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Our Reference
Project Oriel

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (As amended) Request for an EIA Screening Opinion for Project Oriel, including the Redevelopment of St Pancras Hospital

Dear John,

We write to you on behalf of Moorfields Eye Hospital NHS Foundation Trust, UCL Institute of Ophthalmology and Moorfields Eye Charity (the 'Applicant') to request the London Borough of Camden to adopt a formal EIA Screening Opinion pursuant to Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017[1] (as amended) (herein referred to as 'the EIA Regulations') in relation to a proposed development at St Pancras Hospital. The development comprises the construction of a specialised ophthalmology clinical, research and education facility, with associated access, public realm and utilities connections (herein referred to as the 'Proposed Development'), and comprises the north-western part of St Pancras Hospital (herein after referred to as the 'Site').

In accordance with the requirements of Regulation 6(2) of the EIA Regulations, this request provides the following information to assist the London Borough of Camden (LBC) in adopting an EIA Screening Opinion in relation to the Proposed Development:

- A plan sufficient to identify the land;
- A description of the nature and purpose of the Proposed Development;
- A description of the Proposed Development, including in particular the physical characteristics of the Proposed Development and the location of the Proposed Development, with particular regard to the environmental sensitivity of geographical areas likely to be affected, taking into account:
  - Schedules 2 and 3 of the EIA Regulations;
  - The characteristics of the Proposed Development;
  - The location of the Proposed Development and its surrounds; and
- Any features of the Proposed Development or any measures envisaged to avoid or prevent what might otherwise have been significant effects on the environment.

Application Site and Surrounding Area

A plan showing the location of the Site is provided in Figure 1, Appendix A. The Site is bound by Granary Street to the north and east, the remainder of the St Pancras Hospital and St Pancras Gardens and Pancras Road to the south, and the A5202 to the west. The Ordnance Survey grid reference for the Site is TQ 29658 83629. The Site covers an area of approximately 0.808 hectares (ha) and is located wholly within the London Borough of Camden (LBC).

The Site comprises the north-western part of the St Pancras Hospital NHS facility, and contains the following buildings:

[1] Her Majesty's Stationery Office, HMSO (2017); 'The Town and Country Planning (Environmental Impact Assessment)' (Amendment) Regulations 2017.

- Ash House;
- Bloomsbury Day Hospital ;
- Camley Building;
- Jules Thorn Day Hospital;
- Kitchen; and
- Post Room and Mortuary.

The remainder of St Pancras Hospital contains a further 12 buildings (see Figure 2, Appendix A).

St Pancras Hospital provides treatment for a range of conditions, including but not limited to mental health, drug addiction and infectious diseases. An internal one way road services the Site and associated buildings, which is accessible from the western boundary via St Pancras Way/A5202.

To the north of the Site is the 'Ugly Brown Building', which accommodates numerous commercial uses including the corporate offices of Ted Baker. Regents Canal is situated adjacent to the eastern boundary, as are national rail lines which connect to St Pancras International station. A construction site is situated directly adjacent to the eastern boundary, located in between Granary Street and Camley Street, which is associated with the 101 Camley Street development. Beyond the canal are further residential and mixed-use developments, including Onyx Apartments and Gasholders London. South of the Site is St Pancras Gardens and St Pancras Old Church, which is a local Nature Conservation Site of Borough Importance Grade 2, as well as a Grade II Registered Park and Garden. To the west is the Unite Students residential accommodation and King's Cross Residence.

The Sensitivity of the Site

The Site is not located within a Sensitive Area as defined in Schedule 3 of the EIA Regulations. The Site is not located within any statutorily designated ecological, geological or landscape areas such as a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area of Conservation (SAC) or Area of Outstanding Natural Beauty (AONB).

The Site is not located within or close to any World Heritage Sites or Scheduled Monuments.

The Site is not located within any Control of Major Accidents or Hazards (COMAH) consultation zones. However, given its use as a hospital there are a number of licences which are registered at the Site, including for the storage of radioactive substances.

In terms of other designations, the Site is located within the northern end of the Kings Cross/St Pancras Conservation Area, which extends south from the Site to include the railway stations of Kings Cross and St Pancras. To the north and east of the Site is the Regents Canal Conservation Area. The nearest Archaeological Priority Area (APA) is St Pancras Old Church and Burial Site APA (Tier 2) which is located to the south of St Pancras Hospital and beyond Camley Street to the east. The APA covers the church of St Pancras, now known as St Pancras Old Church, and its corresponding post-medieval burial ground combined with that of St Giles-in-the-Fields. The APA excludes areas of former burial ground lost to the construction of the railways associated with St Pancras Station[2].

The north-eastern part of the Site is situated within the Wider Setting Consultation Area of the Protected Vista from Assessment Point 2A.1 Parliament Hill to St Paul's Cathedral as per the London View Management Framework (LVMF).

The Site is located within Flood Zone 1. Flood Zone 1 is defined as land which is at risk of flooding from fluvial flood events with less than 0.1% annual probability of occurrence, and is considered to be at 'very low probability' of fluvial (river) flooding.

The Proposed Development

The Proposed Development comprises a detailed application for a new clinical, research and education facility with associated access, public realm and connection to utilities. The scheme will require the demolition of the existing buildings on-site (Ash House, Bloomsbury Day Hospital, Camley Building, Jules Thorn Day Hospital, Kitchen and the Post Room and Mortuary).

The Proposed Development comprises a new facility for the Moorfields Eye Hospital, UCL Institute of Ophthalmology and Moorfields Eye Charity. The Proposed Development takes a radical approach to the integration of sight-related care, research and education, driving innovation and speeding up the translation of research findings

[2] Place Services (2018) London Borough of Camden Archaeological Priority Areas, October 2018

into treatment. The new facility will enable seamless collaboration between clinicians, patients and researchers, delivering world class clinical services and cutting edge research.

The scheme design caters for the wide diversity of user groups, from patients and their carers, through to doctors, nurses and other clinical staff, from academic researchers and their students through to the building's administrators and other staff, as well as visitors. At the centre of the building is a light-filled atrium, forming the focus and heart of the building. All visitors, patients and staff arrive into this space from where they proceed to the different parts of the building. With plenty of daylight, warm timber finishes and acoustic treatment the atrium and oriel form the key orientation within the building. Wayfinding will be emphasised through light, signage, art, colour and contrast.

The design of the Proposed Development is ongoing at this time, however in summary the Proposed Development is anticipated to comprise the following:

- Up to approximately 44,000m^2 Gross Internal Area (GIA) of floorspace for clinical, research and education purposes, including accident and emergency (A&E) department, outpatients, research areas, operating theatres, education space, café and retail areas, facilities management, office space and plant space.;
- The Proposed Development will consist of a single building with an enclosed courtyard containing the primary circulation of the building;
- The building will range from seven to nine storeys in height (with a maximum height of 63m Above Ordnance Datum (AOD)), including the rooftop plant but excluding associated flues (which would extend an additional 5 – 10m);
- Vehicular access into the Proposed Development via Granary Street;
- The Proposed Development will be car-free, with only blue badge parking provided on the Site, as well as patient and visitor drop off. Cycle parking will also be provided as part of the Proposed Development;
- Infrastructure works:
  - Connection to existing utilities networks;
  - Public realm and landscaping within the planning application boundary; and
  - Internal site roads and other infrastructure within the planning application boundary.
- Temporary works required to facilitate construction, such as a site compound, material laydown areas, haul roads and hoardings.

