

GREATER LONDON AUTHORITY

Jonathan McClue

Regeneration and Planning Development Management
London Borough of Camden
Town Hall
Judd Hall
London
WC1H 9JE

Our ref: GLA/4979a/01/EL

Your ref: 2019/2879/P

Date: 5 August 2019

Dear Jonathan

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

Eastman Dental Hospital Site and Buildings (including the Former Royal Free Hospital the Eastman Dental Clinic and the Levy Wing), 256 Gray's Inn Road WC1X 8LD and Frances Gardner House Wren Street WC1X 0HD

Local planning authority reference: 2019/2879/P

I refer to the copy of the above planning application, which was received on the 1st of July 2019. On 5 August 2019, Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered a report on this proposal, reference GLA/4979a/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

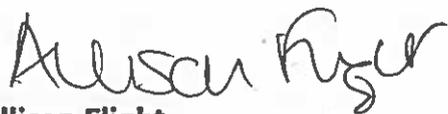
The Deputy Mayor considers that the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 66 of the above report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

GREATER LONDON AUTHORITY

Please note that the Transport for London case officer for this application is Amy Tempest, e-mail AmyTempest@tfl.gov.uk.

Yours sincerely



Allison Flight
Deputy Head of Development Management

cc Andrew Dismore, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, TfL

planning report GLA/4979a/01

5 August 2019

Eastman Dental Hospital, 256 Grays Inn Road

in the London Borough of Camden

planning application no. 2019/2879/P

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Partial redevelopment, extension and erection a five-storey building to provide a dementia and neurology research facility, alteration of Grade II listed building, erection of part four/part seven storey building to provide education space.

The applicant

The applicant is **University College London**, the architect is **Hawkins/Brown**

Strategic issues

Principle: The principle of the increase of social infrastructure and community floor space, namely for uses by healthcare and education activities, is strongly supported in line with Central Activities Zone policies (para's 17-22).

Design: The form, massing and height of the proposal are supported as it successfully responds to the context and character of the site. Further consideration should be given to the architectural treatment of the southern elevation of Plot 3, as viewed by St Andrews Gardens. The proposed development does not impact the Viewing Corridor from Parliament Hill summit to St Paul's (para's 23-29).

Heritage: The proposed development, including movement of a listed fountain, alterations of a listed building and alteration and partial demolition of an undesignated heritage asset, would cause less than substantial harm to the listed building and its setting, the listed structure and the conservation area. The scheme will deliver social, educational, community and economic public benefits including through the provision of an expanded and modernised facility for both UCL's Institute of Neurology and the UK Dementia Research Institute Hub. The public benefits outweigh the less than substantial harm and the scheme accords with heritage policies (para's 30 - 37).

Transport: Trip generation and mode share should be revised to consider the national catchment and specialist function of the proposal. Further engagement with TfL and LB Camden regarding the relocation of the bus stop is required. Financial contributions to mitigate the transport impacts of the development are required for bus capacity. Subject to the revised trip generation, further contributions towards public transport capacity and accessibility may be requested (para's 49 -62).

Outstanding issues relating to **energy, urban greening** and **sustainable drainage** need to be addressed.

Recommendation

That the London Borough of Camden be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 66 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 1st of July 2019, the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London plan and the reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1B and 1C of the Schedule to the 2008 Order:

- Category 1B: "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."
- Category 1C: "Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."

3 Once the London Borough of Camden has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended in 2018) has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site, which comprises 1.207 hectares, is located on the east side of Gray's Inn Road, to the north of the junction with Guilford Street. The site is bounded to the south by St Andrews Gardens and to the north by Calthorpe Community Gardens.

7 The site is broadly comprised of the four separate plots: the Eastman Dental Clinic, the Former Royal Free Hospital, the Levy Wing and the Frances Gardner House.

8 The Eastman Dental Clinic is a Grade II listed brown brick building which fronts Grays Inn Road is located at the south-west of the site area. Immediately to the north of the Eastman Dental Clinic, are the buildings of the former Royal Free Hospital, which comprise four wings set around a central courtyard within which is located the Grade II listed Riddell Memorial Fountain. At the centre of the application site is the Levy Wing, a three-storey brick building set over three wings and to the east of the site is the Frances Gardner House. These buildings, except for Frances Gardener House which is used as student accommodation, are in use as the Eastman Dental Hospital. The Eastman Dental is due to vacate the site in 2019 and relocate to a new development at Huntley Street in Bloomsbury.

