which is currently under construction on the Whittington Hospital site. The development will build across the existing underutilised service area resulting in the loss of an existing, vacant container, 2no. trees (considered separately below) and the reconfiguration of the fire engine route which is to be retained. It is important to note, that as this is a temporary development, the Site will be returned to its existing use by end of 2023.

As mentioned above, the proposals are located on sustainable, brownfield and underutilised land, and as the existing container is vacant, the proposals are considered to be acceptable as they accord with **Policy GG2** and **Policy D3** of the London Plan and **Policy G1** of the Local Plan in making best and most efficient use of brownfield sites. As the proposals are seeking temporary planning permission only, there is no permanent loss of existing use resulting from this application.

Principle of Proposed Uses

Policy C1 of the Local Plan seeks to provide high quality environments with local services to support health, social and cultural wellbeing. It is specifically noted that the Council will support

the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements. The London Plan **Policy GG3** supports development which seeks to plan for appropriate health and care infrastructure to address the needs of London's changing and growing population and **Policy S2** states that boroughs should work with Clinical Commissioning Groups and NHS organisations to maximise health and care outcomes. Further **Paragraph 92** of the NPPF states that planning decisions should take into account and support the delivery of local strategies to improve health and wellbeing.

While the proposals are not strictly for a health development, they are temporary and located on an existing health site, and are also of critical importance to support the construction of the New Mental Health inpatient facility at the Whittington Hospital which is linked to the wider strategic Project Oriel.

The proposals are therefore considered to be compliant with adopted London Plan, Camden's Local Plan and **Paragraph 92** of the NPPF.

Heritage

The proposed development is within the Highgate Conservation Area and will result in less than substantial harm to the character and appearance of the Conservation Area and surrounding registered landscapes, in accordance with **Paragraph 202** of the NPPF and **Policy HC1** of the London Plan, and **Policy G1**, **Policy D1** and **Policy D2** of Camden's Local Plan. The existing views will be retained as the temporary cabins, at a height of 5.6 meters, will not be visible from any key views from the Grade II* registered landscape of Waterlow Park or the Grade I registered landscape of Highgate Cemetery, obscured by the existing Highgate West campus buildings and dense vegetation. Further, as the proposals are temporary, the Site will be returned to its existing use following the completion of the construction of the New Mental Health inpatient facility in December 2023.

Therefore, the proposals are considered to be sympathetic to the Conservation Area and the setting of the registered landscapes, and in accordance with legislation and the relevant planning policies included in the Development Plan.

Trees

The application is supported by a Arboricultural Assessment and Tree Survey which provide an assessment of the existing trees and those immediately surrounding the Site. It is concluded that as a result of the proposals, 2no. of the existing trees on the Site will need to be removed (1no. Birch and 1no. Rowan) and 4no. trees will require pruning to provide low level clearance space.

It is noted that **Policy A3** of the Local Plan and **Policy G7** of the London Plan seek for trees of value to be retained wherever possible. However, in order to accommodate the facilities required, and reconfigure the fire engine route in order for it to be retained, it is necessary for two trees to be removed. Importantly however, the assessment which supports this application notes that the trees requiring removal and pruning are not of any significant value. The small ornamental Birch is classified as Category B (tree of moderate quality) while the maturing ornamental Rowan is classified as Category C (tree of low quality). The assessment concludes that both trees are obscured from surrounding vantages and that their loss, and the pruning of the 4no. trees will have

no adverse impact on the landscape character or visual amenity, and the pruning will not pose unacceptable risk to the health of the trees.

As the trees to be removed are not of significant value, and protection measures have been identified in the supporting Arboricultural Assessment for the retained trees, the proposals are in accordance with **Policy A3** of the Local Plan and **Policy G7** of the London Plan.

Impact on amenity

The proposals do not include any external plant, nor A/C units. Instead, it is proposed that these will be internal 'powrmatic vision' units, resulting in minimal external noise. This will result in a negligible noise impact on the adjacent residential units to the south. Further, the positioning of the cabins has been designed to limit windows which face these residential units, and the cabins will not be visible above the existing tree line.