EIA Screening Criteria and Process

Determining the Need for an EIA

The Proposed Development falls under Schedule 2 category 10(b) 'urban development project' of the EIA Regulations. For developments which fall under Schedule 2, the need for EIA is determined on the basis of set criteria, which are outlined below:

- The development is EITHER in a sensitive area as defined by the EIA Regulations OR exceeds the size threshold for that type of development specified within Schedule 2; AND
- It is likely to have significant effects on the environment by virtue of factors, such as its nature, size or location. Schedule 3 of the EIA Regulations provides criteria which are to be taken into account when determining whether a proposed scheme is likely to have significant effects on the environment.

A flowchart illustrating the EIA screening process is enclosed with this request at Appendix B. This is taken from the Planning Practice Guidance on EIA[3].

The Proposed Development has been assessed against the above criteria and the process outlined in Appendix B to establish whether it constitutes EIA Development, the results of which are presented below.

[3] Ministry of Housing, Communities & Local Government (2019) Planning Practice Guidance, Environmental Impact Assessment, available at: https://www.gov.uk/guidance/environmental-impact-assessment#proposed-development

Review against the EIA Regulations Screening Criteria

As indicated previously, the Proposed Development is not located within an environmentally 'sensitive area' as defined by Regulation 2(1) of the EIA Regulations. The closest sensitive area to the Site as defined in the EIA Regulations is the Benedictine Nunnery of St Mary Scheduled Monument, approximately 2.25km to the south east of the Site.

Schedule 2 category 10(b) of the EIA Regulations sets out the following thresholds for urban development projects:

- *"The development includes more than 1 hectare of urban development which is not dwelling house development; or*
- *the development includes more than 150 dwellings; or*
- *the overall area of the development exceeds 5 hectares."*

The total area of the Site is approximately 0.808ha and no dwellings are proposed, meaning that the Proposed Development does not meet any of the above Schedule 2 category 10(b) thresholds. In accordance with the EIA screening process, as illustrated in Appendix B, the Proposed Development will not constitute EIA Development as defined by the EIA Regulations and EIA is therefore not required.

Review in Light of the Planning Practice Guidance

Planning Practice Guidance (PPG) states that it should not be presumed that developments falling below Schedule 2 thresholds could never give rise to significant effects and therefore each development will need to be considered on its merits. PPG also states that only a very small proportion of Schedule 2 developments will require EIA.

EIA case law has established that the ultimate test to confirm whether a development requires EIA is its likelihood to result in significant environmental effects by virtue of factors such as the characteristics of the development, the location of the development and the types and characteristics of the potential impact of the development on the environment, as set out in Schedule 3 of the EIA Regulations. This is of particular importance in dense urban environments where the planning application site area is small and the proposed development comprises tall buildings.

The PPG provides guidance on the application of the EIA Regulations, including EIA screening and how to determine whether a development is likely to give rise to significant environmental effects so that EIA is required. The PPG provides a set of indicative criteria and thresholds, and key issues to consider to help determine whether a development is likely to have significant effects.

In relation to Schedule 2 category 10(b) projects, the PPG establishes the following indicative thresholds for "*sites which have not previously been intensively developed:*

(i) area of the scheme is **more than 5 hectares**; or

(ii) it would provide a total of more than 10,000 m^2 of new commercial floor space; or

(iii) the development would have **significant urbanising effects** in a previously non-urbanised area (e.g. a new development of **more than 1,000 dwellings**)".

The Site has been subject to extensive use in the past associated with the construction and use of the St Pancras Hospital. Whilst the area of the Site is less than 5ha and it is already within an urbanised area, it will provide more than 10,000m^2 of new floor space for clinical, research and education use (use class D1).

With regards to Schedule 2 category 10(b) projects, the PPG also states that "Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination". The key issues specified in the PPG in relation to this type of development are "physical scale, potential increase in traffic, emissions and noise".

Consideration of the key issues identified in the PPG for Schedule 2 category 10(b) projects and the requirements of Schedule 3 of the EIA Regulations in respect of the Proposed Development is provided in the section below.

Potential Environmental Effects

The characteristics and location of the Proposed Development have been considered when assessing the impact of the Proposed Development on the environment and the potential for likely significant effects to result from the Proposed Development.

For the purposes of this EIA screening request the Proposed Development has been appraised against the following topics:

- Air Quality;
- Archaeology and Built Heritage;
- Climate Change;
- Daylight, Sunlight, Overshadowing and Solar Glare;
- Ecology and Biodiversity;
- Ground Conditions;
- Health and Wellbeing;
- Major Accidents and Disasters;
- Noise and Vibration;
- Socio-economics;
- Townscape and Visual Impacts;
- Traffic and Transport;
- Waste and Resources;
- Water Environment;
- Wind Microclimate; and
- Cumulative Effects with Other Developments.

Air Quality

The entire borough of LBC is designated as an Air Quality Management Area (AQMA) due to the exceedance of Air Quality Strategy (AQS) objectives[4] for both nitrogen dioxide (NO_2) and particulate matter (PM_{10}). To monitor air quality, the LBC uses three continuous monitoring sites (monitoring concentrations of NO_2, PM_{10} and $PM_{2.5}$) and 14 NO_2 diffusion tube sites. In 2018 Camden saw exceedances of the annual NO_2 AQS objective at 10 locations.

Sensitive receptors to air quality effects during construction and operation of the Proposed Development include nearby residential properties, community facilities (e.g. schools and hospitals, including the Site itself and the remainder of the St Pancras Hospital site and the Proposed Development) and designated ecological sites (as discussed below). The closest receptors comprise the remainder of the wider St Pancras Hospital site (<50m south and east), 101 Camley Street (<100m east), Unite Students accommodation and Kings Cross Residence (<100m west). The Site itself is part of St Pancras hospital which is a sensitive receptor. There is one school within 200m of the Site (Abacus Belsize Primary School) and five within 500m. The nearest nursery is within 450m, and the next nearest hospital (excluding St Pancras hospital itself) is just over 1km and a care home is within approximately 1.2km of the Site. These receptors may be sensitive to changes in the concentrations of NO_2 and dust emissions associated with emissions from road traffic.

With regards to sites designated for nature conservation, there are no internationally recognised statutorily designated sites within 5 km of the Site (SAC, SPA, Ramsar sites). There are no Sites of Special Scientific Interest (SSSIs) or National Nature Reserves (NNRs) within 1 km of the Site.

The main impacts during construction would arise from fugitive emissions of dust due to activities such as earthworks and increases in PM_{10} and NO_2 concentrations at sensitive receptors due to emissions from road traffic and plant (i.e. non-road mobile machinery (NRMM)). These impacts are likely to be localised and temporary in nature. During construction, dust and emissions from the Proposed Development would be managed in line with a

[4] Department for Environment, Food & Rural Affairs (Defra), 2019. UK and EU Air Quality Limits, National Air Quality Objectives. Accessed at: https://uk-air.defra.gov.uk/assets/documents/Air_Quality_Objectives_Update.pdf

Construction Environmental Management Plan (CEMP). Furthermore, a Construction Management Plan (CMP) will be prepared setting out measures to minimise the impact of construction traffic.

The main sources of emissions to air during operation of the Proposed Development would be associated with vehicles servicing the Site and any associated energy plant.

An Air Quality Assessment will be undertaken and the results will be submitted in support of the planning application for the Proposed Development, taking account of anticipated dust arising during construction, and emissions to air from construction traffic and operational road traffic as well as potential energy sources during occupation of the Proposed Development. A three month diffusion tube survey has been completed at the Site and the results of this survey will be used to inform the modelling for the Air Quality Assessment. The Air Quality Assessment will specify mitigation measures required to avoid significant dust effects during construction. The Camden Local Plan[5] establishes provisions related to air quality and these will be taken into account during the design of the Proposed Development.

