



Jonathan McClue
London Borough of Camden
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London
WC1H 9JE

08 June 2022

Dear Jonathan,

PROPOSED SERVICE AREA - UCL EAR INSTITUTE, 330 GRAYS INN ROAD, LONDON, WC1X 8DA

On behalf of our client, UCL Estates, please find enclosed an application seeking planning permission for a new service area as part of the University College London (UCL) Ear Institute (EI) at their 330 Gray's Inn Road site. The service area would be accessed via Wicklow Street.

The description of development is:

Partial demolition of the existing building and erection of replacement service area.

In addition to this covering letter, the submission package comprises the following:

- Application form and CIL form;
- Planning drawings:
 - Existing Ground Floor Plan (dwg: 6706-SRA-XX-00-DR-A-00303 P01)
 - Demolition Ground Floor Plan (dwg: 6706-SRA-XX-00-DR-A-00305 P01)
 - Proposed Roof Plan (dwg: 6706-SRA-XX-00-DR-A-00310 P01)
 - Existing First Floor Plan (dwg: 6706-SRA-XX-00-DR-A-00304 P01)
 - Lower Ground Floor Demolition Plan (dwg: 6706-SRA-XX-00-DR-A-00306 P01)
 - Existing Lower Ground Floor Plan (dwg: 6706-SRA-XX-00-DR-A-00302 P01)
 - Proposed Lower Ground Floor Plan with Topographical Survey (dwg: 6706-SRA-XX-00-DR-A-00308 P01)
 - Proposed Lower Ground Floor Plan (dwg: 6706-SRA-XX-00-DR-A-00309 P01)
 - Site Plan (dwg: 6706-SRA-XX-00-DR-A-00300 P01)
 - Location Plan (dwg: 6706-SRA-XX-00-DR-A-00301 P01)
 - Existing Elevation (dwg: 6706-SRA-XX-00-DR-A-00307 P01)
 - Proposed Elevation (dwg: 6706-SRA-XX-00-DR-A-00311 P01)
- Design and Access Statement (DAS); and
- Transport Statement (TS), prepared by Momentum

The planning application fee of £952 has been paid directly to LB Camden via the Planning Portal (PP-11005681).



Background and Site Context

The application site is located between Gray's Inn Road, Britannia Street and Wicklow Street in the London Borough of Camden (LBC). The site is located within the Kings Cross and St Pancras Conservation Area, namely Sub-Area 4: Greys Inn Road which is characterised by a mix of 19th century terraces and institutional buildings. It is adjacent to the Grade II Listed, 75 Wicklow Street.

The site is located approximately 500m from Kings Cross St Pancras Station and is surrounded by a mix of uses including student housing, offices, restaurants and retail units. Wicklow Street is a secondary street and at its western end is characterised by large buildings and former warehouse units many of which have their service yards onto Wicklow Street. The former Royal National Throat, Nose and Ear Hospital is located to the south of the site, where the EI's existing service yard is situated.

The need for a new servicing solution for the EI has been discussed extensively with LBC officers and is directly linked to the proposed development at the former Royal National Throat, Nose and Ear Hospital. The purpose of this application is to secure operational continuity for the EI if the redevelopment of the adjacent site comes forward.

Planning History

GROVEWORLD APPLICATION

The neighbouring site at the Royal National Throat, Nose and Ear Hospital site has been subject to a planning application for a proposed mix-use scheme, comprising of a 15-storey hotel, offices, courtyard and residential units. This application, known as the "Groveworld" application obtained a resolution to grant planning permission in July 2021.

The Groveworld development includes the removal of the existing EI service yard.

Our client has been extensively involved in discussions with LB Camden and Groveworld about the site including its impact on the EI's ability to service and maintain the continuous operation of the EI during the Groveworld construction period and beyond.

Proposed Development

In light of this context, this application is for the demolition of an existing ancillary area of the EI site and the construction of a new service area accessed via Wicklow Street.

The proposed service area is necessary as the existing service yard would be lost as a consequence of the Groveworld development. The new service area would accommodate existing deliveries made to the EI and would be large enough to accommodate all service vehicles up to 7.2m in length. These deliveries are currently made to a covered service yard situated in the neighbouring site to the south of 332 Gray's Inn Road, at 330 Gray's Inn Road.

The proposed service area would provide an enclosed, off street area for delivery vehicles to load and unload. The new service area would also accommodate 16 cycle parking spaces, storage space for gas cylinders and a new refuse area for storing waste.



Planning Policy Context

THE DEVELOPMENT PLAN

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that where an adopted development plan contains relevant policies, an application for planning permission shall be determined in accordance with the plan, unless material considerations indicate otherwise.