It is therefore considered that the proposals are in accordance with **Policy D14** of the London Plan and **Policy A1** and **Policy A4** of the Local Plan in protecting the quality of life of neighbours in relation to visual amenity and noise.

Transport

As summarised in the supporting Site Information Document supplied by Bam Construction, it is proposed that this temporary development will be car-free, in line with aspirations of **Policy T6** of the London Plan, **Policy T2** of the Local Plan, and with due regard to the good accessibility credentials of the Site. There are no car parking spaces currently on the Site and therefore the development will not result in a net loss.

Access to the Site is to be limited to pedestrians only (with the exception of fire engines) and all Bam Construction employees will travel between the proposed facilities and the construction site at Whittington Hospital by foot. The construction site for the New Mental Health inpatient facility is located within walking distance, to the immediate east of Dartmouth Park Hill, and the Site is suitably located with good access to public transport, aligning with **Policy T2** of the London Plan and **Policy C2** and **Policy T1** of the Local Plan. Further, as the proposals are car-free, this will have a negligible impact on the surrounding highway network.

In terms of cycle parking, the London Plan requires that new Sui Generis development should follow the standard of the most relevant Use Class. For this development, this is Use Class B1 (now Class E) which requires a minimum provision of 1no. long-stay space per 75 sqm, and 1no. short-stay space per 500 sqm for the first 5,000 sqm (GEA). The development therefore requires 2no. long-stay spaces and 1no. short-stay space, based on the GEA of the B1 use being 117 sqm, and all other floorspace ancillary to this. As set out in the supporting plans, there will be 4no. cycle spaces provided at the Site, and therefore provision for this temporary development is in excess of the requirement.

The proposals have therefore taken account of relevant policies and will not cause any detrimental impact to the surrounding highway network.

Summary

The proposal for the temporary use of the Site for the site welfare facility is directly associated with the ongoing construction of the Camden and Islington NHS Foundation Trust new mental health facility on the adjacent Whittington Hospital site. The Applicant has reviewed several options, all of which have had to be discounted. The proposals have considered the relevant constraints are considered acceptable for the proposed temporary use.

We trust that you have all the necessary information to progress this application and look forward to receiving confirmation of validation. If you have any queries, please contact me on the details below.

Yours faithfully,



Jessica Wilson
Associate Director



Appendix A: Planning Policy Context

London Plan (2021)

Policy GG2 seeks to create sustainable places which make the best use of land with particular focus on the development of brownfield land and sites which are well-connected by public transport.

Policy GG3 seeks to improve Londoner's health, reduce inequalities and plan for appropriate health care infrastructure to address the needs of London's changing and growing population.

Policy D3 requires that all development makes the best of use of land by following a design led approach to determine the most appropriate form of development which responds to the site's context and capacity for growth. Development proposals are required to enhance local context, encourage active travel, be street-based and facilitate efficient servicing and maintenance. Proposals should also achieve safe, secure and inclusive environments, deliver appropriate outlook, privacy and amenity, as well as responding to the existing character including enhancing heritage assets and providing high-quality architecture. Proposals should also aim for high sustainability standards.

Policy D14 requires development proposals to reduce, manage and mitigate noise to improve health and quality of life.

Policy S1 states that development proposals providing high-quality, inclusive social infrastructure which address a local or strategic need and support delivery strategies should be supported. Development proposals which seek to make the best use of land, including public sector estate should be encouraged and supported.

Policy S2 states that boroughs should work with Clinical Commissioning Groups and NHS organisations to understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes. Development proposals which support the provision of high-quality, new and enhanced health facilities to meet an identified need and new models of care should be supported. New facilities should be easily accessible by public transport, cycling and walking.

Policy HC1 requires proposals which affect heritage assets and their settings to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings.

Policy G7 states that proposals should ensure that wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should be generally included in new developments – particularly larger canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

Policy T2 requires proposals to be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. The Plan requires one long-stay cycle parking space per five members of staff, and one short-stay cycle parking space per 30 members of staff.