Baseline monitoring using diffusion tubes has been undertaken by AECOM to determine NO_2 concentrations in the area of the Proposed Development and i to provide a means to verify the air quality modelling that will be undertaken as part of the future Air Quality Assessment. The diffusion tube monitoring locations are shown in Figure 3 below. The seven sites were annualised using the LAQM.TG(16) Guidance document. The annual ratio was calculated to be 1.25 as shown in

Table 1. This ratio is then multiplied by the average NO_2 concentration for each tube over the 3 months as shown in Table 2. Bold concentrations highlight exceeding concentrations. These results indicate that the annual mean concentration is exceeded at Locations 4, 5, 6 and 7 and is within 10% of the AQS objective (40 µg/m^3) at Locations 2 and 3.

Table 1 Annualisation Ratio for Diffusion Tube Monitoring Data

Background	Date On	Date Off	Annual Mean	Period Mean	Ratio
Camden - Bloomsbury	26-Jul-19	30-Oct-19	30.02	24.63	1.22
Westminster - Covent Garden	26-Jul-19	30-Oct-19	38.20	30.37	1.26
Islington - Arsenal	26-Jul-19	30-Oct-19	26.05	20.17	1.29
		Total	**31.42**	**25.06**	**1.25**

[5] London Borough of Camden (LBC), 2017; Camden Local Plan

Figure 1 Air Quality Diffusion Tube Monitoring Locations

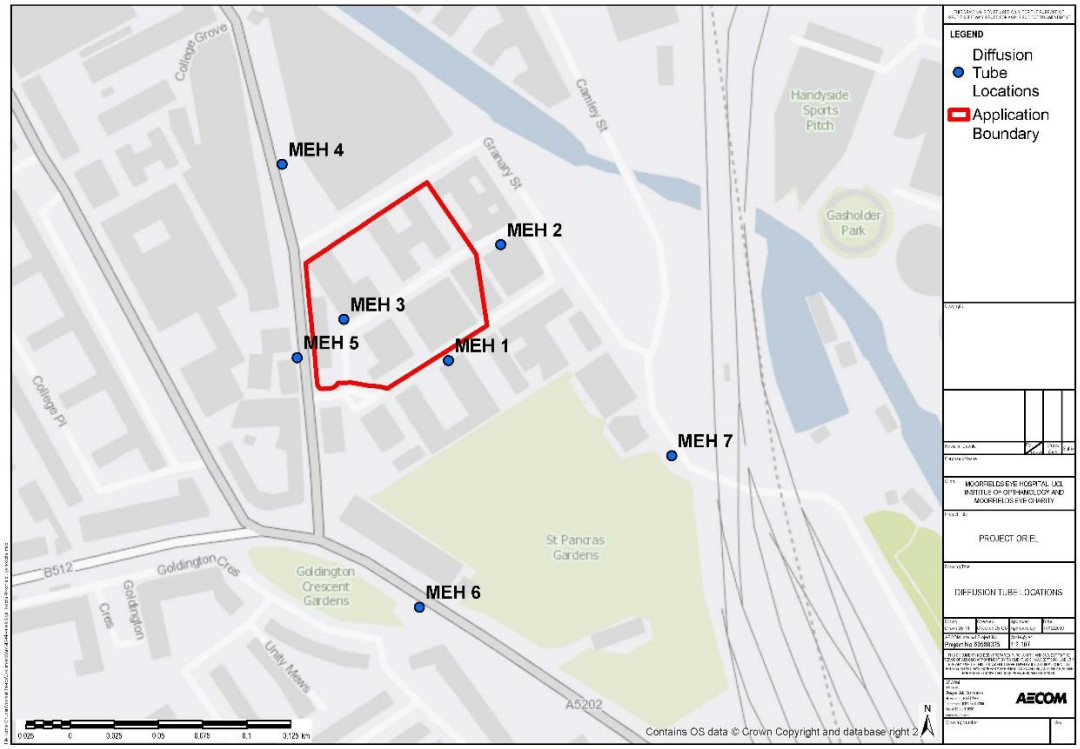

Table 2 Annualised Diffusion Tube Data

Site Ref	Results µg/m³				Ratio	
	1	2	3	Mean	Site Mean	Annualisation
MEH 1a	27.9	27.3	29.5	28.2	28.3	35.4
MEH 1b	28.3	25.5	32.2	28.7		
MEH 1c	28.3	25.6	30.2	28.0		
MEH 2a	29.1	26.2	34.2	29.8	29.4	36.7
MEH 2b	28.7	26.7	32.2	29.2		
MEH 2c	28.6	27.8	30.9	29.1		
MEH 3a	30.3	28.8	33.7	30.9	30.0	37.4
MEH 3b	28.6	30.5	28.9	29.3		
MEH 3c	28.1	28.4	32.3	29.6		
MEH 4a	34.9	32.4	40.8	36.0	36.0	**45.0**
MEH 4b	32.9	33.2	41.3	35.8		
MEH 4c	34.6	34.3	39.8	36.2		
MEH 5a	40.8	40.3	43.1	41.4	41.2	**51.5**
MEH 5b	40.0	40.8	43.0	41.3		
MEH 5c	40.2	41.0	41.8	41.0		
MEH 6a	32.6	32.7	38.7	34.7	34.1	**42.7**
MEH 6b	33.9	29.6	38.7	34.1		
MEH 6c	33.0	31.2	36.8	33.7		
MEH 7a	41.0	40.1	39.5	40.2	39.3	**49.1**
MEH 7b	38.0	37.4	39.1	38.2		
MEH 7c	41.4	37.3	39.7	39.5		
Blank	< 1.0	< 1.0	< 1.0	< 1.0		

Orange cells show overall mean concentrations for each location over the 3 month period, Blue cells show annualised results, **BOLD** shows the NO_2 concentrations which exceed the AQS objective.

The mitigation measures to be implemented during the construction works to minimise air quality impacts will be confirmed following an assessment using the Mayor of London's guidance for construction and demolition sites[6]. The proposed mitigation measures will be taken from this guidance and the associated IAQM guidance[7] in order to control and minimise the demolition and construction impacts.

Measures which aim to minimise and mitigate the potential exposure of future occupants of the Proposed Development to elevated pollution concentrations (i.e. concentrations above air quality objectives in the opening year) will also be developed if necessary and incorporated within the scheme design. Mitigation requirements will be determined based on an evaluation of the results of the Air Quality Assessment, a review of sources of pollutants (i.e. background contributions, road sources and energy centre, if applicable), the location of existing sensitive receptors to local pollutant sources and relevant planning policy.

With the implementation of the good practice mitigation measures referenced above (CEMP and CMP) as well as sustainable design principles being incorporated into the scheme design, the Proposed Development is unlikely to give rise to any significant adverse effects related to air quality.

Archaeology and Built Heritage

There are no World Heritage Sites, Scheduled Monuments or registered battlefields within 1km of the Site. The nearest Scheduled Monument is the Benedictine Nunnery of St Mary, Clerkenwell located approximately 2.25km south-east of the Site.

The Site is located approximately 100m north of the St Pancras Old Church and Burial Ground Archaeological Priority Area (APA) as defined in Scheduled Ancient Monuments and Archaeological Areas Act 1979. The Regents Canal and Rail Infrastructure APA is also located within 250m of the Site toward the east. St Pancras Gardens is also designated as a Grade II Registered Park and Garden.