9 The Eastman Dental Clinic and the former Royal Free Hospital buildings are located within the Bloomsbury Conservation Area (sub area 14), as is St Andrew's Gardens to the south of the site (outside site boundary) and the Calthorpe Project Community Gardens to the north of the site (outside site boundary). The Levy Wing and Frances Gardner House, to the east of the application site, are not listed and are not located within the Bloomsbury Conservation Area. To

the north-east of the site are the residential terraces of the New Calthorpe Estate and Langton Close House is located to the south-east of the application site.

10 Beyond St. Mary Magdalene School to the southwest is the A102 Blackwall Tunnel Approach Road which is part of the Transport for London Strategic Road Network, to the west of which is industrial and commercial premises and the safeguarded aggregate processing wharves at Delta Wharf and Victoria Deep Water Terminal. Grays Inn Road forms part of the Strategic Road Network. The closest London Underground and National Rail station is Kings Cross St Pancras, located approximately 750m to the north west, which provides access to national and international services. There are 2 bus stops within 640 metres of the site, providing access to the 259, 63, 46 and 17 bus routes. The majority of the site has a Public Transport Access Level (PTAL) of 6a and 6b (on a scale of 0 to 6b where 6b is the highest). There are small areas of the site that have a PTAL rating of 2, 5 and 6b. The site is also located in the Central Activities Zone (CAZ) as detailed in the London Plan and draft London Plan.

Details of the proposal

11 The proposals seek the partial redevelopment of the site in order to deliver 32,401sqm of medical research, outpatient facility and academic (Use Class D1) floorspace. The proposals result in an uplift of 12,940 sqm of D1 floorspace across the site.

12 In summary, the proposals comprise the following six elements:

1. Former Royal Free Hospital: demolition of the New, Sussex and Victoria Wings (with retention of the Alexandra Wing); single storey extension and reinstatement of southern pediment on Alexandra Wing; erection of five storey building (plus two storeys of plant and two storeys of basement) to the rear of the Alexandra Wing, including plant, terraces and flues, to provide a dementia and neurology research facility (Use Class D1). The proposed dementia and neurology research facility, which would be delivered in the first phase of the proposals, would house the University College London (UCL)'s Queen Square Institute of Neurology and the central hub of the UK Dementia Research Institute alongside related neurological NHS services provided by University College London Hospitals NHS Foundation Trust.
2. Eastman Dental Clinic: alterations to the Grade II listed building including the part rebuilding of the northern façade; replacement windows; new plant; works to the courtyard and associated external and internal alterations associated with its conversion to education use (Use Class D1) to be used as additional academic space for UCL.
3. Levy Wing: substantial demolition of the building and erection of a part 4, part 7 storey building (plus single storey basement, including plant and external amenity spaces, to provide education space (Use Class D1), likely to accommodate the newly established UCL Institute of Mathematics and Statistical Science
4. Frances Gardner House: installation of photovoltaic panels on the roof and landscaping works to the courtyard.
5. Riddell Memorial Fountain: relocation of the listed fountain from the courtyard of the Former Royal Free Hospital to the courtyard of the Eastman Dental Clinic.
6. Associated landscaping arrangements, including: the creation of a new public square, other public spaces and routes, and pedestrian connections to Gray's Inn Road, St

Andrew's Gardens, Cubitt Street and Langton Close. Associated transport and servicing arrangements including cycle parking, parking and a new servicing ramp.

Case history

13 There is no strategic planning history relevant to the application site.

Strategic planning issues and relevant policies and guidance

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Camden's Local Plan (2017), and the London Plan 2016 Consolidated with Alterations since 2011.

15 The following are also relevant material considerations:

- The National Planning Policy Framework (February 2019) and National Planning Practice Guidance.
- The Draft London Plan – Consolidated Changes Version July 2019, which should be taken into account on the basis explained in the NPPF.