Policy T5 requires proposals to secure the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with minimum standards set out in Table 10.2 and Figure 10.3.

Policy T6 states that car-free development should be the starting point in places that are well-connected by public transport. Adequate provision should be made for efficient deliveries and servicing and emergency services.

Camden Local Plan (2017)

Policy G1 states that the Council is committed to creating the conditions to deliver for growth in infrastructure and facilities to meet Camden's needs and to harness the benefits for those who live and work in the borough. The policy states that the Council will deliver growth by promoting high-quality development and the most efficient use of land and buildings, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site.

Policy C1 states that Camden will improve and promote strong, vibrant and healthy communities through ensuring a high-quality environment with local services to support health, social and cultural wellbeing to reduce inequalities, and protect existing health facilities and support the provision of new or improved health facilities.

Policy C2 requires that the community facilities and services are accessible by foot and sustainable modes of travel. It also seeks to ensure that existing community facilities are retained, and where replacement facilities are provided, that they meet the needs of the local population or the current, or intended, users.

Policy C5 states that the Council aims to make Camden a safer place and requires appropriate security and community safety measures in buildings, spaces and the transport system.

Policy A1 seeks to protect the quality of life of occupiers and neighbours and states that the Council will seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities, and will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network. It notes that the factors to consider are visual privacy and outlook; sunlight, daylight and overshadowing; artificial lighting levels; construction impacts; noise and vibration levels; and odour, fumes and dust.

Policy A3 seeks to protect existing and secure additional trees and vegetation. The policy notes that the Council will resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value, including proposals which may threaten the continued wellbeing of such

trees and vegetation. The Council will also required trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development.

Policy A4 seeks to ensure that noise and vibration is controlled and managed, and that development should have regard to Camden's Noise and Vibration Thresholds.

Policy D1 seeks to secure high-quality design in development. Development should respect the local context and character; preserve or enhance the historic environment and heritage assets; be sustainable in design and construction; comprise materials that are of high quality and complement the local character; integrate well with surrounding streets and open spaces; be accessible and on easily recognisable routes; be inclusive and accessible for all; promote health; be secure to minimise crime and anti-social behaviour; incorporate high quality landscape design and outdoor amenity space; and, preserve strategic and local views.

Policy D2 states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings and historic parks and gardens and locally listed heritage assets. In conservation areas, the Council requires that development preserves or, where possible, enhances the character and appearance of the area.

Policy T1 states that the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free, with on-site parking spaces designated for disabled people where necessary, and/or essential operational or servicing needs.

National Planning Policy Framework (2021)

By **Paragraph 2**, the NPPF (2021) is a material planning consideration. At the heart of the NPPF (2021) is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking (**Paragraph 11**).

In decision-taking this means:

- Approving development proposals that accord with the development plan without delay; and
- Where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - Specific policies in this Framework indicate development should be restricted.

Paragraph 7 of the NPPF (2021) states that the purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development, as defined within the NPPF (2021, **Paragraph 8**) is made up of three dimensions: economic, social and environmental.

These dimensions give rise for the planning system to perform a number of roles and each of these are considered to be critical when assessing the successfulness of any planning application:

- An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Paragraphs 10 and 11 refer to the presumption in favour of sustainable development which in decision-taking requires the approval of development proposals that accord with an up-to-date Development Plan without delay. The presumption applies unless any adverse impacts of a development would 'significantly and demonstrably' outweigh the benefits.

With respect to decision-making, **Paragraph 38** requires local planning authorities to approach decisions on proposed development in a positive and creative way and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. **Paragraph 38** concludes that decision-makers at every level should seek to approve applications for sustainable development where possible.

Section 8 promotes healthy and sustainable communities and **Paragraph 92** specifically states that planning decisions should take into account and support the delivery of local strategies to improve health and social well-being for all sections of the community.

Section 11 requires the effective use of land, stating that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for identified needs.

Section 16 seeks to conserve and enhance the historic environment. Specifically, **Paragraph 202** states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.