The closest heritage asset to the Site is the Registered Park and Garden, St Pancras Gardens, approximately 100m to the south of the Site. The wider St. Pancras Gardens site also includes 10 Grade II Listed buildings, two Grade II* Listed buildings and one Grade I Listed building. There is approximately a 2-3m difference in ground levels across the Site, with some small brick retaining walls in place. There are semi-basements in some buildings to accommodate the level changes across the Site. A network of underground service tunnels is present across the Site, supplying the hospital buildings with heat/steam. Asbestos containing materials (ACM) are known to be present, having been used as an insulating material in some tunnels.

The Proposed Development will include a lower basement level and due to changes in the ground level across the Site a retaining wall is likely to be required on one or more sides of the new building.

A Heritage Statement will be prepared in support of the planning application. As part of this, a detailed desktop study will be undertaken, supplemented by site surveys in order to provide a baseline for the cultural heritage resource that has the potential to be impacted by the Proposed Development. Data will be collected for a 1km study area to gain an understanding of the nature of the surrounding historic landscape and provide a context for the Site. The Heritage Statement will present the historical background of the Site, including the designated and non-designated heritage assets within the Site and a wider study area. An understanding will be obtained of the extent of previous below ground disturbance experienced throughout the Site. To inform the potential for archaeological deposits to survive beneath the Site, the baseline will set out assessments of the archaeological potential of the Site, the significance of the cultural heritage resource, including any contribution made by its setting. The study area for the setting assessments will be guided by the urban context of the Site and the height of the Proposed Development. The Heritage Statement will include an assessment of the significance of cultural heritage assets likely to be impacted by the Proposed Development and make appropriate recommendations to mitigate any adverse effects.

With the implementation of appropriate mitigation, no likely significant adverse effects on archaeology and built heritage have been identified.

Climate Change

The UK Government has announced a target of net zero carbon emissions by 2050, which was legally adopted in June 2019. Furthermore, the climate projections for the UK (according to the UKCP18[8]) predict that summers will

[6] Mayor of London, 2014; The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance
[7] Holman et al, 2014; Guidance on the Assessment of Dust from Demolition and Construction. Institute of Air Quality Management
[8] Met Office, 2019. UK Climate Projections (UKCP). Accessed at: ttps://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index

become hotter and drier; winters will become milder and wetter; soils will become drier on average; snowfall and the number of very cold days will decrease; and storms, heavy and extreme rainfall, and extreme winds will become more frequent. Therefore, the greenhouse gas (GHG) emissions, climate resilience and in-combination climate impacts of the Proposed Development have been considered.

The construction and operation of the Proposed Development would inevitably result in GHG emissions. Primary emission sources over the life cycle of the Proposed Development include embodied carbon within building materials, energy consumption of plant and vehicles, fuel consumption for the transport of materials and future on-site users or workers, and the disposal of waste.

The design of the Proposed Development will be developed to be climate resilient and to reduce any potential in-combination climate impacts. For example, the Drainage Strategy, which will be submitted with the planning application, will be developed to provide an allowance for an increase in surface water runoff as a result of climate change. The landscaping strategy, as set out within the Design and Access Statement to be submitted with the planning application, will incorporate drought resilient planting. Design principles to avoid overheating would be set out within the Energy and Sustainability Strategy.

The strategy relating to climate change for the Proposed Development will be based on three key aspects: adaptation, resilience and mitigating greenhouse gas (GHG) emissions.

- *Adaptation*: The planning application will be accompanied by a Surface Water Drainage Strategy that will demonstrate the ability of the proposed drainage strategy for the Proposed Development to adapt to the predicted scenario of rainfall increase. The Environment Agency's mapping indicates that the Site is at low risk of surface water flooding, with surface water pathways present across the Site. In line with the Environment Agency's guidance, the drainage strategy will be designed to accommodate a 40% increase in precipitation with climate change;
- *Resilience*: The design of the Proposed Development will consider the climate projections summarised above in order to withstand the impacts generated by the predicted changes. This can include measures such as specifying drought resilient planting within the Landscape Strategy and setting a strategy to avoid the overheating of buildings; and
- *Mitigating GHG emissions*: The GHG emissions arising from the Proposed Development will be minimised throughout the construction and operational phases. During construction, a CEMP will outline measures to use energy in an efficient manner. Materials with lower embodied carbon will be considered during detailed design development, such as locally sourced products and materials with a higher recycled content for inclusion in detailed design specifications. Materials made available through excavation (for example, fill soil and gravels) will be reused directly on-site where feasible to minimise emissions associated with the import of materials to Site, and embodied carbon associated with additional materials. During design development of the Proposed Development, a Part L Building Regulations compliant baseline for energy consumption will be established against further energy efficiency measures, and low and zero carbon technologies will be considered, whilst also acknowledging Site constraints and their feasibility. An Energy and Sustainability Strategy will be prepared and submitted in support of the planning application to demonstrate how the Proposed Development complies with London Plan Policy 5.2 Appendix D of the Sustainable Design and Construction Supplementary Planning Guidance (SPG)[9]. GHG emissions from the Proposed Development are likely to contribute considerably less than 1% of the UK's carbon budget and therefore are not likely to be so significant as to prevent the UK from meeting its current carbon budgets.

No likely significant adverse effects due to climate change resilience and in-combination climate impacts have been identified. Measures embedded within the design will take into account future conditions associated with the changing climate.

Daylight, Sunlight, Overshadowing and Solar Glare

The assessment of daylight, sunlight and overshadowing conditions considers the potential for likely significant effects caused by a reduction in available direct sunlight and daylight in adjacent properties as a result of the Proposed Development.

As set out above, the nearest existing residential receptors to the Site are 101 Camley Street less than 100m east and Unite Students and Kings Cross Residence less than 100m west. The Unite Students building is deemed to have a low sensitivity in relation to daylight and sunlight due to the transitory nature of student residents. To the

[9] Greater London Authority, 2014. Sustainable Design and Construction. Available: https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf

north is the Ugly Brown Building which comprises commercial uses, therefore has a low sensitivity in relation to daylight and sunlight due to its use class.

St Pancras Gardens includes amenity space, therefore would be at risk of increased overshadowing levels, however it is separated from the Site by the remainder of the St Pancras Hospital. Railway lines are situated approximately 120m east of the Site, therefore the drivers could be potentially adversely affected by solar glare as a result of the façade materials associated with the Proposed Development.

The Proposed Development comprises one building up to a maximum height of nine storeys. Due to the low rise nature of the existing buildings on the Site, any development of scale on the Site would likely result in potentially adverse impacts in relation to daylight, sunlight, overshadowing and solar glare to surrounding properties.

Daylight, sunlight, overshadowing and solar glare modelling will be undertaken to inform the emerging design, the focus of which will be to minimise the potential for adverse effects on nearby residential properties, where the occupants have a reasonable expectation of daylight and sunlight. In addition, the Design and Access Statement submitted with the planning application will include information to demonstrate how the design of the Proposed Development has been developed to avoid likely significant adverse effects on daylight, sunlight, overshadowing and solar glare.

With daylight, sunlight, overshadowing and solar glare effects having been taken into account during design development, no likely significant adverse effects are anticipated.

Ecology and Biodiversity

A Preliminary Ecological Appraisal (PEA) was completed for the Site in May 2019 (the results of which are included in Appendix C), which demonstrated that the Site has little ecological value and offers no suitable habitat for any notable or protected species. An extended Phase 1 Habitat Survey of the Site was undertaken by AECOM on 24 April 2019. The habitats identified on-site included hardstanding, buildings, introduced shrub, scrub and trees, and a Phase 1 habitat map can be found within Appendix C.