16 The relevant issues and corresponding policies are as follows:

- Land use principle *London Plan; draft London Plan; Social Infrastructure SPG; Central Activities Zone SPG; Town Centres SPG;*
- Urban design and heritage *London Plan; draft London Plan; Character and Context SPG; London View Management Framework SPG;*
- Inclusive design *London Plan; draft London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Sustainable development *London Plan; draft London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; draft London Plan; the Mayor's Transport Strategy.*

Principle of development

17 Policy 2.11 of the London Plan and Policy SD4 of the draft London Plan support and promote specialist clusters and centres of excellence of health and higher education within the CAZ. Figure 2.16 of the draft London Plan highlights the role of University College London, alongside the University of London and the University College Hospital, as a strategically important specialist cluster of academic research and health related activities which contribute towards the capital's international and national role as a centre for academic and research excellence. This is also recognised in the London Plan and the Central Activities Zone SPG.

18 London Plan Policy 4.10 sets out the need to give strong support for London's higher education institutions and their development, recognising the special status of London's Med City and the Bloomsbury/Euston university precinct and its need for accommodation. The Mayor's Economic Development Strategy and Policy E8 of the draft London Plan provide strong support for existing and emerging clusters of specialist activity, including life sciences research and development associated with London's MedCity. Paragraph 2.4.12 of the draft London Plan recognises the role of UCL in achieving these objectives, alongside the Wellcome Trust and Francis Crick Institute which help make up the existing MedCity cluster around Euston Road. The draft

London Plan highlights the need to support the continued growth and development of this cluster through the provision of suitable workspace for the sector.

19 London Plan policies relating to social and health care also relevant to the proposed development. London Plan Policies 3.16 and 3.17 of the London Plan support development proposals which provide high quality health and social infrastructure (including universities and health care facilities). Similarly, Policies S1 and S2 of the draft London Plan support the provision of high quality new and enhanced healthcare facilities that meet demand and new models of care.

20 The proposals would provide 12,000 sqm of high quality educational floorspace across the remodelled Eastman Dental Clinic and plot 3 (Levy Wing locality) of the development area. London Plan Policy 3.18 provides explicit support for expanding higher education facilities in order to meet the demands of a growing and changing population and in order to maintain London's international reputation as a centre of excellence in higher education. Policy S3 of the draft London Plan notes the positive role of increased university provision on improving educational choice and the skills Londoners need in order to succeed in a changing economy, and for the capital to remain globally competitive.

21 In view of the positive contribution the proposed medical research and development facility would make towards strategic policy objectives, and as part of London's wider MedCity cluster, the redevelopment of the site for this purpose is strongly supported in accordance with London Plan Policies 2.13, 4.10, 3.16-3.17 and Policies SD1, E8 and S1-S2 of the draft London Plan.

22 Furthermore, the provision of additional higher education floorspace is strongly supported in accordance with Policy 3.18 of the London Plan and draft London Plan Policy S3.

Urban design

23 The design principles in chapter seven of the London Plan and chapter 3 of the draft London Plan place expectations on all developments to achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality.

24 The proposed layout and massing of the development responds successfully to the site's context in terms of acknowledging the existing built character of heritage assets and in creating new pedestrian routes and spaces across the site. The configuration of new build elements frames a sequence of public realm, linking together the green spaces of St Andrew's Gardens and the Calthorpe Project to the north.

25 The form, massing and height of the proposed building are supported and successfully respond to the immediate context and character of the site, its relationship with listed buildings and structures within the site, and local townscape views within the conservation area.

26 The heights and massing strategy of containing the tallest element (up to 9 storeys – approximately 55 m + AOD) to respect the scale and character of retained buildings along Gray's Inn Road is supported. The rear part of the site (to the eastern boundary) is within the landmark Viewing Corridor and Wider Setting Consultation Area for protected view 2A.1 from Parliament Hill summit to St Paul's Cathedral. The proposed height of the building will not rise above the threshold of either this Viewing Corridor nor the Wider Setting Consultation area, as has been demonstrated within the Townscape and Visual Impact Assessment provided with the application.

27 Overall, the height and massing of the development is supported and would ensure the proposed building forms a more positive and sympathetic relationship to the listed building and wider setting of the nearby listed buildings.