The statutory development plan for the site comprises:

- The London Plan (2021); and
- Camden Local Plan (2017).

Consideration has also been given to various Camden Planning Guidance (CPG) documents and where relevant these are referred to below.

THE LONDON PLAN (2021)

Policy D3 (d.4) of the London Plan focuses on design that facilitates efficient servicing and maintenance of buildings and the public realm as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.

Policy E8 supports London's higher and further education providers and their growth across all parts of London.

Policy HC1 requires development proposals to conserve the significance of heritage assets and their settings as well as be sympathetic to the assets significance and its surroundings.

Policy T7 states that development proposals should facilitate safe, clean and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off street with on street loading bays only used where this is not possible.

CAMDEN LOCAL PLAN (2017)

The Camden Local Plan is the overarching plan setting policies to guide sustainable development of the borough.

Policy D1 of the Local Plan details policies that inform design practices of development proposals, including the requirement that development should be of a high quality. Development is expected to respect the local context and character, preserve or enhance the historic environment, integrate well with surrounding streets and contribute positively to the street frontage amongst other things.

Policy D2 sets out how Camden's heritage assets and their settings will be preserved or enhanced. For designated heritage assets the Council will not permit the loss of or substantial harm to them. Nor will the council permit development that results in less than substantial harm to designated heritage assets.

In conservation areas part f) of the policy states the Council will resist the total or substantial demolition of unlisted buildings that make a positive contribution to the conservation area. Regarding listed buildings, part k) of the policy states that the Council will resist development which would cause harm to the significance of a listed building through an effect on its setting.

Policy E1 states that the development of Camden's health and education sectors and the Knowledge Quarter around Euston and King's Cross will be promoted.



Policy A4 states that the Council will seek to minimise the impact on the local amenity from deliveries and from the demolition and construction phases of development.

Policy T1 sets out the Council's approach to promoting sustainable transport options by prioritising walking, cycling and public transport. Regarding cycling, part h) of the policy requires development to provide accessible, secure cycle parking exceeding the minimum standards.

Policy T4 requires development to accommodate goods vehicles on site to reduce the impact on road users and the highways network.

OTHER MATERIAL CONSIDERATIONS

NATIONAL PLANNING POLICY FRAMEWORK (2021)

The NPPF (2021) sets out the Government's planning policies for England and how these are expected to be applied.

Paragraph 11 states that for decision-taking, applying a presumption in favour of sustainable development means approving development proposals that accord with an up-to-date development plan without delay.

Section 9 is also relevant to this application as it focuses on promoting sustainable transport, including the increased use of cycles and walking. Paragraph 111 identifies that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Section 12 of the NPPF focuses on achieving well-designed places, including creating places that are safe and accessible which promote health and well-being with a high standard of amenity for existing and future users.

Section 16 of the NPPF focuses on conserving and enhancing the historic environment. Paragraph 194 requires development affecting heritage assets to describe the significance of the heritage asset, including any contribution made to their setting. The level of detail should be proportionate and no more than is sufficient to understand the potential impact of the proposal on their significance.

CAMDEN PLANNING GUIDANCE (CPG): TRANSPORT (2021)

The CPG on Transport sets out guidance on delivery and servicing within LB of Camden, which is likely to have an impact on the amenity occupiers, neighbours and road users in terms of noise and vibration, air quality congestion and road safety.

The guidance also sets out requirements for DSPs and vehicular access and crossovers as well as detail on cycle parking.

CAMDEN PLANNING GUIDANCE (CPD): DESIGN (2021)

The CPG on Design sets out Camden's design expectations including how proposed development should respond to heritage assets and how aspects such as the storage and collection of recycling and waste should be considered in the design of the development.



Planning Justification

PRINCIPLE OF DEVELOPMENT

The UCL EI forms part of the Knowledge Quarter, a cluster of academic, cultural, research, scientific and media organisations within a one-mile radius of King's Cross. Policy E1 supports the future development of the established scientific and knowledge-based institutions in the area, including the health and education sectors.

As the UCL EI site is currently operating and is an established institution, in accordance with Policy E1 it is necessary that the EI is supported in its need to find a servicing solution and ensure it has access to an onsite service yard that will allow the continued operation of the EI within the Knowledge Quarter for years to come.

Policy E8 of the London Plan also states that London's role as a location for research and development should be supported and London's higher and further education providers and their development should be promoted, encouraging growth and innovation.

The proposed development would meet the London Plan ambition as well as the local planning policy and therefore the principle of this development in this location should be supported.