Suitable habitat for nesting birds is present within the Site in the form of trees, scrub and introduced shrub. There is also ecological connectivity between the Site and St Pancras Gardens (a local Nature Conservation Site of Borough Importance Grade 2), 75m to the south of the Site. In addition, the Site may function as a 'stepping stone' for the movement of species between two other nearby local Nature Conservation sites, St. Pancras Lock (100m to the north-east) and Camley Street Local Nature Reserve (230m to the south-east). These sites form part of a wildlife corridor in the local area. Other sites listed for nature conservation can be found above within the *Air Quality* section.

During the Phase 1 Habitat Survey, five buildings on the Site were assessed for their suitability to support roosting bats. One building was determined to have moderate potential (Estates and Facilities Building), three buildings have low potential (Bloomsbury, Ash House and Jules Thorn Buildings) and one building has negligible potential (the Post Room and Mortuary) to support roosting bats. As a result of this assessment, further dusk/dawn surveys were undertaken for the buildings that have moderate and low potential for bats, the findings of which are presented in Dusk Bat Emergence Survey Report within Appendix D. Surveys were carried out on the buildings, dated 8th, 9th, 15th and 16th of July and 3rd September under optimal weather conditions during the optimal season. No bats were recorded emerging from or returning to the buildings and very limited bat activity was recorded around the buildings, however bats were recorded foraging within the Site. It is therefore concluded that roosting bats are likely to be absent from the Site and a Natural England European Protected Species Mitigation Licence will not be required for works associated with the Proposed Development.

The PEA report in Appendix C identifies various potential opportunities for providing ecological enhancement and such opportunities will be considered during the emerging scheme design. Initial recommendations to mitigate for the loss of habitat for foraging bats and potential measures to provide enhancement for bats are presented within Appendix D. The ecological mitigation and enhancement measures to be integrated into the scheme will be confirmed during the detailed design and will be subject to operational considerations given the nature of the Proposed Development. The PEA report will be updated to reflect the final mitigation and enhancement measures and will be submitted in support of the planning application.

Virginia creeper, an invasive non-native species was recorded during the Phase 1 Habitat Survey, as well false acacia, cherry laurel and buddleia (however the latter trees are not listed in Schedule 9 of the Wildlife and Countryside Act 1981 as amended). As such, it was recommended that an Invasive Species Management Plan is produced to manage this species with the site and measures to minimise the risk of spread of these species.

Following implementation of suitable mitigation measures, it is considered that no significant adverse effects on ecology and biodiversity are likely to arise as a result of the Proposed Development. Furthermore, opportunities for ecological enhancement will be incorporated as appropriate within the scheme design.

Ground Conditions

A Phase 1 Geotechnical and Geo-environmental Desk Study Report (the 'Phase 1 Report') was prepared for the Site in September 2019[10] and is presented in Appendix E. The Phase 1 Report describes the geology beneath the Site as well as potential sources of contamination and source-pathway-receptor linkages. In summary, no significant potential sources of contamination were identified, with vegetation across the Site appearing to be in good condition and no evidence of spillages was observed. A network of tunnels is present across the Site, supplying hospital buildings with heat/steam. Asbestos containing materials are known to be present on the Site and are carefully managed and monitored.

According to mapping published by the British Geological Survey[11], the geology of the Site comprises London Clay formation to a depth of 30m, overlying Lambeth Group, overlying the Thanet Formation, which further overlies the White Chalk subgroup. The London Clay formation is classified as an unproductive strata. Historic British Geological Survey Borehole Data[12] recorded the following beneath the Site:

- Gravel at ground level to 6.10m below ground level (mbgl);
- Blue clay 6.10 mbgl to 21.34 mbgl;
- Yellow clay 21.34 mbgl to 33.53 mbgl;
- Sand 33.53 mbgl to 46.03 mbgl; and
- Chalk 46.03 mbgl – depth not proven.

Historically the Site was occupied by St Pancras Workhouse, this together with the current use of the Site as St Pancras Hospital may have resulted in the presence of ground contamination. Industrial activities associated with railways in the vicinity of the Site and various offsite historical sources including an ale store/granary, gas works, St Pancras Generating Station, a refuse treatment plant and the Metropolitan Cattle Market may also be potential sources of contamination. Potential contaminants include petroleum hydrocarbons; polycyclic aromatic hydrocarbons (PAH); polychlorinated biphenyls (PCB); heavy metals; asbestos; ash and fill; organic and inorganic chemicals; and sulphate. Landfill/soil gases and/or other mobile contaminants may be present also. However, as the Site is in current use as a hospital, the overall geo-environmental risk is considered to be low.

It is proposed that a Phase 2 Site Investigation is undertaken post-submission pursuant to a suitable planning condition to specify foundation and geotechnical design requirements and management measures for any contamination found, if required (such as a remediation strategy and ground gas protection measures)

During construction there is potential for exposure of contaminated soils, generation of dust, volatile organic compound emissions, migration of existing soil contamination to groundwater and off-site surface water, and accidental loss or spillage of construction materials. Given the nature of the proposed uses, the Proposed Development will not introduce significant new sources of contamination during operation.

A detailed Unexploded Ordnance (UXO) Risk Assessment for the Site was completed in August 2019[13]. The risk assessment identified that there is evidence to suggest an elevated risk of unexploded ordnance at the Site given its location and since buildings on the Site sustained severe damage during WWII. It was concluded that the UXO risk at the Site is Medium. The report proposes a risk mitigation strategy to support ground works at the Site, including UXO briefings to all staff, presence of an explosive ordnance disposal (EOD) engineer on site during shallow intrusive works and magnetometry surveys of borehole and pile locations.

With mitigation embedded within the detailed design and the implementation of a remediation strategy (if required), no likely significant adverse effects have been identified.

Furthermore, measures for pollution prevention and control and the management of UXO risks during construction would be set out within the CEMP. These will mitigate any potential effects from contamination due to construction works. With control measures set out within the CEMP, no likely significant adverse effects have been identified.

[10] AECOM, 2019. Phase 1 Geotechnical and Geo-Environmental Desk Study Report, Moorfields Eye Hospital
[11] British Geological Survey, 2019. Geology of Britain viewer. Available: http://mapapps.bgs.ac.uk/geologyofbritain/home.html . Last checked 11/12/2019.
[12] SafeLane Global, 2019; Detailed Unexploded Ordnance Risk Assessment – Moorfields Eye Hospital
[13] Safe Lane Global, 2019. Detailed Unexploded Ordnance Risk Assessment, Moorfields Eye Hospital.

Health and Wellbeing

The London Healthy Urban Development Unit (HUDU)[14] specifies eleven health determinants for the assessment of development proposals, including:

- Housing design and affordability;
- Access to health and social care services and other infrastructure;
- Access to open space and nature;
- Air quality, noise and neighbourhood amenity
- Accessibility and active travel;
- Crime reduction and community safety;
- Access to healthy food;
- Access to work and training;
- Social cohesion and inclusive design;
- Minimising the use of resources; and
- Climate change.

As the Proposed Development comprises medical treatment and research facilities, the achievement of improvements to human health and advancement in medical research are central to Project Oriel. A rapid HIA will be undertaken for the Proposed Development and the findings will be submitted in support of the planning application. The HIA report will contain information relating to relevant policy, baseline conditions and the assessment of the Proposed Development. The health and wellbeing assessment would be based on a thorough desk-top review of information available publicly and would reflect best practice principles as set out with the Healthy Urban Development Unit (HUDU) checklist 'Watch Out for Health'. Relevant policy will be reviewed at the local (LBC), regional (Mayor of London, GLA) and national level.