28 The proposal successfully draws on key features, architectural characteristics and building materials present in the immediate and wider area and would provide high-quality new buildings that would respond positively to its local context. The design of the proposed buildings facades helps to visually subdivide different elements of the buildings. This approach helps to articulate the massing changes and provides visual interest and is supported. Notwithstanding this assessment, further consideration should be given to the provision of architectural detail to the south-eastern elevation of Plot 3, which is currently proposed as a blank façade, to provide for activation and interest to the building when viewed from St Andrew's Garden.

29 The proposals have been informed by the surrounding context, including the listed building and the Bloomsbury Conservation Area. To ensure a high quality is delivered, the materiality should be secured by condition on the grant of any planning permission. Overall, the design approach is well-conceived and the fully rendered images provided demonstrate that the proposed building would be of a high architectural quality.

Heritage

30 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*. In relation to conservation areas, special attention should be paid to the desirability of preserving or enhancing the character of conservation areas when making planning decisions. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. London Plan Policy 7.8. and Policy HC1 of the draft London Plan states that development should conserve heritage assets and avoid harm. Case law has held that a finding of harm must be given considerable importance and weight.

31 As set out above, both the Eastman Dental Clinic building, and the Riddell Memorial Fountain are Grade II listed. These designated heritage assets, along with the buildings of the former Royal Free Hospital, are located within the Bloomsbury Conservation Area. The former Royal Free Hospital (which is not a heritage asset in its own right) is identified as making a positive contribution to the Conservation Area.

32 The Eastman Dental Clinic was built between 1928 and 1931 and rises to four storeys. Constructed of steel and finished in brown brick with Portland stone, the building was Grade II listed in 2007. The building forms part of the wider Eastman Dental Hospital Site and contains a series of treatment rooms, lecture theatres, laboratories along with back office functions and public waiting areas. The refurbishment of the Eastman Dental Clinic is proposed, with the retention of the exterior of the building, along with much of the principal internal, and historically significant spaces. The proposals would also see the reinstatement of historical features such as the original crissal windows and ceilings, whilst removal of latter additions to the site, and the proposed creation of routes through the site would reveal the original exterior of the northern wing, and rear elevations of the building.

33 While harm will result from the removal of internal fabric and development within the setting of the Grade II listed building, overall the proposals offer the possibility to enhance and better reveal the significance of the heritage asset whilst also securing its long-term future within a use appropriate to its historical significance. Furthermore, historic features of the building, including art deco detailing, would be enhanced and refurbished throughout the building.

34 The Riddell Memorial Fountain sits within the courtyard of the Royal Free Hospital and was erected in 1931 in celebration of the President of the Royal Free Hospital, Lord Riddell. The memorial was Grade II listed in 2018. The proposals include the relocation of the fountain to a new location within the public square to the rear of the refurbished Eastman Dental Clinic building. Given the fountain's association with its current courtyard setting, this element of the proposals would result in harm to the significance of the Grade II listed heritage asset, nevertheless, the retention of the asset on site and its relocation to a publicly accessible square would help to mitigate harm.

35 As noted above, much of the site, including the Eastman Dental Clinic and Riddell Memorial Fountain, sits within the Bloomsbury Conservation Area. This includes the buildings of the Royal Free Hospital to the north of the site which comprise three historic wings (1855 to 1895) and one modern wing (1989) surrounding a courtyard. The proposals would see the demolition of three of these four wings, with the retention of the Alexandra Wing which fronts Grays Inn Road. The demolition of the three wings, namely, the Sussex Wing, the Victoria Wing and the New Wing, along with the loss of the central courtyard space will result in some harm to the Bloomsbury Conservation Area. Nevertheless, the works of refurbishment to the Alexandra Wing, including the reinstatement of the southern pediment, would serve to mitigate the extent of harm.

36 Notwithstanding the proposals, the overall on the historic significance of the listed building would amount to less than substantial harm. The impact on the Bloomsbury Conservation Area amounts to less than substantial harm.