DESIGN & HERITAGE

DESIGN

Local Plan Policy D1 and the CPG on Design require high quality design and careful consideration to be given to the location of service areas, cycle parking provision, vehicle entrances and servicing requirements on the public realm to minimise the impact of any dead or blank frontages.

The materiality and external appearance of the proposed service area includes brick to match the existing adjacent buildings and the rear of the façade of the EI is to be in-filled and be white render to match the above appearance. In addition, the flashing on the parapet wall will match the existing appearance of the building.

This would be a significant improvement on the existing situation, where the existing service yard is tired and not in keeping with the materiality in the wider street scene. The design of the proposed service yard is complimentary to the existing built form and in accordance with Policy D1 and the Design CPG, as the proposed materials have been informed by those used in the local area, it would respond well to neighbouring heritage assets and would contribute positively to the street scene.

Policy D3 of the London Plan, part D.4 states that good design should facilitate the efficient servicing and maintenance of a building. The design of the proposed service yard has to be functional given its operational use but it is clear that the proposal would be an improvement over the current built form and would not lead to any increase in blank frontages on Wicklow Street. It is therefore acceptable in design terms and would accord with policy at all levels.

HERITAGE CONSIDERATIONS

The application site is formed of three interconnecting buildings, including the Grade II listed 75 Wicklow Street (NHLE 1379193). Whilst the development proposals do not directly impact the listed building, the proposed new service area is located adjacent to the heritage asset and

therefore the main issue for consideration is the indirect impact, including the impact on the setting of 75 Wicklow Street.

75 Wicklow Street is the former Church School of St Jude's Church (demolished 1936) and now forms part of the Ear Institute. The building dates from 1872 and was designed by Joseph Peacock, with the yellow brick, red brick banding, gable ends and decorative stone dressings being distinguishing features. The significance of the listed building derives from its historical association with the former church on the neighbouring site and its architectural character and appearance. The building has clear ecclesiastical references and gothic detailing which create aesthetic value and contributes to the building's significance.

The site is also located within the Kings Cross and St Pancras Conservation Area, namely Sub-Area 4: Greys Inn Road which is characterised by a mix of 19th century terraces and institutional buildings. 75 Wicklow Street is noted in the Conservation Area Audit as being a building which positively contributes to the character and appearance of the conservation area. The audit also identifies buildings that detract from the character and appearance of the Conservation Area and the structures above ground floor level at the rear of the Ear Institute are identified as such. Specifically, it states 'to the rear of the main hospital building, a single storey, stock brick building with a prominent, and entirely unsympathetic, single storey extension at first floor level fronts Wicklow Street'.

The proposed new service area, with direct access from Wicklow Street, will maintain the existing building line, including retaining the degree of separation with the listed building on its return elevation. The structure is single storey with an overall height of 5.5meters and will utilise buff brick, replacing the corrugated metal sheeting.

Chapter 7 of the Camden Local Plan (2017) relates to Design and Heritage. Of relevance is policy D1 which seeks to secure high quality design particularly seeking details and materials that complement the local character, a positive contribution to the street frontage whilst respecting the historic environment. This is further supported by policy D2 which specifically relates to heritage including the setting of listed buildings and conservation areas. Policy HC1 of the London Plan (2021) echoes this sentiment and requires the conservation of heritage assets and their settings.

The new service area has consciously been designed to be subservient in the street scene whilst being mindful of its siting within a conservation area and in close proximity to a listed building. Given the identification of the existing structure as a 'detracting feature' the decreased height, use of local materials and minimal punctuations in the elevation is an enhancement in the street scene, particularly for a functional and operational building. The proximity to the proposed neighbouring development is also understood and whilst the area will become more publicly accessible and visible, the design approach allows for the building to blend into the wider Ear Institute site, preventing competition and detracting from the public realm enhancements. Again, given it is a building with an operational function the design has responded to its need to be a secondary and subservient feature on Wicklow Street. The proposal is therefore considered to accord with the aims of Policy D1 of the Local Plan.

In considering the indirect impact on the listed building, the proposals will not impact the significance of 75 Wicklow Street but will positively change its setting. Given the loss of St Jude's Church and the growth of the Ear institute, the setting of the listed building has changed over time, however the introduction of a complimentary material pallet and the removal of detracting clutter

associated with the current structure will improve the appearance of the rear of the Ear Institute and will result in an improved setting for the listed building. Similarly, the proposals result in the removal of the detracting feature from within the conservation area, replacing it with a consciously designed subservient building which blends into its surroundings and therefore enhances the appearance of Wicklow Street, according with the aims of Policy D2 and HC1 of the London Plan.