As set out within this letter , the Proposed Development is not likely to result in significant effects relating to air quality, noise and vibration, ground contamination or visual amenity. Effects associated with minimising the use of resources and climate change have been considered separately (see Waste and Recycling and Climate Change sections within this letter). As a result, no likely significant adverse effects associated with health and wellbeing have been identified as a result of the Proposed Development. Recommendations will be made to mitigate any potential adverse health outcomes and to enhancement opportunities will be integrated within the scheme design where practicable.

The Proposed Development will provide new employment opportunities and the design of the scheme presents opportunities to enhance social cohesion and accessibility through its public realm proposals. Design development considering those aspects and the prevention of crime, access to open space and placemaking would be described in the Design and Access Statement submitted with the planning application.

Major Accidents and Disasters

The Site is not located within an area which is at risk of major accidents or natural disasters and therefore is not likely to be vulnerable to such events. Measures embedded within the design for safety and security for crime prevention would be set out within the Design and Access Statement. Risks associated with climate change have been considered separately (see above). No likely significant adverse effects associated with major accidents and disasters have been identified as a result of the Proposed Development.

Noise and Vibration

As discussed above, the closest residential receptors to the Site are 101 Camley Street less than 100m east and Unite Students and Kings Cross Residence less than 100m west. Existing noise and vibration conditions at the Site are likely to be dominated by road traffic noise from the surrounding local road network.

The potential for significant noise and vibration effects to occur at existing and future noise sensitive receptors due to the following activities associated with the Proposed Development has been reviewed:

[14] NHS London Healthy Urban Development Unit, 2019. HUDU Planning for Health, Rapid Health Impact Assessment Tool. 4th Edition. Accessed at: https://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2019/10/HUDU-Rapid-HIA-Tool-October-2019.pdf

- Construction activities;
- Changes in road traffic flows;
- Noise generating activities in the Proposed Development (i.e. servicing areas); and
- Fixed plant associated with the Proposed Development.

These impacts are likely to be localised and temporary in nature over the duration of the construction works. Noise and vibration during construction would be managed through the implementation of best practice means in line with BS 5228, with appropriate measures for the mitigation of construction noise and vibration set out within the CEMP. Construction traffic generated by the Proposed Development would be managed and routed in line with the CMP.

During operation, noise may be generated by building services plant associated with the Proposed Development and deliveries to the Site, such as delivery of medical gases. It is proposed that suitable noise limits for building services plant will be set by a planning condition. Therefore, noise generated from road traffic associated with the Proposed Development would be limited, and mostly related to servicing and deliveries. A Delivery and Servicing Plan will be prepared as part of the Transport Assessment for submission with the planning application.

A Noise and Vibration Assessment will be undertaken to support the planning application for the Proposed Development. The assessment will identify the main sources and sensitive receptors of noise and vibration at the Site and in the vicinity of the Site, including the results of a baseline noise and vibration survey (including consideration of the suitability of the Site for the Proposed Development). It will also include prediction of the levels of noise during operation of the Proposed Development, and potential measures to minimise noise and vibration from sources such as construction activities, construction and operational traffic and building services plant. Mitigation measures, such as the timing of works, siting of machinery and use of hoarding will be specified within the CEMP.

With the implementation of the widely used standard mitigation measures stated within the CEMP and CMP, and by appropriate scheme design, no likely significant adverse effects related to noise and vibration have been identified.

Socio-economics

The Proposed Development will provide new jobs during its construction and operation. In June 2019, the workforce of Greater London comprised over 6 million people[15]. According to the 2011 Census, 21.4% of the Greater London workforce lives outside of the capital, therefore, the majority of the new jobs created by the Proposed Development are expected to be filled by the Greater London workforce[16].

According to the Office of National Statistics (ONS) Annual Population Survey[17], 75.6% of working age people in the LBC were economically active in 2019, which is slightly lower than the rate for Greater London (78.2%) and England as a whole (78.9%). The unemployment rate among working age residents in LBC was 4.8% which is broadly in line with the level recorded for Greater London (4.7%) and slightly higher than recorded for England as a whole (4.1%).

Construction and operation of the Proposed Development will generate direct, indirect and induced, temporary and permanent employment, which is considered to result in a beneficial socio-economic effect. There will also likely be an increase in local spending as a result of the jobs created once the scheme is complete and operational. The Proposed Development is replacing an aged and dated NHS facility and will provide a flexible, fully integrated state of the art facility for advancing clinical, research and education for eye health together with education space.

There are no other likely socio-economic effects associated with the Proposed Development. It is therefore considered that the Proposed Development will not give rise to any likely significant socio-economic effects.

Traffic and Transport

The Site benefits from a Public Transport Accessibility level (PTAL) rating of 6b (derived using the TfL Web-based Connectivity Assessment Toolkit, WebCAT), representing excellent access to public transport. This is due to the Site's proximity to St Pancras and King's Cross Stations from which National Rail, International Rail and Underground services are accessible. In addition, four bus stops are within a short walk of the Site.

[15] Office for National Statistics (ONS), 2019. Workforce jobs SA: London (thousands). Accessed at: https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/timeseries/jwu7/lms
[16] Office for National Statistics (ONS), 2011. 2011 Census data. Accessed at: https://www.ons.gov.uk/census/2011census/2011censusdata
[17] Office for National Statistics (ONS), 2019. Annual Population Survey, Economic Inactivity. Accessed at: https://www.nomisweb.co.uk/reports/lmp/la/1946157255/report.aspx

St Pancras International Station and King's Cross Station are located approximately 900m (a 13-minute walk) to the south-east of the Site. Mornington Crescent Underground Station is the closest Underground Station, located approximately 600m (a 8-minute walk) to the south-west of the Site.

During operation the Proposed Development will be car-free, with only blue badge parking provided on the Site. It is anticipated that journeys associated with staff will be undertaken by public transport, cycling and on foot. For patients it is anticipated that the use of public transport will be maximised apart from those who are unable to travel by public transport due to disability who will use non-emergency patient transport (NEPT) and taxis to travel to/from the Site. While there will be some private car travel, the attractiveness of alternative modes will be maximised to reduce car traffic generation and patient travel will be dispersed as far as possible throughout the day to minimise trips during peak hours.

A pedestrian route review has been undertaken from the main public transport hubs to the Site to identify potential improvements to the pedestrian infrastructure to encourage patients to walk from the nearby bus stops and train stations to the Site to reduce the use of private cars and taxis. A working group, including current users of the Moorfields Eye Hospital, some of which are blind and partially sighted has been established, in order to identify improvements required to make the pedestrian routes to the Site more accessible and increase safety for individuals that are visually impaired.

Surveys have been undertaken to assess the existing vehicular activity associated with the Moorfields Eye Hospital and the University College of London Institute of Ophthalmology (UCL IoO) in their current locations to determine the servicing and drop-off requirements for the Proposed Development. It is proposed that NEPT drop-off bays are provided at the front of the building, accessed from St Pancras Way. In addition, it is proposed that a taxi and private car drop-off facility will be provided along the on-site road along the southern façade of the building in the form of a lay-by. Dwell time could potentially be reduced by having staff on hand to assist with dropping off and picking up patients. This would be supplemented by time limits to prevent the drop-off provision from being used for parking.

A dedicated service area will be provided on the northern side of the Site, accessed from Granary Street. The use of the service area will be managed to ensure efficient operation with deliveries required to pre-book arrival slots as far as is practicable. Some spare capacity will be included to allow unscheduled deliveries to be accommodated and to provide resilience.