46 In accordance with paragraph 196 of the NPPF, where a development results in less than substantial harm to the significance of a designated heritage asset, that harm should be weighed against the public benefits. The proposal will deliver substantial public benefits including the provision of a significantly expanded and modernised facility for both UCL's Institute of Neurology and the UK Dementia Research Institute Hub, as well as additional academic floorspace. The proposed development would also help to achieve strategic policy objectives set out in the London Plan in relation to the CAZ and London's MedCity. Additionally, the works will contribute to the protection, re-use and enhancement of the listed building, and the conservation area.

37 Having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservation Areas) Act 1990, the relevant paragraphs in the NPPF in relation to heritage assets and having given the finding of harm considerable importance and weight, GLA officers are satisfied that, for the reasons set out above, the proposal is acceptable and aligns with Policy 7.8 of the London Plan and Policy HC1 of the draft London Plan.

Inclusive design

38 London Plan Policy 7.2 and draft London Plan Policy D3 require that all new development achieve the highest standards of accessible and inclusive design and can be used safely, easily and with dignity by all; are convenient and welcoming with no disabling barriers; are flexible and responsive; and realistic. In accordance with these policies, the design and access statement include

an access statement and sets out that the detailed design has taken into account the requirements of Part M of the Building Regulations, and a condition should be imposed that ensures these requirements are satisfied.

39 The accessibility statement sets out that there is significant change in level east-west across the site; and as such, the design of the landscaping and the public realm and access arrangements will be fundamental to how inclusive the development will be for many people and this should be given detailed consideration as the design is developed. The statement also sets out numerous principles for designing the scheme for people living with dementia has been a key objective of the project. Overall, the statement demonstrates that inclusive design principles have been considered from the outset and the overall approach is supported. The Council should ensure these commitments are carried through to the detailed design stages and secured by condition.

Flood Risk and Sustainable Drainage

40 The site is in Flood Zone 1 and greater than 1 hectare in area. A Flood Risk Assessment has been submitted, as required under the NPPF, which complies with London Plan policy 5.12 and draft New London Plan policy SI.12.

41 The surface water drainage strategy addresses the drainage hierarchy. Attenuation is proposed in a mix of blue/green roofs, permeable paving and below ground attenuation systems. The surface water drainage strategy for the proposed development does not comply with London Plan policy 5.13 and draft policy SI.13, as it does not give appropriate regard to the greenfield runoff rate. Further justification in respect of the proposed attenuation tank's volume should be provided and/or the tank's volume should be changed to meet London Plan Policy 5.13 and draft London Plan Policy SI.13. The detailed technical comments have been circulated to Camden Council and should be addressed.

Water Efficiency and Urban Greening

42 The sustainability statement proposes that the non-residential components of the development will target a minimum BREEAM rating of 'Excellent'. The BREEAM pre-assessments for these components show a greater than 40% reduction in water consumption and scores of 3 on water measures. This is in accordance with London Plan policy 5.15 and policy SI.5 of the draft new London Plan and as such, is strongly supported.

43 While the proposed development generally meets the requirements of London Plan policy 5.15 and draft New London Plan policy SI.5, further consideration should be given to water harvesting and reuse to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

44 Urban greening should be embedded as a fundamental element of site and building design, in line with London Plan policy 5.10 and draft New London Plan Policy G1 and G5. Features such as street trees, green roofs, green walls, rain gardens, wild flower meadows, woodland and hedgerows should all be considered for inclusion. The proposed development's Urban Greening Factor should be calculated, as set out in Policy G5 of the draft New London Plan.

Energy

45 The Energy Hierarchy has broadly been followed; however, the applicant is required to review their energy proposals to ensure compliance with the London Plan policies. Notably, the new build elements of the development are not meeting the 35% carbon emission reduction for

SAP 10 calculated emissions and should investigate further carbon reduction measures; and the energy efficiency target of 15% is not achieved by the design so further new build measures should be investigated.

46 The applicant should use the GLA's Carbon Emission Reporting spreadsheet, which has been developed to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors. The link to the spreadsheet can be found here:

<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>. This is encouraged to be submitted for review.

47 In addition to the above, compliance with TM52 London Design Summer Year 1 (DSY1) weather file: 2020s, High emission, 50% percentile scenario is not being achieved and further measures for reducing the overheating risk should be investigated and further information on the limitation for Air Source heat pumps should be provided.