In summary, the proposals comply with the relevant policies with the Camden City Plan (2017), London Plan (2021) and are compliant with the obligations set out in sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and with the NPPF.

HIGHWAYS

The Transport Statement submitted alongside this cover letter sets out in greater detail the specific manoeuvres and highways considerations that have informed the design of the proposed service area.

Pre-application discussions have also been held between Momentum, acting on behalf of UCL, and LB Camden highways officers in relation to this proposal and the proposals were considered to be acceptable by officers during those discussions including the reversing entrance movement from Wicklow Street.

The proposed development would relocate the existing servicing activity of the EI from one location on Wicklow Street to another. There would be no increase in deliveries as a consequence of this proposal and therefore the impact on the local highways network would be negligible.

Policy T7 of the London Plan requires development to provide adequate off street servicing for developments so as not to increase road danger nor impact on the road network. Furthermore, the CPG on Transport states that the location of loading facilities should be considered in all developments and must not prevent the safe operation of highways infrastructure.

Policy T4 in Camden's Local Plan states that development should incorporate space within the site for goods vehicles, reducing the on street impact of goods vehicles in the area. The development proposal provides an enclosed space within the EI site for service vehicles to load and unload. The proposal is therefore supported by adopted local policy T4.

The proposed service yard is supported paragraph 112 of the NPPF which states that applications for development should allow for the efficient delivery of goods, and access by service and emergency vehicles. The proposed development would allow goods vehicles to access the EI and efficiently deliver goods. The service area is located to the rear of the EI and accessible via Wicklow Street, away from Gray's Inn Road mitigating the impact on the main road, in accordance with national and adopted policy.

CYCLE PARKING

The proposed development also includes provision for 16 cycle parking spaces using two-tiered racks. The existing EI has no formal provision for cycle parking and currently only eight bicycles can be stored on site, in a room without cycle racks. The proposed service area provides the opportunity to increase cycle provision and deliver a high quality, covered shelter for cyclists to park their bicycles.

Policy T1 of the Local Plan states that development should provide accessible and secure cycle parking provision to promote more sustainable travel patterns. The proposed development creates

a formal area for cycle parking, creating an environment where people are more likely to choose to cycle knowing that bicycles can be stored away safely. The provision of dedicated and secure cycle spaces will help remove barriers to cycling and should encourage more staff to cycle to work.

Therefore, the proposed development is in accordance with policy at all levels and the delivery of enhanced cycle parking provision on site accords with the sustainable development aim of the NPPF.

WASTE AND RECYCLING

Camden's CPG for Design sets out the requirements for waste storage for new developments. This includes providing internal storage areas with separate facilities for waste and recycling.

The proposals would provide a 7.8sqm area for the storage of waste and recycling. This quantum is based on the existing provision and the level of waste generated would not change as a result of these proposals. Five, 770 litre bins (one general, two recycling and two clinical) are currently used by the EI and would be re-provided within the new storage area.

Collection of the bins would continue to be undertaken on street, as per the existing arrangements but the new service area would improve accessibility to the bins and make the collection of the waste more efficient. This should reduce the amount of time that waste vehicles are waiting on street.

NEIGHBOURING AMENITY

Policy A4 of the Local Plan seeks to minimise the amenity impact of deliveries. The proposed service yard would relocate the existing service yard for the UCL EI and there would be no increase in the number of vehicles movements or deliveries to the EI.

The vans used to deliver to the EI are small and would not cause undue disruption to any neighbours from a noise or congestion perspective. The majority of deliveries would take place within the site, as detailed in the accompanying Transport Statement but some deliveries may have to take place on street, as they already do, but this would not be a daily occurrence and the impact on neighbours would be no worse than the existing arrangement.

There would be no adverse amenity impact arising from the development proposals and therefore the proposal accords with local and national policy.

Conclusion

The proposed development has been informed throughout the design process by engagement with LBC officers. The proposed replacement service area on Wicklow Street will allow the continued operation of the Ear Institute in its current location. It is essential that the service yard is re-provided as the existing service yard will cease to operate once work begins at the neighbouring Groveworld site.

Not only would this proposal ensure a safe, off street delivery solution for the EI but it would also enable the EI to enhance their cycle parking provision for staff and enable them to more efficiently store and dispose of waste within their own site.

The proposal would represent a sustainable development which is in accordance with policy at all levels.



We trust that LB Camden has everything required to validate the application without delay and we look forward to discussing this application with you further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AS' followed by a flourish.

Anna Stott
Associate

JMc/AS