During the construction phase, there will be construction vehicles accessing the Site for its duration. As part of the construction phase, the contractor will develop and submit for approval a Construction Management Plan (CMP) to work with other development teams in the area to manage any cumulative traffic and transport effects appropriately. With an effective CMP in place, transport effects during construction phase will be localised and temporary. A CMP will be prepared following appointment of a contractor and would be subject to a planning condition.

A Transport Assessment (TA) including a Delivery and Servicing Management Plan will be prepared for submission with the planning application to set out the effects of the Proposed Development on the local transport infrastructure and outline any mitigation required. This will include an assessment of the forecast increase in bus and rail passengers as a result of the Proposed Development. Furthermore, a Travel Plan, setting out measures to encourage sustainable travel, will be submitted with the planning application.

With mitigation in place as set out within the CMP, the TA (incorporating a Delivery and Servicing Management Plan) and the Travel Plan, no likely significant adverse effects have been identified.

Townscape and Visual Impacts

A site visit was undertaken in July 2019 identified that the Site comprises a complex of historic and more recent buildings which collectively form part of the St Pancras Hospital, located within a densely urban area close to the Regents Canal. The Site is primarily accessed from St Pancras Way and Pancras Road, which form its western boundary. The Grade II Registered Park and Garden of St Pancras Gardens is located approximately 100m south of the Site, beyond the remainder of St Pancras Hospital, and the northern and eastern boundaries are formed by Granary Street, which wraps around the Site between a junction with St Pancras Way at the north-west corner of the Site and a junction with Camley Street east of the Site.

The Site is located within the northern end of the Kings Cross/St Pancras Conservation Area, which extends south from the Site to include the railway stations of Kings Cross and St Pancras. To the north and east of the Site is the Regents Canal Conservation Area, which follows the Regents Canal through the London Borough of Camden and includes built-up areas adjoining the canal.

The area around the Site has a somewhat incoherent character, with high-quality regeneration along the canal contrasting with degraded canal-side sites and buildings which do not make a positive contribution to the local

townscape character , such as the Ugly Brown Building to the north of Granary Street. Physical barriers in the area include the railway line, the canal, and the Site, such that there are opportunities to improve the public realm.

Visibility towards the Site is constrained by the built-up townscape context and the broadly flat topography of the surrounding townscape, and as such views towards the ground level of the Site and of existing buildings within the Site are generally limited to the adjoining street pattern and the Regents Canal. Longer distance views towards the Site are available from elevated positions in the wider area at Primrose Hill to the west and Parliament Hill/Hampstead Heath to the north.

The north-eastern part of the Site is situated within the Wider Setting Consultation Area of the Protected Vista from Assessment Point 2A.1 Parliament Hill to St Paul's Cathedral as per the London View Management Framework[18] (LVMF); however, due to the height and positioning of the Proposed Development it is unlikely to have a significant effect on the viewpoint.

During construction, mitigation for townscape, built heritage and visual effects will be set out within the CEMP to reduce the visibility of the construction works through the use of site hoarding and appropriate controls to limit light spill during the works, following industry best practice construction standards.

During operation, whilst the Proposed Development is likely to be visible from a range of different close viewpoints, it is unlikely to result in significant adverse effects as the Proposed Development presents an opportunity to bring forward a high-quality design that enhances the local townscape.

A Townscape and Visual Impact Assessment will be submitted with the planning application which will provide an assessment of the Proposed Development's impacts on townscape character and visual amenity, with reference to a series of representative viewpoints and visualisations. This will include analysis of the impact on the LVMF Viewpoint 2A.1.

Waste and Recycling

The Proposed Development will generate waste during the construction and operational phases. The volumes and types of waste produced from the Proposed Development are not anticipated to greatly alter the waste arisings or volume capacity of the local area. However, this waste will need to be managed in a compliant and sustainable way. All waste generated at the Site will be collected and disposed of by licensed waste management contractors.

During construction, the selected construction materials and methods will reduce waste generation as far as reasonably practicable and waste arisings will be managed in accordance with best practice guidance including segregation, recycling and re-use of waste wherever possible. The CEMP will set out the strategy for the collection, storage, transport and disposal of wastes generated on-site during construction.

Waste generated during operation of the Proposed Development will be collected and disposed of by licensed waste management contractors, with separate dedicated waste storage areas being provided for municipal waste and clinical waste (which is classified as Special Waste). An Operational Waste and Recycling Management Strategy will be produced in line with the LBC Waste Requirements as set out in their Local Plan (Policy CC5) to demonstrate how sustainable methods for waste and recycling management will be taken into account during the operation of the Proposed Development.

Reviews of waste management practices at the existing Moorfields Eye Hospital and UCL IoO have been undertaken in order to gain an understanding of the waste requirements for the Proposed Development. Waste reduction and recycling initiatives are being explored for the Operational Waste and Recycling Management Strategy so that waste is managed in line with the waste hierarchy.

It is therefore considered that no significant adverse effects in respect to waste and recycling will arise as a result of the Proposed Development.

Water Environment

The nearest surface waterbody to the Site is the Regents Canal (approximately 60m east), which feeds into St Pancras Basin further south. There are also boating lakes within Regent's Park approximately 1.72km west and 3.2km north within Hampstead Heath. The River Thames is also situated 3.2km south of the Site.

[18] Greater London Authority (GLA), 2012; London View Management Framework Supplementary Planning Guidance

The Site is located within Flood Zone 1. Flood Zone 1 is defined as land which is at risk of flooding from fluvial flood events with less than 0.1% annual probability of occurrence, and is considered to be at 'very low probability' of fluvial flooding. The Site is not located within a groundwater Source Protection Zone.

Due to the distance from the Site and the presence of intervening development, no direct adverse impacts to surface water bodies have been identified. During construction, there remains the potential for indirect adverse effects to surface water (i.e. Regents Canal) and groundwater receptors from construction site runoff and spillages via existing surface water drainage and local combined sewer network, although the application of best practice construction environmental mitigation measures to be set out within the CEMP will avoid, reduce and minimise these risks.

A Surface Water Drainage Strategy will be submitted with the planning application to demonstrate measures embedded within the design for pollution prevention during the operation of the Proposed Development.

The Surface Water Drainage Strategy will seek to discharge surface water flows from the Proposed Development at greenfield runoff rates and will attenuate rainwater on-site and incorporate measures to minimise the pollution risk to ground water and surface water.

Therefore, no significant effects on the water environment are anticipated as a result of the Proposed Development and the risk of flooding, which is low, will be mitigated via measures specified within the Surface Water Drainage Strategy and the CEMP.

Wind Microclimate

Key considerations related to wind microclimate at the Site include pedestrian wind comfort and safety conditions that may arise as a result of downdraft and funnelling wind flow patterns within and around the Proposed Development.

The emerging design of the Proposed Development will be informed by specialist wind microclimate advice. This will include advice on the built development and landscape elements which can be included in the scheme design to avoid and minimise adverse wind effects arising from the completed Proposed Development.

It is proposed that a Wind Microclimate report is submitted with the application for the Proposed Development. The Wind Microclimate report will set out the measures which have been embedded within the design to minimise effects on pedestrian safety and comfort on the Site and in the immediate vicinity as a result of changes to the local wind microclimate.

With the preparation of a Wind Microclimate report setting out mitigation to be included within design, no likely significant adverse effects have been identified.