48 More detailed roof plans should be provided to demonstrate PV has been maximised. The full detailed technical energy comments have been sent to Camden Council and should be addressed.

Transport

49 A transport assessment has been submitted with the application in accordance in London Plan policy 6.3 and draft London Plan Policy T4. However, the use of census data to determine the existing modal split for patients, staff and students is not considered to be appropriate for the proposed development, as patients (in particular) will be from a far wider catchment than that captured in the local output area census data because of the specialist function on the site. Surveys that capture the existing use mode share are requested to be undertaken for a more robust assessment of mode share. Similarly, the use of TRICS survey data from a GP surgery in Wandsworth is also considered inappropriate. A combination of survey data from the existing hospital on-site and other 'destination' medical facilities in London should be used to future patient mode share. Future staff mode share has also been derived from Census data. Survey and postcode data (potentially combined with relevant TRICS data) would be more appropriate, and this approach should be carried out.

50 There is concern that the equal distribution of trips across the day for Outpatient and MRI facility trips is not reflective of a typical scenario of trip rates. Clarification on whether the 'worst-case' scenario has been provided within the Transport Assessment should be provided. Furthermore, several assumptions have been factored into trip rate generation without supporting evidence or clear rationale.

51 There are several errors within the train frequencies identified within the Transport Assessment, which should be reviewed and amended. It is welcomed that trip distribution separating trips out by line has been prepared, however it does not appear that consideration has been given to the distance of the station from the site, or the ultimate origin/destination which would indicate the direction of travel. Distribution of London Underground trips should be based on a survey of existing users. The Transport Assessment concludes that the impact of the development on London Underground services is negligible; however, it does not include an assessment of line capacity or station capacity. The Transport Assessment should be updated to include this information and the conclusion revised as necessary.

52 Based on the current trip generation, the development will result in a net increase of 182 AM peak trips to the bus network. King's Cross is a major central London hub for national rail services; provides access to Eurostar at St Pancras; and interchange between several London

Underground services and bus routes, therefore it is considered that this station will be where a considerable number of visitors to the site would initially arrive. Bus Route 46 is the only route within 400m (TfL's preferred walking distance) that provides direct access between King's Cross Station and the proposed development. On this basis, it is assumed that in excess of one-third of bus trips would be assigned to Bus Route 46 in peak direction, rather than an equal distribution of passengers across all services. Bus Route 46 currently operates at capacity, and any additional demand will need to be mitigated. In line with London Plan policy 6.3 and 6.7 of the London Plan and draft London Plan Policy T4, a financial contribution of £850,000 over a 5-year period should be secured within a s106 legal agreement to mitigate the site-specific impacts of this development.

53 The proposals include the relocation of the southbound bus stop on Gray's Inn Road to better serve the pedestrian desire line into the site. The proposed arrangements, which have factored in Camden Council's proposals to introduce a segregated cycle lane, need further detailed review to ensure the higher number of vulnerable road users who will be using the bus stop to access the research centre and outpatient facility are catered for safely. TfL is working with Camden Council on the bus stop design and highway layout, and it is expected that further engagement will continue to ensure that a suitable design is found.

54 In accordance with draft London Plan Policy T4, a Healthy Streets Check has been undertaken, which includes Camden Council's proposals to construct a segregated cycle lane on Gray's Inn Road. The Transport Assessment must clearly demonstrate how the development proposal on its own, delivers against the Healthy Streets criteria. Furthermore, where there are reductions in the score against various Healthy Streets criteria, measures to address these should be proposed.

55 The Active Travel Zone Assessment identifies several improvements for the five routes identified, and these should be implemented either through planning obligation within a s106, s278 agreement or use of Borough CIL. Similarly, the Transport Assessment identifies measures to improve road safety and reduce in car dominance, and in accordance with Policy 6.3 of the London Plan and draft London Plan policy T2, these road safety measures identified should be secured by condition or planning, working in consultation with the relevant highway authority.

56 The improved permeability of the site is welcomed. However, there are concerns regarding the suitability of Langton Close as a pedestrian and cycle access due to it also being the main servicing access and access to disabled parking provision. This route should be reviewed in light of Vision Zero principles, and it should be demonstrated how interaction between vehicles, pedestrians and cyclists will be minimised, with appropriate mitigation measures secured by condition or planning obligation within a s106 legal agreement.