Cumulative Effects with Other Developments

The EIA Regulations require that the potential for direct and indirect cumulative effects during construction or operation of a development is considered. Best practice[19] dictates that cumulative assessments of this nature should have regard to those schemes which are reasonably foreseeable (i.e. usually those under construction or with planning permission), with less consideration given to development proposals for which an EIA Scoping Report has been submitted to a local planning authority or proposals which are identified in the local development plans. Such a review can only be carried out based on publicly available information.

The commonly used threshold criteria for considering whether development schemes have the potential to result in cumulative effects are that they must:

- Be the subject of a submitted planning application or be currently under construction; AND
- Be located within an approximate 1 km radius of the Site; AND
- Result in an increase of more than 10,000m^2 Gross External Area (GEA) in floor area (or over 150 residential units).

Within the technical studies to support the planning application for the Site, consideration will be given to the future changes in the baseline conditions in the vicinity of the Site (including the introduction of new sensitive receptors within consented developments), for example in the assessment of daylight and sunlight, townscape, built heritage and visual impact and wind microclimate effects.

[19] PINS (2015) Cumulative Effects Assessment Advice Note https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/12/Advice-note-17V4.pdf

The cumulative schemes proposed to be assessed together with the Proposed Development are set out in Table 3 below. These cumulative schemes are to be agreed with LBC:

Table 3 Cumulative Scheme List within 1km

Application Number	Type	Description of works	Address	Decision Status (as of 13 December 2019)	Distance from Site
2017/5497/P	FULL	Demolition of the existing building (Class B1 and B8) and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use development of business floorspace (B1), 73 residential units (C3) (10xstudio, 29x1 bed, 27x2 bed 7x3 bed), hotel (C1), gym (D2), flexible retail (A1 - A4) and storage space (B8) development with associated landscaping work.	'Ugly Brown Building' 2 - 6 St Pancras Way London NW1 0TB	Submitted – awaiting Section 106 signing	50m
2014/4385/P	FULL	Demolition of existing building and redevelopment for a mixed-use building ranging from 6 -13 storeys comprising 2,220sqm employment floorspace (Class B1), 121 residential flats, the provision of a pedestrian footbridge with disabled access over the Regent's Canal, and associated landscaping and other works relating to the public realm.	101 Camley Street, London NW1 0PF	Under construction	100m
2018/4813/P	Reserved Matters	Reserved matters relating to Plot S5 within Development Zone S for the erection of a 15 storey residential building (Class C3) with flexible retail A1-A5, B1, D1 and D2 uses at ground floor level and associated public realm works, as required by conditions 9, 10, 14, 16-22, 24, 27, 28, 31, 33- 36, 37, 38, 39, 42. 42a, 43, 45, 46, 48, 49, 50A, 51, 55, 56, 60, 61, 63 and 64-67 of outline planning permission reference 2004/2307/P granted 22/12/06 (subject to S106 agreement) for a comprehensive, phased, mixed-use development of former railway lands within the King's Cross Opportunity Area.	Building S5 King's Cross Central York Way London	Consented	530m
2016/1877/P	Reserved Matters	Reserved matters relating to Building R8 for erection of a 9-12 Storey building (excluding basement and roof levels), comprising office (class B1) and 151 residential units (class c3) (82x Social Rented Affordable and 69x market), and retail units (Flexible A1-A5 Use Class) at ground floor level as required by conditions 9, 10, 12, 14, 16-22, 24, 27, 28, 31, 33-39, 42, 42A, 43, 45, 46, 48, 49, 50A, 51, 56, 60, 61, 64-67 67 of outline planning permission reference 2004/2307/P granted 22/12/06 (subject to S106 agreement) for a comprehensive, phased, mixed-use development of former railway lands within the King's Cross Opportunity Area.	Kings Cross Central – Main Site Building R8 Development R York Way London N1C	Consented	580m
2013/8088/P	FULL	Demolition of all existing buildings and structures except Lulworth House and Agar Children's Centre (249 existing Class C3 residential units and 2 retail units), and erection of new buildings ranging between 4 and 18 storeys in height along with the refurbishment and extension of Lulworth House (extending from 18 to 20 storeys in total) to provide a total of 493 Class C3 residential units, comprising 240 market, 37 intermediate and 216 social rent units; a community facility (Class D1); 2 flexible retail shop (Class A1) or restaurant and cafe (Class A3) units; business space (Class B1(a)); 2 flexible retail shop (Class A1), business (Class B1) or non-residential institution (Class D1) units; refuse and recycling facilities; car and cycle parking facilities; landscaping / amenity space; and associated works.	Agar Grove Estate, Agar Grove London NW1	Under construction Completion due Q2 2020.	630m

Conclusion

This letter provides a description of the Proposed Development and the likely significant effects on the environment in line with the requirements of Regulation 6(2) and Schedule 3 of the EIA Regulations. The Proposed Development is not located within, partly within or immediately adjacent to a sensitive area as defined by the EIA Regulations and does not meet the criteria for a Schedule 2 development set within the EIA Regulations.

Although there will be an increase in floorspace as a result of the Proposed Development (clinical, research and education floorspace), it is not expected that there would be any likely significant environmental impacts by virtue of its scale, given the surrounding highly urbanised context and the brownfield nature of the Site. Furthermore the indicative threshold of 10,000m^2 in new commercial floor space in the PPG is specifically stated as applying to sites which have not previously been intensively developed. The Site is considered to be previously intensively developed by virtue of its current use as St Pancras Hospital and its historic use as a workhouse.

A review of planning applications that have been approved for similar developments in the local area has been undertaken. It is noted that several of these schemes have been deemed not to be EIA development, with LBC instead requesting the submission of a number of environmental reports to support the planning applications. These developments include 101 Camley Street (Application Reference: 2014/2674/P), 'Ugly Brown Building' (Application Reference: 2017/2031/P) and Agar Grove Estate (Application Reference: 2013/7118/P) as identified within Table 1 for the cumulative schemes above, all of which are greater in scale than the Proposed Development.

A review of the potential effects of the Proposed Development concludes that the Proposed Development is not likely to result in significant adverse effects on the environment by virtue of factors such as its nature, size or location, with appropriate mitigation in place. Therefore, the Proposed Development is not likely to result in any new significant environmental effects. As such, it is considered that the Proposed Development does not constitute EIA development.

Mitigation measures required to avoid significant effects will be described within the following technical reports which will be submitted with the planning application:

- Air Quality Assessment;
- Arboriculture Report;
- Construction Environmental Management Plan;
- Contaminated Land Assessment;
- Daylight, Sunlight, Overshadowing and Solar Glare Assessment;
- Delivery and Servicing Plan;
- Design and Access Statement;
- Drainage Strategy;
- Energy and Sustainability Strategy;
- Landscaping Strategy;
- Heritage Statement;
- Noise and Vibration Assessment;
- Operational Waste and Recycling Management Strategy;
- Preliminary Ecological Appraisal and Ecological Assessment;
- Townscape and Visual Impact Assessment;
- Transport Assessment including Travel Plan; and
- Wind Microclimate Report.

In addition, it is proposed that a Construction Management Plan, setting out further details of the mitigation during the construction phase, will be submitted to LBC under a suitable planning condition.

We trust that this request includes all necessary information and we would be grateful to receive your formal EIA Screening Opinion in line with Regulation 6 of the EIA Regulations within the requisite three-week timescale.

In the meantime, please do not hesitate to contact us should you have any queries.

Yours sincerely,

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Appendices

Appendix A Indicative Application Site Boundary and Layout of the Wider St Pancras Hospital
Appendix B EIA Screening Process
Appendix C Preliminary Ecological Appraisal
Appendix D Dusk Emergence Bat Survey Report
Appendix E Phase I Geotechnical and Geo-Environmental Desk Study Report