57 In accordance with London Plan 6.9 and draft policy T5, the development includes a new walking and cycling connection to Cubbitt Street, which will link the site to CS6. This is broadly supported, however clarification on the width and details on how this shared space will function should be provided prior to Stage 2 referral. Public access to the new pedestrian and cycling routes, and the minimum hours that they are to be available, should be secured by condition or a planning obligation within a s106 legal agreement.

58 In order to confirm the cycle parking provision is in accordance with London Plan and draft London Plan policies, a clear breakdown of the floorspace for the different land uses should be presented. To ensure compliance with London Plan policy 6.9 and draft London Plan T5, cycle parking and access should be designed in accordance with the London Cycle Design Standards (LCDS), and this should be secured by condition.

59 In line with Vision Zero and TfL Guidance, a Stage 1 road safety audit should be completed at the planning stage for any proposed highway works.

60 For an ambulance to leave the site in forward gear from the on-site patient drop-off bay reversing will need to occur. With a high number of vulnerable road users on this site, further information is requested on how the design/layout will ensure that there is minimal interaction between vehicle movements and vulnerable road users. Ambulances should enter and exit the site in forward gear, without the need for reversing.

61 The proposed development is car-free, except for disabled parking, which is strongly supported as it accords with London Plan policy 6.13 and draft London Plan policy T6.

62 In accordance with London Plan policies 6.3 and 6.14 and draft London Plan policy T4, requirements for a full Delivery and Servicing Plan, Construction Logistics Plan and travel plan should be secured as part of any permission. The Construction Logistic Plan should seek to minimise the impact the development has on CS6 as well as other key pedestrian and cycle routes such as the planned segregated cycle route on Gray's Inn Road.

Local planning authority's position

63 London Borough of Camden's planning officers are currently assessing the application and are aiming to take this application to be determined at Planning Committee on the 19th of September 2019.

Legal considerations

64 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

65 There are no financial considerations at this stage.

Conclusion

66 London Plan policies on the principle of development, urban design, heritage, inclusive design, flood risk, sustainable drainage, water, urban greening, energy, and transport are relevant to this application. The following issues should be considered:

- **Principle of development:** The principle of the increase of social infrastructure and community floor space, namely for uses by healthcare and education activities, is strongly supported in line with Central Activities Zone policies.
- **Design:** The form, massing and height of the proposal are supported as it successfully responds to the context and character of the site. Further consideration should be given

to the architectural treatment of the southern elevation of Plot 3, as viewed by St Andrews Gardens. The proposed development does not impact the Viewing Corridor from Parliament Hill summit to St Paul's (para's 23-29).

- **Heritage:** The proposed development, including movement of a listed fountain, alterations of a listed building and alteration and partial demolition of an undesignated heritage asset, would cause less than substantial harm to the listed building and its setting, the listed structure and the conservation area. The scheme will deliver social, educational, community and economic public benefits including through the provision of an expanded and modernised facility for both UCL's Institute of Neurology and the UK Dementia Research Institute Hub. The public benefits outweigh the less than substantial harm and the scheme accords with heritage policies.
- **Flood Risk and Sustainable Drainage:** The surface water drainage strategy for the proposed development does not comply with policies as it does not give appropriate regard to the greenfield runoff rate. Additional attenuation storage volume calculations should also be provided. A London Sustainable Drainage Proforma should be provided.
- **Water Efficiency and Urban Greening:** Further consideration should be given to water harvesting and reuse to reduce consumption of water across the development. Urban greening should be embedded as a fundamental element of site and building design. The proposed development's Urban Greening Factor should be calculated.
- **Energy:** Comprehensive comments have been provided to Camden Council however in summary, various elements of the energy strategy are required to be addressed.
- **Transport:** Trip generation and mode share should be revised to consider the national catchment and specialist function of the proposal. Further engagement with TfL and LB Camden regarding the relocation of the bus stop is required. Financial contributions to mitigate the transport impacts of the development are required for bus capacity. Subject to the revised trip generation, further contributions towards public transport capacity and accessibility may be requested.

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